



Unlocking your risk management plan for refrigerants

Why do I need a risk management plan?

Businesses need to be aware of their risks. Overall business success depends largely on effective management and minimisation of risk – refrigerant is no different.

Under the Ozone Protection and Synthetic Greenhouse Gas Management Regulations 1995, a condition of holding a Refrigerant Trading Authorisation (RTA) is implementing an effective risk management plan (RMP), which outlines the handling and storage of refrigerant in the holder's business.

What should my RMP include?

An RMP must identify potential risks which could result in the emission of refrigerant to the atmosphere and identify processes and practices that minimise the possibility of those risks occurring. Your RMP must reflect the risks of emissions relevant to all parts of your business practices, including refrigerant handling, storage and transport. This applies whether your business is conducted from a vehicle or building, and whether you are a sole trader or employ 100 or more technicians.

Over the next 2 pages is a useful template you can use, or compare to your existing RMP. Feel free to use this template, just make sure you apply it to your specific business practices and do the following:

- Identify if you work in the Automotive or Stationary fields
- Insert relevant person responsible against each risk
- Insert review date
- Read over the whole plan carefully and put lines through the areas that don't relate to your business. In particular, see the section 'Decommissioning end of life equipment'.
- Add further risks and control measures if relevant to your business.

Risk Management Plan

Business name

Automotive

Stationary (please tick)

RTA Number

Main contact for your business RMP

Activity steps	Potential hazards/risks	Risk control measures	Australian Standards and Code of practice reference	Person responsible (full name)	Next review date (within 12 months)
Purchase of refrigerant	Loose, damaged or missing cylinder caps	<ul style="list-style-type: none"> At time of purchase check that refrigerant cylinders are tightly capped Ensure quarterly purchase records are kept up to date Only accept refrigerant cylinders from wholesalers if they are properly sealed (bunged or capped). 	✓		
	Poor cylinder condition (rusted, corroded, damaged). Expired, or close to expired 'Test Date'	<ul style="list-style-type: none"> Check cylinder date markings/imprints – specifically, that they are 'In Test' Good condition etc. 	✓		
Transportation of refrigerant	Damaged cylinder during transportation	<ul style="list-style-type: none"> Keep out of direct sunlight and/or in cooler area of vehicle Safely stored/fixd when transporting Fitted with safety equipment etc. 	✓		
	Damage to gas cylinders during handling (hand-moved, equipment-moved)	<ul style="list-style-type: none"> Implement proper handling techniques Report accidents immediately. 	✓		
Using equipment containing refrigerant	Leakage of refrigerant during charging of equipment	<ul style="list-style-type: none"> Implement best practice procedure as per the Standards AS 2030.1 & AS 4332 and/or code of practice 	✓		
	Improper care of cylinders	<ul style="list-style-type: none"> After each use check that refrigerant cylinders are tightly capped Check for leakage etc. 	✓		
Handling	Unlicensed handling staff or contractors	<ul style="list-style-type: none"> All refrigerant handling must be carried out by qualified licensed staff or contractors Check temporary contractor's licence before commencement of refrigerant handling work Ensure quarterly refrigerant handling licence holder records are up to date, taking particular note of expiry dates. 	✓		
Installation, service and maintenance of equipment containing refrigerant	Lack of servicing of equipment containing refrigerant	<ul style="list-style-type: none"> Adhere to manufacturers' recommendations and relevant standards Maintain recommended servicing frequency: <ol style="list-style-type: none"> Obtain and keep warranties on repairs Keep record of each service to equipment Check cylinder weight regularly etc. Refer to appropriate standards. 	✓		
	Infrequent testing of equipment containing refrigerant	<ul style="list-style-type: none"> Check that all test equipment is in good working condition at least once every three months. Test leak detectors and recovery units Regularly monitor vacuum pump oil etc Ensure quarterly equipment maintenance records are kept up to date. 	✓		
	Inadequate leak testing	<ul style="list-style-type: none"> Implement best practice procedure as per Standards AS 2030.1 & AS 4332 and/or code of practice Check at least every three months Ensure quarterly cylinder leak test & in-test expiry date records are kept up to date. 	✓		

Risk Management Plan (continued)

Provide a short description of your business (i.e. what the business does; how many branches; how many staff handle refrigerant, etc.)

Activity steps	Potential hazards/risks	Risk control measures	Australian Standards and Code of practice reference	Person responsible (full name)	Next review date (within 12 months)
Recovery and recycling of refrigerant	Improper filling of cylinders	<ul style="list-style-type: none"> Fill bulk refrigerant cylinders in-line with manufacturers' recommendations etc. 	✓		
Decommission end of life equipment	Poor cleaning and flushing	<ul style="list-style-type: none"> Never charge refrigerant into equipment with identified leaks Refer to standards and Code of Practice for leak testing procedures. 	✓		
	Venting	<ul style="list-style-type: none"> Never vent fluorocarbon refrigerant where its release is avoidable etc. 	✓		
	Leakage of refrigerant if pumped down and left in the equipment	Put line through dot point 1 or 2 if not relevant: <ul style="list-style-type: none"> When a vehicle is being scrapped or dismantled or the air-conditioning system is being de-commissioned all refrigerant is to be recovered from the system (AUTOMOTIVE) All refrigerant is to be reclaimed from all parts of the system at the time of decommissioning (STATIONARY) After recovery refrigerant is to be recycled or returned to an authorised refrigerant supplier (see 'Disposal'). 	✓		
Storage of refrigerant	Poor storage of cylinders on premises	<ul style="list-style-type: none"> Ensure all cylinders are stored in a safe and secure location: <ol style="list-style-type: none"> climate controlled (cool place, removed from direct sources of heat and the risk of fire) free of obstacles with appropriate signage to provide ready identification for emergency teams. 	✓		
Disposal	Inadequate seals	<ul style="list-style-type: none"> Closed valves when not in use Check all seals for leakage every 3 months. 	✓		
	Mixing refrigerant types	<ul style="list-style-type: none"> Clearly identify refrigerant stored in cylinders Store reclaimed refrigerant separately. 	✓		
	Lack of labelling	<ul style="list-style-type: none"> Clearly label refrigerant type Clearly label lubricant type Store in specific locations Training personnel. 	✓		
	Equipment that cannot be repaired	<ul style="list-style-type: none"> Document and keep records of reasons why Establish a retirement plan of action. 	✓		
	Recovered refrigerant	<ul style="list-style-type: none"> Return refrigerant contaminated to supplier for disposal Document and keep records of recovered refrigerant returned to supplier for disposal Ensure quarterly recovered refrigerant returned records are kept up to date. 	✓		