LIGHTINGEUROPE
THE VOICE OF THE LIGHTING INDUSTRY

16 November 2026

Challenges and Opportunities for the lighting sector under a revised EU Public Procurement Framework

Executive summary

Public procurement is a major driver of the European lighting market, enabling public authorities to shape demand, stimulate innovation and accelerate the deployment of sustainable lighting solutions. As lighting contributes to key EU priorities, including energy efficiency, decarbonisation, digitalisation, circularity and healthier built environments providing liveable, safe, and secure indoor and outdoor spaces, **public procurement should be used strategically to deliver broader environmental, social and economic benefits**.

Investment in high-quality, energy-efficient lighting and intelligent controls can reduce energy use, costs and emissions while improving safety, comfort, wellbeing, accessibility, ecological outcomes and asset management across public spaces and buildings.

Public authorities can further lead by example by giving equal priority to life-cycle value, quality, durability, reparability, smart functionality, and energy efficiency. Such procurement supports innovation, strengthens the competitiveness of Europe's lighting industry and accelerates the uptake of advanced technologies.

A modernised **EU public procurement framework should therefore promote value-based procurement, evaluating lighting solutions over their full life cycle rather than on upfront cost alone.** This approach enables public authorities to achieve better outcomes for citizens, maximise value for taxpayers and support Europe's sustainability, competitiveness and innovation objectives.

Benefits of value-based procurement for public authorities include:

- Lower energy consumption, operating costs and carbon emissions.
- Reduced maintenance and replacement costs through longer-lasting, more reliable lighting systems.
- Improved safety, comfort and wellbeing in public spaces and buildings.
- Reduced cybersecurity and data privacy risks.
- Greater value for taxpayers through life-cycle costing.
- Future-ready infrastructure enabled by connected and intelligent lighting systems.

LightingEurope AISBL | Rue Belliard 205 | B-1040 Brussels | Belgium
+32 (0)2 426 23 27 | info@lightingeurope.org | www.lightingeurope.org

While we welcome the progress introduced by the proposal, to ensure that the ambitions translate into effective implementation and measurable outcomes, we recommend:

- **Avoiding fragmentation of the EU Single Market by limiting Member States' discretion.** Excessive national flexibility could undermine the benefits of the shift from a Directive to a Regulation and lead to divergent requirements across the EU. Moreover, allowing public authorities to require specific or local labels could create additional barriers and further fragment the Single Market.
- **Ensuring that lighting quality criteria are adequately reflected in technical specifications for public procurement.** This should include recognition of lighting's contribution to Indoor Environmental Quality and ensure that procurement decisions consider quality and performance alongside energy efficiency and other sustainability criteria.
- **Making Green Public Procurement (GPP) mandatory.** Binding sustainability requirements for public buyers would provide a stronger and more consistent signal to the market, accelerate the uptake of sustainable solutions, and provide greater planning and investment certainty in sectors where public procurement represents a significant share of demand, such as the lighting sector.
- **Clarifying the role of the existing GPP criteria within the revised public procurement framework.** In particular, the framework should clarify to what extent existing GPP criteria will remain relevant for public buyers and whether, and how, they will be integrated into the broader revised framework.
- **Referencing the relevant technical screening criteria under the EU Taxonomy Climate Delegated Act as a mean of demonstrating "high energy efficiency".** Energy-efficiency provisions should include a reference to the relevant Taxonomy criteria, in particular Activity 3.5, *Manufacture of energy efficiency equipment for buildings*, and Activity 3.6, *Manufacture of other low-carbon technologies*, as an additional pathway for demonstrating compliance with high energy-efficiency requirements.

LightingEurope, based on the information available, has not yet been able to form a position on the European preference requirements set out in recent EU legislative initiatives. We are following developments as the legislative process continues.

The rationale underpinning our recommendations is set out below.

Avoiding fragmentation in the Single Market

The Single Market is one of the most effective tools available to European policymakers for achieving the EU's strategic objectives of strengthening competitiveness and reducing carbon emissions. Its functioning depends on a high degree of harmonisation of rules and obligations across Member States and divergent national requirements undermine the very integration the Single Market is designed to deliver.

