



Australian Government



Australian  
**Small Business and  
Family Enterprise**  
Ombudsman

31 March 2022

GEMS Product Review Team  
Department of Industry, Science, Energy and Resources  
10 Binara St  
CANBERRA ACT 2601

*via email: Screens@industry.gov.au*

Dear Sir/Madam

**Equipment Energy Efficiency Program: televisions, computer monitors and digital signage**

We welcome the opportunity to comment on the proposed alignment of Minimum Energy Performance Standards (MEPS) and labelling requirements for televisions, computer monitors, and digital signage displays. We support the proposal that the Australian standards be aligned with the European Union requirements for electronic displays. As previously highlighted by this Office aligning Australian standards with trusted foreign requirements reduces the regulatory burden on small business. To limit the unintended impost on small business throughout the implementation of the new standards we make the following suggestions.

**1. Any changes to labelling requirements should be undertaken by importers and manufacturers, rather than individual retailers.** This is in line with existing requirements, and essential given importers and manufacturers have a greater capacity than small retailers to ensure their products are in line with the relevant MEPS and labelling requirements.

**2. A minimum 12-month transition period be provided.** An adequate transition period for adjustment to the new standards will minimise the impost on small business, in particular the amount of stock that requires relabelling or sale at a reduced price.

Furthermore, we recommend an additional grace period be incorporated, where compliance activities are focussed on education rather than punitive measures, to ensure small businesses have the capacity to comply with the relevant regulation.

**3. Funding should be allocated to ensure consumers are adequately educated about the changes.** Small business' limited capacity to provide education to consumers on changes to ratings, as such, we suggest funding be made available to ensure that changes in MEPS and labelling requirements do not impact sales or add financial burden to small businesses.

It is important the Government consider the timing of changes to standards as small businesses are currently navigating several significant regulatory changes. The cumulative effect of these changes, results in a substantial compliance burden for small business. It is crucial that adequate support and guidance be provided to small businesses to ensure a smooth transition to new standards.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Lachlan Bayliss on 02 5114 6131 or at [lachlan.bayliss@asbfeo.gov.au](mailto:lachlan.bayliss@asbfeo.gov.au).

Yours sincerely

**The Hon. Bruce Billson**

Australian Small Business and Family Enterprise Ombudsman