

## SaveStageLighting

### Web Timeline from the ALD Website

#### Timeline: August 2020

Throughout the peak of the Save Stage Lighting campaign, the ALD website published updates on the issues and objections and news on progress and people. In this document we capture the history of the process as detailed on the ALD website. Note: Some of the links towards the end may now be dead or directing to other pages.

#### Update 11: 13th May 2019

Moving into the middle of 2019, the situation with Ecodesign remains roughly where it was in January.

We have now seen the full final text of the Ecodesign regulations. The text is as discussed in the 5th January entry below, which is to say generally good news but with some very particular issues caused by the way the EU have changed one section of the text the entertainment lighting industry supplied (Annex III - 3(w)), so that it reads 'two or more' instead of 'one more'. This renders most of the section invalid since none of the specified light sources can meet two or more of the requirements (since a DWE lamp cannot also be, for example, an LED source).

Frustratingly, it has been impossible to establish exactly why this change was made or by who, beyond 'by some of the member states' at the final EU meeting discussing the regulations on December 17th last year. EU process is that once such a meeting takes place and all of the member states agree on the text, no further reviews take place and this text becomes the 'approved' text. This text is still subject to approval by the European Parliament, but this is generally accepted to be a formality unless there is some outrageous issue with the regulation. The text was forwarded for approval on 7th February; it is expected to be voted on during May/June, and adopted and published in the Official Journal of the Union in June/July; it is generally accepted that it will be waved through.

The particular issue this leaves the entertainment lighting industry with is that it will potentially be hard to create very high output white LED lighting fixtures - the scale you might require for large stadium-scale moving lights or,



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particularly, for followspots. The irony of this, of course, is that such fixtures might have to continue using existing, less efficient arc sources.

The further irony of all this is that the EU are about to start the same review process for their RoHS (Restriction of Hazardous Substances) regulation. As part of that they would like to ban the use of mercury, but mercury - albeit in tiny amounts - is an important element in many of these arc sources. If entertainment lighting is unable to be sure it can replace arc sources, it will likely have to request an exemption from the RoHS regulations for such arc sources.

This all clearly runs counter to the overall intent of both regulations, and indeed to the move to more efficient lighting sources that is already taking place across the entertainment lighting industry.

In informal conversations with leaders of the EU's Energy team, they have accepted that the current wording is problematic and that it should be revised. However they are also unable to change what they consider to be the final text. They have suggested that the entertainment industry needs to provide a revised text, and this text needs to be submitted via the member states to be voted on as a later revision to the regulation.

The entertainment industry has now prepared a suitable revised text. Once it has been agreed upon by all involved, it will be submitted to the member states via Pearle, the European producer's league. Since Britain has not managed to Brexit yet, we in the UK still get to be part of this process.....

In the nearer-term, there will be a panel to discuss Ecodesign with Adam Bennette from PLASA, Steve Giudici from ASPEC and the ALD's Rob Halliday at the PLASA Focus Show in Leeds on Wednesday 15th May, at 2.45pm in the Bury Theatre. This will discuss the current state of Ecodesign in particular, but also look forward to how the entertainment industry (lighting and beyond) can better monitor, protect itself from and maybe even help influence regulatory changes like this in the future. And since recent events, such as the recall of Par lamps by Osram, suggests that the demise of tungsten might come sooner than we might hope regardless of regulation, it will also allow a discussion of the challenges (and advantages!) of moving to newer lighting technologies.

Continued....



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## Update 10: 5th January 2019

The start of 2019 brings some good news - with, inevitably, a caveat.

The member states met on December 17th to discuss Ecodesign. It was, by all accounts, a good discussion, with the points made by the entertainment lighting industry strongly presented by a number of countries - and with the entertainment lighting community welcomed to the 'ecodesign family' in a speech by the head of the Commission's Energy Efficiency Unit at an event after the meetings.

We haven't seen the official final version of the text yet. We have, however, been given a peek at the changes which affect entertainment lighting.

