

23 September 2022

Ministry of Business, Innovation and Employment (MBIE)  
PO Box 1473  
Wellington 6140  
By email: [HSWRregs@mbie.govt.nz](mailto:HSWRregs@mbie.govt.nz)

Attention: Nick Mercer

Dear Nick

**RE: Licencing system for refrigeration, heating and air conditioning technicians: consulting on technical details**

The Climate Control Companies Association of New Zealand (CCCANZ), the Institute of Refrigeration, Heating and Air Conditioning Engineers of New Zealand Inc (IRHACE) and Refrigerant Licence Trust (RLTB) welcome the opportunity to jointly submit to MBIE consultation document "*Licensing system for refrigeration, heating and air conditioning technicians: consulting on technical details*".

## Who are we

Organisation	Representation
CCCANZ	HVAC&R companies throughout New Zealand.
IRHACE	Individuals within the HVAC&R industry located both in New Zealand and its overseas members.
RLNZ	Charitable Trust Training organisation for the HVAC&R industry.

Whilst each organisation is a separate legal entity within the HVAC&R industry sector they work together on several key initiatives and IRHACE/CCCANZ/RLNZ have a central governance, operations, and administration centre (HVACR Centre).

The CCCANZ, IRHACE and RLNZ can rightfully claim to represent the majority of the HVAC&R industry and as such should be regarded as the primary voice for the industry with respect to engagement with the government on industry related matters including climate change policies. CCCANZ/IRHACE/RLNZ previously made detailed submissions in 2019 on this subject.

1	Do you think that these proposed definitions will capture hazardous industrial or commercial systems, while avoiding domestic or light commercial systems? Are there changes you would suggest?
2	Do you think these measures based on kWh output and charge sizes will be easy for businesses and technicians to understand and apply when checking which systems need a licenced technician?
3	Do you think these definitions are clear and will capture all relevant hazardous refrigerants? Are there any changes you would suggest?



### HVACR CENTRE

PO Box 217184, Botany Junction, Auckland 2164 | [www.irhace.org.nz](http://www.irhace.org.nz) | [www.cccanz.org.nz](http://www.cccanz.org.nz) | [www.rlnz.org.nz](http://www.rlnz.org.nz)  
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It is our opinion that everyone working with refrigerants whether toxic, flammable or otherwise MUST be licenced so that we capture the entire industry. What is proposed is a great step forward for the larger capacity equipment, but we shouldn't be ignoring smaller equipment as modern systems are using flammable refrigerants A2L and A3 and on the whole more refrigerant is used in smaller systems than large systems collectively.

The industry needs at least a minimum registration similar to the EST. Excluding domestic and light commercial systems/technicians requiring a licence means more environmentally detrimental leaks. Plus, and not ignoring the huge health and safety factor for the public in their private dwellings which would occur due to the use of these flammable refrigerants.

The development of a proper cradle to grave refrigerant tracking system, like CCCANZ has proposed with their development of an Ethereum blockchain solution will allow the use of all refrigerants and will detect the loss of refrigerant in systems. This would show up those installing and maintaining equipment poorly and give them an opportunity to improve their skills.

The cost of these licences seems too high for our industry, and we would request consideration of a shorter licence for a lower fee, so it fits alongside the electrical relicensing system. The RLNZ Board is also concerned about the perceived lack of consideration for training to upskill people to achieve this licensing system.

We support a licencing system and feel that this is a great step forward for our industry.

The training that is going to be required to support this licensing system is of concern to us as industry associations. RLNZ are already working with WorkSafe, WDC and MBIE and would like to continue this relationship to support them in both the qualifications and training that is going to be needed to make this licencing system successful.

Our combined industry associations have consulted with our members through a webinar with MBIE in September and through our communication channels and we have found the below definition to have overwhelming support.

***"Commercial or Industrial."***

Commercial or Industrial refrigeration or air conditioning systems refer to any pressure equipment, plant, or appliance, permanent or temporary, installed within the occupancy categories established in AS/NZ Standard 5149.1:2016 Clause 5.1 table 1. Or requires the installation of interconnecting refrigeration pressure pipework and mechanical joints,

***Exemption: "Light commercial and domestic."***

"Light commercial and domestic" refrigeration or air conditioning systems refer to any pressure equipment, plant, or appliance that is hermetically sealed (with no mechanical joints or pipework installation) and is contained in parts that are not permanently connected to a power supply and located outside the occupancy categories established in AS/NZ Standard 5149.1:2016 Clause 5.1 table 1.



On behalf of IRHACE/CCCANZ/RLNZ

Gina McMaster

Executive Officer – IRHACE, CCCANZ, RLNZ