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## The European Union of Electrical Wholesalers response to the Commission's Consultation Working Document on Tertiary Lighting

### Who we are

The EUROPEAN UNION OF ELECTRICAL WHOLESALERS (EUEW) is a 15-nation organisation representing the interests of the electrical wholesaling channel which distributes domestic and industrial products including lamps, lighting fixtures, electrical and electronic wire and cable, household appliances and electronic components. Total membership in the 15 national federations belonging to EUEW is about 1.000 companies with more than 6.000 outlets employing some 70.000. The European Union of Electrical Wholesalers represents a total turnover of more than 40.000 million euro. Lighting represents more than 20% of this turnover.

### EUEW response to the Commission's Consultation

EUEW, The European Union of Electrical Wholesalers has received the Commission's Working Document on possible measures targeting the energy efficiency of lighting in the tertiary sector.

The European Union of Electrical Wholesalers **strongly supports the Option B** of the Commission's Working Document "Addressing Lighting at the System Level (Beyond EcoDesign)". The system level is the best one to address the energy efficiency of lighting in the tertiary sector as lighting is a system and not a product.

The European Union of Electrical Wholesalers also strongly supports the request of the European Lighting Industry (CELMA & ELC) to address lighting at the system level by complementing the existing EcoDesign Legislation for tertiary sector lighting products with a **new harmonised EU Lighting System Legislation (LSL)**. With an harmonised new EU Lighting System Legislation the quality of lighting will be secured by addressing the needs of particular systems before choosing a proper combination of products and controls to achieve the efficiency requirements at design level. Employing LSL based lighting installations will make significant saving in the energy used for lighting and will also improve the quality of light.

### Contact information



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