

Firstly thank you for the opportunity to offer our thoughts of your proposal to discontinue Schedule 19 of the VEEC program for Destruction of Pre 1996 Refrigerator or Freezer.

While the current amount of pre 1996 Refrigerators is declining that does not necessary imply they are not still in use. As you know the amount of energy to drive those units is massive compared to the current technology and type of gas used. It is important for you to consider the fact of your program aids the opportunity for us in removing the R12 gas safely which process is explained to the customers when trading in their old fridge. With that knowledge the customer is aware the fridge is being responsibly recycled and payment is being made by us to the retailer. If there was no payment to the retailer, the retailer would not encourage any trade in system thereby leaving the disposal of the fridge even harder and as we know now, there are still members of the community and some local council recycling depots still not safely collecting the R12 gas and allowing that gas to just go into the atmosphere which is extremely hurtful for that energy to be released into the environment. In fact you should be looking at altering the year for VEEC's to be attained for fridges up to 2006 due to energy usage plus to keep the system of responsible recycling of old fridges for the various classes of gas.

In conclusion there are two factors which should be seriously considered, If the program is withdrawn there will be no payment or encouragement for retailers to responsibly recycle refrigerators and the possible irresponsible non collection of any refrigerant gases is wasted energy and so much damage to the environment.

Again we thank you for this opportunity and stress the importance of keeping the current system running.

Regards

Murray Godfrey

Southern Cross Metal Recycling.