

VEU water heating and space heating/cooling activities requirements

Submission received through Engage Victoria

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Submitted by: Stiebel Eltron

Attachment: No

From 6 April through to 24 April 2023 we invited submissions on the proposed changes to guidance materials, recordkeeping requirements and program forms relating to water heating and space heating and cooling activities.

Do you believe the information in the proposed decommissioning guidance material adequately sets out the steps and considerations for decommissioning a water heating product in a practical and safe manner? Does it align with industry best practice?

For the most part we believe it does, however not all potential environmental waste associated with water heating activities is considered, so the information proposed in the decommissioning guidelines and record-keeping requirements is incomplete and does not align with what should be industry best practice.

Are there other key decommissioning steps or information not captured in the guidance material and if so, what are they?

The previous two VEU consultations on water heating activities raised the dumping of refrigerant gas contained in end-of-life hot water heat pumps as a matter of great concern, given that such water heaters are under no obligation at the moment to be disposed of by duly acknowledging the fact that the refrigerants they carry can be potentially harmful to the environment and should be treated in a special way. Therefore, hot water heat pumps are typically disposed of in landfill, as any other conventional storage water heater would. This means any refrigerant contained within is allowed to be freely released to the atmosphere. This was in fact a key reason for the decision in the VEU program to limit the GWP of heat pump refrigerants for water heating activities, to values below 700 by July 2024.

Do you have any comments on the proposed decommissioning record-keeping requirements for water heating activities? Do you consider the proposed decommissioning record-keeping requirements to be practical and achievable? If not, why?

Do you have suggestions for alternative or additional forms of records that could be provided to verify that an existing water heating product has been decommissioned in a practical and safe manner so it cannot be used again?

As a matter of information, refrigerant disposal from hot water heat pumps is entirely voluntary at the moment and done by a minority of tradespeople providing industry best practice. While it is an added expense for an end-user, it is not particularly onerous or costly and the reason for this is the availability of restricted refrigeration licensing for electricians and plumbers, making this a relatively straightforward process that does not necessarily require refrigeration specialists to do the work. For many years, electricians have been able to install and decommission air conditioning heat pumps. An integral part of this work is being able to reclaim the refrigerant of old equipment prior to replacement and subsequent

disposal. Plumbers are able to obtain a restricted refrigeration license that enables them to decommission and install hot water heat pumps, which includes refrigerant recovery handling. Therefore, the added complexity and costs associated with proper refrigerant disposal and record-keeping activities should not represent any major burden to those involved in VEU activities that could require it.

Do you have any comments on the proposed disposal record-keeping requirements for water heating activities? Do you consider the proposed disposal record-keeping requirements to be practical? If not, why?

As mentioned before, proper disposal of hot water heat pump refrigerants must be accounted for. The record keeping requirement for refrigerant recovery and disposal as per Table 5 is practical and easy achievable and must be applicable to hot water heat pumps as well.