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PROPOSED REVISIONS TO THE *FEDERAL HALOCARBON REGULATIONS, 2003* CONSULTATION REPORT

**Prepared for
Environment Canada
Consultation held March 12 to 20, 2013**

Prepared by:
Groupe Intersol Group
205 Catherine, Suite 300
Ottawa, Ontario K2P 1C3
Tel.: 613-230-6424
Fax: 613-567-1504

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Canada 

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Background

Environment Canada (EC) held four consultation sessions across Canada from March 12 to March 20, 2013, to obtain feedback on the proposed revisions to the *Federal Halocarbon Regulations, 2003*. Consultations took place in Edmonton, Halifax and Gatineau. The proposed revisions aim to continue minimizing releases of halocarbons to the environment while addressing various administrative and operational issues in a practical manner.

Objectives of the Consultation

To reduce the administrative burden and clarify interpretation issues related to the *Federal Halocarbon Regulations, 2003* by:

- Obtaining feedback on changes as proposed by EC;
- Identifying other areas for improvement; and
- Clarifying the next steps in the regulatory process.

Consultation Process

In order to support a meaningful dialogue with participants, EC presented an overview of the context for the revisions, as well as a summary of the revisions proposed at each consultation meeting. The presentation, as well as the consultation document that includes additional details about the proposed changes, are available under separate cover.

The meeting's agenda (the same for each meeting) and a list of participating organizations can be found in Appendices A and B.

Proposed revisions identified through the consultation process will help EC put forward draft revised regulations. Further opportunities to provide input will be offered, as appropriate, following the publication of the revised regulations in the *Canada Gazette*, Part I. While 20 issues were considered as a starting point of the discussion, the consultation was open on all aspects of the Regulations.

This report summarizes and consolidates the feedback received during the four consultation sessions that took place across Canada.

Feedback on the Proposed Revisions

A. Interpretation

Issue 1 – Definition of Charging

Proposed Revision:

Ensure the definition of charging does not include preventative maintenance activities.

The following input was provided:

- Defining preventative maintenance would resolve a number of questions, as the issues associated with charging relate to the types of activities that could result in the potential for release, as opposed to charging itself.
- It was suggested to define activities that have an impact on releases, and to exclude activities that do not imply release risks.
- Preventative maintenance activities would include filter, oil and screen changes, as well as work on metering devices.
- Preventative maintenance activities recommended by the manufacturer could be referenced, and would not be deemed as charging.
- If construction activity is occurring around the system, halocarbons may be required to be removed for safety reasons.
- Fire extinguishing systems need to be considered separately from air conditioning and refrigeration systems.
- Another element pertains to the definition of “system,” as some systems are closed (e.g. air conditioners) and other systems include a cylinder or container.
- The Regulations need to continue to encourage replacement of older systems.

Issue 2 – Definition of Owner

Proposed Revision:

Ensure that responsibilities of owners and service technicians are clearly defined throughout the Regulations.

The following input was provided:

- It will be important to define the responsibilities of owner, operator, contractor and service technician.
- A number of unique scenarios need to be considered, regarding owning, leasing, engaging third parties to manage facilities, retaining the services of contractors to perform services, buildings located on provincial land, buildings under the control of a builder until they are transferred to an owner, etc.
- Questions regarding warranty responsibilities of the contractor/service provider vs. the owner were discussed.

- Regulatory obligations need to be linked to the most appropriate group, which has control over the system.
- The name of the person/organization who would receive a warning or notification of non-compliance can also be considered in the ownership definition.
- Incorporating the concept of ownership with regulatee identification and referring to organizational responsibilities (vs. individual's name) should be considered.

Issue 3 – Definition of Small System

Proposed Revision:

Revise the definition to a threshold motor rating of less than 3 hp.

The following input was provided:

Defining small systems based on quantity

- Defining the small threshold in terms of rated horsepower is not supported.
- Industry standard is to use volume or tonnage to rate the size of equipped systems.
- Small systems could be defined by the quantity of refrigerant (e.g. 10 kg), and the charge (e.g. 10 kg to align with the reporting provisions) should be specified rather than horsepower.
- Since the charge can vary, one suggestion was to use the maximum charge.
- It was noted that a calculation of the charge (CSA-140) can be performed if the charge is unknown (or if the system would need to be emptied in order to measure the charge).
- Many stakeholders agreed that a threshold of 10 kg or less could define a small system; one stakeholder had a concern that this threshold might be too high. EC indicated that the threshold is not set at this stage, and further analysis is needed.

