



The Alliance

for Responsible Atmospheric Policy

August 1, 2016

The Honorable Karen Andrews, MP
Assistant Minister for Vocational Education and Skills
House of Representatives
Parliament House
Canberra ACT 2600

Dear Assistant Minister,

I am writing on behalf of the Alliance for Responsible Atmospheric Policy (“Alliance”) to provide comments regarding the guidelines released on April 13, 2016 by the Industry Skills Councils, *Retrofit and Modify Air Conditioning and HVAC Systems* (AURETU3005).

The Alliance is an industry coalition organized in 1980 to address the issue of stratospheric ozone depletion as well as the production and use of fluorocarbon compounds. It is composed of manufacturers, businesses and trade associations, which make or use fluorinated gases in their course of business. The US fluorocarbon using and producing industries contribute more than \$158 billion annually in goods and services to the US economy, and provide employment to more than 700,000 individuals with an industry-wide payroll of more than \$32 billion. In August 1986, one year before the Montreal Protocol treaty was signed, the Alliance was the first industry organization to call for an international environmental agreement to address ozone depletion when the science demonstrated that the world needed to cooperate on this global environmental threat.

Today, the Alliance coordinates industry participation in the development of reasonable international and government policies regarding both ozone protection and climate change. At the same time, Alliance member companies are leading the development of next-generation technologies and applications beneficial to the climate and ozone layer. A list of Alliance member companies is attached.

The Alliance is proud of its long history of working constructively with governments at the international, national and sub-national level on the protection of stratospheric ozone and climate change. Since September 2014, the Alliance has publicly expressed support for global and domestic efforts to reduce the emissions of high global warming potential (GWP) HFCs and to

promote technology innovation for low-GWP substitute compounds and technologies. Alliance members have pledged to take actions and support policies to reduce global HFC use by 80 percent by 2050.

While supporting a transition which provides both environmental and economic benefits, the Alliance has called for this transition to be pursued in a manner which recognizes the importance of proper servicing practices, including safety considerations.

The Alliance is aware that the revised *Retrofit and Modify Air Conditioning and HVAC Systems* guidelines provide instructions on completing system retrofits with both hydrocarbons and new, low-GWP HFC-1234yf. This form of retrofit conflicts with the standards set forth by the Society of Automotive Engineers (SAE).

Vehicle air-conditioning systems are tailored to specific refrigerants based on those standards. Replacing a unit's refrigerant with hydrocarbons or HFO-1234yf, which are highly and mildly flammable respectively, creates a grave risk to servicing technicians if a system is not designed for those refrigerants. These low-GWP refrigerants should only be used in equipment designed to accommodate their distinct properties and technical attributes. Retrofitting an existing system that was not designed for flammable fluids with flammables is not a safe practice.

Furthermore, the retrofits in question are prohibited by regulations in the United States and numerous state jurisdictions in Australia, including Queensland. Given that this publication carries the seal of the Commonwealth, implying an endorsement of these practices by the federal government, there is likely to be significant confusion regarding regulatory compliance.

Though its members come from the fluorocarbon community, the Alliance has consistently advocated for a "technology neutral" approach to phasing down HFCs under the Montreal Protocol. This term means that the choice of refrigerants chosen to implement the phase-down should be chosen based on their performance and safety, rather than their class of compound. In this respect, the concerns outlined here are not intended to give advantage to any one refrigerant over another, but to ensure the safety of those using and maintaining our industry's products.

The Alliance applauds the Industrial Skills Councils' intent to build the capacity of the refrigerant servicing sector. Even for low-GWP refrigerants, increasing proper handling and management of refrigerants is critical for maintaining the energy efficiency of air-conditioning systems, thereby limiting their climate impact.

Our members are fully engaged in the regulatory and policymaking process, providing detailed information on technologies when appropriate. The Alliance strongly encourages your ministry to consider rescinding or revising this update to the noted guidelines. We would be happy to meet with you or your staff to provide further perspective on the transition to low-GWP alternatives.

If you have any questions, please feel free to reach me at fay@alliancepolicy.org or +1(703)243-0344.

Sincerely,

A handwritten signature in black ink, appearing to read 'KF' followed by a stylized flourish.

Kevin Fay
Executive Director
Alliance for Responsible Atmospheric Policy

cc:

The Honorable Josh Frydenberg MP, Minister for the Environment and Energy
Dr. Gregory Picker, Executive Director, Refrigerants Australia



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Members

AGC Chemicals Americas
A-Gas/RemTec
Air-Conditioning, Heating &
Refrigeration Institute
Airgas
American Pacific Corp.
Arkema
Association of Home
Appliance Manufacturers
Auto Care Association
Bard Manufacturing Company
BASF
Brooks Automation, Inc.
Cap & Seal Company
Carrier Corporation
Center for the
Polyurethanes Industry
Chemours
Combs Gas
Consolidated Refrigerant
Solutions
Daikin Applied
Danfoss
Dynatemp International
Emerson Climate
Technologies
E.V. Dunbar Co.
Extruded Polystyrene Foam
Association
Falcon Safety Products
FP International
Golden Refrigerant
Halon Alternatives Research
Corporation
Heating, Air-conditioning &
Refrigeration Distributors
International
Honeywell
Hudson Technologies
Hussmann
ICOR International
IDQ Holdings
Ingersoll-Rand
International Pharmaceutical
Aerosol Consortium
Johnson Controls
Lennox International
Metl-Span Corporation
Mexichem Fluor Inc.
Midwest Refrigerants
Mitsubishi Electric
National Refrigerants
Owens Corning Specialty &
Foam Products Center
Rheem Manufacturing Company
Ritchie Engineering
Solvay
Sub-Zero
The Dow Chemical Company
Whirlpool Corporation
Worthington Cylinder