

Vademecum on the use of fluorinated greenhouse gases in Agricultural Machinery

1. This document should be considered as a short guide to support the manufacturer of Agricultural (AG) machinery that contains fluorinated greenhouse gases in its equipment, according to the Regulation (EU) 2024/573¹.
2. This document is focused only on the use of these gases in the air conditioning system.
3. The phases considered in this document are “import” [Art.3(7)], “export” [Art.3(8)], “placing on the market” [Art.6], and “manufacturing” of mobile equipment that contains fluorinated greenhouse gases listed in Annex I, II, or III of the Regulation¹ in the air-conditioning system in non-road mobile machinery used in agriculture [Art.5(3) subparagraph (c)].
4. The following information, reserved for CEMA’s members, is not legally binding. Please note that it is the responsibility of each company to comply with the law. This *Vademecum* should be intended as a support for further assessment by each company.

Before analyzing the following Table 1, it is necessary to verify if the fluorinated greenhouse gases of interest are listed under Annex I, II, or III¹. In case the gas is not included in those Annexes, then the Regulation (EU) 2024/573¹ does not apply.

Any Articles (“Art.”) should be understood as referring to Regulation (EU) 2024/573¹, unless otherwise specified.

Any manufacturer of equipment (i.e. AG machinery) that contains fluorinated greenhouse gases shall comply with:

1. the precautions to minimize leakage of the gases, as well as measures to repair and verify that the repair has been effective [Art.4(3), Art.4(5)].
The measures of repair and verification should be referred to as “Leak Checks” [Art.5];
2. the certification necessary for the natural person who carries out the activities [Art.4(7)], [Art.5(4)]: a training attestation (see the minimum requirements²) [Art.10(1) second subparagraph] for the maintenance or servicing, repair, and leak check of equipment [Art.10(1) second subparagraph (c)];
3. requirements of “Leaks Checks” [Art.5], in particular Art.5(1), but the specific Implementing Act [as referred in Art.5(8)] is still pending (*April 2026*).
Currently, a Regulation³ is in place which refers to the repealed Regulation 842/2006/EC;
4. requirements of frequency of verification laid down in Art.5(6) and in accordance with Art.5(5);
5. keep a record of the “Leak Checks” [Art.7] for a period of at least 5 years [Art.7(2)];
6. “recovery and destruction” of the substances [Art.8(1), Art.8(3) subparagraph (c)], but from 12th of March 2027 [Art.8(5)];
7. “control of use”, see restrictions on uses [Art.13].

¹ Regulation (EU) 2024/573, on fluorinated greenhouse gases (consolidated version [link](#)).

² Commission Implementing Regulation (EU) 2025/1893, establishing minimum requirements for training attestations of natural persons and the conditions for the mutual recognition of such training attestations ([link](#)).

³ Regulation 1516/2007/EC, establishing standard leakage checking requirements for air conditioning equipment containing 3 kg or more of fluorinated greenhouse gases ([link](#)).

Table 1
Summary of the requirements for different scenarios.