Exemptions

- Stakeholders agree with the importance of exempting small systems from certain regulatory requirements; this places a particular importance on having a clear definition for “small systems.”
- Ultimately, how small system and resultant exclusions are defined in the Regulations should not result in including more systems than are currently captured in the Regulations, as this would introduce a costly regulatory burden.
- Exempting small domestic appliances from the reporting provisions in the Regulations is considered a must.
- Portable systems (bar fridges in trains, portable air-conditioning units, other portable refrigeration units, etc.) should be exempt from significant portions of these regulations.

Other elements of definition

- The term “installation” also needs to be defined and clarified.
- The suggestion to consider “hard wired or installed” vs. “plug-in systems that are portable” as a way to distinguish large vs. small systems was made; however, this may be problematic because some otherwise small systems can be hard wired (e.g. offshore applications).

- The definition must be clear to lay people, in order to ensure that those who manage facilities can easily identify small from large systems (e.g. administrative staff who manage facilities).
- It was suggested that wording from the *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations* could be useful to consider (systems piped together, independent units, etc.); the primary driver being the potential size of the release.

B. Prohibitions

Issue 4 – Prohibition of HCFC Solvent Systems

Proposed Revision:

Revise sections 4 and 5 to prohibit the installation and use of halocarbon solvent systems. Add HCFCs to the list of halocarbons for use in a solvent system for which a permit may be requested (permits can currently be requested for HFCs and PFCs).

The following input was provided:

- There was general support for this provision.
- Participants in Edmonton indicated that such systems might be in use in electrical hydro or mint facilities; however, they did not know.
- Certain stakeholder groups believe that when HCFCs serve as both the propellant and the solvent, they should be considered as solvent; hence the clarification of the term “solvent systems” would be helpful.
- It was also noted that the high cost of HCFCs prevents them from being used as solvents.

C. Recovery

Issue 5 – Recovery from Out-of-Service Systems

Proposed Revision:

Provide that a system may be out of service to a maximum of 12 months before halocarbon must be recovered.

The following input was provided:

- Taking halocarbons out of systems that are pre-charged and sealed incurs risks of releases.
- As long as due diligence is exercised, there is no point in removing the refrigerant. Typically, systems that are not regularly used continue to be leak tested regularly, thus this provision may not be required.
- The definition of “out of service” needs to be clarified, as some systems are in place for contingency, systems can be temporarily out of service (e.g. seasonal use), different types of applications need to be considered (e.g. rental units, portable units, buildings under construction, portable/deployable units in a military context), and other systems may be intended for decommission at some point in time. One suggestion was to include the wording “out of service permanently,” to clarify this question.

- The 12-month timeframe is too short for some stakeholders, especially for remote areas. However, if the system is put out of service permanently, 12 months is a realistic timeframe. Some suggested 24 months would be suitable.
- This issue is related to proper management and stewardship, as opposed to regulation.

Issue 6 – Records of Dismantling, Decommissioning and Destruction Notices

Proposed Revision

Remove the requirement to keep a separate record of the information contained in the notice (the notice itself would still need to be affixed to the system). Add the final destination of the system to the service log (to be completed when the system is dismantled, decommissioned or destroyed). Require retention of the service log.

The following input was provided:

- Stakeholders agreed with the intent of reducing administrative burden in this area.
- Posting a physical notice on a piece of equipment does not have environmental benefits in terms of managing halocarbons; it is sufficient to consign the information in the service log.
- It was suggested to include clarification regarding the fact that the notice must be posted before the decommissioning work begins.
- Clarifying the definition of “system” will be crucial in order to ensure clarity regarding when notices are required.
- There are many units for which there are no service logs; however, these units are typically subject to internal inventory record-keeping systems.
- It was suggested to remove the final destination from the requirement. Others suggested that the final destination is not always known at the time of decommissioning; that information can be entered in the record log when available.
- In many instances, it can be difficult to determine what the final destination will be.
- Various situations can occur: systems can be sold (and halocarbons would not be recovered), systems may be removed from the premises before the refrigerant is removed, etc. The real issue needs to be halocarbon removal, or the destination of the halocarbon, rather than the final destination of the hardware itself.
- As provincial jurisdiction is involved, this clause could be worded to indicate that this is done in accordance with provincial regulations.

