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Sent: Friday, 3 March 2017 2:22 PM

To: EER Lighting <EERLighting@environment.gov.au>

Subject: Consultation RIS – Lighting - 2nd email - the first was incomplete... please discard

I write in support of the Consultation Regulation Impact Statement – Lighting Submission, submitted by the International Association of Lighting Designers (IALD).

By any measure lighting is facing a critical turning point in its development; this has been the case since the introduction of Solid State Lighting with its attendant advantages and disadvantages. Few within the professional lighting community would disagree that it is clearly anomalous that LED lighting technology has not been subject to MEPS and that this now needs to be addressed.

However, this complex question requires close consideration from multiple perspectives including that which ensures the continuing advance of increased quality in lighting design outcomes. When it became clear, some 20 years ago, that lighting related energy usage required to be curbed, many in the lighting design profession expressed concern that it would be difficult to meet the new standards whilst continuing to deliver 'well lit' environments. However, what had been overlooked was the axiom that 'less is more' and that much of the lighting designer's work is about deciding where to have less light, or perhaps no light at all, and that it is the juxtaposition of light and shade that creates stimulating, and human, places to live and work in. This reality is worth considering in the context of the application of MEPS to LED driven luminaires. A lighting design may require the use of good quality luminaires with refined optical performance, such as a lensed wallwasher to provide uniform vertical luminance. Whilst the overall system efficacy of such an integrated luminaire may be relatively low and, indeed, below the currently proposed MEPS, the fact is that only a small number is generally required and that such a lighting technique is likely to result in diminishing the need for uniform levels of luminance on the horizontal plane, with an attendant reduction of energy usage. This can justify the specification of what could be deemed to be an inefficient luminaire. The IALD statement reflects this, not untypical, situation in its reference to the relationship between MEPS and NCC J6.

The IALD Statement makes it clear that a significant amount of work remains to be done before a wholly satisfactory and operable MEPS can be extended to the field of LED light sources and luminaires. One of the key responses from the IALD is the proposal that there should be alignment with the forthcoming European standard. This makes eminent sense from every viewpoint. There is also sense in proceeding with the development of MEPS for LED lamps as an entirely separate exercise from that for integrated and non-integrated luminaires.

In view of the work that remains to be undertaken, and as the only past president of the IALD currently living and working in Australia, I urge the Department of the Environment and Energy to engage at least one senior independent lighting design consultant, with minimally ten years' experience, to contribute to the further development and finalisation of this Standard.

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