

Brussels, 4 December 2017

Subject: **Inclusion of a binding smartness indicator and technical building requirements in the Energy Performance of Buildings Directive**

To whom it may concern,

LightingEurope is the industry association that represents the lighting industry in Europe. We are the voice of more than 1,000 lighting companies that employ more than 100,000 Europeans and create an annual European turnover of over € 20 billion. Since its establishment, LightingEurope has always supported initiatives from the EU that benefit consumers, the environment, and the economy.

As such, LightingEurope supports:

- the inclusion of binding requirements for a smartness indicator;
- the inclusion of lighting systems within the scope of technical building systems; and
- the inclusion of requirements for Member States to establish national renovation strategies encompassing health and wellbeing in the revised Energy Performance of Buildings Directive (EPBD).

LightingEurope calls on Member States to approve the amendments proposed by the European Parliament regarding these topics.

Further information on the reasons why the European lighting industry supports the above mentioned measures can be found in the annex to this letter. Should you have any questions or comments, please do not hesitate to contact us.

Thank you for taking the position of the European lighting industry into consideration.

Yours sincerely,

Ourania Georgoutsakou
Secretary-General



ANNEX

Smartness indicator

In order to fully benefit from the advantages given by the smartness indicator, it has to be made binding in the EPBD. Only in this way will it be possible to guarantee a short return on investments whilst keeping the additional costs as low as possible. On the contrary, voluntary schemes will only increase the burden on industry and consumers with negligible benefits for the environment, due to non-homogenous implementation of the EPBD. For this reason, LightingEurope strongly supports binding schemes for the smartness indicator in the EPBD.

A smartness indicator will support the reduction of the energy consumption of buildings through life, and if defined correctly will also bring considerable value to owners and users of buildings, stimulating even more energy reduction. In addition, a smartness indicator will offer advantages that go beyond energy efficiency by also focussing on building space optimisation and the wellbeing and performance of occupants. In doing this, a smartness indicator will reduce business operating costs. More information can be found in the LightingEurope [Position Paper on the smartness indicator for buildings and lighting](#) (dated 28 November 2017).¹

Lighting systems as a technical building system

Depending upon the scenario, lighting accounts for around 20 % of the total cost-effective energy savings potential in buildings towards 2030.² Properly designed and well-coordinated lighting systems are one of the most cost-efficient ways to reduce energy consumption and CO₂-emissions. According to the ENER Lot 37 Preparatory study on lighting systems that was published in February 2017, well-designed lighting systems can also improve the quality of lighting and the wellbeing of occupants through Human Centric Lighting. More information can be found in the [Position Paper on the EPBD review](#) (dated 15 September 2017) and the LightingEurope [infographic on Healthy Buildings](#) (dated 4 October 2017).³ This is why LightingEurope believes that lighting systems have to be included within the scope of technical building systems, replacing the current requirement on built-in lighting.

National renovation strategies

Each year, at least 3 % of the existing building stock needs to be renovated in order to achieve the European energy objectives. The focus of renovation should be on energy efficiency together with benefits for people. Therefore, LightingEurope supports the inclusion of a requirement in the EPBD for Member States to establish long-term renovation strategies encompassing an evidence-based estimate of expected energy savings and wider benefits, such as health, wellbeing, and productivity.

¹ LightingEurope, *Position Paper on smartness indicator* (28 November 2017). < www.lightingeurope.org/images/publications/position-papers/LightingEurope_-_Position_Paper_-_20171129_-_on_smartness_indicator.pdf >.

² Source: EPBD Impact Assessment.

³ LightingEurope, *Position Paper on EPBD review* (15 September 2017). < www.lightingeurope.org/images/publications/position-papers/Position_Paper_on_EPBD_legislative_debate_-_20170915_-_final.pdf >; LightingEurope, *Infographic on Healthy Buildings* (4 October 2017). < www.lightingeurope.org/images/focus-areas/LED/11_LE_HealthyBuilding_Infog.pdf >.