



No renovation without an upgrade of the lighting installations

18 national associations and their European-level association, representing Europe's lighting manufacturing companies (1000 companies, 80% of which are SMEs) urge you **to put renovation, including of the lighting installations, at the heart of your national recovery and resilience plan.**

We ask you to **prioritize investments and policy stimuli that will accelerate renovation and the upgrade of lighting installations.** Renovation has been identified as a key driver for the recovery of Europe's economy post Covid-19; 15 million workers are directly employed in the EU construction sector and the sector creates 28 % of Europe's industrial output¹. The renovation value chain is wide and diverse, investment in this action will create and maintain jobs and manufacturing in a number of different sectors (e.g. construction, electrotechnical manufacturing, materials).

Europe's lighting industry has the innovative technologies and products ready to install. LED lighting systems are more energy efficient and can lead to a reduction of CO₂ emissions. Better lighting plays a major part in making a building more energy efficient. Did you know that LED-based lighting systems could additionally save the EU up to 48-56 TWh of electricity annually by 2050²? This will also offer significant benefits to the occupant's visual comfort, wellbeing, and productivity. Renovating our schools, our hospitals, our public buildings, our wider infrastructure will improve the quality of students, teachers, patients, or office workers' lives and will contribute to reaching Europe's climate targets.

There cannot and should not be any renovation of buildings in Europe without upgrading the lighting installations.

To grasp the full benefits of better lighting, we recommend:

- **A focus on non-residential buildings** (public and commercial buildings), as already set out in the Energy Performance of Buildings Directive. We believe that public buildings should lead by example.
- **The use of LED lighting, in combination with controls and sensors.** A full renovation of luminaires should include LEDs, combined with controls and sensors, with a minimum Smart Readiness Indicator (SRI) level – see recommendation below. A simple replacement of a lamp should be avoided. Replacing luminaires or introducing a whole new lighting design should be stimulated, as this will lead to greater energy savings and a better indoor environment for occupants of buildings.
- **A uniform and harmonised application of the Smart Readiness Indicator across the EU** to maximise its energy savings potential and capture all the benefits it can bring to the

¹ <https://www.efbww.eu/activities/construction>

² Energy savings for optimised lighting systems (both indoors and outdoors) with controls. VITO et al. (commissioned by the European Commission), Preparatory study on lighting systems 'ENER Lot 37' (Brussels, 15 December 2016), p. 331.

- wellbeing and performance of building occupants. Renovations should lead to a certain minimum SRI score – see recommendation below.
- **The introduction of mandatory minimum requirements on Indoor Environment Quality.** Instructions for lighting can be found in EN 12464-1.
- **The design of safe indoor spaces that includes the installation of UV-C disinfection technologies,** as a means not only to address the current COVID-19 pandemic but also more generally and in the longer term to help ensure healthy indoor environments.
- A **mandatory emergency lighting risk assessment** to be carried out for compliance with EN 1838 and the national regulations.

We urge you to **make renovation projects a priority investment at the national, regional and local level. Each euro invested in renovation must deliver benefits in terms of energy efficiency, smartness and indoor environmental quality.** The access to public financing must be subject to the fulfilment of certain conditions. An obligation to include lighting renovation to obtain full subsidy should be introduced:

Conditions to be fulfilled:

- **Lighting should comply with EN 12464-1.**
- **Use of controls and sensors, with minimum SRI level** (based on the second SRI technical support study³):
 - For lighting service 1a (occupancy control for indoor lighting), a minimum functionality level of 2 (automatic detection) should be required, as level 2 functionality is simple to implement and is based on established technologies that provide good additional levels of energy saving and user satisfaction as compared to level 1; and
 - For lighting service 2 (control artificial lighting power based on daylight levels), a minimum functionality level of 3 (automatic dimming) should be required, as level 3 functionality is simple to implement and is based on established technologies that provide good additional levels of energy saving and user satisfaction as compared to level 2.
- **UV-C disinfection technologies should comply with existing standards and guidelines** – for further details see the [Global Lighting Association's UV-C Safety Guidelines](#).

We remain at your disposal to provide our technical expertise to shape these new instruments and investments plans.



³ [Milestones and Documents | Smart Readiness Indicator for Buildings](#)