

# National Light Pollutions Guidelines

## Illuminations Article

Finalised National Light Pollution Guidelines have been published in March 2020 by the Department of Agriculture, Water and the Environment. In this revision the Department has failed to address the concerns previously raised by Lighting Council Australia's submission to draft guidelines. The guidelines do not provide prescriptive limits on lighting, do not refer to relevant Australian or international lighting Standards, and add additional and unnecessary expense to industry at the benefit of consultants and third-party certification schemes.

The document is intended for use in lighting design and assessments for species covered by the Environment Protection and Biodiversity Conservation Act 1999. However, the guidelines consist of generalised recommendations that are vague and open to interpretation. Suggestions such as "Install light fixtures as close to the ground as practicable.", "Avoid high-intensity light of any colour." and "Aim lights downwards and direct them away from nesting areas." with no actual guidance or recommendations for mounting heights, spectrum limitations or shielding means if referred to in any form of specification or assessment, a lighting designer will have great difficulty interpreting what is required.

These guidelines have been developed with disregard of input provided by lighting designers and product suppliers. Loose guidelines that are open to interpretation are fertile ground for consultants to claim a significant stake in future projects and are costly to design to (with so many potential variables such as mounting heights). The lack any of prescriptive recommendations enables third-party certification schemes that require lighting manufacturers to pay for accreditation that demonstrates that their products reach specific criteria such as colour temperature or shielding requirements. Similar requirements could instead be incorporated directly into the guidelines.

Lighting Council Australia's concern is that without practical guidelines project managers will turn to consultants or third-part certification schemes for assessment, resulting in an additional and unnecessary expense. The National Light Pollution Guidelines should be tightened with further assistance and advice from lighting designers and product suppliers. We suggest that the most appropriate avenue for development is through the Standards Australia process that is trusted by all stakeholders from industry, government, and consumers. Various options are available including the option to develop a technical specification or an Australian Standard.

**Lachlan Greve**

**Corporate Affairs Manager**