Net Zero Commission

Pathways Call for Evidence Submission

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NSW NET ZERO COMMISSION:

Public Call for Evidence – Development of the First NSW-Specific Decarbonisation Pathways

Prepared By
Refrigerant Reclaim Australia
10 August 2026

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SUMMARY

Refrigerant Reclaim Australia (RRA) welcomes the opportunity to contribute to the NSW Net Zero Commission's development of the first NSW-specific decarbonisation pathways.

As NSW accelerates the electrification of buildings and the uptake of high-efficiency refrigeration, air conditioning and heat pump technologies, Lifecycle Refrigerant Management (LRM) will become increasingly important. While these technologies reduce operational emissions, their overall climate benefits depend on responsible management of refrigerants throughout the equipment lifecycle.

The Commission has an opportunity to strengthen emissions outcomes by implementing mandatory documented evidence of refrigerant recovery prior to building decommissioning and demolition processes. Integrating refrigerant management requirements into planning approvals, demolition permits or compliance frameworks will help ensure refrigerants are recovered before equipment is dismantled or buildings are demolished.

This would reduce avoidable emissions, support existing national stewardship requirements and complement mandatory refrigerant recovery requirements under the Ozone Protection and Synthetic Greenhouse Gas Management Act.

ABOUT REFRIGERANT RECLAIM AUSTRALIA (RRA)

Refrigerant Reclaim Australia (RRA) is a not-for-profit organisation and administers Australia's only nationally approved product stewardship scheme for refrigerants. RRA is dedicated to protecting the environment by preventing emissions of ozone-depleting substances and synthetic greenhouse gases.

Established in 1993, RRA is run and funded by industry and works in partnership with the refrigeration and air conditioning sector and the Australian Government. Its internationally recognised program provides an accessible and practical mechanism for collecting used, surplus and unwanted refrigerants from more than 500 locations across Australia and ensuring their safe destruction.

For more than 30 years, RRA has supported industry to reduce the release of high-global-warming-potential (GWP) gases while contributing to Australia's transition to a circular economy. To date, RRA and industry have prevented more than 20 million tonnes of CO_2-e emissions.

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SUBMISSION RECOMMENDATIONS

1. Recognise Lifecycle Refrigerant Management as an enabling component of building electrification.

2. Explicitly incorporate refrigerant stewardship within the built environment decarbonisation pathway by mandating refrigerant recovery into building approval criteria and demolition permits.

3. Support the development of mandatory product stewardship arrangements for household appliances containing refrigerants, ensuring the rapid deployment of heat pumps and other energy-efficient technologies is matched by effective end-of-life management, refrigerant recovery and the prevention of avoidable end-of-life refrigerant emissions.

4. Recognise the important roles of equipment owners, manufacturers, importers, engineers, facility managers, licensed technicians and end-of-life sectors in improving recovery outcomes in this sector.

5. Encourage greater engagement with equipment owners and end-of-life sectors, including demolition and waste industries, to increase participation in established refrigerant recovery pathways.

6. Recognise the increasing importance of refrigerant stewardship as the installed refrigerant bank grows through the continued electrification of buildings and deployment of heat pump technologies.

7. Leverage Australia's existing nationally accredited product stewardship framework as a proven, cost-effective mechanism for reducing fugitive emissions while supporting circular economy, resource efficiency and environmental outcomes.

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BUILT ENVIRONMENT

ELECTRIFICATION OF RESIDENTIAL AND COMMERCIAL BUILDINGS

RRA supports the accelerated electrification of residential and commercial buildings as a critical component of NSW's transition to net zero.

The increasing deployment of electric heating, cooling, refrigeration and heat pump technologies has the potential to significantly reduce operational emissions. However, this transition will also substantially increase the volume of refrigerants contained within Australia's installed equipment bank.

Electrification alone will not deliver the full climate benefits intended unless refrigerants are effectively managed throughout their lifecycle.

RRA supports an LRM approach that recognises emissions reduction depends on responsible refrigerant management from installation and operation through to servicing, leak prevention, recovery, decommissioning and building demolition.

RRA recommends evidence of formal/mandatory refrigerant recovery becomes part of demolition approvals, major refurbishment works and building decommissioning activities. Requiring evidence that refrigerant has been recovered by licensed technicians before structural works or demolition commence would strengthen compliance, improve recovery outcomes and minimise avoidable emissions.

As Australia's installed refrigerant bank continues to grow, refrigerant stewardship should be recognised as an essential enabling measure supporting successful building electrification.

Government incentives and rebates across various Australian states are supporting the uptake of electrification and energy-efficient technologies, including heat-pump hot-water systems, and accelerating the installation of refrigerant-containing equipment in Australian homes and businesses. This rapid uptake has also seen large numbers of lower-cost, and, in some cases, lower-quality products enter the market, including equipment containing scheduled refrigerants.