D. Halocarbon Inventory

Issue 7 – Halocarbon Inventory

Proposed Revision

Require owners to maintain an inventory of all on-site halocarbon systems, listing the type, description and location of each system. Small systems would be exempt from this inventory.

The following input was provided:

- There was general support for this proposed revision, because most organizations currently keep internal inventories; however, there was concern about the level of detail required and the level of effort needed. The frequency of updating the inventory would pose some issues, especially when it comes to portable systems.
- Some organizations use the service logs as their inventory, and suggested that both can be combined.
- The importance of not adding undue administrative requirements for regulatees was mentioned (the *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations* on federal lands were provided as an example), and ensuring that the requirements are in line with the objective the Regulations need to serve.
- There are different practices in place in organizations; all maintain inventories of their large systems; some organizations also track their small systems. The proposal is for the Regulations to exempt small systems; however, stakeholders may still decide to track them on their inventories if they prefer.
- One stakeholder was of the view that the small systems may incur the most risk of release of ozone-depleting substances. Others felt that exempting small systems would be key.
- The revisions will need to accommodate electronic inventory systems, where records are not necessary on site, but will be available.
- The definition of “site” will be important.
- There was concern about non-owner owned equipment on site, e.g. portable vending machines. Mobile systems including military ones are also subject to various circumstances (especially when deployed in war zones), which need to be taken into account.
- Overall, the discussion reiterated the importance of clarity in the definition of owner and small system. Links can also be made with the identification of regulatees.
- Regulations need to focus on key elements required, and other items can be addressed under good stewardship and management.

E. Installation, Servicing, Leak Testing and Charging

Issue 8 – Charging Halocarbons for Leak Testing

Proposed Revision:

Prohibit charging any halocarbon for the purpose of leak testing, unless recommended by the revised Refrigerant Code of Practice.

The following input was provided:

- In order to identify the source of a leak, trace amounts of refrigerants must sometimes be used. Trace gases are used for leak-testing procedures. This is, according to some stakeholders, an acceptable procedure in the U.S.A. (see EPA section 608).
- Other mechanisms for leak testing exist; however, they can only be performed at the manufacturing facility (and not in the field).

- Questions were posed regarding whether the next-generation refinements (hydrofluoroolefins (HFOs)) are considered as HFCs.

Issue 9 – Leak Test Notices

Proposed Revision:

Remove the requirement to affix a leak-test notice to a system.

The following input was provided:

- There was general support for the proposed revisions to remove this requirement, although it was noted that there can be a delay between the leak test and the update of the register.
- In many applications (e.g. offshore, equipment exposed to harsh weather conditions), the physical leak-test notice does not remain in place. In addition, many of these systems are not in easily accessible locations.
- Posting a physical notice is also good due diligence, and when a contractor comes on site to conduct maintenance or repair activities, a visible tag or notice on a system is useful.
- It was suggested to clarify that the leak test information only needs to be entered in the service log (i.e. no posting of a notice, with information available in the service log).
- It was suggested to consider articles 31 and 36 and to remove the notice from article 36.
- Many people felt that this is a management issue, and not a regulatory issue.

Issue 10 – Annual Inspections

Proposed Revision:

Require that systems be inspected annually, including a leak test, in accordance with the revised Refrigerant Code of Practice.

The following input was provided:

Inspection requirements

- The annual inspection requirements would need to be clearly defined, perhaps in reference to manufacturing specifications.
- Annual inspection requirement could include verifying pressure, temperature, amperage, as per manufacturer's specification. There is a need to balance what is prescribed in light of the fact that there are several different kinds of systems and manufacturers, with a variety of requirements.
- It was suggested to remove the words "in accordance with the Code of Practice," and to be careful in defining inspections, given that manufacturers require and/or recommend various maintenance activities.
- It was also suggested not to define the activities included in an inspection and rather to indicate that the system needs to be inspected by a competent professional; the certified professional who conducts the inspection would determine which activities are required.

