

Texte zu EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung ^[1] des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 6. Oktober 2020
Stellungnahme des Unterhaltungssektors (ALD, DTHG, IALD, OETHG, Pearle, PLASA, SLF, STEPP, VPLT) ^[2]
vom 2. November 2020

Hinweis: Bitte beachten Sie, daß der angehängte Text nur in Englisch verfaßt ist.

EN: Information on EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation ^[1] of the Federal Environment Agency (UBA), Germany

The EU Commission's drafts of 6 October 2020

Comments of the Entertainment sector (ALD, DTHG, IALD, OETHG, Pearle, PLASA, SLF, STEPP, VPLT) ^[2] as of 2 November 2020

FR: Informations sur réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation ^[1] de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Les projets de la Commission Européenne du 6 octobre 2020

Commentaires du secteur du divertissement (ALD, DTHG, IALD, OETHG, Pearle, PLASA, SLF, STEPP, VPLT) ^[2] du 2 novembre 2020

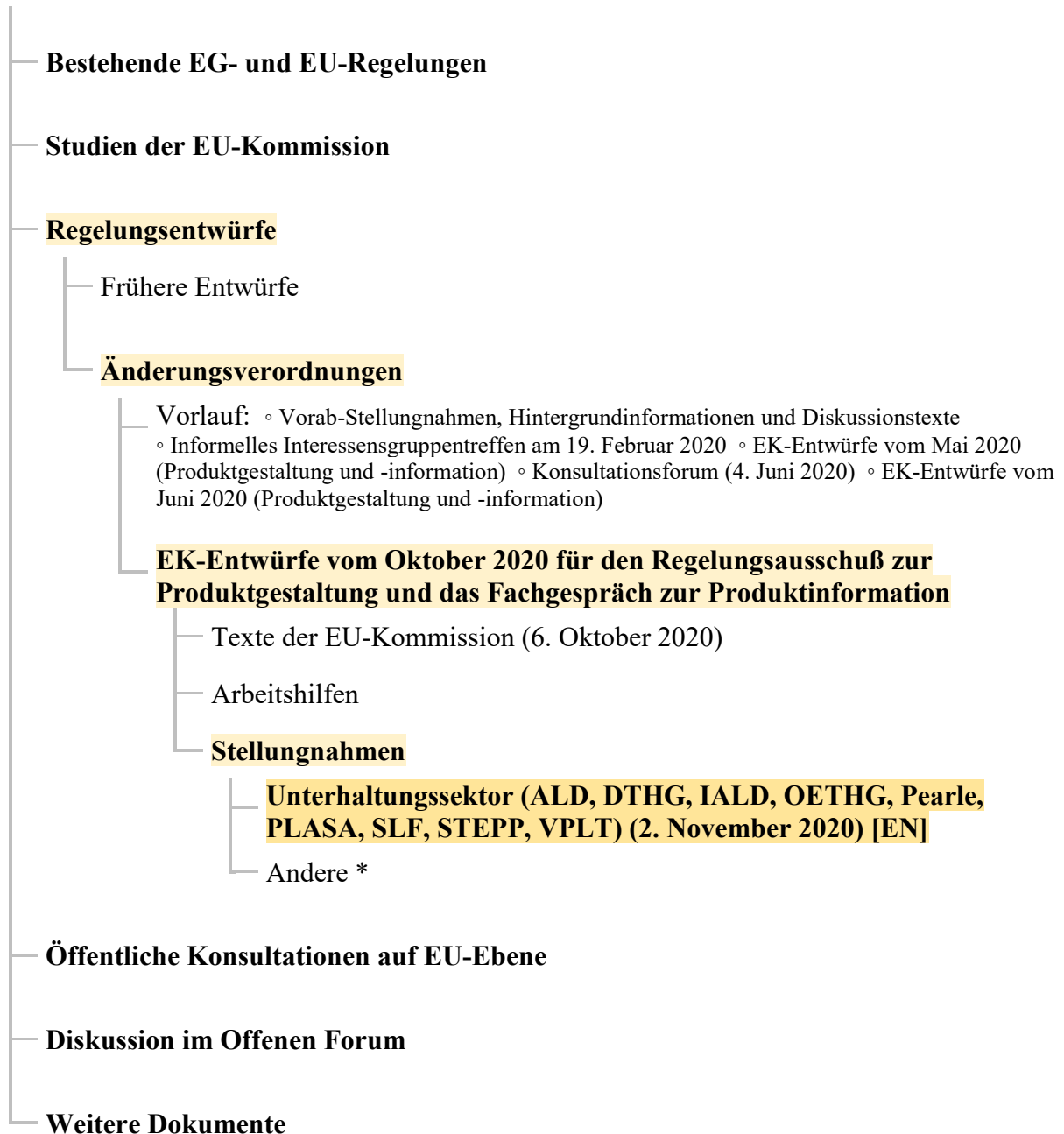
Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

