



Wednesday, August 2, 2023

VEU Consultation Team

Energy Demand, Programs and Safety | Department of Energy, Environment and Climate Action

The Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) thanks DEECA for the opportunity to provide feedback on the review of the refrigerated cabinets (RC) activity under the Victorian Energy Upgrades (VEU) program.

AIRAH is Australia's peak membership body for professionals and practitioners working in the heating, ventilation, air conditioning and refrigeration (HVAC&R) industry. It is our mission to create and Australian HVAC&R industry that is highly skilled and professional, safe, sustainable and environmentally effective, and we commend the work done by the Victorian government through the VEU to boost the uptake of higher efficiency HVAC&R equipment. In the case of RCs, there is a real opportunity for improving the energy efficiency of our equipment fleet.

AIRAH supports the changes proposed to the RC activity, with the following notes:

- Q8: The new registration fees proposed VEU and GEMS registration will disproportionately impact large suppliers with a wide range of high-efficiency RCs. We recommend that similar RCs be grouped together for registration purposes, and the fee only be charged once for the group of products.
- Q9: With regards to the limit of two new RCs, some business types – for example, chain supermarkets – should be exempted to ensure the scheme maximises energy savings.
- Q12: AIRAH recommends that the VEU adopt an approach for RCs similar to the NSW Energy Savings Scheme (ESS), which requires pre-installation photos of old equipment decommissioned, a scrap receipt, and the requirement demonstrate due diligence around recovered refrigerant where applicable. Managing “like for like” with the same class would be impractical, as it is very difficult to match cases from an old technical standard with classes in a new technical standard, and this in turn could prevent end-users selecting the solution that would achieve the best outcome for the next 15 years. If the VEU still prefers a “like for like” approach, this could be achieved by comparing overall length of cases decommissioned versus overall case length installed, regardless of class (with a reasonable tolerance built in).
- Q13: AIRAH supports the proposed co-payment model. We believe that setting the co-payment at \$1,000 would prevent much of the malpractice identified in the consultation document.
- Q15: In terms of timing, summer is a period of extremely high demand that puts pressure on all parts of the HVAC&R industry. AIRAH recommends that the existing regulations stay in place until at least the end of March 2024, to allow end-users to complete installations.

In summary, the changes to the RC activity risk decreasing abatement rather than increasing abatement, by introducing too many broad brush impractical requirements in order to re-introduce self-contained cases. If these requirements result in impeding the installation of high-efficiency remote RCs, it may be better to exclude self-contained cases from Activity 32.

If you have any questions or would like to discuss any of the points in more detail, please let me know.

Mark Vender
Advocacy Lead
AIRAH