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Kortenberg, August 2010

AIE Comments and position on the proposal for Lighting System Legislation.

The AIE represents the Electrical Contracting Industry in Europe which comprises about 175,000 enterprises, the vast majority of which are SME's, having a combined turnover in the order of 70 Billion Euro and a workforce of more 1,000,000 people.

The electrical contractors therefore play a significant part in the achievement of the EU energy targets.

The AIE acknowledged the European Commission 's working document on possible measures targeting the energy efficiency of lighting in the tertiary sector wherein in Option B lighting is considered at system level.

Having carefully considered the ideas and arguments put forward by the lighting sector for a Lighting System Legislation (LSL), the AIE would like to contribute to the discussion with the following comments:

a) The AIE draws attention that lighting represents a part in the overall electrical work of the electrical contractor. Beyond lighting systems the electrical installation or systems in buildings in the tertiary sector and industry often also include:

- power generation
- office networks
- information technology and telecommunication systems
- fire and security systems
- central management processing
- integration of renewable energy sources (heat pumps, photovoltaic systems etc.)
- access control
- automation and active control systems
- integrated energy management, monitoring and metering systems.
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For this reason the AIE considers the electrical installation or system as a total integrated electrical system which needs a holistic approach and not a fragmented approach per market segment.

b) Having said that, the AIE believes that energy efficient lighting systems have their role to play within the overall energy performance of a building. We also agree that lighting should be considered as a system and not only as an assembly of different individual products (lamp, ballast, luminaires).

Market experience demonstrates however that clients do not need legislation to realise that lighting renovation can result in energy savings and bill reduction. Having regulation of designers and installers won't have therefore much impact: some electrical contractors already do propose refurbishment of the lighting systems with performance contracts to their clients, which suppose that the quality of the work and the savings are already actively controlled.

c) AIE is also concerned about the fact that the LSL proposal threatens to fragment the electrical contracting industry in different activities, with each their own competencies, of 'design' and 'installation'.

Indeed, the process of realising a project does not only involve planning and design on the one hand (the concept based on possible regulations and agreement with the client), but also engineering (turning the concept into a detailed and feasible engineering file with the required functionality). It does not on the other hand only involve installing, but also commissioning and handover (proving that the complete installation is fault free, the setup and functionalities of all requirements were successfully tested and the training of the customer to operate the system is properly done), and can even include maintenance and repair.

This could easily result for the electrical contracting industry to an increasing proliferation of additional competence requirements or qualification schemes of the electrical contractor for each single market segment (such as lighting). For our member companies, with a majority of SME's, who work in all previously mentioned areas, these requirements will limit their capacity of work and adds complexity and unnecessary administrative burden in an economically difficult period for works they already carry out today.

Indeed, we think the debate here is not a question of competence rather than to ensure that what is installed is according to the design, design which has to comply with energy performance requirements in order to achieve energy savings.

In order to have energy efficient lighting, the AIE believes this should be achieved with energy performance requirements for a lighting system (design) rather than by defining the different roles and competences of the market players (designer, installer).

d) In June this year, the Building Regulations 2010 were implemented in Denmark. As something new, there are specific regulations on lighting systems, for example that light should be dimmed according to daylight or presence of people in the room. It will be the electrical contractors' responsibility to comply with these new requirements.

The AIE could support the idea that with every task comes the responsibility for the

correct execution of this task, whoever the person is doing it. In that sense, when designing the installation, one would be responsible for making sure that this design meets the national energy efficiency requirements (EPBD), whereas when installing, one would (also) be responsible for this task.

If changes are introduced on site after the design stage further to e.g. changes requested by the client, the impact thereof on the compliance with the applicable performance requirements should then logically be addressed by the parties present. Both designer and customer should be responsible and sign off for the introduced changes.

The AIE could therefore eventually support to have in the framework of the building certificate according to EPBD a (voluntary) lighting installation certificate, with different sections for designing and installing, which every interested party should complete and sign for their respective responsibility and work.

d) In order to avoid after the design stage, a systematic change of products because of lower prices, the AIE firmly supports the need to promote and **integrate the principle of life cycle costs instead of lowest price as criterion in choosing a lighting system.**

e) It should also be avoided in general that **'one manufacturer' systems** (package systems) would be advantaged, one way or another, in comparison to systems designed, on the basis of their practical expertise, by installers. This would inevitably have adverse effects on the market and within the lighting value chain

CONCLUSION:

- 1) In the framework of the energy efficiency debate and energy savings targets, the AIE welcomes the fact that the lighting sector can play a significant role regarding energy savings but we need to bear in mind that lighting is not a single discipline for electrical contracting companies.
- 2) Therefore this debate should equally be incorporated into the requirements of the Energy Performance of Buildings Directive. In order to have efficient lighting, the AIE strongly believes the objective should be achieved rather with performance requirements for a lighting system. It cannot accept that such an objective would be said to be realised by defining different roles and competences of market players (designer, installer).
- 3) The AIE would support the principle that whoever takes on certain tasks, also takes on responsibility for his work. In concrete terms, this would mean that instead of speaking of a competent person, we introduce the responsibility principle according to which each market player is signing off recognizing his responsibility for his part of the work.
- 4) Life cycle costs need to be integrated, otherwise it won't work...

- 5) The lighting value chain should be respected as to deliver best cost efficient solutions responding to the consumer's needs and expectations.

With this paper the AIE hopes to explain the European Commission the electrical contractors' point of view as well as making a constructive contribution to the discussions.

The AIE hereby equally confirms to be willing to be further actively involved in the debate. Don't hesitate to contact us if you have any further question.

Yours sincerely,

Evelyne Schellekens,
AIE Secretary General.