

Roberts, Kellee

From: Dennis GALVIN <dennis.galvin@legrand.com.au>
Sent: Thursday, 12 October 2017 2:18 PM
To: EER Lighting
Subject: Lighting – Updated policy positions' HPM Legrand submission
Attachments: FINAL-consultation-ris-lighting-updated-policy-proposals - feedback from HPML (2).doc

Please find attached consultation RIS with our comments

We have made comments in Table 1 and Table 5 with our comments highlighted in yellow. If we have no comments we have noted "agreed"

In general we are in support of the Proposal for MEPS for LED Lighting and in fact we would like to see simple luminaires, such as down lights, as well as LED lamps included at the first stage. Our comments only relate to test methods and acceptance levels. i.e. we think that in item 12 of Table 1 that minimum life should be 6000 hrs rather than 15,000 hrs. In a low use area what is wrong with using a lower cost lamp with equal efficiency. 6000 hrs at 1 hr per day is over 16 years use.

In regard to the phase out of halogen lamps in attachment H our only comment is we are concerned that removing G9 and R7 lamps will cause problems with finding LED equivalents and the phase out should be pushed back to 2021

In regard to timing of the introduction of MEPS for LEDS we think 1 year from publication is too short. People talk about releasing products every 6 months but that is not the total development cycle. We need 18 months from when the specification is finalised for the application date.

Regards

Dennis Galvin
Technical Director
Legrand Australia
Ph +612 8783 4825
Mob +61410 678 111
43-47 Lyn Pde
Prestons
NSW 2170
Australia

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