



**LIGHTINGEUROPE**  
THE VOICE OF THE LIGHTING INDUSTRY

## **LIGHTINGEUROPE position on the Review of Directive 2010/31/EU on energy performance on buildings**

### **Executive summary**

LightingEurope appreciates all activities of the European Commission to improve the Energy Performance of Buildings (EPBD) within Europe. The Energy Performance of Buildings Directive 2010/31/EU<sup>1</sup> imposes Member States to set energy requirements for technical building systems in respect of overall energy performance, proper installation and appropriate dimensioning, adjustment and control.

So far the mandatory system requirements cover heating systems, hot water systems, air-conditioning systems, and large ventilation systems. However LightingEurope misses **lighting systems in the current list of mandatory system requirements**.

### **LightingEurope Recommendations**

Ambitious minimum requirements for building related lighting products are already successfully covered under the Ecodesign Directive and related Implementing Measures. Recent studies show that lighting represents 20 to 30% of final energy used in today buildings. To allow Member States to significantly and permanently reduce further energy consumption and carbon dioxide emissions, it is necessary to **include lighting systems in the current set of technical building systems**.

Lighting has already been defined as a technical building system under article 2.3, p. 18 in directive 2010/31/EU<sup>1</sup>, where

**“technical building system’ means technical equipment for [...], lighting [...] of a building unit”.**

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<sup>1</sup> The European Parliament and the Council of the European Union, “Directive 2010/31/EU on the Energy Performance of Buildings (EPBD),” European Union, Brussels, 2010.

Nonetheless, under article 8, p. 21 of directive 2010/31/EU<sup>1</sup> mandatory system requirements are set to cover heating systems, hot water systems, air-conditioning systems, large ventilation systems or a combination. **Lighting is not mentioned.**

As a consequence, poor or inefficient lighting designs, while responsible for a significant part of a building's electricity consumption, can be counterbalanced by the use of efficient HVAC-systems. While of course the use of other efficient technical building systems is welcomed by LightingEurope, lighting systems are among the most cost efficient ways to reduce CO<sub>2</sub>-emission<sup>2</sup>. Moreover, no other technical building system has seen comparable strides in efficiency. Hence, lighting systems should be balanced mandatorily and independently from other building trades.

**Thus, LightingEurope strongly recommends the inclusion of lighting systems in the list of mandatory system requirements for new installation, replacement, and upgrading as well as its definite determination as a technical building system.**

### **Lighting Systems Design Process**

An important necessity to ensure valid long term energy performance measures for a technical building system is the implementation of a system design process. A system design approach will ensure the support of the implementation of possible measures such as components, design and the usage of control systems and thus, represents an important factor in securing the compliance with anticipated energy savings. A continuous monitoring of the necessary steps in the design, implementation and maintenance processes is an important tool for an evolving improvement of a technical building system's energy performance including later verification purposes.

Therefore, **LightingEurope assigned a task to CEN/TC 169 to develop a lighting systems design process.** The process will holistically cover the following milestones in a lighting system's design, implementation and operation:

1. Design
2. Installation (according to design)
3. Commissioning (according to specifications)
4. Verification (according to design)
5. Operation & Maintenance (according to design)

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<sup>2</sup> McKinsey & Company, "Lighting the way: Perspectives on the global lighting market, 2nd Edition," 2012.

The upcoming design process will be finished in 2017-2018 and will especially meet current EPBD requirements regarding the inspection of current technical building systems and energy certification of buildings with the main goal to ensure that anticipated energy savings will be met.

### ***About Lighting Europe***

*LightingEurope is an industry association of 33 European lighting manufacturers, national associations, and companies producing materials. LightingEurope members represent over 1,000 European companies, a majority of which are SMEs; a total workforce of over 100,000 people in Europe; and an annual turnover estimated to exceed 20 billion Euros. LightingEurope is dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. More information about LightingEurope is available on our website [www.lightingeurope.org](http://www.lightingeurope.org).*

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