

9 November 2018

European Commission  
Review of ecodesign requirements for lighting products

To whom it may concern

Lighting Council Australia represents the lighting industry in Australia. We provide this response to the *European Commission Review of Eco-design Requirements for Lighting Products* due to the likelihood that future Australian lighting regulations will be heavily influenced by future European eco-design legislation - Australia is a relatively small market and it does not make sense that our regulations and standards are markedly different to major markets.

We thank the European Commission for the opportunity to comment on the eco-design legislative review for light sources.

### **LED market characteristics**

Lighting Council Australia highlights that the global LED market is characterised by new LED models becoming available every six months due to the continual re-development and improved performance of LED chips and modules. LED product models are re-developed with incremental increases in lumen output and/or decreases in power used.

### **Proposed 3600-hour duration pre-market testing**

Lighting Council Australia makes the point that any regulation designed to improve market compliance should be low cost and compatible with market characteristics. For this reason, we suggest reducing the time taken for pre-market testing (i.e. the endurance test outlined in Annex V of the draft Act regarding eco-design requirements for light sources) from the proposed 3600-hour (around 5 months) duration, to a simpler 500-hour early failure test.

LED products are long-life and poor designs suffer from early failures. An 500-hour early failure test will detect these deficient products and is more likely to be undertaken by the majority of market participants.

We note that the likely outcome of the proposed high cost 3600-hour test will be to further increase costs for legitimate lighting industry participants and make non-compliant products yet more attractive in comparison to compliant products. This undermines the stated policy objectives of the initiative and will result in poor outcomes for compliant businesses and poor environmental outcomes.

If the cost of compliance is high then the level of market compliance, especially amongst smaller market players, is likely to decrease.

Another unintended consequence of such long and costly testing will be that low volume lines will likely increase significantly in price or be deleted from product ranges due to the need for businesses to look at return on investments. This will cause a reduction in consumer choice and competition.

The proposed product testing program will delay new model launches by more than four months compared with a shorter early failure test. This will result in the perverse outcome that higher efficiency products will take longer to reach the market.

### **Verification tolerance on luminous flux**

Lighting Council Australia makes the point that the proposed +5% tolerance for luminous flux is unreasonable due to both the wide variation in test laboratory accuracy as well as the variation in performance characteristics of LED model components.

The proposal will likely lead to a high number of verification testing failures that will not be due to the actions of product manufacturers and suppliers. Lighting Council Australia would support a one-side tolerance that is reasonable for manufacturers and market surveillance authorities to work within.

### **Reasonable phase out timetable sought**

Lighting Council Australia highlights that fluorescent lamp technology is relatively efficient compared to other products (e.g. incandescent and halogen) currently being phased out of markets and there is a large installed base of T8 fluorescent fixtures.

Fluorescent T8 technology is not proposed to be removed from the Australian market and an early phase out in Europe will have flow on effects to our market including higher market prices. The transition to substitute technologies and products should

recognise that significant capital investments will be needed and a more pragmatic and realistic timetable should be accommodated to reduce the economic impacts on affected businesses.

### **Further exemptions sought**

The entertainment industry has highlighted that it requires further exemptions under the list of special purpose lamps due to irreplaceable products that it currently uses. A lack of consideration in this area would lead to global disruption and loss of employment in the entertainment industry.

- Digital multiplex remote device management (DMX RDM) systems are specialty (not mass market) systems that should be exempt from the standby power requirements proposed.
- LED high luminance light sources are currently unable to meet the proposed requirements and should be exempt.
- R7 halogen lamps for stage and studio lighting should also be included on the list of special purpose lamps and exempt from proposed regulation.

Other industrial markets have highlighted that E27 halogen heat lamps are valuable to remain on the market for their heating properties and should additionally be included on the special purpose lamp list of exempt products for specialised applications.

### **About Lighting Council Australia**

Lighting Council Australia is the peak body for Australia's lighting industry. Its members include manufacturers and suppliers of luminaires, lighting control devices, lamps, solid state lighting and associated technologies. Lighting Council's goal is to encourage the use of environmentally appropriate, energy efficient, quality lighting systems.

Yours sincerely,

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