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# DON'T LEAVE US IN THE DARK

Dr P Keep  
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Dear Dr Keep

Thank you very much for your interest in the health and social issues generated by the Government's policy of phasing out incandescent light bulbs. Spectrum, Alliance for Light Sensitivity, and Right to Light have now agreed a common policy position which is elaborated in Right to Light's response to the European Consultation on Domestic Lighting earlier this year (attached). This has also been sent to the EU Department of Health and Consumer Protection and a similar paper was also submitted as a response to DEFRA's consultation White Paper on lighting.

**The fundamental principles of this policy are as follows, and are in harmony with the Department of the Environment's pledge that there will be no unintended negative consequences as a result of their policy of a voluntary phase-out of incandescent light bulbs by 2011.**

1. "Light Sensitive" is an umbrella term which we use to describe any person who may have sensitive reactions to some forms of artificial lighting e.g. CFLs, Halogen, LEDs. Some light-sensitive people are also adversely affected by sunlight or even daylight and have to restrict their exposure accordingly. Light sensitivity is often just one component of a recognised health condition e.g. lupus or aspergers syndrome, but can also be a condition in itself i.e. photosensitivity (see document sent by post regarding research). As many light-sensitive people have experienced adverse health reactions to energy-efficient light bulbs, they need to buy incandescent bulbs for their homes and they need to have safe access to the electrically-lit world outside their homes.

2. Every light-sensitive person knows best how to light their home so as to maximise their health and quality of life: their choice of bulbs therefore should not be restricted. People with lupus, for example, will probably choose mainly low wattage incandescent bulbs e.g. 40 watt and below. People with partial sight and other ocular diseases may need extremely bright incandescent lighting (up to three times brighter than average - see attached article by Elaine Kitchel, Research Scientist). In between are people who have numerous conditions (some of which have a relapsing/remitting or "flare-up" pattern) e.g. ME/CFS, fibromyalgia, skin conditions, autism/aspergers syndrome, electro-sensitivity, people on some medications, and they need the broad range of GLS incandescent bulbs including 150, 100 and 60 watts. This is because they may be affected by different technical parameters of the bulb - not necessarily the brightness. These parameters have been listed by the EU Scientific Committee for Emerging and Newly Identified Health Risks, as follows:-

- a. Light spectrum specificities,
- b. the air 'ionised' by fluorescent bulbs,
- c. the electromagnetic fields generated by the bulbs,
- d. potentially other, so far not identified, technical parameters differing from incandescent bulbs.

"Light spectrum specificities" include whether the light bulb emits UV, which is potentially damaging to some people e.g. with lupus or XP, two illnesses which can be fatal.

3. How can the lighting requirements of "light-sensitive" people be met until we are sure, by testing, that there are energy-efficient alternatives to incandescent bulbs which are safe for them to use?

Incandescent bulbs of 150, 100, 60, 40 and 25 watts must be available in some shops. We have been recently writing to stores, asking them not to discriminate against light-sensitive people and have had a positive reply from Tesco Stores (see attached). This is a good start and we will communicate further with them.

We are now clear that the system of operating a register of light-sensitive people - which we have considered - is unworkable; that is because our right to safe access of the electrically-lit world outside our homes is at the heart of this issue. Light-sensitive people cannot be expected to purchase light bulbs for places they need to visit e.g. the homes of family and friends, places of worship, educational and cultural organisations etc. Further, who will decide who is allowed to put their names on such a register? GPs have no special expertise in new lighting technologies and are not trained to make such judgements. Will there be a right of appeal? Some people appear to be affected by the electronic ballasts which are in the CFLs recommended as the improved 'flicker-free' ones, that are suitable for light-sensitive people (see article sent by post). Clearly very technical issues are involved, but nevertheless light bulbs are **essential** consumer items which should be freely available to all. Light-sensitive people should not have to go through hurdles to obtain them.

As light bulbs need to be readily available, you may be concerned that there will be "abuse of the system" if some incandescent light bulbs continue to be sold at, for example, Tesco. **We are clear that the desire to achieve energy-efficiency targets for light bulbs must be balanced by public health and human and disability rights requirements.** The Disability Discrimination Act and Human Rights Act encode these principles in UK law. The UK is also a signatory to the UN Charter on Disability Rights. The whole ethos of social policy is towards social inclusion and light-sensitive people will continue to campaign for there to be incandescently-lit areas in public places and on public transport. Our access needs are even more urgent because, as a result of the promotion of CFLs and the Government's phase-out policy, our access is shrinking rapidly e.g. more small shops, hotels, restaurants use CFLs; National Trust Houses and restaurants are all now lit by CFLs and discriminatory new building regulations have been passed so that some people cannot even join in activities and events at places where they are paid-up members.

