

Energy Demand, Programs and Safety  
Victorian Energy Upgrades Consultation 2019  
PO Box 500, East Melbourne, VIC, 3002

31 January 2020

Dear Sir or Madam

**Re: Proposed changes for lighting activities under VEU**

I am writing regarding the proposed change to the lighting activities under the Victorian Energy Upgrades (VEU) Program and the proposal to remove mercury vapour (MV) lamps (part 27) from baseline calculations so that they will no longer generate Victorian Energy Efficiency Certificates (VEECs). On behalf of 13 Victorian council members (see attached), the Goulburn Broken Greenhouse Alliance (GBGA) does not support this proposed change to the VEU Program.

The councils in the GBGA completed part of a streetlight changeover in 2016. However councils still have large numbers of mercury vapour lights in their public lighting asset base. We are planning to undertake a further regional bulk lighting upgrade within the next 1-3 years. Regional and rural councils have limited budgets and lighting upgrades must compete with many other priorities. External funds provided by rebates often make the difference in a project being approved and funded by regional and rural councils.

We understand that the VEU program can only incentivise upgrade activities which would not have otherwise occurred.

- Without the rebates available through the VEU program, the planned regional bulk lighting replacement (including the mercury vapour lights) is at risk of being abandoned
- The Minamata Convention on Mercury has not yet been ratified by the Federal Government meaning mercury vapour lamps continue to be imported and stocked and are currently still being replaced under regular maintenance by our DNSP. The ratification of this treaty is uncertain and timing unclear (unfortunately). If the bulk lighting conversion does not proceed, all recently replaced mercury vapour lamps would continue to operate for 4+ years.

The proposal to remove mercury vapour from the VEU program would leave a significant gap in planned budgets and potentially result in project termination.

I sincerely request that the proposed changes regarding mercury vapour lights be reconsidered or otherwise delayed for a further 24-36 months to allow our project to be completed as planned. I would be more than happy to provide further details on our project history and business case if that would be of assistance.

Yours sincerely



Bronwyn Chapman  
**Executive Officer**  
**Goulburn Broken Greenhouse Alliance**



## **MEMBERSHIP OF THE GOULBURN BROKEN GREENHOUSE ALLIANCE**

Alpine Shire Council  
Benalla Rural City Council  
Campaspe Shire Council  
Greater Shepparton City Council  
Indigo Shire Council  
Mansfield Shire Council  
Moirra Shire Council  
Mitchell Shire Council  
Murrindindi Shire Council  
Strathbogie Shire Council  
Towong Shire Council  
Wangaratta Rural City  
City of Wodonga