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FROM AMBITION TO ACTION

A Progress Check on Europe's
F-Gas Transition

OVERVIEW

In February 2024, the European Union (EU) adopted a revised F-Gas Regulation (hereinafter “EU F-Gas Regulation”), establishing the world’s most ambitious legislative framework to phase out hydrofluorocarbons (HFCs) and accelerate the transition to natural refrigerants.

Alongside an accelerated HFC phase-down schedule culminating in a phase-out of HFCs by 2050, the EU F-Gas Regulation introduces a wide range of implementation obligations for Member States, including strengthening monitoring and enforcement of illegal trade, updating technician certification schemes, financing refrigerant recovery at end-of-life and removing regulatory barriers to natural refrigerants.

Successful implementation of these measures is critical to achieving the EU F-Gas Regulation’s environmental objectives. While the legislation sets common EU requirements, responsibility for implementation rests largely with Member States, making progress likely to vary considerably across Europe. Any delays or inconsistencies risk undermining both the HFC phase-out and the uptake of alternative technologies.

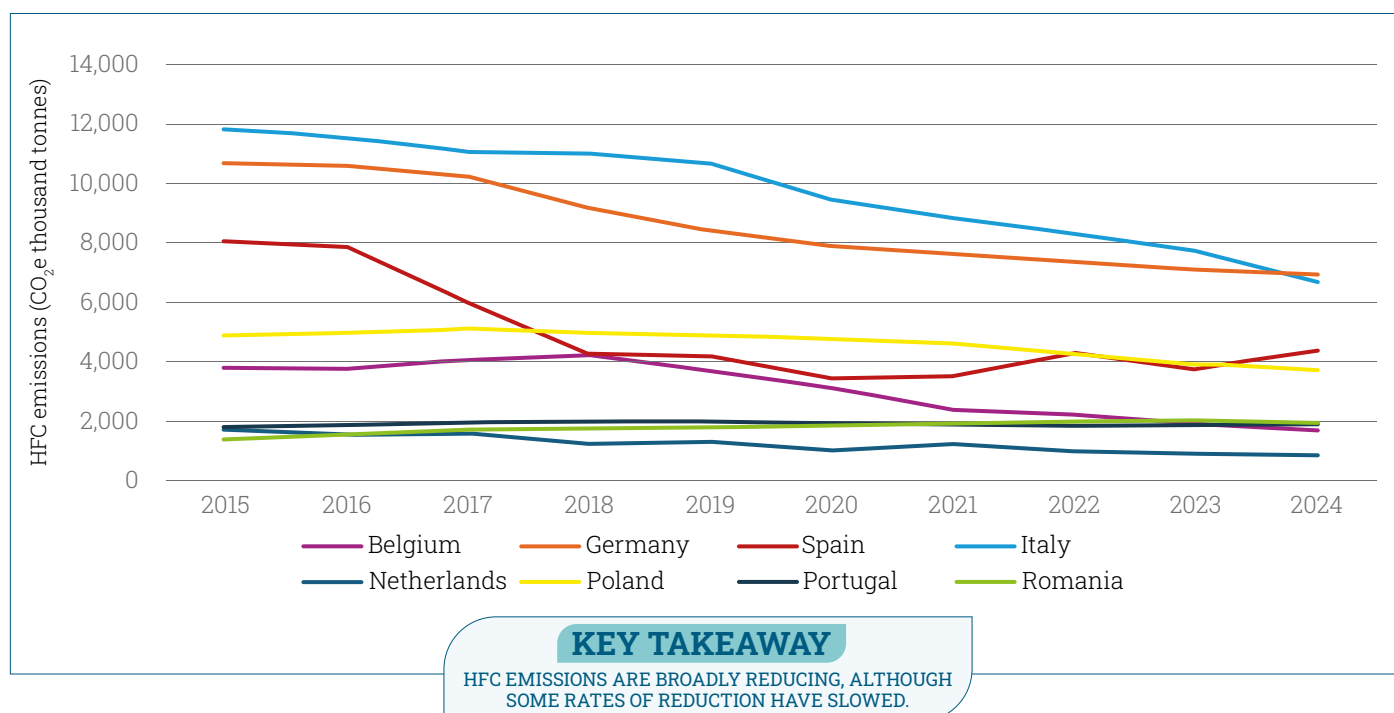
To assess early implementation, EIA and partners surveyed national F-gas policymakers and competent authorities in Belgium, Germany, Italy, the Netherlands, Poland, Romania and Spain during March 2026. Portugal did not respond. The survey explored progress across key implementation areas including training and certification, trade controls, penalties, extended producer responsibility (EPR), record-keeping, safety exemptions and standards. Follow-up research was undertaken where additional context was required.

