Combined GEMS and EESS Registration System

Following a suggestion last year by Lighting Council Australia aiming to reduce red tape by combining electrical safety (EESS) and GEMS (I.e. LED MEPS) registration systems, the GEMS Regulator is working on the development of a combined product registration system. This development will occur in the lead up to LED lamp MEPS regulation.

The GEMS Regulator is trying to determine any 'sticking points' that would need to be resolved before a combined system is feasible. Such sticking points would include any differences between electrical safety registration and GEMS registration.

Lighting Council Australia provides the feedback below following a meeting held in Canberra on 9 May involving LCA (David Crossley), GEMS Regulator (Catherin Zerger, GiGi Ang, Ben Costeloe) and Consultant Tony Willis.

General comment

Lighting Council Australia proposed a combined registration system with the following aims in mind:

- A combined registration system should reduce duplication and at least some of the administration burden associated with the current two separate registration systems.

  Note: Compliance cost (and time) reductions would improve the viability of product ranges, speed to market and increase consumer choice.

- Increased market awareness of both EESS and GEMS product registration requirements should follow a combined registration system. This should lead to increased levels of product registrations and market compliance.

Commercial product registration

The EESS requires only household products and suppliers to be registered. LED lamp MEPS will likely include a wider scope of regulated products including commercial LED lamps.

Comment: We acknowledge there is potential for different regulatory scopes to exist. If possible, alignment of the regulatory scopes is preferred.

LED lamp model identification:

Regulators will need to identify the registration status of products found on the market. Are registered model numbers always the same as the product identifiers listed on product packaging?

Comments:
- *In general, it seems there are a wide variety of approaches to marking products and packaging.*
- *Many product suppliers use the same product model number on products and packaging as registered.*
- *Some product suppliers do not seem to display model numbers on packaging.*

- *Sometimes the model number on packaging will be different to a registered model number for packs of multiple products. i.e. the model number for a single pack product is not able to be the same as a model number for a pack of ten of the same product.*
- *Usually, registrations are performed using descriptive model numbers.*
- *Sometimes a registered model will be supplied to multiple brands and those brands will have unique model numbers.*
- *Some suppliers register SKU numbers and model numbers together as they claim this helps them to maintain their certification status and improves traceability.*
- *Lamps are sometimes marked with a model number or abbreviated description, but the packaging does not have the same marking or just contained the full product description instead.*
- *Barcodes are a unique way of identifying consumer products. However, it is usually only packaging and not products that are marked with a barcode. After installation it is usually not possible to use a barcode to identify a product.*
- *Some suppliers state that a model description should be able to be used as a unique identifier. Model numbers can sometimes reflect non-technical aspects or change over time.*

The current allowance by the NSW electrical safety regulator to list 'wildcard' type model explanators on certificates (e.g. *xxyyzz* with a legend to explain the various models certified) would make it difficult for the GEMS Regulator to quickly determine the registration status of products on the market. How prevalent are 'wildcard' certificates for LED lamps?

Comments:
- *'Wildcard' type model descriptors have been commonly used as a way to reduce the administration involved in certifying large numbers of products on a single certificate. Wildcard registrations are only allowed by the NSW electrical safety regulator and third-party certifiers accredited by the NSW electrical safety regulator. However, the EESS does not allow 'wildcard' type product registrations so even though 'wildcard' certificates are common, all model numbers are entered when a product is registered or when an EESS registration is amended.*
- *Products that are contained in a single electrical safety test report are usually certified together even though they may have different product specifications (e.g. different CCT, CRI, optics, lamp caps, power ratings etc.)*
- *Many suppliers state they register all model numbers (the model number found on the product itself) on the EESS product registration system. Some additionally register the unique product SKU code associated with each product as a way to improve traceability.*
- *Suppliers claim that it should be easy for regulators to check the registration and certification of products by searching the EESS national database using the product model number found on the product.*
- *Some suppliers suggest a descriptive identifier may simplify the registration verification process.*

Family alignment

The list of models registered on an electrical safety certificate would need to align with the LED lamp MEPS 'family' definition.

Comment: We agree that there are different 'family' arrangements that currently exist when comparing GEMS with EESS. For example, for electrical safety, products with different power ratings can share a safety certificate. However, this is not allowed under GEMS family arrangements. Perhaps the family arrangements under future LED lamp MEPS could align with EESS arrangements. GEMS fees could be adjusted to suit the final arrangements.

Location of registrants:

The ERAC EESS National Database only allows Australian based suppliers to register and link to certificates. The GEMS approval/registration system allows overseas entities to 'certify' and register.

Comments:
- *For electrical safety the certification and registration aspects are separate. Certification is often undertaken by overseas manufacturers. EESS product registration can only be undertaken by Australian based suppliers who are accessible to Australian legal authorities.*
- *The GEMS assessment and registration process is currently performed in a single step. The GEMs process allows both local and overseas entities to submit applications and register products.*
- *Why not align the registration requirements of EESS and GEMS and only allow Australian based suppliers to register products. The certification (assessment) process could still be performed by overseas manufacturers and all registrants (EESS and GEMS) would be accessible to the Australian legal system.*

Registration periods

The EESS requires and allows Level 2 and level 3 products to be registered for 1,2 or 5 years. GEMS registration is currently fixed at 5 years.

