



**SUBMISSION ON WHETHER TO INCORPORATE
REFRIGERANT LREAKS INTO NABERS**

September 2024

Who We Are

Refrigerants Australia

Refrigerants Australia, formed in 1989, is the peak organisation representing the supply chain of refrigerants both in bulk and in equipment. Its members include bulk refrigerant importers representing over 95% of all refrigerants sold in Australia, AREMA (equipment importers and manufacturers), Australia Refrigerant Wholesalers Association, several contractor organisations representing people on the tools using refrigerants, and Refrigerant Reclaim Australia, Australia's award winning refrigerant recovery organisation.

Refrigerants Australia is committed to:

- Reducing the environmental footprint of all refrigerants
- Improvements in energy efficiency in refrigeration and air conditioning equipment
- Safety of all refrigerants
- Preparing industry for a low emissions future
- Encouraging government regulation that delivers environmental benefits.

Air Conditioning and Refrigeration Equipment Manufacturers Association

Established in 1967, AREMA (Air-Conditioning & Refrigeration Equipment Manufacturers Association of Australia) represents the interests of air-conditioning and refrigeration equipment manufacturers active in the Australian market. We work with government and industry on policy formulation and regulation to achieve the best outcomes for our members and the wider community.

AREMA's aims are to:

- Help reduce the environmental footprint of air conditioning, heat pumps and refrigeration in Australia.
- Encourage members to design and manufacture energy efficient equipment.
- Encourage our members to deliver real energy savings to consumers.
- Reduce ozone depleting substances (ODS) and greenhouse gases in a safe and controlled manner.
- Work closely with government to ensure the safe implementation of standards that will benefit end users and product designers.
- Work with other local and global associations to ensure we adopt world's best practice.
- Provide a unified voice for representation to government and industry on key issues.
- Represent the air conditioning and refrigeration industry on key standards committees and, where possible, assist members to interpret these standards.

Response

- Refrigerant leaks from buildings are a significant source of emissions which, through proper maintenance, can be significantly minimised across the economy.
- Maintenance of HVAC equipment, on a building-by-building basis, reduces the likelihood of leaks occurring but is not a guarantee that they will not occur.
- Just like a well-maintained car can still suffer a breakdown, an HVAC system subject to a thorough and regular maintenance regime can still suffer a refrigerant leak and even – if a compressor burns out – loss of the complete charge. Maintenance reduces, but does not eliminate, the risk.
- Maintenance also improves energy outcomes and increases equipment life.
- At the same time, NABERs would want to incentivise the timely repair of HVAC systems and ensure that HVAC systems operate on the appropriate charge as failure to do so costs energy and reduces equipment life.
- Linking repair and adding refrigerant to an HVAC system to a reduction in a NABERs rating sets the wrong incentive to the market.
- NABERs should encourage repair and ensuring systems operate on a full refrigerant charge. Otherwise, a building owner looking to maximise their rating would delay repair and refilling – a perverse outcome.

Recommendation

- Refrigerants Australia and AREMA would, therefore, recommend that instead of assessing refrigerant leaks as a basis for a NABERs rating, that appropriate maintenance regimes and timely leak detection capacities be incentivised through the NABERs scheme.

Additional facts

- Refrigerants Australia has long identified this topic as one of critical importance and struggled to get policy interest. Some of the inertia has been due to the dearth of quality information across Australia and globally.
- Refrigerants Australia has supported 3 studies looking to address the topic of maintenance including assessing the performance of HVAC systems across Australia, assessing the consequences of poor maintenance and in a study nearing completion, gaining detailed data on leak rates across a variety of HVAC and R equipment types.
- Refrigerants Australia and AREMA would be delighted to brief NABERs on these findings and discuss better targeted and appropriate policy responses.

Further Contact

Please contact us if we can be any further assistance:

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