Figure 1 documents reported HFC emissions from these Member States. They have broadly fallen, apart from Romania and Portugal which, although low, remain relatively flat. Although some of the biggest emitters, Spain, Germany and Italy, have reduced emissions, the rates of reduction have slowed and Spain’s emissions have increased since 2020, indicating further efforts are needed to continue reducing emissions.

Overall, the survey indicates that implementation of the EU F-Gas Regulation is under way across all participating Member States, although progress varies considerably. Spain and Germany appear to be among the most advanced, particularly on training, communication and enforcement, while countries with devolved governance structures, notably Belgium, face additional coordination challenges. Encouraging progress is being made on updating certification schemes, penalties and EPR systems. However, implementation remains incomplete in many countries and several key provisions have yet to receive sufficient attention.

Figure 1: HFC emissions reported by Member States.

Source: Eurostat



The survey further identifies cross-cutting issues which could undermine successful implementation if left unaddressed:

- **digitalisation of record-keeping could support implementation and counter illegal trade.** Currently only two of the surveyed Member States centrally track record keeping, with Spain also considering this. Digitalisation of record-keeping is an important first step towards better understanding of F-gas supply chains. Cross EU roll-out and inclusion of F-gas sales into digital records could support better F-gas supply chain traceability and deter illegal trade
- **the transition to natural refrigerants requires greater support.** While Member States are updating technician certification schemes, progress remains slow in many countries. Spain demonstrates the value of mandatory training, having achieved significantly higher levels of technician competence through requirements introduced before the most recent revisions to the EU F-Gas Regulation
- **Member States are open to guidance on illegal trade.** As illegal trade in F-gases persists across Europe, Member States note the importance of information from the EU's Anti Fraud Office and appear open to additional ways to tackle it. Despite low use of dedicated customs profiles to detect illegal trade in F-gases, many respondents were open to receiving criteria from the European Commission. In addition, the provision of a dedicated customs code for F-gas operators not required to registers under the F-gas Portal would be required to include in their customs declaration upon entry into the EU
- **monitoring of new safety exemptions is insufficient.** Few Member States have developed systems to track the use of exemptions which allow certain equipment to remain on the market where justified by safety requirements. Without greater transparency, these exemptions risk becoming a loophole weakening future equipment bans. Spain provides an example of emerging best practice through plans to establish a dedicated electronic registry
- **product standards are not receiving sufficient policy attention.** In most Member States, responsibility for product safety standards sits outside F-gas policy teams, limiting engagement at a time when standards will play a critical role in enabling wider deployment of natural refrigerant technologies. Measures aimed at improving coordination and collaboration between F-gas Policy makers and standards bodies could help improve this.

Finally, the survey highlights examples of good practice which could be replicated across the EU, including Spain's mandatory natural refrigerant training programme, Belgium's dedicated customs risk profiles, the Netherlands' approach to financing refrigerant recovery through WEEE systems and Spain's plans for a central registry of safety exemptions.

Sharing these approaches more widely could help accelerate harmonised implementation across Member States.



FINDINGS BY TOPIC

1. CENTRALISED RECORD-KEEPING

Article 7 of the EU F-Gas Regulation requires operators and undertakings to keep records of the type and quantity of gas contained and used in equipment, including any gases recovered and details of the companies installing and maintaining equipment as well as dates of leak checks and repairs. Unless the records are stored in a centralised database set up by competent authorities of the Member States, undertakings must keep those records for at least five years in case competent authorities request to access them.¹ Although not mandated by the EU F-Gas Regulation, centralised collection of this data would support better implementation as it would enable authorities to detect anomalies more easily and track progress. This could be further developed to enable EU wide supply chain traceability, which would support legitimate players and deter illegal trade. EIA therefore asked Member States whether they had, or were planning to set up, centralised databases for collection of this data.

PROGRESS

Two of the Member States surveyed have centralised databases responsible for tracking record-keeping activities listed under Article 7. Italy established its F-gas database and Register of Certified Persons and Companies in 2019; similarly, Poland has a Central Register of Operators.

