



Airconditioning and Refrigeration Equipment Manufacturers Association: Comments on Draft Queensland Development Code 4.1

Introduction

AREMA is the industry body representing the manufacturers, importers and distributors of air conditioning and refrigeration equipment in the Australian market. Founded in 1967, the organization, the organization acts as a focal point for Governments wishing to interact with what is a very diverse and widely distributed industry

In addition to major Australian manufacturers, membership is drawn from major global companies with head offices in Europe, the U.S. and Asia. The association is actively involved in all industry matters including the development of Australian Standards, progress on Minimum Energy Performance Standards, ozone and climate protection, noise and occupational health and safety matters.

The association has a strong environmental focus combined with a solid technical knowledge base and an awareness of the industries responsibility to the community.

AREMA sees its role as facilitating practical moves towards the sustainability of the industry through partnerships with governments, the community and other industry and professional groups.

The Consultation Process

Unfortunately, both the time allowed for, and the timing of the consultation period has not allowed an adequate consultation with our members, or the development of detailed comments on a number of issues.

The paper was issued on the 19th of December, three working days before Christmas, with comments due on 12 January (extension subsequently granted to 23 January).

This time period is woefully inadequate.

Comments on the Discussion Paper

The Discussion Paper contains a number of errors that will need to be addressed at a later date, as time allows.

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In addition, it would appear that that the thrust of the Paper is built on an erroneous assumption.

The Paper states that Queensland currently has no minimum energy requirements on the sale and/or installation of airconditioning equipment.

However, Chapter 7 of the Queensland Electricity Regulation 2006 specifically prohibits the sale of airconditioners that do not comply with the energy performance levels set out in AS/NZS3823.2. Under the provisions of this Standard, split system airconditioners for example must meet a Minimum Energy Performance Standard of 4.5 stars for systems with a cooling capacity of up to 4kW, and 3.5 stars for systems of over 4kW capacity.

All Australian States and Territories have identical regulatory controls.

The Discussion Paper also states that both Victoria and Western Australia are considering bans on the sale and/or installation of airconditioning units with a Minimum Energy Performance Standard of less than one star.

Given that there are no products operating at a level of less than one star, this approach would seem to be pointless.

MEPS Levels

According to industry advice, any proposal to ban the installation of split system airconditioners with a MEPS level of less than 4 stars is of strictly limited benefit, given that, since 1 April 2006 the bulk of the market is already required to comply with a MEPS level of 4.5 stars, with a relatively small sector of the market at 3.5 stars.

In addition, the existing proposal does not recognize or allow for advances in airconditioner technology, specifically the progress in inverter technology which utilizes variable rather than fixed speed compressors, can have considerable benefits in terms of energy efficiency.

The nature of inverter technology means that under conventional full-load test procedures, developed for fixed speed compressors, such equipment can have a slightly lower star rating. However, under part load, which more closely replicates real operating conditions, inverter product is generally considerably more energy efficient.

This is recognized in AS/NZS Standard 3823.2 and international test standards.

While no doubt well meaning, the simple proposal to apply a 4 star limit would perversely prohibit the use of more energy efficient product.

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In consultation with industry, Australian Energy Ministers have proposed to increase the MEPS levels for split system airconditioners from April 2010, allowing the industry sufficient lead time to source, develop and test new models. This process of effective consultation, recognizing the necessary lead times for the development and introduction of new models and technology, underpins the success of Australia's MEPS program.

These MEPS levels equate to just under 5.5 stars for equipment with a cooling capacity less than 4kW, and over 4 stars for units with a cooling capacity of over 4kW.

This would satisfy the Queensland Government's concerns without the perverse outcomes inherent in the current proposal, which does not recognize the timelines necessary to smoothly and effectively manage the introduction of more energy-efficient products.

Comments on the Draft Code

The Draft Code limits this proposal to hard wired equipment.

Again, if proceed with, this provision would have the effect of encouraging the use of less efficient portable equipment which are less efficient but less comprehensively regulated.

Summary

There is currently an agreed proposal by the Ministerial Council on Energy to increase MEPS levels beyond levels proposed in the Draft Queensland Development Code 4.1. This proposal has been agreed with industry, which have been actively planning to meet this timetable.

It is not feasible to radically alter this timetable at this point in time.

In addition, it is essential for the integrity and future success of the MEPS program that the national uniformity of the program be maintained.

Given the date for the implementation of these new MEPS levels is some 9 months after the proposed date of effect for the Queensland proposal, and noting the possible perverse outcomes of that proposal, AREMA strongly advises that the Queensland Government not proceed with the Draft Queensland Development Code 4.1.

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