^[1] <https://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

^[2] www.ald.org.uk | www.dthg.de | www.iald.org | www.oethg.at | www.pearle.eu | www.plasa.org | www.svenska-ljus.se | www.stepp.be | www.vplt.org

Texte im Offenen Forum

(abc = vorliegender Text)



* Stand 4. November 2020: Dieser Text steht noch nicht zur Verfügung.

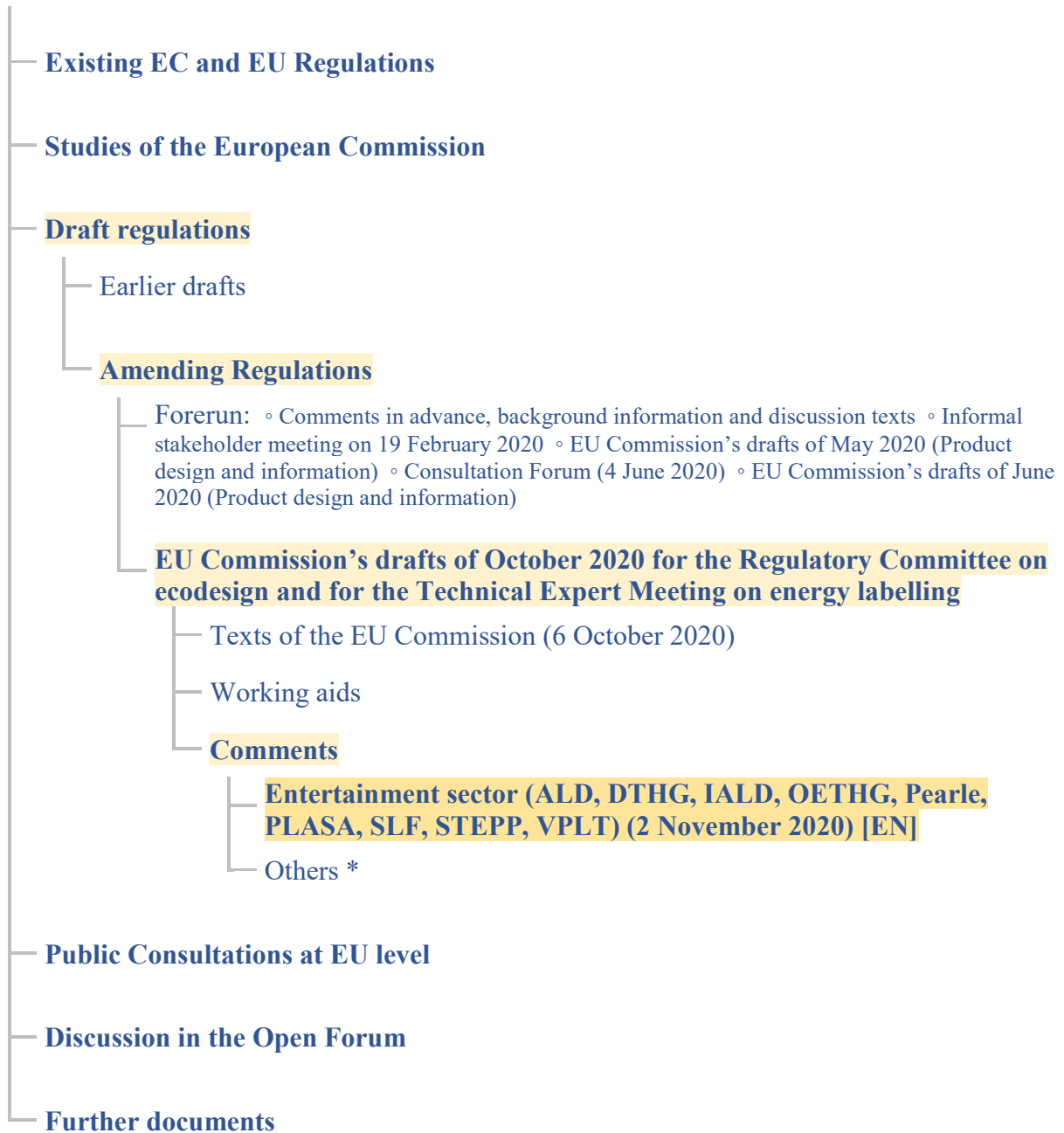
Abkürzungen: ● EG = Europäische Gemeinschaft ● EU = Europäische Union

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Documents in the Open Forum

(abc = text at hand)



* Status as of 4 November 2020: This text is not yet available.