Other countries rely on operators to keep records. For example, in Germany the Association of German Refrigeration and Air-Conditioning Industries has developed record-keeping software which can be used by operators. Spain also relies on a decentralised system where record-keeping obligations remain primarily with operators and servicing companies. Similarly, in the Netherlands the responsibility remains with operators and must be provided to the Human Environment and Transport Inspectorate (ILT) upon request.

Spain's Ministry for the Ecological Transition and the Demographic Challenge (MITECO) has recently opened a consultation relating to the creation of an electronic register of certified personnel.²

CHALLENGES TO IMPLEMENTING A NATIONAL DATABASE

While Belgium's F-gas policy expert was open to the idea of a centralised database, they highlighted the challenges associated with devolved powers to its three regions. They explained that there are positive discussions ongoing about establishing an interconnected electronic system, but the success of this initiative is contingent on political cooperation.

2. FINANCING F-GAS RECOVERY VIA EXTENDED PRODUCER RESPONSIBILITY (EPR)

The EU Waste Electrical and Electronic Equipment (WEEE) Directive is built around the principle of EPR with manufacturers of new equipment required to pay a levy to support recycling of waste equipment. In practice, waste refrigeration, air-conditioning equipment and heat pumps should already be treated correctly at end-of-life; however the extra costs and labour involved in recovery and destruction of F-gases are not covered, making this a regulatory blind spot. The EU F-Gas Regulation attempts to address this by requiring Member States to ensure that financing obligations for F-gas containing equipment deriving from the EU WEEE Directive include the financing of the recovery, and the recycling, reclamation or destruction of fluorinated greenhouse gases listed in Annexes I and II from those products and equipment which have been placed on the market from 11 March 2024.³

Member States were asked whether this specific type of finance was already covered within existing national EPR schemes and, if not, when it would be included.

Individual Member States' data on reclamation and destruction of F-gases is unavailable. However, aggregate EU-wide data is shared by the European Environmental Agency. Figures 2 and 3 below show EU F-gas and HFC reclamation and destruction amounts. In 2024, reclamation of F-gases increased sharply and the number of F-gases destroyed decreased. This increase in reclamation is a positive signal but further data is required at Member State level to understand the impact of the EU F-Gas Regulation and where further support is needed.

PROGRESS

Both Germany and the Netherlands highlighted that their existing national legislation on WEEE already covers financing of the recovery, reclamation, recycling and destruction of F-gases. In recognition of the additional costs associated with treatment of F-gas containing WEEE, the Dutch government has established a scheme which includes financing mechanisms to incentivise complete recovery of F-gases.⁴ These cover specific F-gas recovery-related costs such as use of certified personnel, specialised equipment and controlled extraction and processing.



Spain's EPR system is based on collective compliance schemes financed by producers and importers of electrical and electronic equipment. In their response to EIA's survey, Spain stated that existing EPR schemes were adapting their procedures to fully incorporate F-gases by the end of 2027.

Poland has not yet set a specific date for implementing this requirement, but the issue has already been examined at national level. One of the options discussed is the creation of a dedicated fund to which all producers placing equipment containing F-gases on the market would contribute. Such a fund could finance the recovery, recycling, reclamation or destruction of F-gases.

Belgium noted that there were no specific financing requirements in place and that responsibility for this is with its devolved regions.

CHALLENGES

Some of the main challenges identified by the Member States include difficulties in quantifying and tracing recovered F-gases, the need for harmonised methodologies to ensure consistent reporting and financing across different schemes, differences in interpretation and implementation among producer responsibility organisations and coordination challenges between the different authorities and treatment operators involved.

