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Clean Energy Regulator

Email: methoddevelopment@cleanenergyregulator.gov.au

Commercial and Public Lighting Method – Discussion Paper

To whom it may concern

Thank you for the opportunity to comment on the Commercial and Public Lighting Method – Discussion Paper.

Lighting Council Australia would ask the Emissions Reduction Assurance Committee to refer to our earlier submission (August 2021) in response to the *Commercial and public lighting crediting period extension review* for the majority of our comments.

Our comments on the following pages are in addition to our earlier submission.

About Lighting Council Australia

Lighting Council Australia (LCA) is the peak body for the lighting industry in Australia representing approximately 5,000 manufacturing jobs across Australia, and many thousands more in related product development and research, engineering, distribution, sales and installation.

Lighting Council Australia Members supply products that are used to light the built environment including residential, commercial, industrial and public lighting.

Yours sincerely

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Commercial and Public Lighting Method – Discussion Paper

The following comments should be read in conjunction with the Lighting Council Australia submission of August 2021 in response to the *Commercial and public lighting crediting period extension review*.

Fluorescent lamp phase out timetable for the European Commission market

Lighting Council Australia understands that all fluorescent lamps will be phased out of the European Commission market by the end of 2023 under two European Commission regulations:

- Regulation for ecodesign requirements for light sources and separate control gears (EU) 2019/2020¹; and
- Reduction of Hazardous Substances (RoHS) Directive.

The timetable for the phase out of fluorescent lamps in Europe is as follows:

Lighting Product	Phase out date	Regulatory Restriction
Compact Fluorescent Lamp (CFL) - integrated control gear	1 September 2021	Ecodesign
CFL– non integrated controlgear	March 2023	RoHS
Long life CFL	September 2023	RoHS
T2	1 September 2021	Ecodesign
T5	September 2023	RoHS
T8	September 2023	RoHS & Ecodesign
T12	1 September 2021	Ecodesign
Long life linear fluorescent lamp	March 2023	RoHS

The European Commission market for lighting products is around 25% of the global market. Such a significant market contraction is expected to result in the loss of manufacturers and an increase in the cost to supply fluorescent lamps. This will provide a further disincentive for suppliers and consumers to support the fluorescent lamp market.

Minamata Convention (Fourth Conference)

Further to above, the UN Minamata Convention on Mercury (fourth conference) will meet in March 2022 to discuss proposals that would disallow the manufacture, import and export of the vast majority of fluorescent lamps between 2023 and 2025.

¹ From 1 September 2021, [Regulation for ecodesign requirements for light sources and separate control gears \(EU\) 2019/2020](#)

Although the outcomes of these talks are not yet known, it is clear there is significant global pressure on the fluorescent lamp market that will likely lead to its extinction from global markets during this decade and possibly by 2025.

The Australian Government Department of Agriculture, Water and the Environment will lead the Australian delegation to the fourth conference of the Parties to the Minamata Convention on Mercury (COP4) and can be contacted at minamata@awe.gov.au or (02) 6274 1870.

Australian lamp imports

Table 1 (below) shows lamp imports by technology and type from 2015 to mid- 2021.

The data shows:

- A reduction in the linear fluorescent lamp market of 69% between 2015 and 2020.
- A reduction in the compact fluorescent lamp market of around 30% between 2015 and 2020. Note: Many of our members have informed us that they placed their last orders for compact fluorescent lamps between 2018 and 2020. In some cases, these were larger than usual orders - Hence the import spikes in those years. We expect CFL import volumes will fade at a much faster rate from 2021 onwards (as shown in the 6 monthly data for 2021) as suppliers exit this market.

Table 1: Australian lamp imports by technology and type (2015 – mid 2021)

	2015	2016	2017	2018	2019	2020	2021 (Jan-Jun)
MV Incandescent	7,452,238	8,286,438	8,667,779	5,518,582	4,390,148	4,397,288	1,980,272
MV Halogen	16,708,774	19,075,435	13,931,059	9,902,614	5,557,405	5,065,695	1,863,418
ELV Halogen	5,519,682	6,153,274	4,351,157	3,366,077	2,683,694	1,390,574	704,818
CFL	13,180,852	13,337,309	8,797,375	9,104,593	7,670,457	9,087,465	2,618,460
LED lamp incl. directional, non-directional, linear, unclassified			20,777,871	23,161,240	33,836,672	31,209,986	15,870,553
Linear Fluorescent	11,491,790	10,360,364	9,420,379	5,452,557	4,401,702	3,545,200	1,611,346
HID	2,178,514	2,072,869	1,362,832	1,087,404	762,584	979,006	299,733
Total			67,308,452	57,593,067	59,302,662	55,675,214	24,948,600

Feedback on the Discussion Paper

Fluorescent lamps have historically been used widely in the commercial building lighting market. Lighting Council Australia would highlight that the above market and globally regulatory information is further evidence that the fluorescent lamp market globally and in Australia is expected to continue declining rapidly.

Along with the information contained in our August 2021 submission, we conclude that it would be difficult to argue that commercial lighting upgrades made under the Emissions Reduction Fund are additional now. Certainly, by the middle of this

decade, an argument that lighting upgrades under the ERF are additional would likely be impossible to sustain.

Regarding any potential impact of revocation of the Commercial and Public Lighting Method:

We note there have been only a small number of lighting upgrade projects made under the ERF during its six years of operation. If installations have not utilised the ERF until now, it is difficult to see those installations:

- Utilising the ERF at some point in the future; and
- That future upgrade being additional.

Lighting Council Australia does not agree that revocation of this method will result in lost abatement opportunities given:

- The voluntary direction of the market and the significant and continually increasing benefits of transitioning to LED technology.
- The global moves towards the phase out/bans on fluorescent and other mercury containing lamp technologies.