

15 March 2023

Re: Energy Efficiency Council response to the *Investigating future regulatory options for lighting products* public consultation paper.

The Energy Efficiency Council (EEC) welcomes the opportunity to comment on the public consultation paper for investigating future regulatory options for lighting products. The EEC is Australia's peak body for energy efficiency and management, with a membership of businesses, universities governments and NGOs working to guide Australia on the path to an efficient, prosperous net zero economy.

The EEC strongly supports the Government's proposed changes to the regulation of LED, incandescent and halogen lights under the *Greenhouse and Energy Minimum Standards Act 2012*.

Globally, long-standing appliance efficiency policies have helped to halve the average energy consumption of common appliances including lighting.¹ Due to their efficacy, the EEC is a strong supporter of the GEMS program and minimum energy performance standards (MEPS) for appliances, including lighting.

In Australia, GEMS regulations on appliances including lighting have been shown to substantially reduce energy costs for consumers: on average, these regulations save households between \$140 and \$220 annually on their electricity bill.²

The Decision RIS (DRIS) for this consultation demonstrates a potential \$1.396 billion in energy savings for consumers, and \$132 million in energy savings for businesses, through the introduction of MEPS for LED lamps and the phasing out of halogen lamps.³ Given the current pressures on the cost of living and the imperative to reduce energy-related emissions as soon as possible, these savings should be realised at the earliest available opportunity.

The EEC strongly supports implementation of MEPS for lighting through aligning Australian standards with those in the EU. Alignment of Australian standards with those already in place overseas minimises compliance costs on industry, as many companies are likely to already be complying with these regulations due to selling product in the EU. Alignment with overseas standards also delivers a net benefit to consumers, as demonstrated through the DRIS.

Importantly, precedent for aligning product standards with those already in place overseas has been demonstrated: in 2016, Canada increased the MEPS for 20 products – including lighting – to align with those in force, or soon to come into force, in the

¹ International Energy Agency (IEA) 2021, *Energy Efficiency 2021*, IEA, Paris, p. 57.

² Commonwealth of Australia 2019, *Independent review of the GEMS Act 2012 Final Report*, Commonwealth of Australia, Canberra, p.15.

³ DRIS 2018

United States. Alignment of these standards was estimated to result in about AU\$1.6 billion in net benefits to Canadians between 2016 and 2030.⁴

The EEC also supports the continued phase-out of incandescent and halogen lamps where equivalent replacement LED lamps are available. Incandescent and halogen lamps have higher energy use than LEDs, giving rise to higher emissions; phasing them out will enable the lighting industry to support Australia in reaching its commitment to reduce emissions by 43 per cent by 2030, and reach net zero emissions by 2050, in line with the Paris Agreement.

The EEC looks forward to continuing to engage with the Department of Climate Change, Energy, the Environment and Water on the future of the GEMS program. If you have any questions on points raised in this submission, please contact the EEC's Buildings Policy Advisor, Julianne Tice on julianne.tice@eec.org.au or 0403 251 744.

Yours sincerely



Alex St John
Acting Head of Policy
Energy Efficiency Council

⁴ Government of Canada 2016 "Energy Efficiency Regulations," Canada Gazette, Government of Canada, Ottawa, Part II, Vol. 150.