Figure 2: EU reclamation of F-gases.⁵

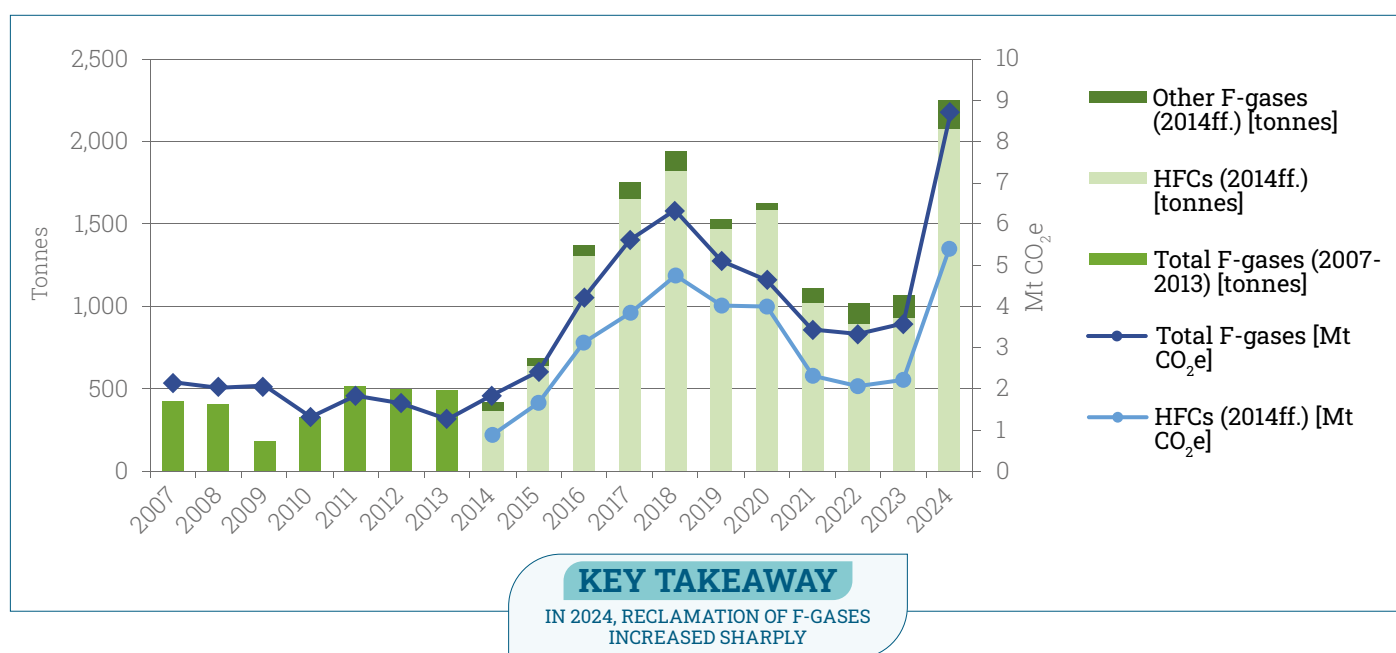
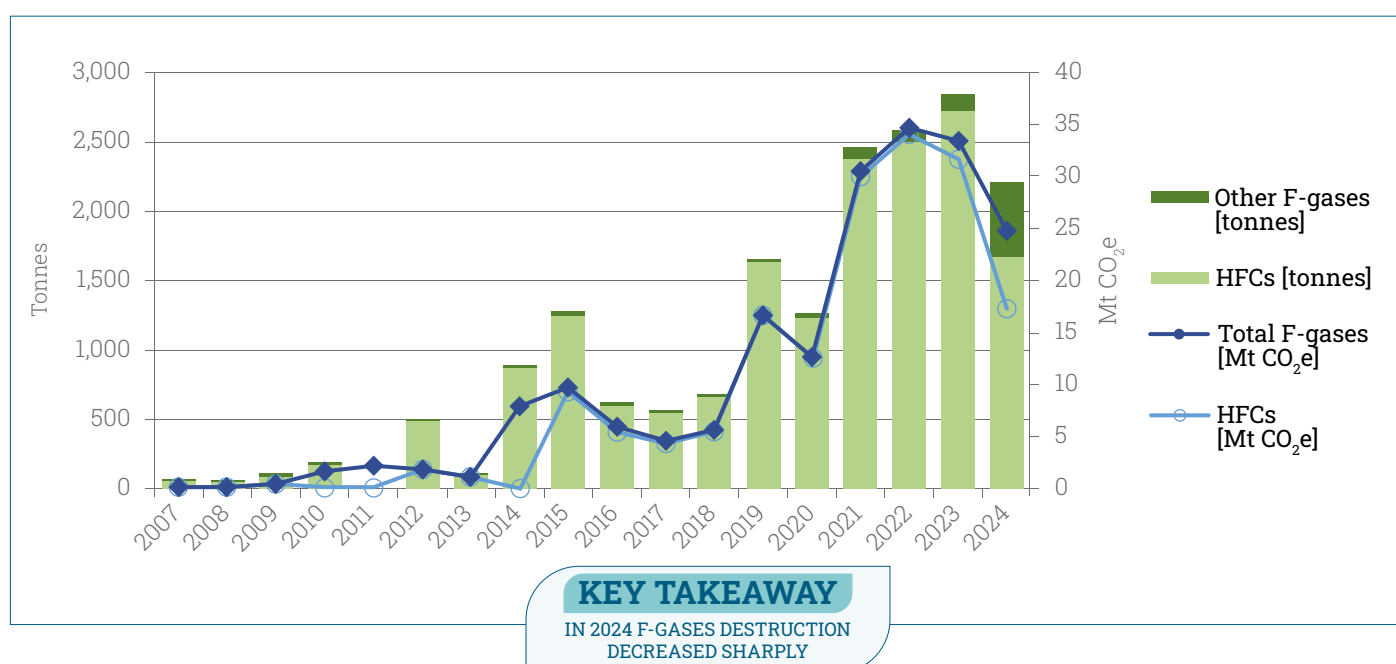


