

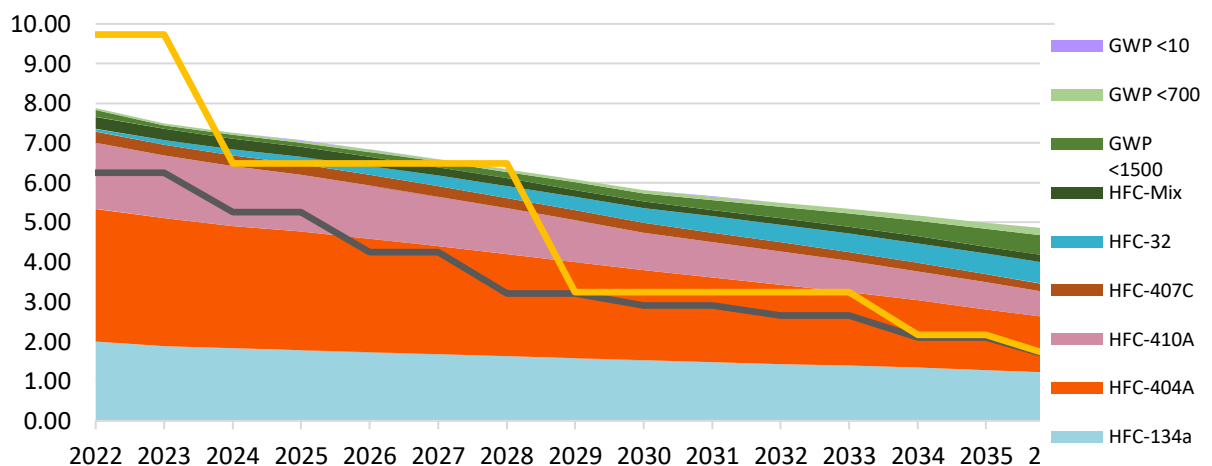


## SUBMISSION ON COMMERCIAL REFRIGERATION

Refrigerants Australia and AREMA thank the Department of Climate Change, Energy, Environment and Water for the care they have taken in preparing the discussion paper and in considering the relevant issues. Refrigerants Australia is broadly supportive of the recommendations and will keep our submission brief. That said, as always, we stand ready to provide further advice or input if there are issues that arise requiring more detailed consideration.

### Overarching points

- The issue of high GWP refrigerants being used in commercial refrigeration is a significant issue. Not only does this heavy use result in markedly higher emissions than would otherwise occur, it also will lead directly to significant issues in supplying all refrigerants needed by the Australian market later in this decade due to the HFC phasedown. This issue need not have arisen – alternative technologies with better performance and lower GWPs are available and there are even refrigerants that can be used in existing system through a retrofit that see both reduced refrigerant and energy emissions. Prompt action is critically needed. **Refrigerants Australia and AREMA call on the Government to introduce GWP limits on equipment from 1 January 2026.**
- As was explained by the Expert Group at the ARBS Exhibition the issue is time critical. Australia's refrigerant market will suffer higher prices and emissions without rapid implementation of GWP limits.



- The transition to new technology is readily achievable. It has been largely completed in Europe and New Zealand and is underway in the USA. While the Australian market will need to adapt, there are positive models we can base our transition on.
- Refrigerants Australia and AREMA believe that the main barrier to transition to date is lack of knowledge about the technology and industry apathy. Given the scarcity of quota over the short term the costs of refrigerant are not a significant barrier to uptake.

### GWP Limits

Refrigerants Australia and AREMA support the specific GWP limits as proposed by the Department, with the only exception being that low temperature for medium commercial refrigeration should be defined as -10, not -20. These limits are:

- Self-contained, plug in commercial refrigeration equipment – 150 GWP
- Medium commercial refrigeration – GWP limit of 1500, except for low temp (minus 10) where 2,500 GWP limit followed by 1500 GWP limit in 2028
- Large commercial refrigeration – GWP limit of 1500 changing to 150 in 2028
- Process and industrial refrigeration – GWP limit of 150

### Limits on refrigerants

As previously discussed, Refrigerants Australia and AREMA also contend there needs to be phased-in limits on the import, reclamation and sale of high GWP gases (R404A and R507A) used in commercial refrigeration. Without these we run the risk that there will continue to be use and emission of these refrigerants even though they are after their “use by” date.

#### **We propose:**

- As of 1 January 2028, that R404A and R507A be prohibited from imports.
- As of 1 January 2030, that R404A and R507A be banned from reclamation.
- As of 1 January 2032, that a sales ban be implemented on R404A and R507A. This would make it illegal for contractor to sell (or gift) refrigerant, but an equipment owner could reuse his existing stock for maintenance purposes.

### Additional Points

- Training is needed to ensure that the refrigerant transition delivers good performance and is safe. Support by Government to industry for some of the additional training needs that will emerge in refrigerant transition is critical.
- The Government also needs to recognize that the refrigerant transition will see greater uptake of highly flammable, highly pressurized and/or toxic refrigerants. There is an onus on the Government to take a leading role in managing these safety aspects given their knowledge of the issue and leadership potential.
- There are other opportunities, such as mandatory maintenance, that should be considered as policy solutions to reduce emissions. Refrigerants Australia believes they are out of scope for this policy formulation but should be considered in the near future.

### Further Information

If you would like any detail on these points, or if there is anyway we can assist, please contact Dr Greg Picker (details below).