



Thursday, February 8, 2024

Mr Christopher Hinchcliffe
Director of ANZSCO Review
Australian Bureau of Statistics
Locked Bag 10
Belconnen ACT 2616

Dear Christopher,

I write on behalf of [AIRAH](#), a leading not-for-profit member organisation for professionals working in the heating, ventilation, air conditioning and refrigeration (HVAC&R) industry. We would like to share some of our comments and concerns about the proposed changes to ANZSCO (which were published after round two of the consultation).

AIRAH is a long-standing and respected voice. Established in 1920, we have represented the industry for more than 100 years. We have a direct membership of around 4,000 professionals, and reach to more than 25,000 industry participants, including engineers, trades, educators, students, manufacturers, regulators, business leaders, and other industry experts. We harness the expert knowledge and experience of our members to support the development of codes and standards, and provide input for government consultations and industry initiatives.

In reading through the proposed changes – and in speaking with other stakeholders from our sector – we have identified three high-level issues that we would like to flag ahead of the final consultation round later this year.

1. We support the change of occupation 342111 from Airconditioning and Refrigeration Mechanic to Airconditioning and Refrigeration Technician. We recommend, however, that this occupation be placed under the focus area of construction, with occupations such as Electrician and Mechanical Services Plumber. Air conditioning and refrigeration technicians design, install and commission HVAC&R systems, meaning that “repair and maintenance” only covers one part of their activities; this occupation sits alongside the electrical and plumbing occupations as a trade of its own, with its own educational pathway and licensing frameworks.
2. As noted by a number of key bodies in the HVAC&R space, AIRAH recommends that the name of occupation 334112 be changed to remove “Airconditioning”. This would create a clearer separation from occupation 342111 – Airconditioning and refrigeration technician. This is already reflected in state licensing frameworks, so changing the name will support a nationally consistent approach, and we believe it will help capture more accurate data.
3. We also note – as flagged by other industry bodies – that a number of the tasks listed under the Airconditioning Mechanical Services Plumber occupation are not carried out by mechanical services plumbers because their educational pathway does not include these competencies. For example, mechanical services plumbers do not install, maintain and test medical gas systems unless they have undertaken special training. In New South Wales licensing for medical gas work has now been separated from mechanical services plumbing licensing.

As a final general comment, we note that direct stakeholder consultation has taken place in the form of collaborative workshops. AIRAH would welcome such engagement. We represent a sometimes-hidden industry, but a vital one.

According to the latest [Cold Hard Facts](#) report, prepared for the Department of Climate Change, the Environment, Energy and Water, Australian refrigeration and air conditioning equipment is responsible for 12 per cent of total national CO₂e emissions, and uses around a quarter of all electricity used nationally.

As well as playing a key role in the environment, our industry also makes up an important part of our economy. We estimate that around 325,000 Australians work in HVAC&R, including technical and non-technical people. In 2019, direct spending on hardware, consumables and energy, plus employment in the sector, was estimated at more than \$41 billion, or around 2.1 per cent of Australian gross domestic product.

We look forward to sharing our knowledge about HVAC&R occupations – both engineering and trade – in the next round of review.

Many thanks,

Mark Vender
Advocacy and Policy Manager
AIRAH