



3rd March 2017

The Department of the Environment and Energy
Commonwealth of Australia
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Dear Sirs

Re: Consultation Regulation Impact Statement - Lighting

We are an independent lighting design practice working in the Commercial, Hospitality and Urban markets. Our role is to create well-lit spaces that welcome and excite users and yet are sustainable and easily maintained. We welcome the RIS in its desire to remove poor quality LEDs and luminaires from the market.

Having reviewed your document dated November 2016, we make the following comments: -

The issues addressed for LED luminaires is much more complex than is indicated in the draft MEPS. We recognise that Australia has led the world in the banning of old inefficient lighting technology but the MEPS for new technology should be developed with those regions that are responsible for the majority of product we specify.

We recommend that the LEDs and the LED luminaires should be split into 2 documents.

LEDs

1. The proposed MEPS for LEDs is, in general, sound but the comparison of performance with traditional incandescent lamps needs to be modified to reflect that tungsten halogen lamps are more likely to be replaced with LEDs as incandescent lamps were banned in 2009. Table 1 suggests that a MR16 LED lamp that produces 650 lumens is equal to an MR16 50 watt fitting that produces 950 – 1000 lumens. This table needs to be amended. It also does not address the “quality” of the beam. Such that the peak illuminance may be equivalent the beam distribution may not with the possibility that the installation no longer meets the standard (AS1680) that it was designed to meet.
2. The energy and greenhouse gas savings indicated as a benefit will not, in the professional market sector, be a benefit as the BCA Part J6 already limits the watts per square metre permitted. More efficient luminaires will result potentially in the need for dimmers to adjust the illuminance levels. This will have a minor impact of the energy consumed.

Luminaires

3. We are concerned that if a MEPS is adopted for luminaires in Australia, it will either increase the cost of light fittings in our market or result in overseas manufacturers withdrawing their products. The need for all fittings offered for sale, on websites or catalogues, to be reregistered is costly when one considers that around only 5% or so are actually sold here. We are in world terms a very small market and it is unlikely that overseas manufacturers will go to the expense to “Australianise” all their products by paying to register them and adapt them to meet our MEPS. As the vast majority of products we specify are

designed in Europe, we feel that it would be prudent to wait till there is a European MEPS and adopt it. We understand that their MEPS is about 6 - 9 months away.

4. The current MEPS works well for fittings without any precise optics. Meaning wide angled downlights with the LED level with the ceiling or just above the ceiling. These fittings have high delivered lumens but also high glare. When the LED is raised well above the ceiling (to reduce glare) or narrow angles reflectors or lenses are added, it is most probable that they will not meet the proposed delivered lumens and will be excluded from sale. This will remove the majority of the professional luminaires and leave the very fittings that should be deleted. This is particularly relevant to wall washers and accent lights. When we use wallwashers, the apparent brightness of a space is enhanced with minimal energy.
5. We believe that in order to provide a complete overview, the document should include maximum luminance for luminaires as this will help give all manufacturers a more comprehensive idea of the performance quality issues needed in their designing light fittings.
6. It is odd that rope light is exempt and that LED extrusions are not addressed at all.

Recommendations

We support the intent of the MEPS and believe that its final version could be enhanced by: -

1. Dividing the LEDs and the luminaires into two separate documents.
2. Proceed with the MEPs for LEDs with the modification such that both lumen output and beam quality are in fact like for like.
3. Regarding luminaires, wait until the European standards have been resolved. As the vast majority of the fitting we use are designed in Europe. Then we can adopt reciprocal rights with Europe. This will potentially benefit both imported and local manufactures. This we understand is mid 2017 as all light fittings will be registered and suppliers that import cheap fittings from Asia will also have to register their fittings. This suggests a more level playing field.
4. There is a concern that the importers of cheap fittings may ignore the MEPS or may well copy other supplier's data sheets and test reports. Currently it is unclear how the MEPS will be policed.
5. Engage an experienced independent lighting designer to assist your current team to revise the document from a totally independent view point yet with industry experience. This should speed up the process and give the industry more confidence that the proposed MEPs will be better focussed on removing poor quality LEDs and luminaires and provide a document that is simpler to understand.
6. The dissemination of the RIS needs to be more widely circulated in the industry as this iteration of the RIs seemed to appear only 2 weeks ago in much of the market it is aimed at supporting. The industry colleagues from both the design community and supplies we deal with locally all expressed surprise and annoyance at the lack of consultation given that there was seemingly only 2 weeks to review and respond.

7. A simple “2-page summary” should be created that provides the key information with the body providing the backup logic and facts.

As a fellow of the International Association of Lighting Designers, we support the more detailed submission that has been made by the IALD

Yours Sincerely

A handwritten signature in black ink, appearing to read "David Bird".

David Bird FIALD FIES
Managing Director

A handwritten signature in black ink, appearing to read "Kire Bogoevski".

Kire Bogoevski Associate IALD
Creative Director