Figure 3: EU destruction of F-gases.⁶



3. TRAINING AND CERTIFICATION FOR NATURAL REFRIGERANTS

From 25 September 2025, Member States are required to establish or adapt certification programmes to cover training on natural refrigerants for refrigeration, air-conditioning and heat pump equipment.⁷ Certification is required for anyone carrying out installation, maintenance, servicing, repair, decommissioning, leakage checks and recovery of related equipment. Under EU rules, existing professionals are required to renew their certificates by March 2029, with a seven-year renewal cycle following thereafter.

Figure 4: Percentage of existing certified F-gas operatives trained for alternative refrigerants. (no data for Belgium, Germany or Romania) as of December 2024.⁸

Country	Ammonia	CO ₂	Hydrocarbon (small)	Hydrocarbon (large)
Italy	2%	5%	10%	3%
Netherlands	2.5%	3.6%	1%	1%
Poland	2%	2%	1%	N/A
Portugal	0	0	4%	0
Spain	90%	85%	50%	90%

Figure 4 shows data from the Air Conditioning and Refrigeration European Association (AREA) on personnel trained for alternative refrigerants (percentage of existing certified F-gas operatives) as of December 2024.⁹ Spain had substantially higher levels of trained technicians than the other countries surveyed due to training on natural refrigerants already being mandatory in that country ahead of revisions to the EU F-Gas Regulation, further reinforcing the importance and impact of mandatory training on alternative refrigerants.

PROGRESS

Spain offers an example of best practice having already required training on natural refrigerants since 2021.¹⁰ This has been supported by the EU-funded REAL Alternatives European training programme, which provides free training on alternative refrigerant technologies and was translated into Spanish.¹¹ The Government noted that it is currently transposing European Commission requirements, after which an updated course will be delivered.

To further support uptake of certification, the Spanish Tax Agency, in cooperation with the F-gas policy experts, launched a series of webinars for economic operators to explain the key provisions of the EU F-Gas Regulation, including the required certificates and the correct completion of trade related customs procedures.¹²

The Netherlands already had an established (but not mandatory) certification system for natural refrigerants, which has now been integrated into a national F-gas certification. The updated schemes now cover installation, maintenance, servicing, repair, leakage checks, recovery and decommissioning activities for both F-gases and natural refrigerants. Despite having an established certification scheme for natural refrigerants, the Netherlands still has low percentages of personnel trained for these substances. This may be due to the fact that the previous scheme was not mandatory.

Germany has finalised its new legislation on training and certification in April 2026, integrating training for alternatives. This will require existing schemes offering applicable training and certification to request recognition by competent authorities.

In Italy, new training and certification schemes including natural refrigerants are in the final stages of drafting with industry consultations ongoing.

CHALLENGES

Some Member States are taking longer to adapt their certification framework to reflect the new requirements. Belgium again highlighted challenges associated with devolved regional responsibilities, but also highlighted improved coordination on this issue between the regions with the ultimate goal of having coherence between the regional schemes.

Poland has not yet updated its national certification and training programmes to formally include mandatory training on natural refrigerants, noting that work on adapting the certification framework is planned but has not been completed.



4. CONNECTING TO THE EU'S CUSTOMS SINGLE WINDOW – CERTIFICATES EXCHANGE SYSTEM (EU CSW-CERTEX) AND USE OF SPECIFIC RISK-BASED CRITERIA TO REDUCE ILLEGAL TRADE IN F-GASES

The EU Customs Single Window – Certificates Exchange System (EU CSW-CERTEX) enables customs to check in real-time whether importers have sufficient ODS and HFC quotas. Under Article 20 of the EU F-Gas Regulation, Member States are required to connect their national single window environments for customs to it from March 2025.¹³

Consistent integration of the EU Customs Single Window – Certificates Exchange System (EU CSW-CERTEX) across Member States is important to ensure a coherent and effective implementation across the EU. Article 23 requires customs authorities to use risk-based physical customs checks to enforce the F-gas rules, taking into account the risk of illegal trade and a company's compliance history.¹⁴

To further prevent illegal trade, the European Commission is required to regularly monitor illegal trade and, should the risk of illegal trade be deemed high enough, Article 24 allows the European Commission to set more detailed criteria for how Member State authorities should carry out those checks.¹⁵ EIA asked Member States whether they had developed their own risk-based criteria and whether they would welcome specific criteria from the European Commission.

