

**Subject: Australian and British Government comments for the ENERGY STAR CFL
Consultation process, Version 4, Draft 2**

As I believe you are aware, both the UK and Australian governments are currently supporting the “International CFL Harmonisation Initiative”. This is one of a number of initiatives by the Australian Government and others to promote more international partnership and co-operation in developing energy and environmental product standards. In parallel, the UK has launched, with the support of a number of major governments, including the USA, China, Japan, Australia, and Canada, the International ‘Marrakech’ Task Force on Sustainable Product, which responds to G8 and WSSD commitments to more international co-operation in this area.

The Australian-led CFL initiative, launched at Right Light 6 in Shanghai last year, is now a well supported international activity involving government bodies, national agencies, testing organisations and major manufacturers from four continents. Its objectives are to develop an internationally acceptable range of CFL performance indicators, a testing protocol, and a range of performance thresholds (provisionally one of these performance thresholds will align to the Energy Star Specification). The good progress made to date indicates that these objectives could be achieved in the medium term, which would mean lower compliance costs for manufacturers, more and fairer competition in individual market places, better products and lower costs for the consumer.

We are aware that the second draft ENERGY STAR (v4) specification is currently seeking comments. At present we feel it would be inappropriate to offer a detailed response on behalf of the International CFL Harmonisation Initiative as this is still somewhat fluid. However, we do note that you are proposing a “round table” discussion to on the issue of the mercury content of CFLs. As this is an issue that the International CFL Harmonisation Initiative is also currently reviewing (along with the most appropriate method of measuring the mercury content), we would like to propose that one of our representatives joins these discussions. This would not only ensure both our networks can share thinking on this important issue but, hopefully, will establish a common view and an effective linkage between the ENERGY STAR community, the International CFL standards initiative and the more general Task Force agenda. If it would be helpful, we would be very happy to discuss with you further opportunities for developing more effective international product standards setting processes.

One final note. We received the request for comments on the ENERGY STAR proposal via Peter Banwell who has been actively supporting the International Initiative. However, the distribution to us, and our onward distribution to international stakeholders via the International CFL Community of Practice was somewhat delayed. Therefore, we would be grateful if you could informally extend your deadline for comments from international stakeholders to the end of this week (Friday 27th January). Further, in future to avoid such delays, we would be grateful if you could add the coordinator of the International CFL Harmonisation Initiative (Mr Stuart Jeffcott, stuart@jeffcott.fsworld.co.uk) to your primary distribution listings.

We look forward to mutually beneficial cooperation in the future.

Shane Holt, Director Equipment and Appliances, Australian Greenhouse Office, Department of the Environment and Heritage, the Commonwealth Government of Australia

Chris Baker, Department of Environment, Food and Rural Affairs, UK Government