



The Director-General
Department of Environmental Affairs
Attention: Mr. Anben Pillay
Private Bag X447
Pretoria
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By hand at: Environmental House, 473 Steve Biko Street, Arcadia, Pretoria, 0083.
By e-mail: apillay@environment.gov.za
Any enquiries in connection with the notice can be directed to Mr Anben Pillay on Tel: 012 399-9827

cc Minister of Environmental Affairs,
Department of Environmental Affairs
Attention: The Honourable Barno Edith Edna Molewa
Private Bag X447
Pretoria
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**Reference Notice No. 1010 and 1011 of Government Gazette 40270 Date 12 September 2016
PUBLICATION OF NOTICE TO THE PAPER AND PACKAGING INDUSTRY, ELECTRICAL AND
ELECTRONIC INDUSTRY AND LIGHTING INDUSTRY TO PREPARE AND SUBMIT TO THE
MINISTER INDUSTRY WASTE MANAGEMENT PLANS FOR APPROVAL:
Request for comments.**

Dear Honourable Minister Barno Edith Edna Molewa,

The Illumination Engineering Society of South Africa (IESSA) thanks the Honourable Minister for withdrawing the Notice published under Government Notice No. 915 dated 12 August 2016 in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in Notice 1010 and issuing a new notice 1011 in Government Gazette 40270 Dated 12 September 2016.

IESSA thanks the Minister for allowing 12 months for the lighting industry to register with the Department and after the companies have registered, the lighting industry can prepare a waste management plan within the next 12 months. The 12 months are required to prepare a waste management plan because the sales by type, number and mass of the products supplied by the lighting industry companies are not known. Your Department would be collecting this information by the industry registering with you and this will provide a more comprehensive Waste Management Plan (WMP) for the Republic of South Africa.

IESSA requests that "the 70% approval of the WMP by the industry or the industry registered with the Department" is withdrawn as this is non-competitive and would lead to only one plan. It may be necessary to have localised plans to suit the local conditions and requirements and for small businesses to be established. IESSA notes that an Environmental Impact Assessment will be required for each of the Collection, Recycle and / or Disposal sites and these EIA studies can take 24 months.

IESSA takes this opportunity to offer alternative definitions for "Lighting Equipment" because the only part of a light fitting that produces artificial light or illumination is the lamp. The lamps are a small portion of a luminaire and would not reduce the waste going to land fill by any measureable amount.

The proposed definitions are offered below:

"Lighting Equipment" means electrical and or electronic equipment used for the production of light or illumination and includes both the luminaire and the lamp(s).

"Luminaire" means the apparatus which distributes, filters or transforms the light transmitted from one or more lamps and which includes, except the lamps themselves, all parts necessary for fixing and protecting the lamps and, where necessary, circuit auxiliaries together with the means for connecting them to the electric supply. (ISO Definition) For information, a luminaire excludes the control circuits outside of luminaire for example a building management system, daylight switches and dimmer controls not built into the luminaire housing, etc.

"Lamps" means the apparatus that converts energy into visible radiation / light. In this notice / regulation lamps are restricted to those using electrical energy from any source.

"Incandescent lamps" means the family of lamps that use electrical energy to heat a filament to produce visible light. Typically, these incandescent lamps are torch globes, automobile lamps, panel lamps, oven lamps, fridge lamps, General Service lamps used in home pendant or table lamps, floodlights and recessed ceiling downlighters, etc to name a few.

"Discharge lamps" means the apparatus that converts electrical energy into visible light by passing a current in a gas or mixture of gasses between two electrodes. The radiation produced by the arc may be further enhanced by the use of a phosphor coating inside the lamps.

"Light Emitting Diodes or Solid State Lighting" means the apparatus that converts electrical energy into visible light by passing a current through a solid state device / light emitting diode to produce visible light. A light emitting diode may be classed as a luminaire if the light producing component cannot be replaced.

IESSA asks that "Incandescent Lamps" are excluded from these regulations as these lamps already have an energy tax, they contribute very little to the waste from the Domestic or Commercial sectors and are seldom used by the industrial sector. The waste from these lamps has no toxic substances as they are Restriction of Hazardous Substances (RoHS) compliant. These lamps are mainly used by home owners for short burn hours and their life is in excess of a year with the improved efficient halogen lamps. The collection and recycling of these lamps has no economic value especially in the Domestic sector.

The introduction of the Compact Fluorescent and other energy efficient lighting systems have reduced the National Electric Grid Peak load by over 3 000 Megawatts (2014) which is equivalent of four and a half units at Medupi Power Station (if these units were complete and running at rated power), hence they have saved the National Grid. The introduction of light emitting diodes has further reduced the electrical energy load by replacing discharge lamps, in particular fluorescent lamps and street light luminaires. The lighting industry has reduced the toxic substances needed for these lamps to levels below toxic levels by the implementation of RoHS compliant products. We ask that the implementation of these energy efficient initiatives are encouraged that the spent lamps and luminaires from the domestic and small businesses are exempt from these regulations as they contribute little mass to the waste.

Luminaires have a life of over 15 years and over 30 years in many installations in the Republic of South Africa, and the waste created in the replacement or refurbishment of a building is recycled by the end-user who is responsible for this. This will be addressed in the future WMP. IESSA is willing to discuss the points stated above and willing to clarify any other points that the Department of the Environment wishes to raise. IESSA supports recycling where it is economical, viable and safe.

Yours Sincerely,



Ms Natasha Nel-Sakharova
President: Illumination Engineering Society of South Africa