European Association of Refrigeration, Air conditioning and Heat Pump Contractors.
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Information Bulletin

Proposed Revision of European Standard EN 378:2016:

The Enquiry Stage 2025 and how to have a say

The European Standards Organisation CEN is about to issue for public enquiry the proposed revision of the widely-used standard for refrigeration systems, EN 378.

There are several significant changes proposed which will have an impact on the design and installation of both factory-built and site-installed refrigeration, air-conditioning and heat pump systems.

AREA encourages all its members to participate in the enquiry process to ensure that the voice of refrigeration contractors is heard and taken into account in the final version of the standard. This Bulletin is issued to provide an update to AREA organisations on the process so that they can inform their contractor members of the opportunity to take part.

The current standard and the proposed revision (prEN):

The standard was last published in 2016 and comprises of four parts:

EN 378:2016 Refrigerating systems and heat pumps — Safety and environmental requirements —

- *Part 1: Basic requirements, definitions, classification and selection criteria*
- *Part 2: Design, construction, testing, marking and documentation*
- *Part 3: Installation site and personal protection*
- *Part 4: Operation, maintenance, repair and recovery*

The proposed revision includes a number of major changes, including the following:

- The method for the determination of charge limits for flammable refrigerants (relating to Access Categories and Location Classes) is significantly revised.
- The current Annex E of Part 1, “Safety classification and information about refrigerants”, becomes a new Part 5. This is intended to allow it to be revised more easily as new refrigerants come into use.
- EN 378 Part 4 will be withdrawn and replaced by adopting the current ISO 5149-4* as EN ISO 5149-4. There is no change proposed to the technical content.

***ISO 5149:** While EN 378 applies in the EU and CEN member states, there is a very similar four-part international ISO standard, ISO 5149. ISO 5149 and EN378 may in the future become fully aligned, but there are some significant differences at present in Parts 1, 2 and 3.*

The Enquiry Stage

CEN Technical Committee TC182 Working Group WG06 has been preparing the revision for several years. The Working Group comprises Experts from across Europe who have been meeting together several times per year. Experts are nominated through the national standards bodies of CEN member countries.

The Draft Revision has now been approved by CEN for Public Enquiry, and is currently being translated into French and German. The enquiry drafts will be issued in English, French, and German, which are the official languages of CEN/CENELEC. Translation into other European languages is at the discretion of the other national standards bodies.

The Enquiry stage will take place from **3rd July to 25th September 2025**. CEN will issue the proposed revision to the national standards body of each CEN member, asking two questions: Do you approve this revision, and do you have any comments.

The national standards bodies will make the Enquiry documents available to interested individuals and organisations and will facilitate the submission of comments in their jurisdiction. The number of comments can range from very few to very many. All comments received by CEN by the closing date will be submitted to the TC182 Working Group for consideration.

The national standards bodies will also submit each national vote to CEN. There is only one national vote per CEN member. A negative vote at the enquiry stage is does not mean the project has to stop.

Handling of Enquiry Stage Comments and Preparation of the Final Draft (FprEN)

Once the Enquiry Stage comments are submitted to TC182, there is a nominal 4-month period for the Working Group to review and discuss the comments so as to prepare the Final Draft of the standard for submission to TC182 for Final Voting and publication. This period is likely to be from October 2025 to January 2026.

Formal Voting of the Final Draft (FprEN)

The Formal Vote is expected to take place around May 2026. For the Formal Vote to be approved at least 55% of the voting members (abstaining votes are not counted) and at least 65 % of the vote weighted by population need to approve the final draft.

If the Formal Vote is positive, then the Standard is likely to be published as EN 378:2026, and EN 378:2016 would be withdrawn.

A negative Formal Vote is generally escalated to the CEN Technical Board for further review and a decision. If the proposed revision is rejected (i.e. a No vote) by CEN members during Formal Vote, the proposed revision could be sent back for another enquiry of the modified standard, or the revision process could start again. In the meantime, the standard would remain as it is now.

How to participate in the Enquiry Stage:

All interested members of the public in CEN member countries can participate. Current CEN Members are:

- all 27 member states of the European Union;
- three EFTA members: Iceland, Norway, Switzerland; and.
- the United Kingdom, North Macedonia, Turkey, and Serbia.