While these programs deliver important energy and emissions benefits, the growing volume of equipment creates a significant future end-of-life waste stream that will need to be appropriately managed.

Without adequate end-of-life controls, responsibility for discarded equipment can fall to waste management facilities and scrap metal recyclers, where refrigerant recovery may not occur before equipment is dismantled or valuable materials are recovered. This creates an avoidable risk of refrigerant emissions.

As governments continue to incentivise the uptake of these technologies, consideration should also be given to the full lifecycle of the equipment being supported. This could include stronger product stewardship arrangements for household appliances and clearer requirements for refrigerant recovery of these products.

There is an opportunity to ensure that policies designed to reduce emissions through electrification do not inadvertently create an unmanaged source of refrigerant emissions in the future.

ADDRESSING FUGITIVE REFRIGERANT EMISSIONS THROUGH LIFECYCLE REFRIGERANT MANAGEMENT

Fugitive refrigerant emissions remain one of the most significant avoidable sources of greenhouse gas emissions within the built environment.

Australia already has a regulatory framework prohibiting deliberate refrigerant venting. Emissions occurring during the operational life of equipment are primarily the responsibility of equipment owners and licensed service technicians.

Effective Lifecycle Refrigerant Management relies on collaboration across the entire equipment lifecycle. While licensed technicians recover refrigerants, evidence gathered through RRA's independent strategic review demonstrates that many of the decisions influencing recovery outcomes, including equipment specification, purchasing, commissioning, asset management and end-of-life disposal, are made by stakeholders with limited engagement in existing stewardship arrangements.

Equipment owners play a particularly important role, as they often determine whether refrigerant recovery is specified, funded and incorporated into maintenance, refurbishment and asset replacement activities. Engineers, manufacturers, importers, facility managers and end-of-life sectors also influence recovery outcomes through decisions made across the equipment lifecycle.

Government is well placed to strengthen LRM by embedding refrigerant recovery requirements within existing regulatory and approval frameworks. Leveraging existing planning, demolition and compliance processes would improve recovery outcomes while minimising additional regulatory burden on the industry.

As the installed refrigerant bank continues to grow, the opportunity is to maximise participation in existing recovery pathways by strengthening Lifecycle Refrigerant Management across the equipment lifecycle rather than developing new recovery systems.

Current regulatory arrangements appropriately place recovery obligations on licensed technicians. However, many of the commercial and operational decisions that influence recovery outcomes occur elsewhere across the equipment lifecycle. Strengthening participation across these stakeholders would complement existing regulatory arrangements and further improve recovery outcomes.

Building demolition, refurbishment, waste management and other end-of-life activities remain important points in the equipment lifecycle where refrigerant losses can occur if recovery is not appropriately planned or undertaken. Increasing engagement, accountability and controls across these sectors would support improved recovery outcomes while maximising the environmental benefits delivered through existing recovery pathways.

Strengthening refrigerant recovery rates, improving participation across the equipment lifecycle and recognising refrigerant stewardship within broader decarbonisation policy will become increasingly important as refrigerant volumes continue to grow and Australia advances down the path of electrification.

Effective refrigerant stewardship also supports Australia's obligations under the Montreal Protocol and Kigali Amendment by ensuring ozone-depleting substances and synthetic greenhouse gases are responsibly managed throughout their lifecycle.

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OTHER CONSIDERATIONS

The success of NSW's decarbonisation pathway will depend not only on deploying low-emissions technologies, but also on ensuring the refrigerants those technologies rely upon are responsibly managed throughout their lifecycle.

As refrigeration, air conditioning and heat pump technologies become increasingly central to low-emissions buildings, Lifecycle Refrigerant Management should be recognised as an enabling component of building decarbonisation rather than solely an end-of-life or waste management activity.

Australia already has the foundations of an effective national refrigerant stewardship system. As refrigerant volumes continue to grow, the greatest opportunity is to strengthen participation across the equipment lifecycle by engaging equipment owners, manufacturers, importers, engineers, facility managers and end-of-life sectors alongside licensed technicians. Recognising the contribution of these stakeholders will help maximise refrigerant recovery, reduce fugitive emissions and support the long-term success of NSW's net zero pathway.

By integrating refrigerant stewardship into NSW's decarbonisation pathways, the Commission can help ensure that the transition to low-emissions buildings delivers emissions reductions across the full equipment lifecycle while supporting circular economy principles, resource security and Australia's leadership in refrigerant stewardship.

RRA welcomes the opportunity to continue engaging with the Net Zero Commission on these matters and would be pleased to provide further information, evidence or clarification as required.

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Yours sincerely,

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Refrigerant Reclaim Australia