



SUBMISSION TO STANDARDS AUSTRALIA ON DISCUSSION PAPER

Different Models of Standards Development for Energy Efficiency of Specific Products

May 2008

Introduction

Lighting Council Australia is the peak body for Australia's lighting industry. Lighting Council works closely with the Australian Government in introducing energy efficient lighting products to the Australian marketplace. This necessitates close involvement in the standards writing process, both in Australia through Standards Australia and internationally through the International Electrotechnical Commission (IEC). Lighting Council nominates individuals with technical expertise to all lighting-related standards committees of Standards Australia, and nominates its Technical Manager to participate in IEC committees.

While Standards Australia has improved its processes for developing Australian standards, there remain problems in producing energy efficiency standards in a timely manner. These problems largely result from inadequate resources from within Standards Australia. As the demand for energy efficiency standards is expected to increase significantly over the next decade at least, it is essential that these resource issues be addressed.

The Discussion Paper summarises its options as follows:

- Option 1 Status Quo/Core Development.
- Option 2 Co-Resourced Development
 - (a) Increased resources
 - (b) Shared model relating to structure of standards
- Option 3 Commercial Development
- Option 4 SDO/Accreditation
- Option 5 Government Regulation

Of the options presented, Lighting Council Australia favours Option 2 (a) – Co-resourced development with increased resources.

Lighting Association of Australia Inc. trading as Lighting Council Australia

2/25 Bentham Street

Yarralumla ACT 2600

PO Box 7077 Yarralumla ACT 2600

Tel +61 2 6247 8011

Fax +61 2 6162 345

ABN 79 127 442 264

Email info@lightingcouncil.com.au

Web www.lightingcouncil.com.au

Option 1: Status Quo/Core Development

Lighting Council Australia supports the current practice of producing energy efficiency standards through the Standards Australia standards development process. The process ensures that stakeholders have the opportunity to participate through a rigorous tried and tested procedure. For industry this is particularly important. There can be a lot at stake commercially, and the standardisation process provides the best guarantee of procedural rigour, impartiality and fairness.

While the process remains applicable as a model, its execution is flawed because of inadequate resources. This stems from funding for energy efficiency standards coming largely from Standards Australia funds, with limited support, particularly for international work, from government.

Under the existing model any standard approved for development within Standards Australia must compete with all other priorities. To avoid this competition energy efficiency standards require dedicated funding for project manager resources in particular.

Standards Australia net benefit review process

There is no need for Standards Australia to impose a net benefits test on new energy efficiency standards. Governments identify energy efficiency shortcomings and use standards and regulations to effect change. Before they commit to the standards and regulatory process they independently undertake their own analysis to confirm the need for the project and associated standards. This net benefit analysis is considerably more stringent than the Standards Australia process. It is therefore considered a waste of limited Standards Australia resources to further impose its own net benefits test.

Option 2: Co-Resourced Development

Lighting Council Australia supports this option because it significantly extends public sector/government support to resource energy efficiency standards. Public policy emanating from government drives new and/or updated energy efficiency standards. Therefore it is incumbent upon government to finance the process.



Lighting Council strongly opposes the direct funding by industry of the standards development process. The extensive program of energy efficiency standards already tax the resources of industry stakeholders who provide in kind support by injecting substantial technical expertise to the standards writing process at no cost to Standards Australia or government.

Lighting Council supports the continued use of the Part 1 (test procedure) and Part 2 (limit) standards concept.

Part 1 Standards

Such standards increasingly are being adopted from an international (ISO or IEC) or regional (eg EN) standard. However as a consequence of Australia's ambitious equipment efficiency program, there is often a need to develop new measurement standards in areas where energy efficiency requirements are being implemented for the first time. In these cases, it is proposed that a joint government and industry group (for example, a standards committee or working group) develop the initial standard with the intention of forwarding it to ISO/IEC to be included in their work program. If the draft is accepted internationally, it should be adopted in Australia. This will help align Australia with the international community while still enabling Australia to be at the forefront of developing energy efficiency standards.

To ensure its viability international standards development work should be independently funded by government; such funding should remain separate from that which the Department of the Environment, Water, Heritage and the Arts (DEWHA) provides for general IEC/ISO work.

Part 2 Standards

Such standards should be developed under the same Standards Australia process as Part 1. To ensure continuity the process should involve predominantly the same individuals/organisations developing Part 1. In order to avoid undue delays in establishing Part 2 limit values, new rules should be introduced establishing the authority of the Commonwealth Government to determine limit values when the normal process of debate within standards committees fails. Recourse to such action should only be in exceptional



circumstances. As the peak body for the lighting industry Lighting Council would wish to have input to any such determinations involving lighting standards.

Option 3: Commercial Development/Bureau Model

Lighting Council rejects the notion of DEWHA assuming the role of secretariat for development of energy efficiency standards.

This option would see a duplication of Standards Australia processes. It would be impractical, with DEWHA having to develop from scratch most of the existing expertise within Standards Australia. Of particular concern is the short length of service of government staff in particular roles. Standardisation is a long term process and demands continuity of staff. The term of most government staff is shorter than the development cycle of standards. The history of poor staff retention in the Department of the Environment, Water, Heritage and the Arts and its predecessor organisations over the past decade bears witness to this concern.

Option 4: Accreditation as a Standards Development Organisation

Lighting Council Australia rejects Option 4 for similar reasons as Option 3. Under Option 4 DEWHA would become a Standards Development Organisation rather than a secretariat. The same arguments concerning the length of time required to develop the necessary expertise and the lack of continuity of staff in government positions apply.

Option 5: Government/s Regulate

Lighting Council Australia does not support Option 5.

Option 5 carries with it the possibility of arbitrary decisions that could result in disastrous commercial consequences for industry. Lighting Council is particularly concerned about the potential for arbitrary decisions being made when a particular project falls behind schedule. The current standardisation process helps ensure the necessary checks and balances are made in the decision-making process. Most importantly it ensures that the necessary technical expertise is taken into account.



The existing standards development process for energy efficiency standards was developed in consultation with users more than 20 years ago when the first appliance labels were being considered. The desirability of this process (in preference to outright regulation) was reconfirmed at recent discussion paper public forum meetings. The visibility and public review process results in greater community awareness of mandatory technical requirements among suppliers both within Australia and internationally.

Conclusion

Lighting Council wishes to ensure that the development of energy efficiency standards for lighting products is handled effectively and efficiently. While the Standards Australia process is not perfect, it does offer the best chance of balancing often competing stakeholder interests in a fair and impartial manner.

The major problem with the current process is a shortage of resources within Standards Australia to adequately manage energy efficiency standards development. Option 2, with significantly increased funding from government, is seen as the best solution.