Most of the points we raised have been addressed:

- there is a new paragraph specifically exempting network (DMX or equivalent)-controlled entertainment lighting fixtures from the 0.5W standby power requirement, which it would have been impossible for them to meet.
- the definition of green for additive colour mixing fixtures has been extended as we suggested.
- high output R7 linear floods (above 12,000 lumens) have been exempted - these are the lamps used in cyc floods and similar fixtures.
- there are exemptions for a number of other specialist lamps used in entertainment lighting, particularly low-voltage crown-silver lamps used in things like beamlights and Svoboda battens. The main loss is the tungsten M16 lamp as used in Birdies, but we think this was probably unwinnable and in any case tungsten M16 lamps are becoming hard to find and expensive to buy if you do find them.

All of these things are good. They will allow us to continue to use the tools we have and love for now. They will allow manufacturers to continue to develop innovative new lighting tools that we will love. And it gives us more time to transition to those new lighting tools.

However, the caveat: a new section has been added to the regulation. This section attempts to address some remaining white light sources including high-output white LED sources, some fluorescent sources used by the film industry, and the DWE tungsten lamp. The text for this is taken almost word for word from the entertainment industry/Pearle document. Unfortunately one critical word has been changed: the need for light sources to meet 'one or more' of the requirements listed has been changed to 'two or more'. Since the list was constructed around 'one or more', none of the light sources described can



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meet 'two or more' and the whole section therefore effectively becomes redundant, meaning these light sources would not be exempt from the regulations.

We are raising this as a matter of high urgency with all involved. We hope that this can be resolved once the EU returns to work on January 7th.

### **Update 9a: 18th December 2018**

We have now set up a fundraising page so that we can compensate the volunteers that have worked on the campaign during 2018 and also raise some funds to help react to events as they occur in 2019. For full information [please visit the fundraising page.](#)

### **Update 9: 15th December 2018**

The final phase is now upon us.

On Monday, December 17th, EU member states get to meet with the EU to discuss final concerns with and changes to the Ecodesign Lighting regulation, before a final text of the regulations is produced and voted in to law.

In the UK, the ALD, PLASA and ASPEC have been working hard with the UK Government department responsible for Ecodesign who will be at this meeting (BEIS - the Department of Business, Energy and Industrial Strategy) to make sure they are fully aware of and briefed about the outstanding issues relating to entertainment lighting. We have had good and productive conversations with the BEIS team, and they believe they have already persuaded the EU to make changes to deal with two of our four outstanding points (about standby power and the definition of green in additive colour mixing lights). We have also worked with them to refine the list of 'legacy' lamp bases we are seeking an exemption for, removing some which there is no hope of winning or no point in fighting for (since tungsten versions of those lamps are already out of production), to better be able to defend lamps that we consider irreplaceable.

The same or a very similar position will be presented by a number of other key EU countries, including Germany, Italy, the Netherlands, the Czech Republic and Malta.



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We are hopeful all will agree that these requests have been carefully considered, are widely accepted across many EU member states, and reflect products for which no suitable LED alternatives are available or which, though LED based, cannot meet the efficiency requirements for particular reasons of science. We are therefore also hopeful that they will be incorporated into the final version of the Ecodesign regulation. If adopted, the changes would both continue to allow us access to some unique legacy light sources, and allow manufacturers to develop remarkable new lighting tools to carry us into the future.

That will give users and manufacturers stability for now, and time to start planning for the future: the next re-examination of these regulations is in a few years time in the EU. Of course no-one quite knows what that means for the UK yet...

#### **Update 8: 12th November 2018**

For four weeks, from 12 October to 9 November 2018, the EU ran a Public Consultation on the current (October) draft of the Ecodesign lighting regulation - this part of their 'better regulation agenda' intended to let the Commission 'listen more closely to the views of citizens and stakeholders.'

On behalf of its members, the ALD submitted a response to the survey, which [can be found on the European Commission website here](#)

In addition, a number of other organisations representing or working in the entertainment industry responded outlining the effect on their productions should the last four outstanding points relating to entertainment lighting not be addressed. In total, the survey received 72 responses. One of these was an accidental duplicate, so in fact 71 responses.

Of those:

- 22 were entirely about entertainment lighting.
- 8 included entertainment lighting as part of their scope, including even one from Australia.

That means that just over 42% of the total response included concerns about the effect of the regulation on entertainment lighting - clearly showing the level of concern our industry still has.