PROGRESS

Member States noted generalised use of customs risk-based criteria. For example, the Netherlands advised that risk indicators such as correct commodity codes and CO₂-equivalent declarations can be automatically verified by customs using the single window. Italy and Spain noted that customs commodity codes relating to F-gases triggered a higher level of customs control.

Belgium was the only respondent highlighting additional use of dedicated F-gas trade risk-based criteria based on high-risk importing or exporting countries and information shared by various authorities, including Europe's Anti-Fraud Office (OLAF).

Despite low use of dedicated customs profiles, many respondents were open to receiving criteria from the European Commission, with Italy noting it would facilitate a more harmonised approach across Europe.

CHALLENGES

Belgium noted that F-gas infringements are often detected during controls related to the export of waste and that establishing links between the two would be helpful. Belgium also noted that changes under the Omnibus Package which will reduce the requirement for operators to be registered in the F-gas Portal, could increase challenges in tracking the movement of F-gases.¹⁶ This could be mitigated through the provision of a dedicated TARIC code (Y-code) for excluded F-gases that operators would be required to include in their customs declaration upon entry into the EU.

5. INCREASED PENALTIES FOR UNLAWFUL TRADE

Article 31 of the EU F-Gas Regulation requires Member States to adopt effective, proportionate and dissuasive penalties.¹⁷ These must include an administrative financial penalty of at least five times the market value of the gases, products or equipment involved. If the same infringement is repeated within a five-year period, the penalty must be at least eight times their market value.¹⁸

In addition to the penal requirements of the EU F-Gas Regulation, the EU Environmental Crime Directive also stipulates that unlawful trade in F-gases should be a criminal offence with a maximum penalty of at least five years' imprisonment.¹⁹ This is supported by the EU F-Gas Regulation, which notes that Member States are also allowed to use criminal penalties, provided they are equally effective.

PROGRESS

Most Member States reported that they were in the process of integrating updated penalties into national frameworks. For example, in Spain penalties are issued through a combination of existing legal instruments, including those around air quality. In Belgium, penalties are incorporated into product norms rules and a new Penal Code introduced in September 2026, which includes Environmental Crime, is expected to improve understanding of infringements. In the Netherlands, sanctions are imposed by the Human Environment and Transport Inspectorate (ILT), while the legal basis and sanctioning framework are established in legislation. The size of penalties is affected by several factors, including nature and severity of the offence and quantities involved, quota compliance, as well as the carbon impact of the seized F-gases.



Two Member States are implementing more stringent measures linked to criminal offences. In Germany, unlawful placing F-gases on the market is already a criminal offence and the Government plans to increase maximum criminal sanctions from two to five years, in line with the EU Environmental Crime Directive. In addition, a criminal sanction of up to 10 years can be imposed if a person acts on a commercial basis as a member of a group that has continually conspired to commit such acts. One region in particular, Hessen, has built strong enforcement activities on illegal F-gas trade by strengthening cooperation between prosecutors, police and environmental authorities. Similarly, Italy has recently announced implementation of the EU Environmental Crime Directive, introducing fines of up to €150,000 and up to one year in jail.²⁰

CHALLENGES

Although many Member States are in the process of updating administrative penalties, only two reported efforts to criminalise illegal trade in F-gases in alignment with the EU Environmental Crime Directive. EIA's extensive engagement with enforcement authorities across the EU indicates that this criminalisation is a key component of effective enforcement and needs to be adopted more broadly.

6. MONITORING USE OF NEW EQUIPMENT SAFETY EXEMPTIONS

Annex IV of the EU F-Gas Regulation bans the placing on the market of certain types of new equipment, based on the global warming potential (GWP) of the F-gas by certain dates.²¹ Annex IV also includes bans relating to specific types of equipment containing any F-gases. However, there are numerous exemptions related to safety requirements. These include situations where an exemption is needed: to meet safety requirements at the place where it will be used; to meet general safety requirements; or to comply with national safety standards. Safety exemptions are allowed on a case-by-case basis and cannot be used as a general exemption for a product category.