Inspection frequency

- The suggestion to build an inspection regime centred on a risk-based approach (e.g. failure frequency) was proposed.
- There was discussion about how best to word these regulations so that the frequency of inspection and the period between inspections are optimal.
- In order to meet the annual inspection requirement, inspections end up being scheduled on a shorter timeframe, which results in higher costs. Flexibility could be provided for the inspection timeframe (e.g. allowing it to take place between 10 and 14 months if an annual inspection is required, or specifying that the period between tests cannot exceed 15 or 18 months). It could also be useful to specify a minimum amount of time (e.g. 4 to 6 months) between inspections (i.e. to avoid situations where someone would conduct them on two consecutive days, e.g. Dec. 31 and Jan. 1 of subsequent calendar years).
- Providing the option to schedule leak testing and inspections at different times is needed, in order to allow flexibility in conducting these activities.
- Yearly frequency of inspection for reserves and remote sites would be too cumbersome and costly; a two-year frequency might be a more suitable timeframe.
- Small systems should continue to be exempt from this requirement.

Issue 11 – International Civil Aviation Organization (ICAO) Amendments

Proposed Revision:

Prohibit installation of: Halon fire-extinguishing systems in aircraft lavatories in aircraft manufactured after December 31, 2011; Halon fire-extinguishing systems in engines and auxiliary power units in aircraft designed after December 31, 2014; and Halon portable fire-extinguishing systems in aircraft manufactured after December 31, 2016.

The following input was provided:

- Generally speaking, there were no concerns with the proposed revisions, because the Regulations are coming into alignment with ICAO decisions.
- The implications need to be considered for non-military and non-civil aircraft, such as those owned by organizations including the Coast Guard, the Royal Canadian Military Police and others.

Issue 12 – Charging Prohibitions

Proposed Revision:

Consolidate charging prohibitions into one section. Exempt the following systems: Small refrigeration and air-conditioning systems; Fire-extinguishing systems for use on a military vehicle/ship and aircraft (except those that are prohibited by ICAO in Issue 11); Critical systems (Issue 15).

There was support for the proposed revisions.

F. Service Logs

Issue 13 – Exemption – Small Systems from Service Log Requirements

Proposed Revision:

Exempt small systems from the service log provisions.

The following input was provided:

- Most agreed that keeping service logs represents a best practice in terms of management and stewardship, and that it does not necessarily need to be regulated.
- Many participants supported the proposed revision to exempt small systems, as it does reduce unnecessary burden.
- One stakeholder group felt that this exemption should not be provided (i.e. maintain the requirement to report). If this approach is adopted, a clear definition of a service log would need to be in place.
- Once again, the requirements should accommodate the availability and use of electronic records, which are not necessarily on site.

G. Release Reports

Issue 14 – Reporting of Releases of 100 kg or more

Proposed Revision:

Require releases of 100 kg or more to be reported to EC within 3 days, followed by a 14-day written report. Add provisions to allow the 14-day release report to be revised should more accurate information become available.

The following input was provided:

Initial notification

- There was support from many stakeholders for increasing the time for reporting a spill to 3 days from 24 hours. The term “notification” could be considered, instead of “reporting.”
- The urgency of reporting a release within 3 days was questioned, given that once a release has occurred, it is often already too late to mitigate it. An alternative view was that reporting quickly promotes rapid action on the ground (e.g. case number and technician being assigned). Another stakeholder questioned the need even to report, but indicated that if the intent is for EC to be involved in the technical investigation of releases, this requirement is appropriate.
- There were questions around to whom to send the notification, if this requirement is kept.
- There are also provincial notification and reporting systems to consider (e.g. 24 hours in some provinces).

Written report

- There was general support for the suggestion to allow for revisions of the 14-day written report provision. The 14-day timeframe is often not sufficient to prepare a comprehensive report, as activities to investigate or fix the issue cannot all be completed in this timeframe. There was a suggestion to increase this to 21 or to 30 days, as it often takes a significant amount of time to generate a proper report.
- The suggestion was also made that the requirement for notification and reporting could be combined, and the need for initial notification could be eliminated altogether. In addition, it was suggested that this could be included in the semi-annual or annual report instead.
- There was a suggestion to align notification and reporting requirements for spills of under and over 100 kg; however, there was no consensus on that point.

H. Critical Systems

Issue 15 – Critical Systems

Proposed Revision:

Add provisions to allow owners of fire-extinguishing systems in critical work environments for which there are currently no alternatives to the use of halon to apply to designate those systems as critical for 3 years. Add provisions to require owners to report within 30 days when a system has been charged.

