European Parliament
2024-2029

Committee on Petitions

17.3.2026

NOTICE TO MEMBERS

Subject: Petition No 1162/2025 by Marco Masini (Italian), on behalf of CSIM SRL, on harmonising Regulation (EU) 2024/573 with EU occupational safety and health legislation

1. Summary of petition

The petitioner argues that EU law contradicts itself in a matter concerning two key areas, environmental sustainability and workplace safety. The petitioner highlights that, while Regulation (EU) 2024/573 promotes the use of natural refrigerants to reduce the environmental impact of the refrigeration sector by requiring operators to obtain environmental certification to use these substances, the EU occupational health and safety (OHS) law lays down specific obligations as regards vocational training, skill verification and training traceability. While the OHS law was transposed by Italy by means of Legislative Decree No 81/2008, the country's new State-Regions Agreement of 17 April 2025 calls for training to be tailored to managing task-specific risks, especially in sectors like the refrigerant installation industry where technical skills and expertise are needed. The petitioner's major concern is that the environmental certificates that are currently being issued (an example being F-gas licences) do not take the requirements of occupational safety legislation into account, potentially resulting in operators being authorised to work with refrigerants – which could be flammable, toxic or present other hazards – even though they have not received proper handling training. The petitioner highlights that sectoral associations and the European Agency for Safety and Health at Work (EU-OSHA) have already pointed out that the rapid transition to natural refrigerants, combined with the shortage of trained technicians and generational turnover, is creating a dangerous skills gap, which could lead to serious workplace accidents and mistakes. In the light of the above, the petitioner is calling on the European Parliament to clarify how the new environmental regulations relate to existing safety legislation, to promote a harmonised regulatory framework that integrates environmental training and safety and to consider introducing specific and binding training requirements at European level so as to prevent environmental concerns from jeopardising

worker safety.

2. Admissibility

Declared admissible on 17 November 2025. Information requested from Commission under Rule 233(5).

3. **Commission reply**, received on 20 February 2026

The Commission's observations

The minimum requirements of training and certification systems to be established by Member States pursuant to Regulation (EU) 573/2024 and its predecessors principally aim to reduce emissions of fluorinated greenhouse gases by ensuring a high level of training and proven skills, both theoretical and practical. At the same time, however, this training and certification also ensures that the equipment is used safely. Safety issues are an important part of the minimum requirements as contained in the relevant annexes to the implementing acts[1], requiring e.g knowledge of relevant safety regulations and standards as well as safety measures according to applicable rules.

This focus on safety is also evidenced by the fact that the handling of alternatives to fluorinated greenhouse gases have been added by Regulation (EU) 573/2024 to these certification requirements for the main reason to address any safety issues related to these refrigerants such as flammability, higher pressures, or toxicity. The updated minimum requirements of training and certification systems, to be established by Member States should thus address the safety issues related to alternatives to fluorinated greenhouse gases. Furthermore, these rules do not in any way take away or modify safety rules specified elsewhere, as e.g. under the EU occupational safety and health (OSH) legislation, in particular Directive 89/391/EEC (Framework Directive)[2], the Chemical Agents Directive (CAD)[3] and the Carcinogens, Mutagens and Reprotoxic Substances Directive (CMRD)[4]. These contain provisions establishing obligations for employers, such as performing a risk assessment, providing for preventive and protective measures, including personal protective equipment, and the provisions on training and information to workers and their representatives. According to these directives the employers are obliged to assess all the risks present in the workplace.

With particular regard to the training of workers, under Article 8 of the CAD employers are required to provide information and training to workers, among others,the risks to safety and health, relevant occupational exposure limit values and other legislative provisions, as well as

[1] COMMISSION IMPLEMENTING REGULATION (EU) 2024/2215 on stationary refrigeration and some mobile refrigeration equipment; and Commission Implementing Regulation (EU) 2025/1893 on mobile air conditioning equipemnt.

[2] Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work, OJ L 183, 29.6.1989, p. 1.

[3] Council Directive 98/24/EC of 7 April 1998 on the protection of the health and safety of workers from the risks related to chemical agents at work (fourteenth individual Directive within the meaning of Article 16(1) of Directive 89/391/EEC), OJ L 131, 5.5.1998, p. 11

[4] Directive 2004/37/EC of the European Parliament and of the Council of 29 April 2004 on the protection of workers from the risks related to exposure to carcinogens, mutagens or reprotoxic substances at work (Sixth individual Directive within the meaning of Article 16(1) of Council Directive 89/391/EEC), OJ L 158, 30.4.2004, p. 50

training and information on appropriate precautions and actions to be taken in order to safeguard themselves and other workers at the workplace.

The EU OSH directives contain minimum requirements, which must be transposed by Member States and the later are free to provide for more detailed and stringent provisions. It is for the Member States to transpose the provisions of EU OSH directives into national law and it is, primarily for the competent national enforcement authorities to supervise and control the correct application of these transposing provisions.

Conclusion

There appears to be consistency between the policy instruments that result in synergies that promote the safe handling of refrigerants.