Article 13 of the EU F-Gas Regulation sets out the additional obligation on operators, when putting into operation or use any equipment or product in contravention of the placing-on-the-market prohibitions in Annex IV, to keep documentation containing evidence to justify the claim to the safety exception.²²

Under the regulation there is no requirement for these exemptions to be collated centrally, instead the equipment operator is required to keep the evidence for at least five years, which can be requested by authorities.

Member States were asked to update on measures to prevent abuse of safety exemptions, whether they would be open to further guidance from the European Commission, foresaw any barriers arising from national legislation or building safety code, or anticipated problems in transitioning away from F-gases in any specific subsectors.

PROGRESS

Spain's implementation goes above and beyond the legislative requirements and offers an example of best practice for other Member States to follow. It has recently opened a consultation on plans to establish a specific electronic registry for equipment installed under safety exemptions, whereby the installer would be required to register the equipment on an electronic platform, including the safety justification applied, to improve traceability of the use of exemptions and reduce the risk of misuse.

CHALLENGES

The distinction between the Annex IV safety exemptions and the pre-existing equipment exemption applicable to certain product categories where alternatives are not available may not always be straightforward. It is therefore important to clearly distinguish between the scope and application of the two exemptions. Positively, five of the six Member States expressed openness to receiving further guidance from the European Commission relating to the transposition of this requirement, with Poland noting that it anticipate more exemptions arising when new prohibitions come into force.

When asked about possible regulatory barriers which may enable application of the safety exemptions, Spain responded that no such barriers had been identified, although noting potential challenges around installations in renovations where technical constraints around the use of flammable refrigerants may arise. EIA's Portuguese NGO partner ZERO identified national safety standards which may impact the use of natural refrigerants in industrial cooling, but none that had significant impact in residential cooling.

Member States highlighted numerous equipment type sub-sectors within Annex IV which may face problems in transitioning away from F-gases. Poland highlighted ground source heat pumps, heat pump clothes dryers, split-type air-conditioning systems, process cooling, commercial refrigeration and selected industrial refrigeration applications. Italy and Spain both highlighted split air-to-air systems, with Italy also suggesting possible problems with air-to-water and hybrid heat pumps, although recent data which shows that 30 per cent of air-to-water heat pumps on the EU market are now using natural refrigerants indicates otherwise.



7. F-GAS POLICY MAKER ENGAGEMENT IN RELEVANT PRODUCT SAFETY STANDARDS

EIA's ongoing engagement in product standards relating to cooling and heat pumps continues to reveal heavy industry lobbying aimed at undermining efforts to develop product standards which allow broader safe application of A3 flammable refrigerants. In addition to F-gas industry influence, many standards bodies are unaware of the importance of broadening product standards in order to support implementation of the EU F-Gas Regulation. EIA therefore asked Member States whether they were actively supporting the updating of international standards or ensuring national or subnational standards do not impose additional barriers to implementation.

The representative from Belgium noted that although competency on standards is within their remit, they are not always aware of the meetings and find the content very complex. Budgetary constraints further reduce their ability to participate. Positively, Poland reported that it participates in the process.

In the Netherlands, responsibility for engagement in relevant product safety standards is located outside the Ministry primarily responsible for F-gas policy. This requires effective coordination to ensure that product safety standards and F-gas policy objectives remain aligned, with mechanisms in place to enable expertise is brought together for discussions on relevant International Electrotechnical Commission (IEC) and International Organization for Standardization (ISO) standards.

For the remaining Member States (Italy, Germany and Spain), competency for engagement lies within another ministry. This lack of connection between those establishing and voting on rules which affect availability of equipment and those developing and implementing the EU F-Gas Regulation risks undermining successful implementation.

8. SUBSIDISING SUSTAINABLE COOLING

Although not part of the Member State survey, dedicated subsidies for equipment containing natural refrigerants can drive investment and markets towards sustainable cooling and heating technologies, reinforcing the HFC phase-out.

Until July 2026, under Germany's BEG scheme, households receiving a 30 per cent basic subsidy for domestic heat pumps were able to claim an additional five per cent efficiency bonus for systems using ground/wastewater heat or natural refrigerants.²³ The share of installations eligible for the bonus increased from 65 per cent in March 2024 to 76 per cent in December 2024.²⁴ While the data did not specify the refrigerant used, past evidence suggests most bonus-eligible systems use natural refrigerants.

