



LIGHTINGEUROPE
THE VOICE OF THE LIGHTING INDUSTRY

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FOLLOW-UP POSITION PAPER ON ENERGY PERFORMANCE OF BUILDINGS REVIEW (EPBD)

Following LightingEurope's [position paper on the EPBD review published 10th April](#), this document addresses proposals raised during the current legislative debate at Parliament and EU Council level.

LightingEurope welcomes tabled amendments by European Parliament Committees aiming at strengthening the role of lighting in EPBD.

LightingEurope is glad to see many constructive proposals among the amendments tabled by Members of the Parliament in both the ITRE and ENVI Committee, aiming at strengthening the role of **lighting and lighting systems** in the EPBD. This will result in improved **energy savings** and **well-being** in buildings.

We support proposals aiming at:

1. replacing **“built-in lighting”** with **“lighting systems”** as a **technical building system wherever built-in lighting is mentioned** in the EPBD (proposals on art. 2, point 3 – e.g. amendment 207);
2. including **“built-in lighting”** when **determining the performance of buildings** (Annex 1 par.1), in line with Council General Approach (adopted 26 June) and tabled parliamentary proposals (e.g. amendments 54, 593, 594,600, 604);
3. including a requirement for Member States to **establish a long-term renovation strategy** encompassing **“an evidence-based estimate of expected energy savings and wider benefits, including air quality improvements and other benefits such as health, well-being and productivity.”** (proposal for an addition to Art. 2(a), par.1(i) e.g. amendments 244, 245, 248)
4. including requirements on **Smart Readiness Indicator (SRI)** in the EPBD. The SRI has the potential to further foster energy savings and to enable Human Centric Lighting applications (e.g. amendment 628 to add a new point 1(a) in Annex I of the Directive);

and we invite both European Parliament and EU Council to adopt amendments and proposals going in this direction.

Lighting Systems for major energy savings in non-residential buildings

Depending on a low or high policy scenario of the Energy Performance of Buildings Directive review (EPBD), lighting accounts for around 20 % of the total cost-effective energy saving potential towards 2030 (source: EPBD Impact Assessment).

On top of the savings enabled by efficient lighting sources (such as LEDs), **properly designed and well-coordinated lighting systems**,¹ which are not considered in the current EPBD text nor in the Commission’s proposed review, are one of the most cost-efficient ways to reduce energy consumption and CO₂-emissions.²

¹ According to the ENER Lot 37 study on lighting systems, a lighting system means a system of devices intended to deliver effective lighting to create a comfortable, functional, and safe environment for human habitation, travel, work, and leisure activities.

² For instance, the ENER Lot 37 study states that the maximum EU28 total annual electricity savings for optimised lighting system designs with controls – depending on the reference light source scenario – are 20-29

Improved well-being in buildings by Human Centric Lighting

While saving energy is a key EU policy objective, the value of addressing **human health, well-being, and productivity** via lighting quality should be granted similar importance.

According to a Preparatory study on lighting systems prepared by VITO for the European Commission and published in February 2017, well-designed lighting systems not only increase the potential for energy savings, they also improve quality of light and well-being of people in the building itself. That is why **well-designed lighting systems are a key technology enabling Human Centric Lighting (HCL)**. Human Centric Lighting supports health, well-being and performance of humans by combining visual, biological and emotional benefits of light.

LightingEurope supports the proposed introduction of a Smart Readiness Indicator. Such an indicator is currently being developed by a consortium led by VITO (on behalf of the European Commission) and will enable **energy efficiency savings and HCL**. LightingEurope is glad to share its expertise with the consortium in order to achieve those objectives.

TWh/year in 2030 and 48-56 TWh/year in 2050 (for reference: the EcoDesign (EC) 245/2009 on tertiary sector lighting products saving potential is 38 TWh/year in 2020).