

11 October 2017

Karen Moloney, Director – Lighting Team
Department of the Environment and Energy
GPO Box 787
Canberra, ACT 2601

Dear Ms Moloney

Submission re Lighting – Updated policy positions

The Brotherhood of St Laurence welcome E3's new lighting policy paper and this opportunity to provide feedback on it. We acknowledge the research and extensive consultation undertaken by the Department to advance its proposal to this stage. Lighting represents a significant portion of Australian energy use, and we support these important efforts to increase its efficiency and decrease greenhouse gas emissions.

This letter sets out the Brotherhood's responses to E3's most recent policy positions. We support the recommendations put forward in the position paper, including the introduction of minimum standards for LED lamps and the phase-out of halogens. We commend the Department for taking steps to improve the energy efficiency of Australian lighting stock. However, we believe that more could be done to inform consumers about their purchasing choices by further regulating the information provided on bulb packaging.

The Brotherhood supports the introduction of Minimum Energy Performance Standards (MEPS) for LED lamps. High-quality LED lamps are more efficient than any other commonly available lamp type, but due to the present lack of standards, many low-quality, inefficient bulbs are sold. Poor-quality LED lamps both waste electricity and damage the reputation of the technology among consumers, discouraging their adoption. The creation of MEPS for LED lamps will serve to protect consumers from substandard products, and increase the efficiency of Australian homes and businesses.

We commend the proposed increase in MEPS for incandescent and halogen lamps to remove inefficient products from the market. In most sockets, filament lamps can be directly replaced with newer, more efficient technologies with a lower total cost of ownership and minimal change in light output. The recommended policy is a logical continuation of the regulations introduced in 2009, and its revised exceptions appear sound. For downlights, we believe that the delayed phase-out of filament downlights is appropriate in order to ensure compatibility with

transformers and the availability of high-quality LED lamps that meet the new standards.

We welcome the requirement to display specific information on LED packaging. Consumers need information to make informed choices about lighting, and the proposed MEPS requirements to display certain data on packaging represent an adequate minimum standard. However, given that a majority of surveyed Australians cannot define lumens, colour temperature or efficacy¹, the proposed MEPS will be insufficient for them to understand their options. Consumers would benefit further from a regulated panel on packaging explaining this information and displaying it for easy comparison.

We recommend that E3 establish a standard label design setting out key data consumers need to understand their purchases. Under the proposed standard (p. 90), at least 14 pieces of information must be displayed on each bulb package, but potentially without explanation and without consistency between products. If customers are to compare products, their task will be much easier if information is presented in a clear, consistent form. We understand that region-specific packaging requirements may increase manufacturers' costs, so we suggest aligning an Australasian label with one of its international equivalents with a focus on non-technical language.

Please contact Damian Sullivan (e: dsullivan@bsl.org.au m: 0405 141 735) or David Bryant (e: dbryant@bsl.org.au ph: 03 9483 2470) for further information.

Once again, we commend E3 on their work and welcome the completion of this important project.

Yours sincerely

Damian Sullivan
Senior Manager, Energy, Equity and Climate Change

¹ Department of the Environment and Energy 2017, *Light bulb labelling consumer study*, viewed 11 October 2017, < http://energyrating.gov.au/sites/new.energyrating/files/documents/Report_Light_Bulb_Labelling_Consumer_Study.pdf >.