The following input was provided:

- There was general support for this provision; one stakeholder group cautioned that the definition of “critical systems” needs to be clear to avoid interpretation issues.
- No examples of systems other than those in nuclear facilities were cited, except that the North American Aerospace Defence Command might have critical systems. Maritime or air traffic control rooms may also include critical systems (though halocarbons are generally not in used in these applications).
- Five years might be a more appropriate timeframe.
- The ability to add new systems to an existing critical system should be considered, in order to avoid having different fire-extinguishing systems at the same location (i.e., in a laboratory).

I. Permits

Issue 16 – Permits to Install Fire Extinguishing Systems

Proposed Revision:

Exempt fire-extinguishing systems for use on military vehicles, military ships and on aircraft (except those prohibited by ICAO in Issue 11) from the requirement to apply for an installation permit.

The following input was provided:

- There was support for this provision.
- It was suggested to consider all ships, in addition to military ones.
- Considerations related to the purchase and importation of aircraft needs to be included.

J. Logs, Notices, Records and Reports

Issue 17 – Regulatee Identification

Proposed Revision:

Require owners to submit a report to EC indicating the responsible position in the organization for halocarbon systems, location and number and types of systems they own
Small systems would be exempt from this report.

The following input was provided:

- Clarity is required regarding whether the intent is to have a point of contact for communication purposes vs. responsibility for the systems that have regulatory compliance implications.
- There were concerns around the creation of unnecessary regulatory burden and the rationale for this requirement, though stakeholders understand the importance of EC having an up-to-date list of regulatees for contact.
- It was suggested to separate the identification of the regulatee or contact point from the inventory elements.
- A concern was expressed about responsibility, as it relates to which name is cited on a notice of violation or for Administrative Monetary Penalties provisions.
- The regulatee identification definition may resolve some of the questions related to the definition of owner.
- Some stakeholders indicated a preference for single points of contact, and others prefer multiple points of contact (e.g. regional or portfolio-based).
- In some instances (e.g. on reserve), it may be difficult to identify who owns a system, when responsibilities are not clear cut.
- The use of a simple online form could simplify the process of providing and updating contact information.
- There were questions and concerns regarding how often changes would need to be updated, the level of detail required and whether it is a position in the organization or the name of an individual that is required.
- The need for advance notification of inspections was stated, in order to ensure that the right people are present and that the information is available. Having points of contact is useful for that purpose.
- If possible, a mechanism other than regulations should be considered to allow EC to achieve its objective.

Issue 18 – Unoccupied Sites

Proposed Revision:

Remove the requirement to update information on unoccupied sites.

Revise the provision to require that copies of all logs and reports be kept at the nearest location to the site that is occupied by the owner.

The following input was provided:

- It was suggested to eliminate this requirement altogether, given that the definition of an unoccupied site is not straightforward, and given that records would be kept and available.
- Linkages with inspection requirements for such sites should also be considered.
- Some stakeholders monitor their systems on unoccupied or remote sites using remote sensing systems, while other stakeholders periodically visit or inspect their unoccupied systems.
- Information should be made available upon request; the provision or availability of information electronically needs to be considered.
- The definition of availability of records “within a reasonable timeframe” needs to be clarified, especially as it relates to remote or unoccupied sites, where records would typically be accessible off site (even in the case of electronic records).

K. Schedule 2

Issue 19 – Description of System and Issue 20 – Request for a Permit

Proposed revision:

19) Replace “description of system” with: – Type of system (refrigeration, air-conditioning, fire-extinguishing, solvent); – Make of system; – Model of system; – Serial number of system.

20) Add the following information to the request for permit: – Type of system (refrigeration, air-conditioning, fire-extinguishing, solvent); – Make of system; – Model of system; – Serial number of system.

These two issues were considered together.

The following input was provided:

- It would be useful to make the phrase “description of the system” explicit in the Regulations (e.g. many components integrated together to make a “system”).
- There are different practices in place in the industry: some use a unique identifier, others identify their systems with brand, model and serial number, one company opted to track the compressor serial number.
- It was suggested to use “or” instead of “and” in the list of elements to provide, and to keep the wording “if available” next to each element.
- Stakeholders had concerns about being charged with non-compliance in the event that some of the information is not available.

- The use of a unique identifier could alleviate the issues related to the non-availability of some information.
- One stakeholder has what they refer to as a “unique system” (scientific equipment to model nuclear reactions), which does not fall into any of the existing categories, so an “other” category might be required.