LightingEurope is therefore strongly supportive of the shift from a Directive to a Regulation. However, we are concerned that significant discretion is still left to Member States and local authorities throughout the text, a legacy of the previous Directive that sits uneasily with the legal form of a Regulation. Wherever such discretion persists, it reintroduces the very fragmentation the change in legal instrument is meant to eliminate. We therefore urge that these margins of discretion be systematically reviewed and narrowed, to ensure the Regulation delivers genuine harmonisation in practice, not just in form.

We are also strongly concerned by the provision set out in Article 91 and concerning the use of specific local or national labels. We recognise that public buyers must be able to rely on credible methods of proof for product performance and other characteristics. However, allowing the request of specific local labels risks generating precisely the fragmentation a Regulation is designed to prevent.

Non-price criteria for public procurement

LightingEurope welcomes the strong recognition of non-price criteria in the revised Public Procurement Act. Ensuring that public money is spent on products that meet quality criteria should be an essential part of the revised procurement framework. LightingEurope particularly welcomes the link established between defining quality criteria and social, innovation and environmental considerations, as set out in the Public Procurement Act.

For lighting products, however, quality criteria extend beyond product longevity and energy efficiency. Lighting quality is also determined by the provision of suitable light levels, effective light distribution and appropriate light colour. These factors are essential to illuminating spaces appropriately for the task being performed, the people using the space and how they use it, and the desired outcomes. Well-designed lighting contributes to a sense of safety and comfort in both indoor and outdoor spaces, and supports health, alertness and productivity, benefiting both the workplace and society more broadly. Quality in outdoor lighting also relates to the ability to reduce the adverse effects of Artificial Light at Night (ALAN). Modern and controllable luminaires with state-of-the-art optics and operating with an optimized spectrum can limit the negative effects of obtrusive light on the environment.

LightingEurope therefore wishes to stress the importance of recognising quality criteria for lighting, such as its contribution to Indoor Environmental Quality, within the technical specifications for the public procurement of lighting products.

Green Public Procurement

LightingEurope supports the recognition of life-cycle costing in the revised Public Procurement Act. We have been at the forefront of developing rules for the life-cycle assessment of lighting products and key components, with the aim of guiding the industry towards a harmonised set of rules.

LightingEurope also welcomes the inclusion of Green Public Procurement as a central element of the strategic considerations for public buyers under the revised Public Procurement rules. Requirements addressing environmental, product-life cycle or climate-related criteria in public procurement can increase demand for sustainable products, help shape new markets, and contribute to the achievement of the EU's overall environmental objectives. Public bodies, in turn, stand to benefit from products that are easier to maintain, have a longer operational lifetime and consume less energy.

Nonetheless, **LightingEurope believes that demand for sustainable products can be most effectively driven by establishing mandatory sustainability criteria for public buyers**. Such mandatory criteria would provide greater investment and planning security for sectors in which public procurement is a major economic driver, such as the lighting industry.

Additionally, we welcome the reference to **the EU Taxonomy Climate Delegated Act in Article 52. We ask that additional references are added to the** activities 3.5 “Manufacture of energy efficiency equipment for buildings“, and 3.6 “Manufacture of other low carbon technologies” so that the full spectrum of lighting products is covered.

Referring also to these EU Taxonomy technical screening criteria ensure equal treatment across lighting product categories and improve consistency with another established EU framework that already identifies best-performing energy-efficient technologies. However, energy efficiency should not compromise lighting quality and trade-offs between light quality and energy efficiency should be avoided.

Finally, the Public Procurement Act should clarify the relationship between Green Public Procurement as defined by the legislation and the existing, already-applied Green Public Procurement criteria. In particular, **the Regulation should clarify to what extent these existing criteria remain relevant for public buyers, and whether they will be integrated into the broader revised public procurement framework.**

Contact

For further information on this topic, please contact Marion Ebel, through marion.ebel@lightingeurope.org and Jale Marie Enssen, through jalemarie.enssle@lightingeurope.org

LightingEurope is the voice of the lighting industry, based in Brussels and representing 33 companies and national associations. Together these members account for over 1,000 European companies, a majority of which are small or medium-sized. They represent a total European workforce of over 80,000 people and an annual turnover exceeding 15 billion euro. LightingEurope is committed to promoting efficient lighting that benefits human comfort, safety and wellbeing, and the environment. LightingEurope advocates a positive business and regulatory environment to foster fair competition and growth for the European lighting industry. More information is available at www.lightingeurope.org.