

## AVA Technical committee newsletter

### No 12 – May 2021

Welcome to technical committee newsletter number 12, written by the AVA technical committee specifically for technical managers in the industry. We hope you will find it interesting. We would appreciate any comments or suggestions for items to be covered in future newsletters.

#### The new Drinking Water Directive



The EU introduced a new Drinking Water Directive 2020/2194 at the end of last year. Sadly this does not apply to Great Britain as the Directive was introduced after the UK left the EU. The Directive will have little immediate impact on vending anywhere but it is important that it does not mention *Pseudomonas aeruginosa* at all. If you have never heard of this bacterium, consider yourself fortunate, it has caused considerable grief to a number of members over the years as overenthusiastic test houses insisted on analysing for it and worrying customers. Its absence from the new Directive will make this less likely in the future. Among other

changes to the testing for contaminants the acceptable level of lead is to be reduced to 5ppb from the current level of 10ppb from 2036. This may be a long way away but ensuring that this level can be met is going to be a slow and expensive process for a number of countries. The most helpful change in the Directive is a move to mutual recognition of approval of materials in contact with drinking water. Industry has been lobbying for this for years and this is a small step in the right direction. The UK is involved in discussing on standards for materials in contact with drinking water so it may accept accreditation from other countries at some point in the future. Probably one for the grandchildren.

#### Cockroaches, mice and wasps



The hospitality world is going to open shortly and a lot of establishments that have been closed for many months are going to be thinking of starting up. During the period of peace and quiet while the site was closed the local residents may have been taking advantage. It will be worth checking

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machines, particularly table top machines in cafes, for the presence of mice and cockroaches. The AVA has advice on what to do if you find them. The quiet Spring may well have allowed wasps to find nest sites in quiet areas so this may be a summer where we see more wasps than usual. Keep an eye out for them.

### Calorie labelling

The Calorie Labelling (Out of Home Sector)(England) Regulations 2021 are due to come into force towards the end of the year but no date has been set yet. They will apply to food which is suitable for immediate consumption but is not prepacked (because prepacked food already has to have calorie information on it) and this includes drinks. It therefore includes drinks from vending machines but it only applies to businesses that have more than 250 employees at the start of the financial year. It does not apply to single portions of fruit. The information that must be provided at the point of sale or on the menu is the energy content of a single portion of the food in kilocalories and a statement that “adults need around 2000kcal a day”.



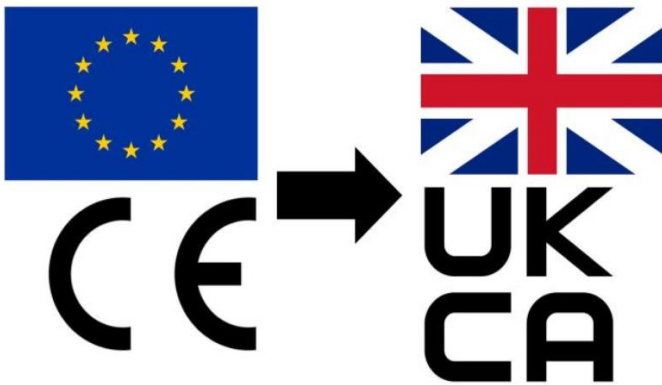
### Energy labelling



The Regulation requiring manufacturers of chilled machines to place a label on their machines which identifies their energy rating came into force in the EU on March 1<sup>st</sup>. This Regulation applies to machines sold in the EU and Northern Ireland but not to machines sold in the rest of the UK. Defra is preparing a Regulation that will cover the rest of the UK but its implementation date is unknown. The label required in GB will be similar to, but different from, that in the EU. The EU has a database on which manufacturers have to

list the energy consumption of their equipment and its rating; Great Britain will not create such a database and will merely allow manufacturers to hold the data themselves. The rating scale runs from A to G and no machine will be better than a C initially.

## CE marking becomes UKCA, UKNI CE marking



Now Great Britain has left the EU (Northern Ireland remains within the EU to all intents and purposes) the rules on CE marking have changed. In order to sell into the EU, manufacturers still need to CE mark their products but in order to sell within Great Britain, manufacturers will need to use the UKCA (UK mark of conformity assessment). This was introduced in January this year but

the CE mark will be acceptable until January 2022. (As Northern Ireland is in the EU they have a special mark, UKNI, for those products where the conformity assessment has to be carried out by a third party but this does not apply to vending machines.) This does mean that manufacturers have to have two separate declarations of conformity, one referencing the relevant Directives in the EU and issued by an address in the EU and the other referencing Regulations in the UK and issued by an address in GB.

## Refrigerant gases

Under the F-gas Regulations, new machines using R134a in the chiller will be forbidden from January 1<sup>st</sup>, 2022. However, machines with R134a can continue to be used and refilled with the gas as long as supplies of the gas permit. R513a is being offered as an immediate drop-in replacement for R134a but with a GWP of 573 it is covered by the ban and will be prohibited from January 1 2022 within the EU and the UK. It is being offered by American suppliers because it complied with Regulations in California.



All three replacement options – blends using a low Global Warming Potential HFC (R1,2,3,4,yf or ze) together with R134a, hydrocarbons (R600a isobutane, R290 propane) and carbon dioxide (R744), are on offer from different manufacturers. Each has its advantages and disadvantages. The HFCs will be drop-in replacements but will be expensive and will have all the negative connotations of HFCs, hydrocarbons are environmentally friendly but will need machines designed to minimise risk of ignition and carbon dioxide is also environmentally friendly but needs high pressures. In particular, hydrocarbon chillers will not be able to be retrofitted to existing machines and of course, parts from R134a machines will not be able to be used as spares for hydrocarbon machines. We have seen the price of R134a increase over the past couple of years and this is likely to continue as supplies dwindle. It is also worth noting that there is evidence of illegal

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supplies of those HFCs which have already been banned, like R404a, and this is likely to be the case for R134a as well.

## Deposit Return Schemes



The AVA is responding to a consultation from DEFRA on a deposit return scheme for England, Wales and Northern Ireland. At best this would come in during 2024, some 2 years after the Scottish scheme. The consultation accepts that the recovery of paper cups is best achieved through a discrete scheme. This situation will only continue if the rate of recycling

of these cups is seen to increase year on year and the industry has to encourage clients to participate in recycling schemes in order to make this happen.

The consultation also proposes that on sites where the only source of products incurring a deposit is a vending machine there does not have to be a reverse vending machine.

These two positions have only been achieved after a great deal of work by the AVA environment committee.

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