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6th October, 2008

Mr David Boughey
Lighting and Equipment Energy Efficiency
Department of the Environment, Water,
Heritage and the Arts
GPO Box 787, Canberra ACT 2601

Dear Mr Boughey,

**Response to Regulatory Impact Statement: Proposal to Phase-Out
Inefficient Incandescent Light Bulbs**

We would firstly express our support and in principle agreement to the objectives set out in the Program and state that, in our view the Regulatory Impact Statement accurately assesses the requirements for implementing this policy of MEPS for incandescent lamps.

As previously advised in our response to the Final Technical Report, the Illuminating Engineering Society of Australia and New Zealand (IESANZ) is the professional body for lighting in Australia and New Zealand and as such represents the professional and technical interests of the members of the Lighting Industry. We therefore, see our Society being able to greatly assist in the Educational and knowledge dissemination process for the E3 Program.

We are able to support a seamless and effective implementation of the phase out through three knowledge delivery mechanisms. These are providing access to:

1. Accredited educational courses with up-to-date information for the lighting industry
2. General knowledge courses for allied design and construction organisations, such as the Australian Institute of Architects, Housing Industry Association and the Electrical Contractors Association, that will be advising the commercial and general community on the proper use and installation of energy efficient lighting systems, and
3. Knowledge dissemination to the general public on appropriate replacement technologies which will provide visual quality in their domestic environments. This can be achieved by assistance in the production of brochures and fact sheets, information campaigns via the various forms of media, presence at Home Show type exhibitions and public lectures to assist in the reduction of fears and misinformation on alternate light sources as discussed in the Statement.

Within our membership we have people with the skills and experience to write the courses for various levels, vet the material for accuracy and commercial independence and also provide the teaching.

We also foresee as a very positive way that the IESANZ, as the professional society for Lighting in Australia and New Zealand can contribute to the smooth transition of this Program, is by teaching others how to disseminate information in a simple and concise manner.

The IESANZ is responsible for accreditation of professional Lighting Engineers and Designers. The member technical grades require graduation from an IESANZ accredited lighting course with Continuing Professional Development. We see that as part of the education campaign, it will become obvious that for large lighting installations, acquiring the services of a professional lighting engineer /designer will be essential. The Society can provide a publicly accessible list of suitably accredited Members that can assist in the provision of these services.

Whilst we believe technical manufacturing aspects and product labelling reforms should be left in the realm of the Lighting Council Australia and Standards Australia, we are aware that the quality of the light produced by some energy efficient sources needs improvement, but firmly believe that in the shortness of time this will be occur through market demand for even better colour rendering and efficacy. In relation to particular issues within the RIS, we wish to highlight and make recommendations on the following:

1. We stress the importance of including lamp efficacy in the mandatory labelling statements proposed under Clause 3.1.4. This information will facilitate an additional positive impact of the efficient lighting policy by making compliance with Regulatory Codes, such as Building Code of Australia (and other state based legislation), which stipulate lighting compliance in terms of lamp efficacy, easier for the end user and incrementally reduce costs of construction simply because this information can be easily found.
2. With reference to Clause 3.1.2 and Figure 3.1 Proposed MEPS for Incandescent Lamps, the IESANZ recommends that reflector type incandescent lamps receive a discount (possibly between 0.8 to 0.9). This type of lamp, as either a bare envelope in a focusable reflector or in a dichroic reflector is an essential lighting design tool and we feel that should the MEPS be too stringent, it will have a negative impact. Further details can be provided on this issue.

Other areas that we see as important is the need to promote the acceleration of alternative efficient light sources such as LED and light emitting polymers and to provide education in better use of daylighting and lighting control systems for larger installations, they being of significant assistance in reduction of energy use in lighting.

We acknowledge that communication and the dissemination of general knowledge to the Public is critical to the success of this Program and in order to support the

Government, the IESANZ would be prepared to significantly develop our website to provide a live source of information, managed by an identifiable, independent body (such as the IESANZ) to commercial, allied industry, trade and general public on the incandescent phase-out and future E3 efficient lighting Programs. We would seek some financial assistance from Government to assist us in the initial development of this facility.

Through previous discussions regarding the upcoming review of The Greenlight Program for the next period, we look forward to working closely with Government and Lighting Council Australia.

We congratulate the Equipment Energy Efficiency Committee on this program and offer the full support of the Illuminating Engineering Society of Australia and New Zealand in the education and promotion of this program to energy users.

We would also like to offer myself (as Director responsible for Energy Efficient Lighting Policy) for a formal engagement in liaison, between the E3 committee and the IESANZ, on ongoing and future energy efficient lighting policy development and implementation in order to facilitate a supportive and effective relationship.

Yours sincerely,



Murray Robson MIES
Director IESANZ Ltd
Convenor : IESANZ Energy Efficient Lighting Policy