



Department of Agriculture, Water and the Environment
Ozone & Climate Protection

Dear consultation team,

AIRAH supports limits on air conditioning units using high-GWP refrigerants.

The Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) appreciates the opportunity to provide comment on the proposed plan to limit the import and manufacture of small air conditioning units using high GWP (global warming potential) refrigerants.

As Australia's peak membership body for professionals and practitioners working in the heating, ventilation, air conditioning and refrigeration (HVAC&R) industry, AIRAH counts more than 10,000 members among our ranks. In recent months, a number of our members have raised concerns about the progress of the HFC phase-down in stopping the import and use of high-GWP refrigerants, so it is encouraging to see the department proactively addressing the issue.

AIRAH strongly supports the proposed action. Below we have answered the specific questions posed in the consultation paper.

More generally, AIRAH notes that the current lack of restrictions on pre-charged equipment has led to a slowdown in the phase-down of HFC refrigerants. Considerations should be made around all self-contained equipment under this type of limitation.

Scope of category

We agree with the types of equipment that would be covered. We do not believe there are any units that should be excluded or treated differently. We agree that the limit should apply to equipment with a maximum charge size of 2.6kg.

AIRAH would welcome an extension of this type of measure for other self-contained equipment using high-GWP refrigerants. We believe a more comprehensive charter that enables further restrictions over coming years would stimulate innovation from local manufacturers and businesses.

GWP limit

AIRAH agrees with the proposal to set a maximum GWP of 750 for refrigerants in the above systems.

Hazard classification of refrigerants

We do not foresee any situations where use of a small AC with A2L refrigerant would pose an unacceptable risk or would require impractical risk mitigation measures.

Timing of restrictions

We believe that, given the penetration of R32 in this sector of the market and the fact that the restrictions would not apply to existing equipment, January 1, 2022 would be a suitable date to begin the new restriction.

We note that there could be an opportunity to align timing and limitations with the F-gas Regulation for consistency in the market and considerations around local building codes.

Other considerations

AIRAH is not aware of situations where exemptions to the ban should be given due to suitable alternative equipment not being available.

Another area of influence in this space would be looking for opportunities to prescribe GWP recommendations under Section J of the NCC.

If you have any other questions or would like more information, AIRAH would be very pleased to share our perspective and insights.

Regards,

A handwritten signature in black ink, appearing to read "Anthony Gleeson". The signature is written in a cursive style with a large initial "A" and a long, sweeping underline.

Tony Gleeson, M.AIRAH
Chief Executive
AIRAH