Airconditioning and Refrigeration Equipment Manufacturers Association: Submission on Application by Refrigerant Reclaim Australia for Revocation and Substitution of A91008.

Background

The Airconditioning and Refrigeration Manufacturers Association (AREMA) has represented the interests to the Australian manufacturers and importers of airconditioning and refrigeration equipment for approximately forty years.

In that time, AREMA has played a leading role in the major issues involving the industry, and over the last decade has had an increasing involvement in environmental issues such as ozone protection, the mitigation of global warming and improved energy efficiency.

A list of AREMA members is attached at Attachment 1.

AREMA has long recognised the need for proper stewardship of refrigerants and was one of the Associations involved in the establishment of Refrigerant Reclaim Australia (RRA) in the early nineties. The organisation’s commitment can be gauged by the fact that AREMA’s then President served concurrently as the inaugural Chairman of RRA.

Application A91079

Application A91079 seeks the revocation of A91008 and its substitution by a new authorisation allowing RRA to increase the levy from $1.50 to $2.00.

AREMA members have been closely involved in the process that has led to the decision to seek to increase the levy.

The financial analysis undertaken by RRA, and included in its submission, is drawn from the regular reporting RRA supplies to all stakeholders, and AREMA members are well aware of the underlying factors necessitating the proposed increase in the levy.

While conscious of the needs to minimise costs to equipment manufacturers and importers, and thus to our customers, AREMA members recognise that the additional costs of $0.50 per kilo of fluorocarbon refrigerant are far...
outweighed by the public benefit flowing from the continued successful operation of RRA.

As detailed in the RRA submission, the cost of refrigerant is a very minor component of the total cost of refrigeration and airconditioning equipment.

To some degree, RRA has been the victim of its own success. The expansion of the program to include HFCs, and the considerable success in increasing the volume of returned material each year have inevitably led to increased costs.

Summary

AREMA members are closely involved in the administration of RRA, and understand and support the proposal to increase the levy to $2.00 per kilogram.

RRA remains possibly the most successful product stewardship program of its type in the world, and performs an extremely valuable and effective role in minimising the emissions of fluorocarbon refrigerants in Australia.

Bill Robertson
President
25 January 2008
Attachment 1. AREMA MEMBERSHIP

Accent Air
ActronAir Actron Air
Australian Air Filters Pty Ltd
Camfil Farr
Cold Rae Pty Ltd
Airwell ECP (Australia) Pty Ltd
Fan Coil INDUSTRIES Fan Coil Industries Pty Ltd
Haier Haier Electrical Austlaii Pty Ltd
Industrial Cleaning Service
McQuay™ McQuay Australia Pty Ltd
Mitsubishi Heavy Industries Australia Pty Ltd
Pioneer AIR Conditioning Pty Ltd
Refrigerated Air Pty Ltd
Sanyo Sanyo Airconditioning Australia Pty Ltd
Soxon Pty Ltd
Tontine Fibres

Actrol Parts
Advantage Air Advantage Air
Bettersafe Air Filtration Pty Ltd
Clean Air Technology Australia
Daikin Australia Pty Ltd
Emerson Network Power Australia Pty Ltd
Fujitsu General (Aust) Pty Ltd
Heatcraft Australia Pty Ltd
M & P Specialised Services
Mitsubishi Electric Australia Pty Ltd
Nicotra Australian Pty Ltd
Polyaire Pty Ltd
Sanden International (Australia) Pty Ltd
Seely International Pty Ltd
Temperzone Australia
Torin Industries Pty Ltd

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Uni Aire Airconditioning Pty Ltd

Trane

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