



## **Lighting Council New Zealand - Consultation Feedback**

### **Standards Australia AS/NZS 1680 Revision – Project P-004864-01**

#### **AS/NZS 1680.1:2006 Interior and workplace lighting, Part 1: General principles and recommendations**

Lighting Council New Zealand (LCNZ) does not support progressing the P-004864-01 Standards Development project based on the Project Proposal as it is currently configured.

This proposal displays a fundamental misalignment with international best practice in adaptive lighting design and in lighting energy performance assessment for connected lighting systems using sensors and smart controls.

The proposal appears to ignore the clear directives of the Standards Australia *Standardisation Guide SG-007 Adoption of International Standards*.

Prior to the start of work on the replacement or revision of the AS/NZS 1680 series of standards LCNZ recommends that the Standards Australia Sector Manager actions the following points:

#### **1) Nominating Organisations**

Reviews the relevance of the current group of LG-001 Nominating Organisations, and invites the participation of other types of Nominating Organisations who represent new topic stakeholders in areas such as control systems, daylighting, systems energy, system commissioning etc.

#### **2) Committee Constitution**

Reconstitutes the participants in the LG-001 committee as it has been dormant for quite some years. The current committee appears to be underpopulated with practitioners in the core subject of interior workplace lighting design.

#### **3) Committee Experts**

Seeks experts experienced in the following emergent areas (in addition to the core discipline of interior workplace lighting design):

- Daylighting design
- Connected digital lighting control systems
- Building energy performance assessment
- Carbon emissions calculation and reporting
- Lighting system commissioning
- Building Information Modelling

#### 4) ISO Standards

Engages with ISO TC 274 and the recent publications of the ISO 'Light and Lighting' committee to ensure that the work of LG-001 aligns with international standards to the maximum extent feasible, and seeks to introduce a minimum possible number of local variations.

Such engagement should ensure that LG-001 committee members are thoroughly familiar with recently published ISO and ISO/CIE International Standards and Technical Reports covering lighting design, daylighting, energy performance, and system commissioning.

#### 5) SA Standardisation Guide SG-007 Adoption of International Standards

Ensures compliance with Standards Australia Guide 'SG-007 Adoption of International Standards' (Version: 2.0.1 27/06/2023) when considering the local applicability of the newly published International Standard *ISO/CIE 8995-1:2025 Light and lighting — Lighting of work places - Part 1: Indoor* and Australia's and New Zealand's obligations to the World Trade Organisation treaty on Technical Barriers to Trade.

This guide clearly states the Standards Australia requirements. Some relevant verbatim excerpts are below (italics):

##### Section 2 – POLICY

These clauses indicate that SA Committees should view international adoptions as the prime requirement.

*'The policy of Standards Australia is to base Australian Standards on International Standards to the maximum extent feasible and to apply the requirements of the World Trade Organization (WTO) Agreement on Technical Barriers to Trade as a benchmark.'*

*'The policy extends to ensuring that Australian Standards meet the provisions of Articles 2.2 and 2.4 of the WTO TBT Agreement, 1994'*

*'Australian Standards should be adoptions of International Standards, unless there are good reasons to the contrary.'*

##### Section 3 - BENEFITS OF THE ADOPTION OF INTERNATIONAL STANDARDS

These clauses indicate that national interests are best served by international adoptions.

*'The benefit to the Australian economy by facilitating the international exchange of goods and services.'*

- *'International (IEC and ISO) Standards generally reflect the best experience of industry and regulators worldwide.'*
- *'Australia's obligations under the WTO TBT Agreement are supported'*
- *'Participation in international certification schemes is facilitated.'*

##### Section 6 - CORRESPONDENCE AND LOCAL VARIATIONS

This clause indicates that SA Committees can only introduce variations to international standards because of risk to human health and safety.

*‘Only where a comprehensive assessment of the International Standard reveals a demonstrable and unacceptable level of risk to human health and safety if the Standard is followed would this Article apply and, even then, the extent of the permissible variation is limited to that required to bring the level of risk down to an acceptable level.’*

## **6) Project Type**

The proposal states the project type classification of ‘Revision’ is the only option. The option of ‘Replacement’ should also be available.

The recently published International Standard *ISO/CIE 8995-1:2025 Light and lighting — Lighting of work places - Part 1: Indoor* takes a fundamentally different approach to AS/NZS 1680.1 and should be in-depth reviewed and considered as a replacement for the AS/NZS 1680 series.

LG-001 adoption or adaption of ISO/CIE 8995-1:2025 (with direct or modified performance parameters) would make periodic future updates simpler and more cost efficient by avoiding the duplication of existing international ISO TC 274 committee work at local level.

The New Zealand ISO TC 274 National Committee is an actively involved ‘P’ member with representatives attending all relevant international F2F and virtual meetings.

## **7) Summary**

- LCNZ does not support progressing the P-004864-01 Standards Development project based on the Project Proposal as it is currently configured.
- The requirements stated in the Standards Australia SG-007 document provides substantiation that the Project Proposal is not following the required Standards Australia standards development methodology.
- The requirements stated in the Standards Australia SG-007 document indicates that the LG-001 committee does not have license to ignore or deflect the requirement for in-depth consideration of the adoption of International Standard ISO/CIE 8995-1:2025.

LCNZ recommends that the current Project Proposal is rejected, and a re-configured version be submitted which includes appropriate in-depth consideration of ISO/CIE 8995-1:2025.

LCNZ would be pleased to provide further input or explanation should this be required.

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