In Belgium, companies can deduct up to 55 per cent of initial investment in green equipment or technologies from an approved list. In theory, if a company switches to natural refrigerants for certain types of cooling systems it can deduct a portion of that investment from its taxable profit.²⁵

Despite the need for subsidies to support Europe's heat pump roll-out, the European Heat Pump Association has noted that, since 2023, subsidies for heat pumps have not expanded but instead have been made more restrictive in some Member States.²⁶ This may partly reflect challenges in implementing and administering subsidy schemes. For example, Spain's decentralised system means that support is administered by its autonomous communities, which have adopted differing eligibility requirements and application deadlines.²⁷ However, making heat pump subsidies more restrictive appears to go against public sentiment, with a recent poll conducted by YouGov indicating that more than 70 per cent of Italians and about 60 per cent of Germans and Spanish citizens backing government financial support for heat pumps.²⁸

Fortunately, Europe's Social Climate Fund, funded through the sale of carbon allowances under the second phase of Europe's emissions Trading Scheme, which will distribute €65 billion across Member States in order to support vulnerable households most at risk from rises in fuel prices, offers a significant source of funding available to support the broader heat pump roll-out.²⁹

The Social Climate Fund is now entering implementation, but progress remains slow, with less than half of all Member States having submitted plans. Heat pumps feature in several plans and related national measures, but there is little evidence to date that funding is being systematically linked to the use of natural refrigerants. Romania provides a notable emerging precedent, having specified F-gas-free heat pumps in its working documents for its Social Climate Plan.³⁰

Italy has now submitted a draft Social Climate Plan worth around €9.3 billion, with about €3.2 billion for building renovation, including heat pumps.³¹ This provides an excellent opportunity for the introduction of subsidies aimed at supporting uptake of F-gas free heat pumps.



RECOMMENDATIONS

Based on the lessons learned through progress and challenges identified by these countries, we propose some recommendations to support stronger implementation of the EU F-Gas Regulation:

1. STRENGTHEN IMPLEMENTATION SUPPORT

- The European Commission should consider an EU-wide centralised record-keeping system or, at minimum, develop guidance and best-practice national models while recognising differing national governance arrangements.
- Member States should ensure WEEE producer responsibility schemes explicitly finance refrigerant recovery, reclamation and destruction, potentially through dedicated national funding mechanisms.

2. ACCELERATE THE TRANSITION TO NATURAL REFRIGERANTS

- Under the EU F-Gas Regulation, Member States were obligated to establish mandatory training in natural refrigerants from September 2025. Our survey indicates that, other than Spain, the remaining Member States are still in the process of establishing programmes. Member States which have not yet updated certification schemes should prioritise implementation of mandatory natural refrigerant training.
- In order to increase availability and uptake of F-gas-free equipment, national governments should introduce financial incentives favouring equipment using natural refrigerants and ensure that support for F-gas-free heat pumps are prioritised for funding in Social Climate Plans.

3. STRENGTHEN ENFORCEMENT

- All Member States should urgently complete integration of their national single window environments for customs with the EU Customs Single Window – Certificates Exchange System (EU CSW-CERTEX) and develop dedicated F-gas risk criteria for customs inspections.
- The European Commission should issue F-gas based risk criteria and consider a dedicated TARIC code for F-gas operators outside of F-gas portal registration requirements.
- Member States should fully transpose the EU Environmental Crime Directive and ensure illegal trade in F-gases includes effective criminal sanctions, where appropriate.

4. PREVENT REGULATORY LOOPHOLES

- The European Commission should publish technical guidance on implementation of Annex IV safety exemptions and require systematic reporting to monitor their use, including through digitisation of record-keeping.
- Member States should actively engage in European and international product standards development, ensuring standards evolve in line with the requirements in the EU F-Gas Regulation and are not unduly influenced by vested commercial interests.
- The additional illegal trade risk posed by recent changes in requirements for operators to register in the F-gas Portal could be partially mitigated by a dedicated TARIC Y code requiring operators outside of F-gas Portal registration requirements to identify F-gas-related consignments in their customs declarations, enabling customs authorities to maintain visibility of these movements.

5. EUROPEAN COMMISSION INFRINGEMENT MEASURES

- Where Member States continue to lag on key implementation measures, the European Commission can open infringement procedures. For example, one was opened against Greece in July 2026 for failing to comply with requirements for mutual recognition of training certificates issued by other Member States.³²



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