

Proposed changes to lighting product applications (product category 34)



9 October 2020



We have introduced new product application requirements for lighting products with switchable wattage settings.

The laboratory test reports must confirm they have tested the product based on its highest wattage setting.

We invite you to provide feedback on how we manage the transition for lighting products with switchable wattage settings which are currently listed on the Register of Products.

All lighting product applicants should review the updated LM80-15 and TM21-19 reporting requirements which now come into effect on 1 November 2021. We will continue to accept reports based on LM80-08 and TM21-11 until 31 October 2021.

Changes to product approval requirements for lighting products with switchable wattage settings

We have received an increasing number of lighting products with switchable wattage settings for approval under the VEU program for installation under building-based lighting upgrade (activity 34). To date, these products have been submitted for approval under the VEU program with different model numbers for the different wattage settings, usually differentiated by the inclusion of the wattage (NLP) at the end of the model number.

We have identified several administrative risks associated with installation of this type of product. Installers may select the lower wattage model number even where the higher wattage is set on the installed product. The energy consumer may also switch the product's power setting after installation given the power settings can be easily altered on these products. The installation of these products therefore carry a high risk of over-claiming of certificates where the installer has claimed for the product based on its lower wattage setting.





Given above risks, our position is that, from 12 October 2020, applicants must submit for approval a product based on their highest wattage setting. This ensures that the certificates are awarded for the device based on it being set at the highest wattage setting to mitigate the risks of over-claiming of certificates. Products will be able to be used in the program with the switch set to any power setting.

In submitting these products for approval, applicants must submit:

- only one product model based on its highest wattage setting
- the laboratory testing the LCP and ISTMT must confirm in a statement that they have tested the setting with the highest possible wattage setting.
- the product specification sheet must describe all variable power (LCP) and LCD settings.
- the laboratory conducting the ISTMT test must provide for a clear photo of the switch, the location of the switch in and its settings.

Request for feedback on approved lighting products with switchable wattage settings

We have a small number of products containing switchable wattage settings which have been approved and listed on the Register of Products. For these products, we propose to end-date the product models with the lower wattage settings on 12 November 2020 and to only maintain the product model with the highest wattage setting.

We invite stakeholders to provide us feedback on whether there you require us to provide a longer transition period for removing the product models with the lower wattage settings. If you require a longer transition period, please let us know how long this period should be, including your justification for requesting this time period.

We note that these products will still be able to be used in the VEU program, however, certificate claims would only be able to be made for the product based on its highest power setting.

Please provide feedback by close of business 30 October 2020 by email to: veu@esc.vic.gov.au

Transition Period extended for LM80 -15 and TM21-19

Following stakeholder feedback and advice from a third-party expert, we have extended the transition period for requiring test reports related to LM80 -15 and TM21-19 standards. The updated testing requirements based on the new IES LM80-15 and IES TM21-19 standards will be





extended by an additional 12 months. We will continue to accept reports based on IES LM80-08 and IES TM21-11 up to 31 October 2021. We will only accept reports based on IES LM80-15 and IES TM21-19 standards (or later) from 1 November 2021.

Who is affected?

Program participants who submit lighting applications or install lighting products under the VEU program.

Updated lighting product application guide

We have updated the lighting product application guide to reflect the above changes which is available at www.esc.vic.gov.au/veu-product-applicants

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.

