



Dear Sir / Madam,

The Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) appreciates the opportunity to provide input on the Regulatory Impact Statement – Open flued gas space heaters. This work aligns closely with our mission to create and Australian heating, ventilation, air conditioning and refrigeration (HVAC&R) industry that is highly skilled and professional, safe, sustainable and environmentally effective.

Last year we provided feedback on the discussion paper about open flued gas space heaters (OFGSHs) in Victoria. At that time we supported Option 5 – the introduction into Victorian regulations of new minimum safety requirements that OFSGH models must meet in order to be certified for supply and installation – but noted that the goal should be to update the Australian Standard. We strongly recommended that the Victorian government work with Standards Australia to ensure that any new Victorian regulation is reflective and adopted in a new national standard that will be adopted in all states and territories.

We also strongly recommended that Victoria engage with industry and Standards Australia while developing the new regulations, to ensure that all industry stakeholders have enough time to adjust to any regulatory changes.

It is encouraging to see that the phase-out process has continued, despite the challenges of 2020. AIRAH commends the Department of Environment, Land, Water and Planning on the regulatory impact statement, which lays out the issue and the options comprehensively and clearly.

After reviewing the options presented, AIRAH supports the preferred option 2: fast-tracking the implementation of changes to the Australian Standards and adopting stringent new safety requirements for open flued gas space heaters by January 1, 2022. We note that this option allows for amendments to the Gas Safety (Gas Installation) Regulations to be made if the Australian Standards amendments and GTRC process are not progressing reasonably towards a compliance date of January 1, 2022.

AIRAH offers its support in communicating these changes to our members and the wider HVAC&R industry as required.

As a final note, we wholeheartedly support the primary objective of the RIS – of ensuring the health and safety of the community by reducing the risk of CO exposure from new OFGSHs in Victoria. AIRAH also supports the other considerations listed in Chapter 2 of the RIS, with one exception.

We do not believe that maintaining consumer confidence in gas should be included as an objective of this RIS. AIRAH advocates for low-emissions HVAC&R systems, regardless of the technology. We do not believe one type of approach should be protected or promoted over others; rather, the overall effectiveness of each solution and its impact on the environment should be evaluated to select the best option.

Regards,

A handwritten signature in black ink, appearing to read "Tony Gleeson". The signature is written in a cursive style.

Tony Gleeson, M.AIRAH  
Chief Executive  
AIRAH