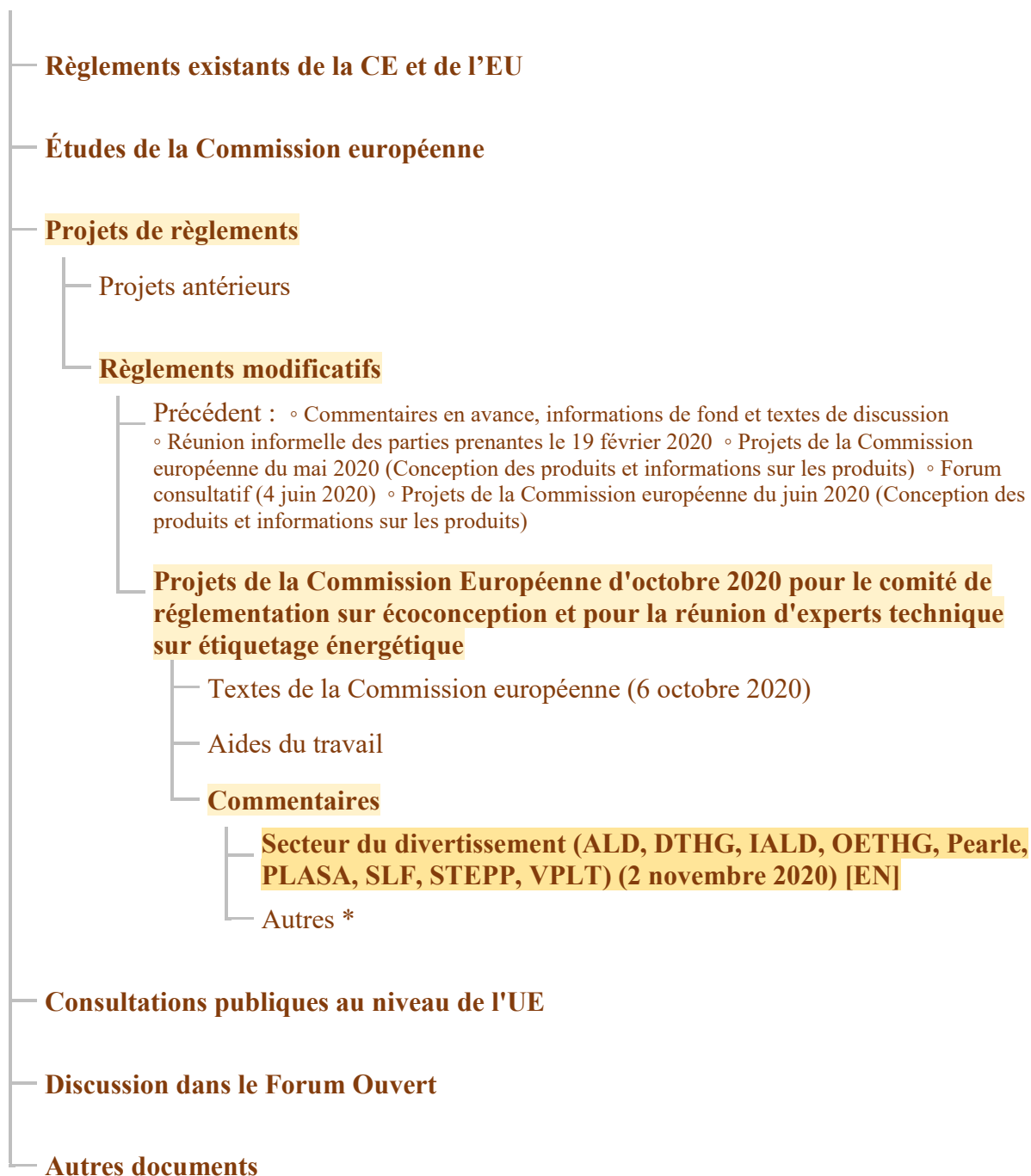
Abbreviations: ● EC = European Communities ● EU = European Union

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Documents dans le forum ouvert

(abc = présent document)



* État au 4 novembre 2020 : Ce texte n'est pas encore disponible.

Abréviations : ● CE = Communauté européenne ● UE = Union européenne

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Contents list

The following table of contents gives details only in the case of lighting products.
The points on which the Entertainment Sector has commented are marked by **(Enter)**.

