



Deregulation Taskforce
Department of the Prime Minister and Cabinet
PO Box 6500
Canberra ACT 2600
Australia

Dear taskforce members,

The Australian Institute of Refrigeration, Air Conditioning and Heating (AIRAH) appreciates the opportunity to provide input for the consultation on Automatic Mutual Recognition (AMR).

AIRAH is Australia's peak membership body for professionals and practitioners working in the heating, ventilation, air conditioning and refrigeration (HVAC&R) industry – a hidden, yet innovative industry that is worth \$38 billion, uses more than 24 per cent of Australia's electricity and accounts for 13 per cent of our carbon dioxide emissions. It also employs over 298,000 people, the majority of whom hold occupational licences and will potentially benefit from AMR.

In principle, AIRAH supports the proposal to introduce automatic mutual recognition for HVAC&R workers. We advocate for state and territory registration schemes that are harmonised and mutually recognised, so that registered practitioners can work across jurisdictions without having to pay multiple registration fees.

However, the licensing and registration landscape for HVAC&R technicians is complex, and we believe it deserves special consideration.

HVAC&R technicians in Australia are covered by two licensing regimes: a national environmental scheme; and state-based occupational licence schemes that vary widely in scope.

The national licensing regime is administered by the Australian Refrigeration Council (ARC) to support regulations under the Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 (OPSGGMA), a responsibility of the Department of Department of Agriculture, Water, and the Environment. These licenses are mandatory for purchasing, handling, and working on systems that use synthetic refrigerant gases, but they are focused on controlling the prescribed substances, rather than guaranteeing the quality of work done by the technicians.

We assume the ARC licensing regime will not be affected by AMR, since this licence regime already operates nationally.

At the state and territory level, licensing for HVAC&R technicians varies across the country and despite relating to a trade of its own, it is often classified as a subclass of electrical or plumbing work. This may lead to some confusion when trying to map licences from one state or territory to another, particularly if the process is led by groups who do not have a detailed knowledge of the HVAC&R industry.

There are also differences in the requirements for different HVAC&R licence types. Some states, such as New South Wales, require all work to be done by Certificate III-qualified RAC technicians. All other states allow Certificate II-qualified trades to perform some tasks by way of a restricted licence commensurate with competency. Some states also require additional licences for some types of work. Queensland requires a special licence for working with hydrocarbon refrigerants, which is not required in other states. Victoria requires HVAC&R technicians to have a restricted electrical licence to perform some electrical work.

In short, clear equivalences do not always exist across borders.

With this in mind, AIRAH recommends a process of consultation with stakeholders in the HVAC&R industry to agree on which licences can be included in the AMR initiative and how to map the equivalences. Because we represent a large number of members working in this space, we have a vested interest in the process, and we can contribute significant experience and expertise.

AIRAH looks forward to supporting the implementation of AMR, and offers our help in refining the regulations for HVAC&R workers, and promoting the system to the industry when it is introduced.

Regards,

A handwritten signature in black ink that reads "Tony Gleeson". The signature is written in a cursive, flowing style.

Tony Gleeson, M.AIRAH
Chief Executive
AIRAH