Additional Comments

At the end of each consultation meeting, stakeholders had an opportunity to make additional comments or to reiterate the importance of comments provided earlier. The following input was provided.

General Comments

- The revised regulations must focus on ensuring that measures have an environmental benefit and on minimizing the administrative burden.
- A small working group composed of people involved in the day-to-day implementation of these regulations could be formed, in order to work with EC in developing the next revision of these regulations. This would help ensure that environmental protection elements are addressed while reducing the administrative burden.
- Decision trees to help apply the Regulations are useful, and providing such tools should continue as a good practice.
- Participants had a number of comments regarding differences between federal vs. provincial regulations and the resulting challenges for their sites; this includes challenges related to servicing systems located across Canada, given training and certifications are under provincial jurisdiction and vary. There are also challenges when hiring contractors who are familiar with provincial requirements and who may not know what is required under federal regulations.
- While it is useful to exempt small systems, it would be beneficial to provide clarity as to what is required for small systems.
- It will be useful to inform stakeholders of what will be done regarding phased-out halocarbons.
- EC needs to distinguish ozone-depleting substances and non-ozone-depleting substances, and reporting requirements around each.
- Stakeholders welcomed the opportunity to take part in these sessions and to provide input.

Refrigerant Code of Practice

- Clarity will be needed regarding whether the requirements in the Code of Practice are simply guidelines or whether they will be prescriptive.

Definitions and Wording

- The definition of “chiller” needs to be clarified.
- It was suggested to clarify whether it is the consolidated vs. the individual “charge” that is considered, as many systems are made of multiple components.
- The release reporting threshold and the definition of small systems need to be aligned.

- In section 3, the term “allow” could be removed (i.e. cause a release, but not allow).
- Paragraph 31(1) needs to be worded to ensure that minor activities (e.g. tightening bolts) are not included.
- In paragraph 36(1), the wording “at least 5 years” would need to be clarified if the requirements for unoccupied-sites systems remain (i.e. if such a system is charged with nitrogen and not in service for 7 years, should it remain on the list?).

Remote Sites

- If addressing unoccupied, remote or First Nations sites is overly complex in the short term, these elements could be removed and addressed at a later stage.

Leak Definition and Reporting

- Where to report leaks for mobile systems is a question: in the province in which they are registered or in the location where the leak occurred?
- It was suggested to revise the definition of a leak to associate it with service (this would prevent discharging a fire system to extinguish a fire to be considered a leak), and to remove the provision to address within 7 days, and to require that action is taken to mitigate the leak.

Schedule 2

- The inclusion of service initiation date and a description of the service activities conducted should be added to the log.
- Making changes to what is required in the service logs creates difficulties in terms of the training of service technicians.
- The differences between federal and provincial requirements create challenges.
- There was a concern about the need to be in compliance for 5 years of record keeping, as even though someone may have addressed issues and be compliant for the current year, past shortcomings keep being considered as non-compliance.

Next Steps

Following the close of the public consultation period on March 31, 2013, EC will consolidate and summarize all input received and draft proposed revisions to the *Federal Halocarbon Regulations, 2003*. If necessary, a working group may review the draft revisions and provide further comment regarding their ease of implementation.

The results of these consultations will be used to draft revised regulations. Stakeholders, Aboriginal groups and Aboriginal organizations will have another opportunity to provide comment on the proposed regulatory revisions following the publication of draft regulations in the *Canada Gazette*, Part I. It is anticipated that the proposed regulations will be published in 2015.

Appendix A – Meeting Agenda

ENVIRONMENT CANADA – PROPOSED REVISIONS TO THE *FEDERAL HALOCARBON REGULATIONS, 2003*

Objectives

Proposed Revisions to the *Federal Halocarbon Regulations, 2003*:

To continue minimizing releases of halocarbons while:

- addressing administrative and operational issues in a practical manner; and
- reducing the administrative burden.

Consultation:

- Obtaining feedback on changes proposed by Environment Canada;
- Identifying other areas for improvement; and
- Clarifying the next steps in the regulatory process.

08:30 Registration

A. CONTEXT AND STATUS

09:00 Welcome *Marie-France Nguyen, Environment Canada*

Agenda and Process Review *Facilitator*

09:15 Overview of Proposed Changes *Sandi Moser, Environment Canada*

Open Forum – Questions of Clarification

B. PROPOSED CHANGES & FEEDBACK

09:30 Overview of Proposed Changes by Section *Sandi Moser, Environment Canada*

Discussion Following Review of Each Section

- Are there any concerns with the proposed changes?
- Are there additional suggestions to reduce administrative burden?

