

# Eligibility of switchable wattage lighting products (category 34)



29 March 2021

We have completed the stakeholder consultation on switchable lamps. Based on the feedback received, we have now finalised our position on switchable products.

We will be removing the lower wattage variants of the switchable lamps from our register. We will only register switchable lamps based on the rated wattage of the lamp.

## How to comply with changes with product category 34

We're clarifying which products are eligible for use under category 34. Use the following table to check which products comply with our requirements.

Product within category 34	Decision	Compliance requirements
Lighting products tested at the highest rated wattage	We will maintain these products on the register.	There is no change to eligibility requirements of products tested at the rated wattage. Please refer to appendix for more details on rated wattage.
Lower wattage variants of switchable lamps	These will be progressively removed from the register from 1 April 2021.	Accredited Persons will be able to create VEECs using these products until they are removed from the Register of Products.
Luminaires with LCDs	These products remain eligible for use under the program. The LCP must be determined at the rated wattage.	You may apply a control multiplier to a product if it includes automatic dimming controls, or manual controls that allow a user to manually adjust the light output using a knob, slider, or other manual input mechanism or by





		manually selecting a pre-programmed light level (scene).
Product safety	Safety requirements in Victoria state that lamps must be tested at the rated wattage.	All luminaires sold in Victoria must comply with AS/NZS 60598.1 which requires in clause 3.2.8 that the rated wattage be clearly marked on the Luminaire. <sup>1</sup>
Product testing	There are no changes to product testing.	Testing procedures and standards generally require that tests be conducted at rated wattage.
Distinction between 'easily switchable' or 'user configurable' and 'factory fixed' luminaires	We now consider such a distinction is unnecessary	

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<sup>1</sup> AS/NZS 60598.1 is prescribed through the VEU Lighting Product Application Guide and [AS/NZS 3820](#).



## **How you responded to our stakeholder consultation on switchable lamps and our feedback**

In October 2020, we advised that we planned to remove lower wattage variants (lamps with lower LCPs) of switchable lamps from the VEU Register of Products. These were incorrectly applied for and published at multiple power settings for some lighting products. We consulted our stakeholders twice last year to seek feedback on this matter.

### **Summary of submissions received**

We received several formal submissions, which covered four main themes:

- supporting the VEUs stance on switchable products and early removal of low wattage products from the register
- restricting the use of products with switchable wattage settings will impose costs and does not reflect market trends and product developments
- the need for transitional arrangements, and in particular considerations for existing projects and stock levels
- that the legitimate savings and benefits which switchable wattage products can deliver should be recognised, and that removal may discourage innovation and flexibility.

We thank everyone for their feedback. We have considered the issues raised and have additionally sought feedback from Energy Safe Victoria. We have also worked with the Independent Pricing and Regulatory Tribunal (IPART) in NSW to ensure that our requirements are, where possible, consistent with the Energy Savings Scheme (ESS) and industry practices. This will ensure commonality between our two programs, consistency in outcomes and reduce costs for stakeholders.

### **Dimmable or power adjustable luminaires could utilise control multipliers**

Some submissions noted that removing the lower power variants of switchable products would not reflect the energy savings that are achieved by using a lower power setting. However, the VEEC calculation includes a 'Control Multiplier' variable which recognises that lighting control systems





can affect the power drawn by reducing lighting levels when not required.<sup>2</sup> This is the correct process to use to claim some of the benefits of lower wattage variants (if the installation meets the definitions of manual or automatic dimming).

## Process for identifying and removing lower power variants of switchable lamps

Some submissions requested that we provide stakeholders with time to clear stock and develop compliant products. We consider this unnecessary, noting that we are not removing approval of the highest wattage (rated wattage) variant of these products and so installers can continue to install products with LCPs established at the rated wattage. We also note that we have already given six months' notice to stakeholders on this matter (since October 2020). Additionally, it may also be possible to utilise control multipliers on these products if the installation meets the definitions of manual or automatic dimming.

We have been working with IPART to identify lower wattage variants of switchable lamps that may have been applied for incorrectly and therefore do not have a valid approval. We will be progressively removing these product variants from our Register of Products as and when they are identified, but after contacting the original product applicant. We will provide the original applicants with an opportunity to demonstrate that those products are not lower wattage variants of switchable lamps (i.e. that the LCP was indeed determined at the rated power).

Please let us know if you identify a product which is a lower wattage variant of a switchable lamp on our Register of Products. We will investigate and act on this information accordingly.

Please provide details to: [veu@esc.vic.gov.au](mailto:veu@esc.vic.gov.au).

## Where to get help

If you have any questions or feedback with respect to matters set out in this program update, please contact VEU Support on (03) 9032 1310 or [veu@esc.vic.gov.au](mailto:veu@esc.vic.gov.au)

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<sup>2</sup> The Control Multipliers reduce the *Baseline Consumption* and/or *Upgrade Consumption* when the lighting equipment is connected to a lighting control system specified in Table 34.9 of the VEU Specifications.





## Appendix: Examples and further clarification

### Example 1 – LCP wattage as marked on the luminaire aligns with the testing done

<b>Luminaire Company</b>	
<b>Model: Model 1 - 10WLED Luminaire</b>	
<b>Made in NSW</b>	
Input Voltage: 100-240V	Rated power: Max 10W (adjustable between 2-10W)
Input Current: 0.053A	Power Factor: 0.9
Frequency: 50/60 Hz	

Published LCP must correspond to the rated wattage marked on the luminaire's label. i.e. at 10W

## Example of transition arrangements

### Example scenario #1 (Low power LCP published at Implementation Date)

Upgrade Date	1 December 2020	Lighting upgrade completed
LCP acceptance date	1 July 2020	Low power LCP published
Low power LCP removed	1 April 2021	VEEC creation using low power LCP is permitted for installations before 1 April 2021.

### Example scenario #2 (Low power LCP removed prior to Implementation Date)

Upgrade Date	1 May 2021	Lighting upgrade completed
LCP acceptance date	1 July 2020	Low power LCP published
Low power LCP removed	1 April 2021	VEEC creation using low power LCP is not permitted for installations after 1 April 2021.

