



SUBMISSION ON THE REVIEW OF THE PROTECTION OF THE ENVIRONMENT OPERATIONS (NOISE CONTROL) REGULATION 2017 (NOISE CONTROL REGULATION)

About AREMA

Established in 1967, AREMA (the Air-Conditioning & Refrigeration Equipment Manufacturers Association of Australia) represents the interests of air-conditioning and refrigeration equipment manufacturers and importers active in the Australian market. Our members include leading companies involved in supplying over 80% of air conditioners to the Australian market. We work with government and industry on policy formulation and regulation to achieve the best outcomes for our members and the wider community.

Our aim is to:

- Help reduce the environmental footprint of air conditioning and refrigeration in Australia
- Encourage members to design and manufacture energy efficient equipment
- Encourage our members to deliver real energy savings to consumers
- Reduce emissions of ozone depleting substances and greenhouse gases safely
- Work closely with government to ensure the safe implementation of standards that will benefit end users and product designers
- Work with other local and global associations to ensure we adopt world's best practice
- Provide a unified voice for representation to government and industry on key issues
- Represent the air conditioning and refrigeration industry on key standards committees and, where possible, assist members to interpret these standards.

Comments

AREMA notes that the regulation currently says very little about air-conditioners and heat pumps and nothing on appliances such as commercial refrigeration outdoor condensing units.

Over time, AREMA believes there will be a need to consider noise issues more carefully and better cover a broader range of equipment. This will be driven by several factors including greater uptake due to the drive to decarbonise and electrify homes and businesses. Such an approach will not be straightforward for several reasons, including:

- Existing buildings were not designed with shift from gas heaters (internally and silent) and either gas or electric resistant water heaters to heat pumps which typically require an outdoor unit and do make noise.
- With the further use of demand response to manage electricity use, building owners may not have the capacity to determine when their equipment is operated.
- There needs to be recognition in setting levels of noise that not only does noise abatement have a cost, it also negatively impacts the performance and efficiency of the equipment. A silent piece of equipment would both be both expensive and rather inefficient.
- Additionally, consideration should be given whether noise requirements should differ between daytime and a night-time setting.
- There is no current standard to assess the outdoor noise from this type of equipment, which results in regulation based on site factors which are ad hoc and different from place to place. It is near impossible for a manufacturer to address the range of circumstances that can appear across NSW.

Accordingly, AREMA feels that simply setting an ad hoc approach based on conditions on locations across NSW would be problematic and would rather see a more nuanced and planned approach. AREMA would also propose that this issue would benefit from a national approach – perhaps through the GEMs program.

Contact Details

As the NSW EPA works through these issues, AREMA is eager to assist. Please contact Greg Picker (gregpicker@me.com and 0403 74 1715) for further engagement.