



3 August 2009

Australia Building Codes Board
GPO Box 9839
Canberra ACT 2601
Telephone: 1300 134 631
International: +61 2 6213 7842
Facsimile: +61 2 6213 7287

Dear Sir/Madam,

**SUBMISSION TO AUSTRALIAN BUILDING CODES BOARD
DRAFT 2010 BUILDING CODE**

Lighting Council Australia is the peak body for Australia's lighting industry. The Council represents manufacturers and suppliers of luminaires, control gear, lamps and associated technologies.

Lighting Council is fully committed to assisting with development of the Building Code of Australia (BCA) and improving the energy efficiency requirements for lighting. We welcome the opportunity to comment on the BCA 2010 draft.

We have provided comments on both Volume 1 and Volume 2.

These are attached as:

ANNEX 1 - Volume 1 Class 2-9 buildings and

ANNEX 2 - Volume 2 Class 1 & 10 buildings.

The majority of our comments relate to commercial buildings but where requirements are shown for residential areas of buildings in Volume 1 and 2 we recommend these should be consistent.

Future BCA changes

Lighting Council Australia is concerned the changes shown in the 2010 draft do not go far enough. The Council of Australian Governments (COAG) endorsed improvements to the energy efficiency requirements for the 2010 BCA. However we understand the ABCB has no future projects on lighting

Lighting Council Australia
25 Bentham Street
Yarralumla ACT 2600
PO Box 7077 Yarralumla ACT 2600

Tel +61 2 6247 8011
Fax +61 2 6162 3457
ABN 64 130 217 613

Email info@lightingcouncil.com.au
Web www.lightingcouncil.com.au

energy efficiency. We see this as a lack of ongoing commitment from COAG and the Australian Building Codes Board for continued improvement to the lighting energy efficiency aspects of the BCA. Lighting Council Australia suggests there are a significant number of ideas and areas that need to be considered in future BCA editions. Lighting aspects need to be developed and adopted in the BCA as iterative changes in a similar manner to minimum energy performance standards (MEPS) requirements for products.

Lighting Council wishes to ensure the continued development of the BCA energy efficiency requirements for lighting. As the peak industry body for Australia's lighting industry, Lighting Council is working in concert with industry, the Department of the Environment, Water, Heritage and Arts and state and territory governments in the preparation of Greenlight Australia 2010-2020. Greenlight Australia is the Government's ten year blueprint for energy efficient lighting. Greenlight Australia 2010-2020 will develop energy efficiency targets and methodologies to achieve considerable energy savings.

To achieve both Greenlight Australia and the energy savings that are the subject of the 2010 draft, regulators must ensure that building regulations – such as Section I and Section J of the Building Code of Australia – are enforced.

Lighting Council Australia looks forward to working with the ABCB, governments and regulators to achieve the considerable energy savings planned for in Greenlight Australia 2010-2020.

Yours faithfully

Owen Manley
Technical Manager