



Hon Trevor Evans MP  
Assistant Minister for Waste Reduction and Environmental Management

Dear Minister Evans,

**AIRAH supports new measures aimed at assisting the phase-down of HFC refrigerants.**

As Australia's peak membership body for professionals and practitioners working in the heating, ventilation, air conditioning and refrigeration (HVAC&R) and building services industry, AIRAH strongly supports the Ozone Protection and Synthetic Greenhouse Gas Program, and the measures introduced in 2016-17 to phase down the import of hydrofluorocarbon (HFC) refrigerants.

Since then, AIRAH has worked to support the program by raising industry awareness of the phase-down and its implications. We have done this through our communications and publications, through our professional development offerings, through our events and conferences, and through special projects such as the development of the Flammable Refrigerants Safety Guide, in which we worked hand in hand with the then the Department of the Environment and Energy. We believe that these efforts have helped strengthen the program.

This work also allows us to gauge the response of industry, and to note any concerns of stakeholders. AIRAH counts more than 10,000 members among our ranks, and especially over the past six months, a number have raised concerns about the progress of the HFC phase-down in certain areas.

One area of concern raised by our members is the stubborn presence of refrigerant R404A.

R404A was introduced in the mid-1990s as a replacement for ozone-depleting refrigerants such as R12 and R502, and later as a replacement for R22. It is used in low- and medium-temperature refrigeration applications, such as commercial refrigeration, supermarket display cases, cold rooms, transport refrigeration and process cooling.

According to the *Cold Hard Facts* series of reports, despite its tag as an "outgoing" refrigerant and its global warming potential of 3,922, R404A still represents at least 20 per cent of all refrigerant used in the economy, based on metric tonnes. Based on GWP, it represents more than 35 per cent.

Alternatives are available, but R404A is still the cheapest first cost low-temperature refrigerant on the market. For this reason, our members believe that additional measures are warranted.

AIRAH is aware that the *Ozone Protection and Synthetic Greenhouse Gas Management Legislation Amendment Bill 2017* included provisions for future bans on the import of new equipment containing high-GWP HFCs, in cases where targeted action is required. AIRAH applauds the recent proposal to limit the import and manufacture of small air conditioning units that use high-GWP refrigerant. This kind of measure can significantly strengthen the program.

We believe a similar proposal could be developed around low- and medium-temperature refrigeration equipment, such as that which uses R404A. AIRAH would be very happy to brief government on our perspective and insights and provide further data to validate this suggestion.

Regards,

A handwritten signature in black ink, appearing to read "Anthony Gleeson", is positioned below the "Regards," text.

Tony Gleeson, M.AIRAH  
Chief Executive  
AIRAH