Ecodesign

Recitals (...)

(...)

Light sources and separate control gears (Regulation (EU) 2019/2020)

Article 4 (...)

ANNEX IV

- (1) Annex I (...)
- (2) Annex II (...)
- (3) Annex III (...)
- (b) point 3
 - (i) point (s) (...)
 - (ii) point (w) **(Enter)**.....1
 - (iii) point (x) (...)
- (4) Annex IV (...)

(...)

Article 9 – Entry into force and application

Labelling

(...)

Es folgt ein unveränderter Originaltext.

EN: The following is an unmodified original text.

FR: Ce qui suit est un texte original.

**European Entertainment Ecodesign Coalition:
Contribution to the updated EU rules on ecodesign and energy labelling:
proposed Commission amendments of Annex III.3 point 3 ii (w)**

Commission Regulation on ecodesign, amending Commission Regulation (EU)
2019/2020

Brussels, 02 November 2020
Ref.: 2020/SL_P7820

The aim being to maximise energy savings and close loopholes in current legislation, the reviewed ecodesign regulation 2019/2020 has replaced general sector exemptions for special purpose lights used in theatres, concert halls, live venues and film studios by narrow exemptions based on technical characteristics.

The **European Entertainment Ecodesign Coalition**, a European-wide group of associations working in the entertainment, lighting design, live performance and film/TV sectors has pointed out several concerns on **Annex III.3 (ii) point (w)** after the vote of the text in December 2018.

We addressed our concerns in two written contributions and participated in the meetings of the ecodesign and energy labelling consultation forum.

Having analysed the Commission proposal published on 6 October 2020 thoroughly, we welcome the proposed amendments on **Annex III.3 (ii) point (w)** introduced by the Commission which are to be voted on 10 November in the regulatory committee.

Point (w) deals with the use of very high output light sources which are a key component and are used in the context of theatre lighting, television, film lighting, concerts and live entertainment, photography.

The revised text proposed by the Commission **addresses inconsistencies** in point (w) of the regulation 2019/2020 voted in December 2018 which bears risks at the legal level as it would lead to heterogenous implementation of the text in the Member States and at the technical level as manufacturers might choose not to produce certain types of light sources anymore.

The revised text also contains an additional minimum power request of 100W in w (2) a) and e). This value impedes cross-use, while taking into consideration that higher values would have repercussions for currently used entertainment technology and the future development of more efficient light sources. This topic was discussed at the meeting of the Ecodesign and Energy Labelling Consultation Forum on 4 June 2020.

Key points: Why do we s **strongly support the commission proposal on a value of 100W** in point w (2) a) and e)

- Very concentrated, small, high output light sources cannot meet the efficiency requirements due to their size (high output LED lighting fixtures generally combine multiple lower-output fixtures) and the LED technology available today and for the foreseeable future. Stage lighting fixtures that use an optical system of reflector and lenses require small light sources to allow these optical systems to work at maximum efficiency. This is a different situation than for general-purpose lighting where it is possible for the size of the light source to be larger.
- At powers of a 100W or less, it is technically possible to solve cooling issues and/or to use more efficient, larger general-purpose LED light sources.
- Application of a higher power limit would discourage development of more efficient spotlight light sources.
- The dominant application for professional spotlights is in the range of 500W-1000W tungsten. Many of these could potentially be replaced with LED equivalents in a power range of 100W-200W. This is where our sector can make the highest improvements of efficiency and energy reduction.

We strongly believe that with the recent amendments introduced by the Commission the concerns regarding stage and studio lighting were addressed as our sectors can further use certain types of LED sources which are recognised as the way forward to reduce energy consumption.

The proposed text leaves enough room for future research and innovation in the area of stage and studio lighting and does not hinder the development of more efficient light sources.

The **European Entertainment Ecodesign Coalition** is a European-wide group of associations working in the entertainment, lighting design, live performance and film/TV sectors:

Pearle* – Live Performance Europe www.pearle.eu

IALD – International Association of Lighting Designers www.iald.org

PLASA – The Professional Lighting and Sound Association www.plasa.org

VPLT – The German Entertainment Technology Association www.vplt.org

ALD – The Association of Lighting Designers www.ald.org.uk

DTHG – German Theatre Technical Society www.dthg.de

OETHG – The Austrian Theatre Technology Association www.oethg.at

SLF – The Association of Swedish Lighting Designers www.svenska-ljus.se/english/

STEPP – The professional association of producers, designers and technicians of the arts and event sector in Belgium www.stepp.be

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