CO2 reduction targets are very important but these depend on a large number of energy-efficient measures, not just light bulbs. Is it a fair or balanced policy which allows consumer demand (i.e. market forces) to operate - where air flights and car buying are concerned - activities that generate much higher CO2 emissions, but are totally denied when assessing people's lighting needs? The brunt of the Government's CO2 reduction policy should not fall on people **who already have restricted lives** and do not even have access to planes or trains because of fluorescent strip lighting. As incandescent bulbs need to be on sale in some shops, the best way to reduce the so called 'abuse of the system' is for the energy-efficient lighting products to be the products that people **want** to buy i.e. which provide good quality lighting, are reasonably priced and which will reduce the customers' electricity bills. Public education is important and incandescent bulbs could also be labelled or indicated as "bulbs suitable for light-sensitive people".

4. **What is the scientific evidence for "light-sensitivity"?** As Professor Pinching has informed the government (see attached), academics have not been given a chance to produce the specific research on relatively new technologies that governments might like to see. The scientific evidence that does exist - to our limited knowledge - we have sent to the EU Scientific Committee for Emerging and Newly Identified Health Risks. They will be voicing their opinion on it shortly. It includes reports on many of the health conditions mentioned from Dr Sarkany, consultant in photobiology, Professor Hawk, Spokesman for the British Skin Foundation, Professor Pinching and Professor Havas, and academic journal articles which we are happy to provide if you require them. (We attach information regarding aspects of environmental disability accommodation in other countries).

If the evidence proves to be inconclusive at present, then we will campaign for more research to be undertaken to make a proper assessment of people's lighting needs, before the complete phase-out of incandescent light. We would then advocate that the Precautionary Principle should apply until there is further evidence and the above arrangements be put into place as a health and consumer protection requirement for light-sensitive people.

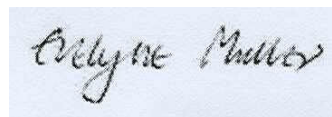
5. We support the development of energy-efficient lighting technologies and are willing to assist with the testing of light bulbs where this is possible; we believe that research like that carried out by Dr Havas, Dr Andrew Goldsworthy (Honorary Lecturer in Biology, Imperial College, University of London) and Helen Irlen (see attached) is very valuable for the public at large, as many people may not be aware that their health is affected by light bulbs. Until you are personally affected, it may be very hard to believe; this is the problem for light-sensitive people. As light is taken in by the human body, governments should be concerned about promoting healthy lighting as well as energy-efficient lighting.

The LED lights that Dr Havas recommends in her report as safe from the electro-magnetic point of view, were tested by a lupus sufferer and found to be too far towards the blue end of the spectrum (see "Artificial Lighting and the Blue Light Hazard" by Dan Roberts, Founding Director of Macular Degeneration Support at [www.mdsupport.org/library/hazard/html](http://www.mdsupport.org/library/hazard/html).) However, at least some LED bulbs show themselves to have more suitable parameters of electro-magnetic fields and hopefully further developments can improve their other specifications.

We thank you for your interest and consideration of these issues.

We are sending a copy of this letter to Peter Hunt of the Lighting Association.

Yours sincerely



David Price  
Co-ordinator,  
Spectrum, the Alliance for Light Sensitivity  
representing the charities:-

Lupus UK  
Eclipse Support Group  
XP Support Group  
The Skin Care Campaign  
ES-UK

Evelyne Muller  
Co-ordinator,  
Right to Light

Also supported by: the National Autistic Society and Migraine Action

cc Peter Hunt, Lighting Association  
cc Anne Keen MP  
cc Joan Ruddock MP  
cc Janet Dean MP  
cc Anne McGuire, MP, Minister for Disability  
cc Neil Crowther, Equality & Human Rights Commission

Right to Light is a signatory to the Earth Charter ([www.earthcharterinaction.org](http://www.earthcharterinaction.org)), the first principle of which is:-

*Respect Earth and life in all its diversity:*

*a. Recognize that all beings are interdependent and every form of life has value regardless of its worth to human beings.*

*b. Affirm faith in the inherent dignity of human beings and in the intellectual, artistic, ethical and spiritual potential of humanity.*