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Minamata Convention on Mercury - Proposed prohibition on mercury-containing lighting

Dear Ms Douglass

Thank you for the opportunity to comment on the proposed prohibition on mercury containing lighting products – to be discussed at the fourth Conference of the Parties to the Minamata Convention on Mercury (COP4).

Lighting Council Australia members supply more than 80% (in Australia) of the products proposed for phase out and have provided the following feedback.

General

- None of the products proposed for phase out are manufactured in Australia.
- Long term manufacturing contracts (i.e. contracts between Australian suppliers and overseas manufacturers) and supply contracts (i.e. between importers/suppliers in Australia and Australian retailers) exist for CFL.i products. Delay of the phase out date for CFL.i to 2025 is requested so there would be no issues with those contracts.
- Up to 5% of the fluorescent lamp market is comprised of grey market imports by small/micro businesses, installation/building owners (including Government), electrical contractors and consumers. If some non-Minamata countries continue to manufacture these products then the Australian Government should put measures in place to stop all the imports of banned products at the border.

European Union proposal to phase out [2023] halophosphate phosphor linear fluorescent lamps

- Halophosphate phosphor linear fluorescent lamps are very old technology and there would be a very limited market for these products in Australia.

- There are suitable LED replacement products available.
- Lighting Council Australia agrees it would not be an issue if these products were phased out in 2023.

Africa region proposal to phase out [2024] compact fluorescent lamps with an integrated ballast (CFL.i) for general lighting purposes \leq 30 Watts

- These are primarily household/consumer market products.
- There are suitable alternative LED products in the market.
- Three-year manufacture contracts (i.e. manufacture overseas) and supply contracts (i.e. supply to retailers in Australia) exist.
- To allow the honouring of existing contracts and to reduce confusion in the market Lighting Council Australia recommends delaying the proposed phase out of CFL.i to 2025 so that alignment with the proposed phase out of triband phosphor \leq 60 W could occur.
- There are still sales of CFL.i products among older Australian consumers who replace CFLs like-for-like. Lighting Council Australia suggest the Australian Government should undertake a market education campaign (regarding the phase out of CFL.i lamps) to assist consumers move to LED products.

Africa region proposal to phase out [2025] linear fluorescent lamps (LFLs) for general lighting purposes,

(a) Triband phosphor \leq 60 watts;

- There are suitable alternative LED products in the market.
- Lighting Council Australia agrees it would not be an issue if these products were phased out in 2025.

(b) Halophosphate phosphor \leq 40 watts]

- If the European Union proposal to phase out these products in 2023 is accepted then this proposal will be irrelevant
- Lighting Council Australia agrees it would not be an issue if these products were phased out in 2025.

Africa region proposal to phase out [2024] cold cathode fluorescent lamps (CCFL) and external electrode fluorescent lamps (EEFL) for electronic displays of all lengths.

- These are very old technology products and the market is very small/limited.
- Suitable LED replacements exist.
- Lighting Council Australia agrees it would not be an issue if these products were phased out in 2024.

- We note that exclusion 1(c) of Annex A would need to be amended to remove the words, “cold cathode fluorescent lamps and external electrode fluorescent lamps (CCFL and EEFL) for electronic displays” if this Africa proposal is agreed.

Further comments

- As agreed by phone on 23 February, the Australian Government Department of Agriculture, Water and the Environment will provide Lighting Council Australia with an update regarding the agreed outcomes of COP4 in mid-April 2022.
- Lighting Council Australia requests the exact date (i.e. day and month) of implementation of each proposal.

Yours sincerely

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