

On behalf of members, the **International Association of Lighting Designers** (IALD) writes in response to the revised proposals described in the Consultation Regulation Impact Statement (CRIS) of September 2017.

The **IALD** and its members have welcomed the opportunity to participate in this joint initiative by the Australian, State and Territory and New Zealand Governments, and thank the Department of Environment and Energy (Lighting and Communications Team) for the consultation process.

This policy area has widespread implications to the lighting industry and profound consequences to lighting design as a profession in particular. We were primarily concerned that the CRIS of November 2016 would erode the profession of lighting design with severe negative commercial outcomes. Whilst we are pleased that the draft has revised out some of the initiatives that we (and other representative parties) considered detrimental or unworkable, we retain severe concerns about the intent and application of item 5 in Table 1 of the amended CRIS.

IALD's position on the revisions can be summarised as follows.

1. Introduction of MEPS for LED lamps.
2. Postponement for further consultation of MEPS for non-integrated commercial luminaires.
3. Increase of MEPS on incandescent and halogen lamps, and additional categories of incandescent lamps subject to MEPS.
4. Removal of mandatory labelling for lamp products primarily used in the residential sector.

IALD has serious concerns in regard to the intent and future development of:

5. Voluntary MEPS for integrated luminaires.

The mechanics and practicality of this Item 5 of Table 1 is unclear to us, and details described in the body of the document do not provide the clarity required for practical application. We differ in the view that integrated luminaires may include remote drivers (page 68 of 107 of the CRIS). This is contrary to recognised terminology in the market and if realised would be confusing to such an extent it would be breached in many instances purely on the illogical application of the term. We find it confusing that integrated luminaires (item 5) may also mean

luminaires with remote drivers, generally regarded as a non-integrated luminaire which forms the category of item 2 of Table 1.

Furthermore, we note that under *"Scope Exclusions for LED Lamps and Integrated LED Luminaires"* that wallwashers and beam shapers are not listed as an exception, nor for that matter accent beam spot lights. These and other specialist luminaire types are valuable tools for the professional lighting designer and if subjected to a broad brush MEPS programme designed for low end open faced down lights they will cease to exist and thereby severely compromise the ability of the lighting designer to perform their task. As stated in earlier correspondence and in meetings this will seriously erode the profession, cause financial stress (or worse) to distributors of these important families of luminaires and make the lighting objectives of many spaces unachievable.

The confused terminology together with the various inclusions and exceptions as to what is or is not applicable and in what circumstance it may be applicable seems to be so contorted as to be unworkable in an otherwise legible document.

Further to the difficulty understanding the blurred reasoning of what constitutes an integrated or a non-integrated luminaire as described above, the requirement that *"product packaging or specification sheet/online where the product is not offered for retail..."* is mostly a redundant clause because products sold outside retail are generally for professional specification and as such performance information to support this technically competent part of the market abounds. We have no practical problem with the clause per se, but it seems an unnecessary embellishment.

In summary to this item 5 we recommend that there is clear and unambiguous delineation between an integrated and non-integrated luminaire such that items 2 and 5 are not muddled by a crossover of terminology. We also are compelled to reiterate the importance of recognising professional luminaires that provide specific effects in the future development of MEPS for non-integrated luminaires.

IALD and its' members thank the Department of Environment and Energy for its consideration of feedback through the consultative process, but ask that it further review

its intent for item 5 of Table 1. We look forward to participating in further appraisals and providing advice from the lighting design profession in the future.