



December 1, 2015

Mr Tim Edwards
Australian Refrigeration Association
PO Box 2167
Bowral NSW 2576

Dear Tim

We are writing out of concern we all have in relation to some of the inaccurate public pronouncements that you have made about the review of the *Ozone Protection and Synthetic Greenhouse Gas Management Act*.

We have a number of areas where we believe you are misleading industry, but we will focus only on the main ones in this letter.

1. You suggest that the industry has not had an opportunity to raise issues with the Department of the Environment and industry needs to “stir” them now. Quite simply, this is incorrect. Following the release of the terms of reference reviewing the legislation in May 2014, the Department established a Technical Working Group (TWG) that met repeatedly to input into the Act review. We (the authors of this letter) were all on the TWG, as were you. You did not bring a single proposal or concrete suggestion for consideration by the Working Group over the course of many meetings. Also, where you now suggest that the analysis (eg. the cost benefit analysis) is inaccurate, you remained silent during the meetings. You had, as we all did, an opportunity to make suggestions, present views, and table proposals. ARA’s failure to get its views across is due to your inaction, not the Department’s failure to listen.
2. You state that ARA is a leading industry voice. Mainstream industry voiced its view during the TWG and is represented by the organisations we represent. We do want to highlight that you do not represent us or mainstream industry. The majority of your support, as indicated on your website, comes from companies selling hydrocarbons for use in retrofits. In claiming everyone else is driven by a commercial motive and you are not, is simply inaccurate. Further, you claim that you are the only organisation supporting “natural” refrigerants, however Refrigerants Australia represents companies that manufacture and sell and use more than 90% of carbon dioxide and ammonia refrigerants, a point you fail to recognise. We all think that natural refrigerants have a role today and one in the future.
3. You claim that HFC systems are consistently less efficient than hydrocarbon systems, yet you have failed to provide any data to support this assertion. Indeed, as you know (because you were there when it was announced), one of the only models of air conditioning systems on the Australian market using HC refrigerants recently failed MEPs. Without data – and with contrary evidence – your claim on HCs always being ‘more efficient’ is simply not substantiated and most likely false.

4. As representatives of mainstream industry, we agree there is a training gap that must be addressed. You imply, however, that nothing is happening in this space and that this is a government responsibility alone to solve. We disagree. As responsible manufacturers, suppliers, contractors and service organisations we believe we share an obligation to respond to industry needs. This is why our organisations and member companies have been instrumental in providing industry support. This includes AIRAH's training on flammables, VASA's training on new refrigerants, AREMA's development of a course on A2L refrigerants and training by companies when they introduced R32 and R1234yf. Further, this is why AREMA, AMCA and the ARBS Foundation have recently launched a scholarship program. Industry is clearly taking action – including working both with, and independently from, Government to address our issues. While we note you have raised concerns on these issues, we do not have any information regarding what investments ARA has made to solve these problems.

5. You suggest that the RAC industry can improve its environmental performance. We agree. Indeed, mainstream industry has been arguing for an HFC phasedown since 2007 – a fact you consistently fail to acknowledge. We also believe you need to recognise industry's recent successes. Emissions from refrigerant have declined by an order of magnitude over the last 15 years, and energy efficiency has improved by more than a third. These are tremendous successes. Can and should we do more – yes, but the implication that mainstream industry is ignoring pressing environmental issues is disingenuous and fails to account for real victories.

Tim, we appreciate that you have your views and that you want to garner support for them. That is appropriate. As you do so, however, we encourage you to be accurate and fair in your claims.

Yours sincerely

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