

June 3, 2011

John Cockburn
Director, Equipment Division
Office of Energy Efficiency
Natural Resources Canada
1 Observatory Crescent, 2nd Floor
Ottawa, Ontario
K1A 0E4

RE: Delay in Efficiency Standards for General Service Lighting

Dear Mr. Cockburn:

After review of the proposed delay in introducing standards for energy efficient lighting as stated within the Canada Gazette on April 16, 2011, it is clear that such a delay will do more harm than good, and therefore should be rejected.

The government's analysis shows that the proposed delay will result in:

- 24 billion kilowatt hours of wasted electricity,
- \$303 million in extra costs for consumers, and
- 13 million tonnes of avoidable greenhouse gas emissions.

These negative impacts seem to be in direct conflict with the federal government's objectives.

Notably:

- Prioritizing the economy's recovery should mean diverting the \$303 million that would be wasted on unneeded electricity into more economically productive expenditures.
- Reducing greenhouse gas emissions as economically as possible means expediting — not delaying — some of the most cost-effective opportunities available.

The main rationale for the proposed delay is perceived health concerns from compact fluorescent light bulbs, or CFLs. As cited in the Gazette, studies done by Health Canada as well as by other jurisdictions find no evidence to support this notion. In fact, it is a delay that would harm the health of Canadians and the environment. The land, water and air impacts that result from generating 24 billion kilowatt-hours of unnecessary electricity have substantial implications for public health and the environment.

It should also be noted that consumer choice would not be limited to CFLs once the phase out of incandescent bulbs take place. There are other established technologies such as halogen light bulbs, as well as emerging technologies like light emitting diodes (LEDs), that can meet the new standards.



Furthermore, a requirement for more efficient lighting would accelerate research, development and deployment of new and alternative lighting options by increasing and accelerating market demand.

The Gazette also argues that delaying these regulations will allow more time for disposal programs to become established. However, many disposal programs already exist across the country. If in fact there is an issue with these programs, the government certainly has not made it clear to consumers that they can expect to have serious issues accessing these programs. While we applaud the government's efforts to make it easier for consumers to properly dispose of CFLs, those efforts could easily be applied in parallel with the implementation of energy efficient lighting regulations.

In addition to the direct negative consequences for Canada's economy and environment, we are also concerned about the indirect consequences of failing to follow through on a schedule that the country has already committed to as part of a broadly coordinated international effort. As cited in the Gazette, British Columbia and California have already implemented these standards, which the United States, European Union and Australia have also adopted. Delaying implementation in Canada will take momentum away from that international effort and could impact Canada's international reputation and relationships.

As an organization that advocates for a healthy environment and a cleaner energy system, we encourage you to reconsider this proposed delay and continue to phase out incandescent light bulbs as originally planned. The transition to a clean energy economy requires strong leadership from government and energy efficiency requirements are an extremely important component. In closing, the Pembina Institute recommends that the proposed delay in introducing these standards be rejected in favour of the original timeline.

Should you have any questions, please don't hesitate to contact me at 780-485-9610x105 or timw@pembina.org.

Sincerely,



Tim Weis, Ph.D., P.Eng.
Director, Renewable Energy & Efficiency Policy
Pembina Institute