A. Interpretation

Issue 1 – Definition of Charging

Issue 2 – Definition of Owner

Issue 3 – Definition of Small System

- B. Prohibitions
 - Issue 4 – Prohibition of HCFC Solvent Systems
- C. Recovery
 - Issue 5 – Recovery from Out-of-Service Systems
 - Issue 6 – Records of Dismantling, Decommissioning and Destruction Notices
- 10:15 Health Break
- 10:30 Discussion Continued...
- D. Halocarbon Inventory
 - Issue 7 – Halocarbon Inventory
- E. Installation, Servicing, Leak Testing and Charging
 - Issue 8 – Charging Halocarbons for Leak Testing
 - Issue 9 – Leak Test Notices
 - Issue 10 – Annual Inspections
 - Issue 11 – ICAO Amendments
 - Issue 12 – Charging Prohibitions
- F. Service Logs
 - Issue 13 – Exemption of Small Refrigeration and Small Air-Conditioning Systems from Service Log Requirements
- G. Release Reports
 - Issue 14 – Reporting of Releases of 100 kg or more
- 11:45 Lunch (NOT INCLUDED)
- 13:00 Discussion Continued...
- H. Critical Systems
 - Issue 15 – Critical Systems
- I. Permits
 - Issue 16 – Permits to Install Fire-Extinguishing Systems
- J. Logs, Notices, Records and Reports
 - Issue 17 – Regulatee Identification
 - Issue 18 – Unoccupied Sites

- K. Schedule 2
 - Issue 19 – Description of System
 - Issue 20 – Request for a Permit

15:15 Health Break

C. PATH FORWARD

15:30 Open Forum – Final Questions and Feedback from Participants

15:55 Next Steps and Closing Comments *Marie-France Nguyen, Environment Canada*

16:00 Adjourn

Appendix B – Participants List

Environment Canada was represented during the consultation meetings by:

Dominique Dore

Sandi Moser

Marie-France Nguyen

The following organizations were represented during the consultation meetings:

Aboriginal Affairs and Northern Development Canada

Advanced Energy Management

Agriculture and Agri-Food Canada

Air Canada

Alberta Government

Atlantica Mechanical

Aureus Solutions Inc.

Bell Canada

Black & McDonald Limited

BLJC

Canada Border Services Agency

Canadian Broadcasting Corporation

Canadian Broadcasting Corporation/Radio-Canada

Canadian Food Inspection Agency

Canadian Pacific

CIBC

Consultant HD

Correctional Services Canada

Department of Fisheries and Oceans

Department of National Defence

Department of National Defence – Engineer Service Company

Department of National Defence – Regulatory Compliance

Edmonton International Airport

Environment Canada, Aboriginal, Northern and Stakeholder Affairs

Environment Canada, Enforcement

Environment Canada, Atlantic Region

Environment Canada, Ontario Region

Environment Canada, Prairie and Northern Region

Environment Canada, Quebec Region

ExxonMobil Canada

Gateway Mechanical Services Ltd.

Gestion immobilière Nexacor

Groupe Master

Hebron Project, ExxonMobil Canada Properties
Hibernia Management and Development Co. Ltd., ExxonMobil Canada
Husky Energy
Independent Control Services Ltd.
MOPIA
Nasittuq Corporation
National Research Council of Canada
Natural Resources Canada
Northern Forestry Centre
Parks Canada Agency
Produits Kruger s.e.c.
Public Works and Government Services Canada
Revenue Canada
Royal Canadian Mint
Royal Canadian Mounted Police
SNC Lavalin – Gestion immobilière Nexacor
SNC Lavalin – O&M
Suncor Energy Inc.
TELUS Communications Inc.
Transport Canada – Aircraft Services

www.ec.gc.ca

Additional information can be obtained at:

Environment Canada

Inquiry Centre

10 Wellington Street, 23rd Floor

Gatineau QC K1A 0H3

Telephone: 1-800-668-6767 (in Canada only) or 819-997-2800

Fax: 819-994-1412

TTY: 819-994-0736

Email: enviroinfo@ec.gc.ca