

Melbourne, 11 November 2015

Australian Competition and Consumer
Commission

By email: adjudication@accc.gov.au

Dear Sir/Madam,

Re A91515 – Refrigerant Reclaim Australia - Submission

As founding members, Arkema fully support the activities of Refrigerant Reclaim Australia and the current application as being in the best interests of the industry to manage its product stewardship obligations.

All importers of refrigerants must, as a condition of their import licence, take responsibility for the refrigerant they import through an approved Product Stewardship scheme. RRA is the only such scheme available and Arkema wishes to continue to support RRA in this regard. The ability of RRA members to meet and discuss a whole-of-industry approach to the setting of levies and rebates has been crucial to the past success of RRA and we support the authorisation to allow this to continue.

The activities of RRA have been crucial in encouraging environmental responsibility throughout the broader industry through the promotion of sound practices and creating awareness of the impacts from industry activities, and providing industry with a proven program that complies with all regulatory requirements, while providing a means for all sectors of the industry to meet their environmental and regulatory obligations.

We do not believe there has been any detrimental effect on industry through RRA activities during the past 22 years. On the contrary, RRA has shown over this time a unique position in recovering and destroying ODP and SGG with its award-winning product stewardship scheme. During this period RRA has prevented the emission of enough ozone depleting refrigerant to destroy more than ten (10) million tonnes of stratospheric ozone, and the equivalent of ten (10) million tonnes of carbon dioxide through the collection and destruction of synthetic greenhouse gas refrigerants.

Yours faithfully

For Arkema Pty Ltd



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