



Submission on Space Heating

1 December 2022

AREMA appreciates the work undertaken by the Department of Climate Change, Energy, Environment and Water, as well as many stakeholders who have worked diligently on this issue. AREMA members have been considering the issues raised and the thinking behind issues raised and have some conclusions. In our mind these are the basis for criteria that need to be met for a heating rating scheme to progress.

1. Assessments of equipment performance need to be from (or derived from) a standard. In AREMA's view the idea that an approach that will equitably compare efficiencies of equipment can be developed by a consultant and a technical working group is unreasonable. Not only will any scheme need to be robust, but it also needs the confidence of industry and governments. Standards provide that and, quite simply, there is no other mechanism that does.
2. Any ratings developed to compare heating efficiencies need to be consistent with existing ratings. The alternative to this assumption would be that many types of equipment would have 2 ratings on it. In the case of air conditioners/heat pumps we already have ratings for both heating and cooling. In a world with a new assessment based on an alternative approach we would have 2 ratings. There is simply no way that this data would not be confusing to consumers. Given our goal is to help ensure there is robust information to enable higher efficiency equipment to be identified and purchased, this result seems like a poor outcome.
3. Companies already invest significantly in meeting efficiency standards, demonstrating they have been met, and communicating these messages to consumers through labels and other means. It is unreasonable for manufacturers to be asked to meet any costs to undertake an assessment that has already been made under the existing standard.

In summary, AREMA urges energy ministers to ensure that any approach to assess heating standards is based on a standard, consistent with current ratings and leads to no additional costs to manufacturers. We are not convinced that these criteria can be met and would, therefore, welcome a broad-based discussion on alternative approaches that are not focused on developing a rating scheme.