

CONSULTATION RESPONSE

Brussels, September 2010

EuroACE response to the Commission's Working Document of the Eco-design Consultation Forum on possible measures targeting the energy efficiency of lighting in the tertiary sector

For EuroACE, energy saving in buildings is the sum of many efforts including building materials, design and the right equipment, correctly installed. Therefore, a systemic approach is paramount when looking at "building system" products. It is about addressing the needs of particular systems before choosing a proper combination of products and controls to achieve the efficiency requirements at design level.

EuroACE, therefore, strongly supports proposed Option B of the Commission's Working Document (dated 5th July 2010) because we believe that addressing building products at system level, including lighting in the tertiary sector, is the best way to ensure greatest efficiency levels. The energy savings can thus be made without sacrificing the importance of the product's overall functionality.

In the case of lighting, renovation of the complete stock of existing installations can result in up to 40% energy savings: that is a yearly saving potential of 80 to 90 TWh compared to Business As Usual (BAU). Such savings could be made sooner if the legislation would contain means to accelerate the refurbishment rate of inefficient stock installations economically.

The tertiary sector lighting in the EU counts for 1.6 billion lighting points (luminaires) with an annual BAU electrical energy consumption of 200 TWh (2005) to 222 TWh (2020). The magnitude of this energy consumption can be halved by prudent design, installation and operation of a lighting installation.

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EuroACE represents Europe's leading companies involved with the manufacture, distribution and installation of energy saving goods and services for buildings. EuroACE members have a total turnover of 140 billion Euros and employ 328,000 people in Europe. The mission of EuroACE is to work together with the institutions to help Europe move towards a more sustainable pattern of energy use in buildings, thereby contributing to Europe's commitments on climate change, energy security and economic growth.

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