

FUJITSU GENERAL (AUST.) PTY LIMITED

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11th November, 2015

Mr Richard Chadwick
General Manager – Adjudication Branch
Australian Competition & Consumer Commission

RE: A91515 – Refrigerant Reclaim Australia - Submission

Dear Richard,

On the 21st of October 2015, we received your letter asking for comments on the applications from Refrigerant Reclaim Australia (known hereafter as RRA) for the re-authorisation for five years to allow it to continue to operate a product stewardship scheme to recover ozone depleting and synthetic greenhouse gas refrigerants to be destroyed, stored, or reclaimed and sold.

The purpose of this letter today is to confirm that Fujitsu General (Aust.) Pty Limited supports RRA's application for reauthorisation.

Fujitsu General also agrees and supports RRA's Authorisation request to be able to:

- Reduce the level of a levy applied to each kilogram of refrigerant imported and sold into Australia
- Set the values of rebates paid to contractors and wholesalers involved in the product stewardship scheme
- The processes used to reclaim recovered refrigerant to on-sell
- To consider alternative destruction services wither in Australia or offshore.

Background

The stewardship scheme operated by RRA is funded by a levy on bulk refrigerant imports and imports of refrigerant contained in equipment. Both types of refrigerant importers must be licensed under the Ozone Protection and Synthetic Greenhouse Gas Management Act and RRA works closely with importers like Fujitsu General to ensure they are able to meet the conditions of their import licence.

Contributors to the program comprise 20 bulk importers and more than 1100 importers of pre-charged equipment, with companies importing less than 100 kilograms per year paying a flat annual fee and companies importing greater quantities charged on a per-kilogram basis each quarter.

In the early days of RRA, the refrigerant in a car air conditioning system was responsible for more than 90 per cent the vehicle's lifetime greenhouse gas emissions, including the manufacture, disposal and fuel burnt. A kilogram of R12 refrigerant released at the end of the vehicle's life was the equivalent of 10 tonnes of carbon dioxide and could destroy 10 tonnes of stratospheric ozone. The air conditioning systems also leaked on average 30 per cent a year – causing continual environmental damage.

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Although most recovery operations yield less than a kilogram of refrigerant, the above example proves the importance of each and every kilogram that is sent for safe destruction.

Since 1993, RRA has safely destroyed over 5000 tonnes of refrigerant, equating to 10 million tonnes of stratospheric ozone saved and 10 million tonnes carbon dioxide equivalent (CO₂e) emissions prevented. For context, the CO₂e figure is equivalent to the prevention of 52 billion kilometres covered by an average passenger car or LCV and a significant contribution to Australia's Kyoto Protocol greenhouse emission reduction targets.

RRA has also commenced planning to upgrade its entire handling and destruction operations in readiness for an increase in recoveries of flammable refrigerants such as R32 and R1234yf. This has greatly supported Fujitsu General and other manufacturers in the residential air conditioning market as new technologies are developed where low global warming potential refrigerants like R32 are becoming to be used more commonly in these products.

In closing, Fujitsu General Australia supports RRA's request for reauthorisation for five years to allow it to continue to operate a product stewardship scheme for ozone depleting and synthetic greenhouse gas refrigerants.

Should you wish to discuss this further, you can contact our National Dealer and Commercial Manager – Peter Cashel or our National Product manager – John Bourke on 02 88222500.

Kind Regards

A handwritten signature in black ink, appearing to read "P. Cashel".

Peter Cashel
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