Comments:
- *We agree this difference exists.*
- *Ideally, both systems would align to allow the multiple options.*
- *Due to the fast-paced market developments most products are not supplied by the importer for 5 years. However, it is not possible for suppliers to control sell-through at wholesale and retail level and some products may stay at retail level for longer than one or two years. This means many suppliers will use five year registration periods to accommodate slow sell through at retail level.*
- *Shorter GEMS registration periods would be used for products that are supplied in a limited capacity (i.e. supplied for specific projects) or for very short supply periods.*

GEMS Registration process

What are the most time intensive parts of the current GEMS lighting registration process? Can members estimate how long a GEMS registration may take to complete through the current registration system?

Comments:
- *There are many data values that must be entered for a GEMS application/registration process. GEMS registration times are usually determined by the time taken to find and match test report data with entered data.*
- *The challenge with using internal test reports from international factories, is that the results/data are not always presented in the same way or order as required by the GEMS registration process. This means it can take around 30 minutes to get through registrations for individual families.*
- *Gathering the required documentation and data to enable a GEMS registration would take around two to four hours of administration time.*
- *The actual GEMS registration process (i.e. filing in the online forms) takes around half an hour to complete for one product/family application/registration.*

- *The ERAC EESS data base auto populates information after a certificate is selected. This makes the EESS registration system faster, easier and more accurate to use. The GEMS registration system requires all values to be manually entered (and accurately match the values on the test reports) and this is a much slower process. Furthermore, inaccurate transfer of data by applicants is often the main cause for questions from GEMS assessors and delays to approvals.*

- *Further suggestions regarding ways to improve GEMs process:*

  - *Dropdown menus with common descriptions would assist to reduce registration times.*
  - *If GEMS assessments are maintained and become a separate process then registration should simply require registrants to 'link' to the certificate, identify (check or uncheck) the products they will market and pay the associated fees (ideally in one transaction).*

Aligned registration system

How do LED lamp registrants envisage an aligned registration process? i.e. What should the common registration system include if it is to result in savings?

Comments:
- *Any combined system will need to have overall benefits including reduced administration time (and associated costs) and improved compliance.*
- *The EESS product registration system requires very little data entry and simply requires a basic product description, model number and certificate number. This is much simpler, quicker and more accurate than the GEMS system. GEMS should not require all data to be manually entered.*
- *A registration system that presents itself as a single system to registrants and that allows each regulator to take the information and fees they require should be an improvement on the current arrangements.*
- *A single payment system should cover both registrations.*
- *GEMS should allow test reports to be uploaded without the additional data entry.*
- *Many comments were received that related to the restrictive arrangements inherent in the GEMS 'family' allowances and the need to reduce the burden associated with restrictive family arrangements. Alignment with electrical safety 'family' arrangements is sought. LED lamps have been level 3 under the EESS and are now required to be registered. LED lamp registration compliance should improve over the coming short to medium term and should provide a good indication of the number of suppliers/families of household LED lamps on the market. Fee levels should be able to be derived based on the revenue sought from the lighting industry and the number of LED lamp registrations.*
- *The GEMS family restrictions not allowing wattage and lumen variations*
- *Greater use of drop-down menus, common industry/end user relevant application and/or product family descriptions.*

Other possible sticking points

Can LCA members identify other sticking points that would need to be addressed?

Comments:
- *The fees structure and family allowances are linked and will require careful arrangement.*

- *Payment should follow EESS's methods (i.e. EFT or credit card). A few would prefer to set-up an account.*

What works well and not so well with the EESS and the GEMS registration systems

Comments:
- *Linking to a certificate and the data associated with that certificate should be possible and easier in both systems. It would be great if suppliers just needed to enter a model number contained on the certificate and then the registration system located and linked the registrant to that certificate.*
- *The manual data entry requirement of the GEMS system is poorly regarded and associated with multiple issues, additional costs and delays.*
- *The current EESS registration system sometimes has difficulty retrieving certificates to use for registration.*
- *The EESS registration system is relatively simple. GEMS is quite clunky and time consuming.*
- *The EESS data base requires certificates to be uploaded after being selected. This seems to be a superfluous step given that the certificate should have already been uploaded by the certifier.*
- *The EESS system is unstable and inputting individual product model codes requires saving to upload. If any step is missed then complete re-entry from the beginning is required.*
- *The EESS database should have an improved search facility.*
- *Email notifications to designated contacts work well.*

Security of information
The GEMS regulator acknowledges it will be very important to maintain data security.

Comments: Absolutely agree. Any private company confidential data must remain confidential. Also, the system must not allow dodgy practices such as uploading shonky certificates etc.