



SUBMISSION ON QUEENSLAND BUILDING PLAN MECHANICAL SERVICING LICENSE – AIR CONDITIONING & REFRIGERATION

Refrigerants Australia – who we are

Refrigerants Australia is the peak body covering the supply chain of refrigerants both in bulk and in equipment. Our members include:

- Importers providing in 90%+ of all bulk refrigerants sold into Queensland
- Equipment importers and manufacturers supplying in excess of 80% of air conditioners sold in Queensland and a sizeable percentage of refrigeration kit sold in Queensland represented through the Air Conditioning and Refrigeration Equipment Manufacturers Association (AREMA)
- Refrigerant wholesalers and the Australian Refrigerant Wholesalers Association providing refrigerant and parts to Queensland.
- Contractor organisations, including AMCA, RACCA and VASA representing hundreds of companies, contractors and tradespeople across the State.
- Refrigerant Reclaim Australia, an award winning industry led and funded program that collects and destroys old refrigerant.

The Consumer Electronics Suppliers Association (CESA) also supports this submission.

As a result of our members, we have a good view on issue impacting on our sector both nationally and internationally.

Overarching Position on Licensing

Refrigerants Australia supports licensing programs for our sector as it can help address a number of issues, including:

Safety: All refrigerants have risk – high pressure, flammability and/or toxicity. These risks are highest for the individuals working directly with refrigerant, but also include the general public.

Technical complexity: Refrigeration and air conditioning equipment are sophisticated requiring a high degree of technical expertise to ensure they work well and safely, and the level of complexity is increasing. The consequences of poor installation and maintenance are profound and include safety, performance, and environmental impacts.

Energy and Environment: Air conditioning and refrigeration equipment use more than 20% of Australia's annual electricity production: given the climate that percentage is probably greater in Queensland. Poorly installed and maintained equipment – which represent perhaps 20% of all equipment – runs up to 40% less efficiently, suffers more breakdowns and had a shorter lifespan. Additionally, it can lead to direct emissions of refrigerants. Ensuring

that the people who install and service equipment have the requisite skills is one of the key ways this impact can be lessened.

Necessary elements of a licensing proposal

In order for a licensing program to be effective, a number of criteria must be met.

1. There has to be clarity on (and analysis of) the problem(s) that are attempting to be addressed through provision of a license. As detailed above licensing in this industry can address a number of issues. Without clarity as to the intent of the license and analysis confirming the benefits of a license there is a real risk of perverse outcomes.
2. Requirements for a license need to mirror the expected deliverables for the license scheme. Without requirements matching the aims the license scheme will not be effective
3. Industry has learned over time that a license by itself does not deliver the expected outcomes unless it is supported by a robust compliance and enforcement scheme.
4. Preferred licensing schemes are national in scope and comprehensive: covering all refrigerants and all relevant issues (ie safety, environmental, energy and performance).

The Queensland Proposal

As it stands now Refrigerants Australia cannot support the proposed mechanical license scheme in Queensland. There are a number of reasons for this including:

- There is no clarity on why a license is being proposed and what issue(s) it is intended to address. Without clearly identifying why there is a license and what issue is being addressed there is a risk that the license is just a meaningless and expensive burden on industry.
- The requirements proposed for getting a Queensland license – training as a plumber – are woefully insufficient to the requirements to work in the trade. The competencies necessary to gain a license must be closely tied to the level of performance required. Training as a plumber cannot meet the requirements of the broad air conditioning and refrigeration industry. Further, those competent people working in the trade today – with appropriate training, but not as a plumber – would then be excluded from the industry.
- The license proposal fails to consider how it will work in with other licenses that already exist – namely the license for people using hydrocarbon refrigerants run out of the Department of Mines and Energy and the Federal environmental license run by the Australian Refrigeration Council (ARC).
- No details are provided on enforcement and compliance activities. To support a license industry must be assured that those people who do not have a license and do the wrong thing will be identified and punished. Without this certainty the license costs are just an economic burden and of little value.

Proposed Next Steps

Refrigerants Australia calls on the Queensland Government to work closely with industry, particularly the ARC, to reform the current proposal in order to ensure it delivers its aims. In considering how to progress a Queensland license innovative solutions should be considered.