Members of the public can participate using the resources provided by their national standards body. In general, members of the public do not have the opportunity to influence the vote; this is reserved for members of the National mirror committee*. Any individual who is already a member of their national mirror committee can comment and vote via their committee.

**National mirror committees are structured to mimic at national level the work of the corresponding Technical Committee (TC) at the European level. They bring together various national stakeholders to discuss and provide input on the draft standards. The mirror committee's role is to formulate and represent the national viewpoint within the European TC process.*

National Standards Bodies in member states will provide a means for individuals to access the draft standard and submit comments. Interested members of the public should visit the website of their national standards body, for example;

- Spain: www.srp.une.org
- Netherlands https://connect.nen.nl/portal/commentaar
- Ireland: www.nsai.ie/standards/your-standards-your-say/
- United Kingdom: https://standardsdevelopment.bsigroup.com/Home/SDUserGuide

General note on EN 378 as a Harmonised Standard and CE-Marking:

Specific sections of Part 2 of EN 378 (which includes the definitions of Part 1) are harmonised with both the Pressure Equipment Directive and the Machinery Directive, and can thereby be used in the CE-marking of refrigerating systems.

A review by a HAS (Harmonised Standard Consultant) is part of the process, and the Working Group will take account of the HAS report. It is worth noting that the new Part 2 when published will only be considered a harmonised standard if it is cited by the European commission in the Official Journal (OJ) of the European Union. A positive HAS assessment is not a guarantee of this.

It should be noted however that EN378 is not a full design guide for refrigeration systems, and it currently does not fully address the legal obligations of designers and installers in introducing flammable refrigerants into a place of work. EN378 is not harmonised to the ATEX directives and this will continue to be the case under the current proposed revision.

Some sources of Information on EN 378 and on the CEN Enquiry Process:

Authoritative and Neutral Sources:

1. **Buying the Standard:**
   The current Standard itself should be the main reference for all interested parties. This is available to buy through any of the CEN standards organisations.

2. **The European Standards Organisation CEN**
   - The CEN website provides detailed information on both the standardisation and enquiry processes
     www.cencenelec.eu/european-standardization/european-standards/
     https://boss.cen.eu/reference-material/guidancedoc/pages/gd-enqquestionnaire/
   - CEN-CENELEC also provides information on the TC and WG structure: https://boss.cenelec.eu/technicalstructures/pages/tcwg/
   - CEN maintain a YouTube channel with information and training videos:
     We are CEN & CENELEC and our standards build trust!

Associations, Organisations and Institutes

3. **AREA organisation: Introduction to EN 378**
   AREA published in 2019 an Introduction to EN 378, which is freely available on the website. www.area-eur.be/publications/introduction-refrigeration-standard-en-378

4. **Norwegian Position Paper on Revision of EN 378**
   Three Norwegian refrigeration associations have recently issued a Norwegian Position Paper, advising their members of the proposed revision process and the opportunity to comment. They have included a number of aspects that they highlight for consideration and they make some suggestions. https://www.vke.no/siteassets/dokumenter/publikasjoner/position-paper-en-378.pdf

5. **Institute of Refrigeration Ireland**
   The IRI has an EN 378 Resources page on their website www.iri.ie which provides information on EN 378 to help individuals become more familiar with the 2016 version. The principal resource is a set of 17 presentations made by the Working Group experts on the three occasions they met in Dublin (2016, 2018 and 2024).

6. **IOR UK documents on EN 378**
   The Institute of Refrigeration UK have over the years issued through their Technical Committee a number of useful documents on EN 378. These are available on their website www.ior.org.uk.

7. **FETA, UK**
   The Federation of Environmental Trade Associations in the UK has a number of useful documents related to EN 378 freely available on www.feta.co.uk, e.g. An introduction to A2L refrigerants 240517.pdf

8. **CIBSE training on EN 378:**
   The UK Chartered Institute of Building Services Engineers (CIBSE) offers some training material https://www.cibsejournal.com/cpd/modules/2024-09-samr/