



Wednesday, 3 November 2010

Gina D'Ettorre
ACCC
GPO Box 520
Melbourne VIC 3001

Dear Ms D'Ettorre

I would like to take this opportunity to make a submission for the Refrigerant Reclaim Australia Limited application for authorisation A91256

Since my appointment as Product Manager for Industrial Gases at Orica Chemicals Australia, my general experience in the dealings with Refrigerant Reclaim Australia (RRA) has been professional, cooperative and constructive.

Please find outline below some benefits that RRA have brought to this market/industry:

The RRA program has facilitated the recovery of approximately 3,500 tonnes of ozone depleting and synthetic greenhouse gas refrigerants since the program began in 1993. In achieving this RRA has provided a significant public benefit as described below.

RRA takes back between 30% and 50 % of all unwanted recovered refrigerant and the program has been globally recognised through awards from the United Nations Environment programme and the US EPA.

Assisting Australian businesses and industries to meet obligations and to control the consumption and production of ozone depleting substances under the Montreal Protocol. The program has so far prevented the emission of sufficient ozone depleting refrigerant to destroy more than eight (8) million tonnes of stratospheric ozone.

Significant contribution to Australia meeting the greenhouse emission reduction targets set out in the Kyoto Protocol. RRA received funding from the Greenhouse Gas Abatement Program, a Commonwealth Government program managed by the Australian Greenhouse Office, to assist in the expansion of the program to take back and destroy synthetic greenhouse gas refrigerants. The volume of gas recovered is currently 76% ahead of the target set, and is the equivalent of 1.27 million tonnes of CO₂.



Encouraging environmental responsibility by industry through the promotion of sound practises and creating awareness of the Impacts from industry activities.

Providing industry with a proven program complied with all regulatory requirements. Also provides the opportunity for all sectors of the industry to meet their environmental and regulatory obligations. RRA is a critical component in a comprehensive industry-wide co-regulatory approach to the reduction of negative environmental impacts. Other components of the program include licensing of importers, sellers, purchasers and technicians, audits of trade contractors, a prohibition on preventable emissions, and the requirement for recovery and safe disposal of ODS and SGG refrigerants.

Furthermore here are some facts and evidence relied upon in support of these claims:

All cylinders and drums of recovered refrigerant taken back by RRA are tested using a gas chromatograph mass spectrometer to ascertain their contents, and to identify the type and volume of ODS and SGG refrigerants being returned.

The resulting chemical analyses are used to calculate the potential reduction in ozone depletion, and the estimated level of abatement of the emission of synthetic greenhouse gases.

The science of ozone depletion and climate change, and the relationship between the phase-out of ODS refrigerants and the use of SGG refrigerants is well explained in the Intergovernmental Panel on Climate Change (IPCC) / Technical and Economic Assessment Panel (TEAP) Special Report Safeguarding the Ozone Layer and the Global Climate System.

In hope that this letter will meet your goals, I would like to thank you for the given opportunity to submit Orica Chemicals Australia view with regards to the RRA application for authorisation A91256

Your Sincerely,

Alex Trajkov

A handwritten signature in black ink, appearing to read 'Alex Trajkov', written over the printed name.