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Subject: VEU division – Activity 21A non omni-directionality transition period

Essential Services Commission
VEU division – Activity 21A non omni-directionality transition period

To whom it may concern

Emerald Planet does not agree with the extension period of non-omni-directional lights until the 31st July 2019

Notwithstanding that this period is only 4 weeks, Emerald Planet has entered into commercial agreements with APs to start using omnidirectional lamps as of 1st July 2019.

If these changes apply this will impact our company negatively
Emerald Planet has complied and supported the ESCs position to support Omni-directional lamps even though Emerald Planet had developed and had approved in VEET a non omni-directional lamp.

Emerald Planet also supported a transition period that the ESC released on the 26th Nov 2018 through to 30th June 2019 based on the to the lighting requirements imposed by the ESC on the 13th Nov, plus the need for Electricians. This period was a 7 month period from the time of release.
Emerald Planet supported this to its commercial detriment.

Emerald Planet appreciates and respects that the ESC is willing to work with vested interested parties in regards to these changes. It is important that the ESC, Aps and other vested parties work together to protect the integrity of the program.

EP does not agree with these ongoing changes being applied to support unreasonable, irresponsible commercial decisions by manufacturers and APS. Emerald Planet also notes that the requirements around non omni-directional lamp installations(see below) are not being met in practice which also seems to be supported by the ESC.

Emerald Planet believes the ESC has met its obligation to the original transition period and should stand by its original decision to end the transition period on the 30th June 2019, supporting the silent majority of companies that have planned around this date.

5.1. Activity 21A: Incandescent GLS lamp or CFL replacement

Requirements	Description
Activity	<p>Installers must:</p> <ul style="list-style-type: none">• decommission a mains voltage incandescent GLS lamp of at least 25 watts (tungsten filament lamp) or 18 watts (tungsten halogen lamp) or a mains voltage compact fluorescent lamp of at least 5 watts• take away the decommissioned lamp for recycling• physically install a lamp which meets the below product criteria.• ensure that the consumer is satisfied with the light distribution of any non omni-directional lamps which are installed. These lamps should only be installed in the following situations:<ul style="list-style-type: none">– where the shade/reflector of the lamp is low translucency– where the shade/reflector of the lamp is opaque– where lamps are mounted close to the wall/ceiling that are either:<ul style="list-style-type: none">– perpendicular to that surface (i.e. pointing away from surface)– parallel to that surface with multiple lamps having opposing orientations– where multiple lamps are fitted close together (e.g. chandeliers) <p>Installers must not:</p> <ul style="list-style-type: none">• install a LED lamp into dimmable circuits unless the lamp is listed as suitable for dimmable circuits in our Register of Products• give the consumer spare LED lamps• replace LED lamps• install a non omni-directional lamp if the consumer is not satisfied with the light distribution of the lamp. These lamps should not be installed in the following situations:<ul style="list-style-type: none">– where there is no shade/reflector around the lamp– where there is a transparent shade/reflector around the lamp– where the lamp shade/reflector is relatively translucent– where the internal surface of an opaque shade is intended as a luminous feature– where the fitting contains a single lamp only that is mounted parallel and close to the mounting surface



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