

Illegal Trade: Safety-Related Aspects

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Tim Vink

Honeywell

Agenda

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- **Causes of Safety related issues**
- **Enforcement**
- **Conclusion & Recommendations**

Interesting quote

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The Chinese R22 price has decreased from 2\$/Kg to 1.30 \$/Kg FOB Shanghai.

The reason of this decrease is the obligation to destroy a specific amount of R23 to get the credit amount forecasted in order to pay the lawyers offices who advice them this business case. In short, they are forced to produce while the Asian demand decreased heavily.

Causes of Safety Related Issues

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- **Inaccurate labeling (e.g. R-134a label for R-22)**
 - **May affect the operation of the equipment**
 - ◆ Incompatibility of lubricants, compressor, piping, expansion valves
 - **Difference in operating pressure**
 - ◆ System not designed, may lead to bursts

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- **Use of inferior cylinders**
 - **Not tested in accordance with Directive 99/36/EC (transportable pressure equipment)**
 - ◆ Safety valve/disc lacking, may lead to bursts in warm conditions
 - ◆ Production method not robust, pressure resistance not proven.
 - **Unwarranted use of EC mark of conformity (π-mark)**

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- **Impurities**
 - **May be harmful to health in case of exposure**
 - **May cause malfunctioning of equipment.**

Enforcement

- **Different competent authorities**
 - Labelling directives
 - Worker Safety
 - Customs
- **Generally low on priorities lists**
 - Cost of destruction
 - Tracing difficult
 - ◆ Analytical capabilities lacking
- **Onus of proof often difficult**
 - Small quantities
 - Mixed Loads

Conclusion & Recommendations

- **Certification of contractors will help**
- **Single point of reference**
- **Clear cut-off date for non-refillable cylinders under the F-Gas Regulation**
- **Producers willing to provide laboratory services for identification**