All of the responses are publicly available, and can be found here: [https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-476175\\_en](https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-476175_en)



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Parallel to this, the ALD and others including PLASA and the film trade body ASPEC have been engaging with the UK Government's Department of Business, Energy and Industrial Strategy (BEIS), the department that deals with Ecodesign and so will be involved in the final discussions on the subject in Brussels. A very productive meeting was held with them on November 5th, during which the remaining issues with the regulations were identified and clearly explained to them.

Ideally, the equivalent departments in every other EU country would be similarly briefed. Such discussions are taking place in some countries (we know of at least Spain and the Netherlands). But ideally, every such department would understand our concerns and be well briefed on them. If you work or are based in other EU countries, the ALD would strongly encourage you to identify and contact the relevant department to make sure they are aware of the issue.

There is an urgency to this. Final discussions and the vote to accept the regulation are currently scheduled to take place on December 17th. That is very soon.

We have all achieved a great deal over the last eleven months. But we're not quite done yet.

If you need help or additional information to help in any discussions you have with government, [\*\*please do get in touch\*\*](#).

#### **Update 7: 5th November 2018**

The ALD represents lighting designers and lighting technicians working in entertainment and performance lighting, with members from around the world. The Association has been involved, through the European Entertainment Ecodesign Coalition (EEEC) and Pearle, with all of the discussions about Ecodesign as it pertains to entertainment lighting throughout 2018, since it became clear that the proposed regulation would remove the existing, clear exemption for 'lighting applications where the spectral distribution of the light is adjusted to the specific needs of particular technical equipment in addition to making the scene or object visible for humans (such as studio lighting, show effect lighting, theatre lighting)' while imposing much higher efficiency standards that it would be impossible for many specialist entertainment luminaires to meet because of their particular optical design and performance requirements.

During this time, the ALD has always aimed to ensure that the views



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and concerns of lighting designers and lighting users (including venues that own and purchase lighting equipment, and productions and producers that rent or purchase lighting equipment for specific projects) have been represented alongside those of lighting manufacturers.

You can read the full response [\*\*by following this link\*\*](#)

### **Update 6: October 2018**

A PDF document of the press release from the European Entertainment Ecodesign Coalition on the current position can be read / downloaded [via this link](#)

The European Union has now made available new drafts of its Eco-Design and Eco-Labeling regulations for lighting. This third draft, released on October 8th, is what is proposed as the final version of these rules. These drafts are available to read here:

- [https://members.wto.org/crnattachments/2018/TBT/EEC/18\\_5215\\_00\\_e.pdf](https://members.wto.org/crnattachments/2018/TBT/EEC/18_5215_00_e.pdf)
- [https://members.wto.org/crnattachments/2018/TBT/EEC/18\\_5215\\_01\\_e.pdf](https://members.wto.org/crnattachments/2018/TBT/EEC/18_5215_01_e.pdf)
- [https://members.wto.org/crnattachments/2018/TBT/EEC/18\\_5216\\_00\\_e.pdf](https://members.wto.org/crnattachments/2018/TBT/EEC/18_5216_00_e.pdf)
- [https://members.wto.org/crnattachments/2018/TBT/EEC/18\\_5216\\_01\\_e.pdf](https://members.wto.org/crnattachments/2018/TBT/EEC/18_5216_01_e.pdf)

It is worth re-iterating that we - the entertainment lighting industry - have achieved a great deal over the last few months. The second draft of the regulations, released in July, achieved a number of important things for us, particularly an exemption for many of the tungsten light bulbs in common use, and for additive colour-mixing (what the EU calls 'colour tuneable') lighting fixtures. All of these remain in this final draft.

However, that draft also included some details that were problematic to our industry. These included:

- the inability of entertainment lighting products to achieve the 0.5W maximum power consumption when in standby mode - ie. when not emitting light - because of the need to keep processing incoming data all the time in order to be able to respond immediately to commands.



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- the inability of high-powered / high output white LED sources to meet the efficiency level required, because of the way that optical systems naturally become less efficient as they get larger
- the definition of green used for colour-tunable fixtures, which is not set at the right point for the most efficient design of such fixtures
- a number of specific lamp bases still in use which were included in our original request for exemption, but not included in the revised rules.

