

**Philips Lighting comments on the LED MEPS proposal, V11 13 September 2017 – E3
Lighting Policy Proposal (Lighting -Supplementary Consultation-September 2017)**

To
The Department of the Environment and Energy
Commonwealth of Australia

Subject: Lighting
Sir/Madam,

We, Philips Lighting wish to express our thanks for providing an opportunity to provide a feedback to the E3 Lighting Policy Proposal.

This submission contains Philips Lighting comments and recommendations on the LED MEPS Standard proposed, Version V11 13 September 2017 in the E3 Lighting Policy Proposal (Lighting -Supplementary Consultation-September 2017).

We would like to state Philips Lighting's position as being in support of the introduction of MEPS for LED lamps in March of 2019 and LED luminaires in March of 2021, but only if this is done in a manner whereby requirements are set out in line with global standards and in line with most recent technical and research updates so as to minimize market confusion.

Philips Lighting is of the view that the LED MEPS proposal under consideration have significant implementation barriers and would, if implemented without sincere consideration of the many detailed comments provided, have unintended, negative consequences not only for the lighting industry, but also for consumers and the environment.

The consequence of the proposed measure would be that state-of-the-art LED products cannot meet the proposed requirements. Prices of LED products would increase dramatically for consumers and the strictest forms of surveillance and corrective action would be required to enforce the new regulation. Furthermore such proposal would stimulate unfair competition, trade barriers, and a rogue channel of uncompliant products.

We also note that the cost of administration and testing will be borne by quality importers and manufacturers like us, further increasing the price differential between compliant and non-compliant products and increasing the attraction of non-compliant products in the market



We sincerely feel that there would not be any benefit gained by the regulatory authority, lighting industry and end consumers by imposing the proposed regulation for LED lamps in its current form.

As mentioned at the beginning of this letter, our position is in support of the introduction of LED MEPS in Australia in line with the rest of the world, so Philips Lighting will endeavor to engage in constructive discussions with The Department of Environment and Energy. Philips Lighting Australia and New Zealand extend you an offer to discuss matters on which you may require further clarification directly with our Global Standards and Regulations experts some of which sit in international standards boards.

In this context please refer to our "Written Consultation Response" attached for the detailed feedback and suggestions on this LED MEPS proposal.

We sincerely request that you to provide us with an opportunity to have a follow up discussion with your Department on our submission, before implementation of this LED MEPS proposal.

We shall appreciate a positive reply.

Thanking you,

Sincerely

Philips Lighting