



19 February 2018

Industry Reference Committee Fall Short when it comes to delivery on behalf of the HVAC&R Industry.

Dear Industry Stakeholder,

The Electrotechnology Industry Reference Committee (IRC) deliverance of a complete and comprehensive draft training packages for the HVACR industry is hanging by a thread if its industries tradespeople don't voice their opinions. The opportunity to scope a defining RAC exclusive training package for its tradespeople is urgently needed therefore, we urge you to fill in the survey, so we can present the results to government to keep this a specialist trade it rightly deserves.

As Australia is an important signatory to the Kigali Amendment to the Montreal Protocol, it has an obligation to phase-down HFC refrigerants commencing 1 January 2018. The target is to reduce use of HFC's by 85% by 2036. This is an enormous change for the HVACR industry, because all HFC's should disappear from all new installations over the next few years and ultimately disappear from all systems, with the introduction of more natural refrigerants and lower GWP refrigerants such as R32.

Safety alerts concerning natural refrigerants in the class 2.1 flammable refrigerant gases such as hydrocarbon, ammonia, carbon dioxide, with the exception CO₂, water and air, are already coming in proliferation of split air-conditioners imported into Australia. There are more than 1,000,000 R32 based split air conditioning units installed in Australia now. Although Refrigerant R32 is not a natural refrigerant and has a Global Warming Potential (GWP) of 650 (Climate Control News- 2013) it still belongs to the 2L flammability category – same as ammonia (NH₃) because of its potential of flammability if used incorrectly.

The HVACR industry need urgent support and development of long overdue, improved training packages to ensure transitioning of the use of class 2.1 flammable refrigerant ensuring safety not only for its tradespeople but to cease all peripheral tradespeople working outside of the scope of their work. Unfortunately, industry representatives are losing faith in the IRC under the direction of Minister Birmingham, as necessary tools for the HVAC&R industry are not being administered to

meet the Turnbull governments' commitment to the Kigali Amendment or the COP 21 climate treaty known as the Paris agreement.

The Minister for Education and Training, Simon Birmingham has ignored industry's demands. The Minister for Education and Training, Simon Birmingham, decided instead of an independent HVAC&R lead body under the IRC, he assigned as advised to review the HVAC&R training package under the umbrella of the Electrotechnology IRC. Within the Electrotechnology IRC 15-member committee, only 2 representatives are associated with HVAC&R. The 2 representatives for the HVAC&R industry we believe are not a true representation for the whole of the industry due to their association with the regulator that administers the licensing scheme for ozone depleting HFC giving a possible conflict of interest, while reviewing training packages not inclusive of natural refrigerants.

In concert with the HFC phase-down and subsequent proliferation of flammable and/or toxic refrigerants and refrigerants operating under extreme pressure, additional dimensions need to be added to environmental compliance. These pertain to the risk management associated with the application of flammable and/or working fluids, with the added interest of protection of workers and the public.

As an industry stakeholder you are now being asked to respond in only a few weeks to almost 90 units of competencies. A knowledgeable and fully informed response would require any individual to allocate at the very least 6 months to a full time review. This is to fully understand the qualifications, competencies and the projected impacts on the HVAC&R industry as a whole and on individual businesses.

We struggle to compile a survey to aid you as a stakeholder to provide feedback, as questions require comprehensive knowledge of all the training packages.

We can advise the draft training packages reflect not what the HVAC&R industry needs, but what the electrical industry requires to maintain a stranglehold on your industry. The draft training packages, should they be introduced, fail to deliver the skills outcomes required to work within HVAC&R and would expose the public and tradespeople to significant workplace and general risks.

As stakeholders in the HVAC&R industry support for trade qualifications, specifically certificate III in any area of study is the fundamental building blocks for your trade, but we are now faced with recommendations for a range of qualifications such as Certificate IV Electrical and Air Conditioning or Certificate II in Split System Air Conditioning however, the Certificate III RAC is in question and requires all stakeholders in the HVAC&R industry to stand up and have their say on the outcome of current changes being proposed by the IRC Committee.

The HVAC&R industry is at the precipice of change, and it cannot be underestimated the importance to ensure the Certificate III RAC, is exclusive to its trade with the inclusion of natural refrigerants as core Cert III competency requirements. It is equally important for the HVAC&R industry to break away from the Electrotechnology and Mechanical ideology with its own HVAC&R training package, to future proof and grow the industry to its full potential instead of current divisions due to peripheral trades' influences. Why is there reference to a national licence (ARCTick) when future proofing will see the redundancy of the existing environmental licencing system?

What level of evidence do Australia's political leaders require to remove the barriers inhibiting change process that the HVAC&R industry has already initiated? It is only a matter of time before tragic evidence in the form of injuries or fatalities will be forthcoming. Is this the evidence that is

being awaited before action is taken? Is the political leadership looking for another insulation scandal?

Our Politicians must recognise The HVACR industry is a specialist trade with exceptional skills at all levels which includes electrical and plumbing skills. It is the only trade that has all three within the 4-year apprenticeship they undertake. Therefore, the question this industry should be asking government is when will Government initiate the support so rightfully deserved?

Right from the outset and throughout the whole IRC process, it has lacked transparency, broader consultation with industry stakeholders, minimal integrity displayed, and minimal high standards as suggested by John Polleras, Chair, Australian Industry Skills Committee, in his welcome message to stakeholders.¹

Understandably, the IRC has pressure to fulfil timeframes, but not taking the appropriate time to provide feedback will result in the training packages being approved and an opportunity missed. So, we urge you to take a few minutes to complete the survey and to ask your colleagues to also complete the survey.

We urge you not to assume it will happen, as you must participate and make it happen for your industry to survive as a recognised trade. Your feedback as an individual stakeholder is no different to a politician needing every vote they can secure to win the election. Industry needs your voice and your support so you are heard.

We will guide you through the survey we have compiled and thank you in advance for standing up and making a difference for now and for the future of the HVAC&R industry.

We urge every stakeholder to secure 10 more stakeholders to successfully complete this survey.

Sincerely

Kim Limburg

Mrs Kim Limburg

Chief Executive Officer

38 Ceduna Street,

Loganholme, QLD 4129

Ph: 0403 680 981

Australian Refrigeration Mechanics Association

Email: kim@arma.org.au

Web: <http://www.arma.org.au/>

¹ Industry Reference Committee's Operating Framework 2016