	Quota allocation [Art.16(1)], value of quota allocation and its declaration [Art.17], Fgas portal registration for receiving quota allocation [Art.18] See Note 1.	Declaration of conformity [Art.19(1) + Art.19(2) + supporting documentation according (a), (b), (c), (d) Art.4(6) + Implementing Regulation (EU) 2025/2155⁴] See Note 2.	Customs declaration [Art.23(3)]	Labelling [Art.12 + Art.23(10 subparagraph (c)) + Implementing Regulation (EU) 2024/2174⁵]	Fgas portal registration [Art.20(4) subparagraph (a) + Art.20(5) + Implementing Regulation (EU) 2024/2473⁶] for getting a valid licence [Art.22(1)]	Reporting + veracity of report by independent auditor [Art 26 + Annex IX + Implementing Regulation (EU) 2024/2195⁷] See Note 3.
Import pre-charged AG machinery	Yes	Yes	Yes	Yes	Yes	Yes <i>Depends on the quantity, reporting obligations apply [Art.26(4)] and a verification report is issued [Art.26(7)]</i>
Import empty AG machinery	NO	NO	Yes	Yes	NO	NO
Placing on the market of the AG machinery	See Import pre-charged <i>NO, if the AG machinery is charged by gases purchased in the EU</i>	See Import pre-charged <i>Yes, also in case the AG machinery is manufactured in the EU and the hydrofluorocarbons charged into the product or equipment are purchased by an EU supplier [Annex I, case "c" ⁴]</i>	See Import pre-charged and Import empty <i>NO, in case the AG machinery is manufactured in the EU</i>	Yes	See Import pre-charged	See Import pre-charged <i>NO, in case the AG machinery is manufactured in the EU and uses a gas purchased by an EU supplier</i>
Export pre-charged AG machinery	NO	NO	Yes	NO <i>BUT, it is recommended to assess accurately with the customs Authority since there is no specific reference to export in the legislation acts</i>	Yes	NO <i>Since there is no specific reference in ⁸</i>
Export empty of the AG machinery	NO	NO	Yes	NO	NO	NO

⁴ Implementing Regulation (EU) 2025/2155, establishing the detailed arrangements relating to the declaration of conformity and the verification by the independent auditor ([link](#)).

⁵ Implementing Regulation (EU) 2024/2174, laying down rules for the format of the labels for certain products and equipment containing fluorinated greenhouse gases (consolidated version [link](#)).

⁶ Implementing Regulation (EU) 2024/2473, on the rules regarding the registration in the F-gas Portal ([link](#)).

⁷ Implementing Regulation (EU) 2024/2195, determining the format for submitting the reports of data referred to in Art.26¹ ([link](#)).

⁸ "Guidance document on the verification by independent auditors of HFC reporting in accordance with Regulation (EU) 2024/573 on fluorinated greenhouse gases" ([link](#)).

Notes:

1. See further details on the "Transfer of quota and authorisation to use quota for the placing on the market of hydrofluorocarbons in imported equipment" [Art. 21] in case of Import of pre-charged AG machinery and Placing on the market (but not where the AG machinery is charged with gases purchased in the EU);
2. The "Declaration of Conformity" should be kept by the importer or manufacturer of the equipment pre-charged with greenhouse gas [Art.2(1) subparagraph (a)⁴], and it should be provided to the competent Authority only upon request [Art.4(6)¹]. This would mean that it is not necessary to provide it to the customer of the AG machinery;
3. In case an independent audit is necessary, see case of "exemptions" [Art.19(6)], by 30th April 2026 (and every year), the independent auditor verifies the accuracy of the documentation, the declaration of conformity and the veracity of their report pursuant to Art.26(7), for the preceding calendar year, at a reasonable level of assurance, as laid down in Art.19(3).
4. Cost of a quota: 3,00€ for each tonne of CO2 equivalent of quota to be allocated [Art.17(5)];
5. "Import and export of hydrofluorocarbons and of products and equipment containing hydrofluorocarbons or whose functioning relies upon those gases, from and to any State or regional economic integration organisation (see [link](#)) that has not agreed to be bound by the provisions of the Protocol applicable to those gases, shall be prohibited from 1 January 2028" [Art.25(1)];
6. List of the Implementing Acts updated by the European Commission, at this [link](#).

ABOUT CEMA

CEMA aisbl (www.cema-agri.org) is the association representing the European agricultural machinery industry. With 11 national member associations, the CEMA network represents both large multinational companies and numerous European SMEs active in the sector. CEMA represents about 1,300 manufacturers, producing more than 450 different types of machines with an annual turnover of about €40 billion and 150,000 direct employees. CEMA companies produce a large range of machines that cover any activity in the field from seeding to harvesting, as well as equipment for livestock management.

For more information, please contact:



CEMA aisbl

European Agricultural Machinery Industry Association

Avenue de Tervueren 168

1150 Brussels

Tel. +32 2 706 81 73

secretariat@cema-agri.org