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RACCA Australia's submission to the Review of the Ozone Protection and Synthetic Greenhouse Gas Management Programme

RACCA welcomes this review and would like to express the view of contractors.

RACCA has always been fully supportive of emission reductions. There are still RACCA members who have worked through transitions from Methyl Chloride to R12, then from R12 to R134a, and in all these changes careful planning and the acquisition of new knowledge and skills have overcome the challenges presented.

The industry welcomes the change to very low GWP refrigerants but only if the transition is safe. The safety of our personnel, customers, and the public is paramount. Our view is that all refrigerants are dangerous and should only be used by competent technicians. RACCA believes that new systems development will grow towards very low GWP refrigerants. Ammonia, CO₂, hydrocarbon and HFOs will increase in usage and they each have their own specific safety concerns. RACCA holds the strong belief that no system should be retrofitted without the approval of the original equipment manufacturer or that of a properly qualified independent engineer, as is the case now in Queensland for hydrocarbons.

RACCA holds grave concerns for the safety of its members and their employees due to the inappropriate use of refrigerants by unqualified people. Installing refrigerants into systems for which they were not designed is an unsafe practise made more so as unscrupulous operators, who avoid the current licensing system, do not properly label systems to identify the refrigerant within. RACCA members may be called to work on a system containing highly flammable refrigerant but where there are no external indications of the dangerous nature of the changed contents.

With the knowledge of all refrigerants being dangerous, RACCA wants to see all refrigerants being controlled and included in the ARC licensing system. Also, given the loophole exploited by unqualified operators, RACCA would like to see the ARC licensing system expanded to become an occupational as well as an environmental licence, as well as increased efforts in compliance testing and auditing. Further, RACCA would like to see the Certificate II split system licence discontinued. The training and knowledge provided through the Certificate II qualifying course is inadequate to ensure the proper and safe installation of split air conditioning systems.

Another area of concern is the lack of responsibility for refrigerant by equipment owners. Importers, sellers, and tradespeople working with ozone depleting and synthetic



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greenhouse gas refrigerants require licences and must meet certain conditions, particularly regarding emissions. Not so equipment owners even if they have a system containing tonnes of refrigerant. RACCA strongly supports regulations requiring equipment owners to act responsibly by ensuring only properly licensed technicians work on systems; by ensuring systems are properly maintained to reduce direct and indirect emissions through refrigerant leakage and excessive power consumption; and by ensuring the proper and safe disposal of refrigerant at end-of-life. In particular, RACCA would welcome the requirement for regular service and maintenance of any equipment with a charge of 3kg or over. Servicing would include a thorough leak test and costs would be more than offset by the saving from improved efficiency and performance and lower indirect emissions, as noted in the cost benefit analysis.

At the round table meeting in Melbourne, Mr Bob Baldwin said to put everything out there, so with this in mind, I would like to put forward additional important ideas and initiatives.

As noted above, RACCA supports the expansion of the ARC licensing program to incorporate all refrigerants. We also support stronger enforcement and consequences for non-compliance. For example, strong fines and potentially loss of licence should be imposed on companies and technicians that work in an unsafe manner that puts others at risk, such as retrofitting systems to refrigerants that have not been authorised by an independent engineer.

RACCA strongly supports mandatory labelling of all equipment so that technicians immediately know the type of refrigerant in the system. Labels should also display information about the system and the company that has worked on the system. During the change over from CFCs to HFCs there were many systems that did not have labels identifying the new refrigerants.

RACCA believes a thorough risk assessment must be completed before any change of refrigerant. If by changing the refrigerant the risk is increased, then an independent engineer or the equipment manufacturer must give approval. The independent engineer giving approval must be an engineer who is highly competent in system design and safe use of refrigerants.

RACCA would also like to see a technical working group formed to look at developing a full risk matrix for the safe use of refrigerants. RACCA could fulfil the role of co-ordinating this as it has worked previously on training packages for CO₂ and hydrocarbon safe use.

The standard of apprentices needs to be vastly improved: if the standard of technicians improves, then work practices will also improve. The fear of working with low GWP refrigerants is that the standard of work practices could put the public at risk. It would be



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good for governments to help promote the refrigeration and air conditioning industry to attract a better standard of apprentices. In addition to attracting high quality apprentices, greater investment is needed in training and course development. Governments must invest more in trade training programs and institutions to ensure Australia has enough tradespeople to meet the challenges of a rapidly changing industry.

In conclusion, RACCA would like to see Option 4 of the Options Review Paper adopted, as RACCA believes that the industry is up for the challenge of moving over to low GWP refrigerant in a controlled way.

Should you require any further information, please contact me.

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