



**Dark-Sky Slovenia**  
Savlje 89, SI-1000 Ljubljana, Slovenia  
Mob: +386 41 738 411  
[www.temnonebo.si](http://www.temnonebo.si)

---

**Dr. Jennifer Veitch**

President of the CIE  
International Commission on Illumination  
Email: [Jennifer.Veitch@nrc-cnrc.gc.ca](mailto:Jennifer.Veitch@nrc-cnrc.gc.ca)

Ljubljana, May 11, 2026

Cc:

**CIE Members**, Email: [ciecb@cie.co.at](mailto:ciecb@cie.co.at)  
**Researchers in the field of light pollution**  
**Environmental organizations**

**Subject:**

**Complaint Regarding Misleading Claims About the Reduction of Light Pollution in Slovenia on the CIE Website**

Dear Madam President,

We welcome the idea that the CIE is organizing the webinar titled:

“Lighting the Way: Finding Balance Between Safety, Beauty, and the Night Sky”  
<https://www.cie.co.at/news/cie-webinar-light-pollution-celebration-international-day-light-2026>

Unfortunately, in the presenter summary of dr. Matej B. Kobav we noticed a completely inaccurate statement regarding the state of light pollution in Slovenia after 2007, when the Decree on Limiting Values of Light Pollution was adopted (Decree):

"At the same time, upward light emissions and skyglow levels have been reduced, contributing to improved night sky visibility, enhanced environmental protection, and lower operating costs for municipalities."

Light pollution in Slovenia decreased only for approximately three years, from 2007 to 2010, when luminaires emitting substantial light directly into the sky (globular fixtures and unshielded HPS lamps) were replaced, and externally illuminated or upward-illuminated advertising billboards were removed.

Since 2010, with the widespread introduction of LED lighting, the situation has been continuously deteriorating. The main problem is the installation of ever more outdoor lighting, often in places where it is not needed at all. A major issue is systemic corruption, whereby the lighting industry — formally organized within the Slovenian Lighting Society (SDR) — succeeded in promoting the illumination of motorway exits, motorway junctions, petrol station entrances, roundabouts outside settlements, rural intersections, and many other locations.

In urban areas, locations for new lighting installations have largely been exhausted, so the industry now increases lighting levels during every road reconstruction project (for example Celovška Road in Šentvid). The greatest environmental destruction is occurring in rural areas, where continuous village lighting fragments the entire natural environment and animal habitats. Lighting is also being installed around monuments in natural landscapes (for example Cerje). At this very moment, lighting is being installed along a 200-meter roundabout at the end of the runway of Ljubljana Airport, even though a passenger aircraft once crashed near runway after colliding with trees during landing.

Dr. Kobav has been secretary of the SDR for approximately 20 years and is one of the society's most active members. He is therefore also partly responsible for the continuous increase of light pollution.

Dr. Kobav has publicly strongly criticized the Decree, particularly the provision concerning sports facilities, which originally required 0% upward light emission. Several years later, without consulting environmental organizations (and allegedly under negative influence from the SDR or individuals associated with it), the government allowed all sports facilities to emit up to 5% of light above the horizontal plane.

The consequences are widespread citizen complaints about intrusive light entering residential spaces. This year, one resident, disturbed by excessive illumination from a football field, attempted to install blinds on his windows. He fell from a ladder and fractured his spine. Fortunately, he holds a black belt in karate, which probably contributed to his recovery and prevented permanent confinement to a wheelchair — but he will suffer lifelong consequences from this injury.

The problems have become so severe that residents living near four football stadiums are preparing a class-action lawsuit against the Ministry of the Environment.

Dr. Kobav possesses no proper equipment for measuring light pollution (a luxmeter is not a light pollution measuring instrument), nor does he conduct any actual monitoring of light pollution (luxmeters are unsuitable for monitoring purposes). Satellite maps of light pollution are also unreliable because VIIRS satellites do not detect the blue portion of the spectrum. Consequently, satellites interpret the replacement of HPS lighting with white LED lighting as a reduction in light pollution.

Dr. Kobav is also an advocate of the EN 13201 standard and blames lighting designers for allegedly overusing outdoor lighting. This is simply untrue, because designers are merely victims of the excessively demanding EN 13201 standard. The standard lacks a reliable scientific foundation, and there is no credible scientific study conclusively demonstrating that higher lighting levels and greater uniformity reduce the number of traffic accidents. The excessive nature of EN 13201 is also demonstrated by research conducted by respected lighting scientists such as dr. Fotios and dr. Halonen.

Excessive outdoor lighting increases the number of fatalities caused by collisions with lighting poles, both during daytime and nighttime. In Slovenia, approximately two percent of traffic fatalities result from collisions with lighting poles.

**We are convinced that the EN 13201 standard, together with EN 12464-2 (lighting of parking areas and storage facilities), guarantees the complete destruction of the nighttime environment. Slovenia**

itself is clear evidence of this: despite the fact that the vast majority of outdoor lighting in Slovenia has a correlated color temperature of 3000 K or lower and 0% upward light emission, **light pollution in Slovenia continues to increase steadily, with no indication whatsoever that this growth will ever stop.**

We therefore understand dr. Kobav's statement regarding the alleged reduction of light pollution in Slovenia merely as greenwashing — an attempt by a representative of the lighting industry to minimize the negative consequences of continuously adding new outdoor lighting installations.

We respectfully request that the CIE immediately remove the inaccurate claims regarding the reduction of light pollution in Slovenia from its website.

Sincerely,

Andrej Mohar

Jurij Stare

Herman Mikuž

Expert on Light Pollution  
Measurements

Expert on Geographic Information  
Systems and author of  
[www.lightpollutionmap.info](http://www.lightpollutionmap.info)

President

