



13 April 2018

Attn: GEMS Review team
Appliance and Building Energy Efficiency Branch
Department of the Environment and Energy
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Submission to the GEMS Review

The Fan Manufacturers Association of Australia and New Zealand (FMAANZ) welcomes the opportunity to provide this submission to the review of the *Greenhouse and Energy Minimum Standards Act 2012* (GEMS Act),

FMAANZ is a collegiate body of the manufacturers and suppliers of non-domestic fan equipment. Our Association was established with a specific aim of working cooperatively with regulatory bodies to achieve the twin objectives of: delivering improvements in energy performance; and ensuring the ongoing viability of internationally competitive domestic fan industry.

FMAANZ has long advocated introduction of MEPS for fans. Current consultations being conducted by the E3 Committee have identified the following issues of concern to industry representatives:

1. There are many thousands of fan models, each one with a distinct efficiency performance level. Many units are tested but some variants where sub components are often assembled on site are not tested by the manufacturer but are estimated by robust propriety software that has been shown to provide adequate results. This industry structure means that a registration process, even on a family basis, is simply unworkable. For MEPS to proceed there would need to be an alternative approach that did not require registration by model number. An approach similar to that used in the European Union, i.e. one of self-regulation, would significantly provide a solution to cover multiple product categories.
2. Many fans are used within heating and air conditioning and refrigeration equipment that is already covered by MEPS. Manufacturers of such equipment have expressed concern about the potential administrative and cost burden of registering a component of their equipment. If a self-certification process was enabled this would lead to a possible solution.



These issues are significant, and may also occur in other industry sectors as well. FMAANZ supports further detailed examination of these issues as a case study to explore the benefits and limits of GEMs as a means of ensuring energy efficient products are placed within the Australian market.

Yours sincerely

Simon Bradwell

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Chairman