Some of these issues are laid out graphical format [on this document](#)

The entertainment lighting industry, through Pearle (the European producers league that has been our 'voice' in Brussels) has been trying to feed this back to the EU's Energy team since July. The [version linked here](#) is a slightly updated version with more signatories. However, there has been no response to this from Energy, and none of these issues have been addressed in the latest draft.

The regulations now enter a consultation period during which member states can comment on the regulations through their appropriate government body. In the UK this is the Department of Business, Energy and Industrial Strategy - BEIS. The ALD and others in entertainment lighting have been talking to this department for some time, and they are fully aware of the issues and are poised to help. However, if you work in other countries, or know people who do, it would be incredibly helpful if they could contact the relevant department (the department responsible for Ecodesign) in their country and make sure that department is informed and asked to help. The more countries that respond with the same message (and particularly countries that are not Britain - announcing that we are leaving does not put us in a particularly strong position within Europe), the better. If people, companies or organisations need help working out who to contact or need more information about what to tell them, please ask them to contact the ALD - we'd be happy to help.

If that fails, the manufacturers are already starting to plan their workarounds. But we continue to believe it would be better to get these outstanding concerns resolved properly, so manufacturers can concentrate their efforts on making innovative new products, not having to engineer work-arounds to rules.

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Continued....



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### **Update 5: September 10th 2018**

ETC's Adam Bennette has written a summary of his views on the current state of the Ecodesign regulations for PLASA which can be read on the PLASA website here:

<https://www.plasa.org/wp-content/uploads/2018/09/ECO-design-regulations-summary.pdf>

In addition, PLASA are also running a panel on the subject on the Tuesday of the PLASA Show at London Olympia, 11am-12pm. Full details and how to register can be accessed by the following link:

<https://www.plasashow.com/session-registration-eco-design#/>

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### **Update 4: August 11th 2018**

The last update was written just a few days after the meeting with DG Energy in Brussels, when the entertainment industry had, in effect, been asked to submit ideas for a suitable exemption for stage lighting. The proposal submitted included a reference to the existing European safety standard for stage and studio luminaires (EN60598-2-17), plus a list of lamp bases used in entertainment lighting fixtures. We felt both were required since the standard would define fixtures with built-in light sources (ie. LED fixtures) but not those using separate light sources (eg. tungsten or arc lamps), while the list of lamp bases would define those light sources, tungsten and arc, we felt were important for our work; limiting the exemption to their use in already-defined stage and studio luminaires would, it seemed to us, reduce or remove the potential for an exemption for these bulbs to be abused by people outside entertainment lighting – something DG Energy have repeatedly suggested happened with the previous entertainment lighting exemption, without ever really explaining that abuse.

That proposal was submitted through PEARLE, the pan-European producers organisation which has become our “channel” into Brussels.... and then the silence began. Silence on our side because we'd all been asked to be quiet and let the EU do its work. Silence on their side, because it was doing its work. We were told that a next draft would appear in the first week of July; we waited...

Finally, on 16 July new drafts for both the Ecodesign and EcoLabelling regulations and their corresponding Annex documents (dated 3/4 July) appeared...



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Silence over, time for some new reading to begin!

### The Key Change

What the reading reveals is that we have made DG Energy understand that entertainment lighting is something of a special case, that there is now language in the text very specifically about entertainment lighting – but that more discussions are required just to be clear that the exemption gives us all we need.

For us, there are two points of Annex III (Exemptions) of the Ecodesign Annex document. Point 3m details

"halogen light sources with cap-type GX9.5, GY9.5, GZ9.5, GP9.5HPM, G16d, GX16, GX16d, GY16, G22, G38, GX38, GX38Q, P28s, P40s, PGJX50, QXL, designed and marketed specifically for scene-lighting use in film-studios, TV-studios, and photographic-studios, or for stage-lighting use in theatres, discos, during concerts or other entertainment events". That covers many lamps we use and love, including the Source Four's HPL, the Revolution's QXL, 1k and 2k Fresnel lamps, lamps for fixtures like the Brio, SL and CCT Freedom, lamps for older fixtures such as the Patt 23/123, Par64 lamps and more.

