

January 14, 2020

Response to the Open flued gas space heaters discussion paper addendum

Dear Sir / Madam,

Thank you for sending us the updated discussion paper about open flued gas space heaters (OFGSHs) in Victoria. Once again, the Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) appreciates the opportunity to respond.

In our first submission, we recommended Option 4 – a standards-based approach. Now a new option has been added: Option 5 – the introduction into Victorian regulations of new minimum safety requirements that OFSGH models must meet in order to be certified for supply and installation.

In principle, AIRAH supports Option 5, however, we still believe that the goal should be to update the Australian Standard. We strongly recommend that the Victorian government works with Standards Australia to ensure that any new Victorian regulation is reflective and adopted in a new national standard that will be adopted in all states and territories.

We also strongly recommend that Victoria engages with industry and Standards Australia while developing the new regulations, to ensure that all industry stakeholders have enough time to adjust to any regulatory changes.

As in our first submission, we continue to support the complementary measures of mandatory installation of CO alarms and mandatory servicing requirements for OFGSHs.

AIRAH has operated since 1920 and is the leading specialist membership association for professionals in the heating, ventilation, air conditioning and refrigeration industry (HVAC&R). This

hidden, yet innovative and essential industry employs over 298,000 people in Australia, is worth \$38 billion annually, uses more than 24 per cent of the electricity generated in Australia annually, and accounts for 13 per cent of the nation's carbon dioxide emissions.

AIRAH's primary aim is to develop the competence and skills of industry engineering professionals and technicians so that they can better meet the public's safety, energy usage, comfort, and emission concerns. AIRAH encourages world's best practice within the industry through continuing professional development, education programs, and a wide range of technical tools and resources.

AIRAH is the only body solely focussed on representing Mechanical Engineering (HVAC&R) professionals. Mechanical Engineers (HVAC&R) are those engineering professionals who plan, design, install, commission, operate, tune, and maintain mechanical machines and systems in the built environment that include air conditioning plants, ventilation systems, chillers, cooling towers, refrigeration systems for food production and preservation applications, transport cooling systems, fire and smoke systems, medical facilities, and control systems.

Regards,

A handwritten signature in black ink, appearing to read "Anthony Gleeson".

Tony Gleeson, M.AIRAH

AIRAH Chief Executive