

Comment on the current EN 13201 draft
(to be submitted to the national standard institutes)

On behalf of the EU supported COST Action ES 1204, “Loss of the Night Network” (LoNNe), we appreciate the introduction of upper limits to street lighting levels in the current EN 13201 draft.

The COST Action LoNNe aims to improve knowledge of the multiple effects of increasing artificial illumination worldwide.

However, on behalf of this COST Action, we strongly advise to significantly reduce the current proposed minimum street lighting levels (luminance and illuminance) in the EN 13201 for the following reasons:

- There are many longstanding examples of European cities that use light levels substantially below the street lighting levels required by EN 13201 and that successfully address safety with these substantially lower levels.
- The CO₂ emissions and the electric power consumption for street lighting would increase dramatically if even the minimum limits to street lighting levels required by EN 13201 were applied to all countries adopting this norm.
- We are concerned that these minimum limits to street lighting may not be based on current knowledge of human vision and circadian rhythms.

As experts in the EU COST LoNNe Action, we are investigating these points. One of the directives assigned to us by the EU COST program is to advise municipalities and regions on the use of artificial light at night, and we are very interested in entering into continuing discussions regarding the norm before its official adoption.