Point 3n details "colour-tuneable light sources" that can be set to at least the colours defined as "white light" by the EU – in effect, multi-coloured additive colour mixing LED sources.

While the EU seems to have decided not to make any reference to the EN standard we proposed, they have clarified many other points. Key is that the measurement is of the light source, outside of the optical system and excluding any other functionality; if the light source is built in to a fixture it has to be removed for testing. That should make it easier to hit both the efficiency and standby power requirements, since there are no losses through the optical train to worry about and you can remove non-lighting power consumption (displays, fans, motors).

Alongside that, it has been clarified that while a simple lumen per watt calculation is used for the new A-G EcoLabelling scheme (with "G" anything 85lm/W or below), a different, more complex calculation, including corrections for different source types and colour qualities, is the one used to determine whether a product is allowed or not. Most of the common arc sources we use seem to pass this test, as do many low-powered white LED sources, though achieving the targets for high power white LED sources will be harder. However, manufacturers have an extra year to achieve this: another key change is that the proposed start date is a year later than before, September



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2021. Curiously, even products that are exempt from the Ecodesign regs will have to follow the EcoLabelling regs; that probably means no one will sell a tungsten or arc fixture with a bulb included, since without a light source the fixture itself is not subject to either regulation.

### **Problem Solved?**

Nearly, but as ever, the devil is in the details. One particular issue is that just 17 lamp bases are included in the exemption, considerably less than the 49 we submitted. Truth be told, we never expected some of these to get through – the M16 lamp is too widely used in domestic/office lighting and is clearly a target for the EU. Some are safe because they sit above the 82000 lumen upper limit. Some – beamlight, Svoboda and ACL lamps – are potentially safe because they originally come from the marine or aero fields which have their own exemptions, though it'd be nice to be sure. The R7 linear lamp used for cyc lighting and much else is still unclear because we think there's a typo in the current draft; we've asked for clarification. The rest? At the time of writing, we're still checking.

Please do look at the list, compare it to the fixtures you have or love to use, and shout if anything's missing.

For LED colour-mixing sources, there is a little concern about the way such a fixture is defined by having at least red, green and blue emitters of quite tightly defined colour ranges and purity; the spec for the green emitter is a slight cause for concern.

These are all issues that require clarity and a bit more discussion. The same team of people who presented to the EU in May and then submitted the exemption proposal – which includes representatives from PLASA, VLPT, OETHG and the IALD as well as the ABTT – have already started informal discussions through PEARLE while continuing to analyse the documents. Within the EU, the documents now move in to "interservice consultation", which is when the other EU departments (culture, environment, employment) get to comment on the new draft. After that, the expert groups for the Member States get to work on the draft. The entertainment industry will be continuing, through PEARLE, to talk to DG Energy through this process to achieve the clarifications and, if necessary, changes that are required.

So: we are making progress. Things are looking much better than they did a few months ago. But having got this far, we just need to make sure we keep paying attention and working the details to really make sure that we can



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continue to get the tools we love (or, in the case of tungsten, can continue for as long as the manufacturers keep making it!)

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### **UPDATE 3: 16th JULY 2018**

**The next draft of the EU's proposed Ecodesign and Eco Labelling regulations became available on July 16th.**

A quick initial reading of the documents shows that the EU has recognised the special requirements of entertainment lighting, with exemptions included for both 'colour tuneable' LED lighting fixtures and for a number of tungsten lamp bases commonly used in entertainment lighting. Notably, the start date for the regulations has also been revised from September 2020 to September 2021.

Teams from the ALD and others in the entertainment industry are currently scrutinising the drafts to understand exactly what they offer, what they don't offer and how they will impact entertainment lighting.

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### **UPDATE 2: 22nd JUNE 2018**

**ECO Design regulation: news of our industry's petition to save stage lighting.**

**'Theatres will not go dark due to ECO design rules'**

On 20 June 2018, the period of public consultation for the proposed ECO design regulation – that will affect lighting products of all types – expired. The EU DG Energy department has passed on a revised draft to the next stage of the legislative process. We expect to know its content within a few weeks as it progresses through the committee stages of the process of turning it into a law. Although much still remains to be known, the situation now is far more positive than many had feared and greatly improved since our public meetings earlier this year.

Our petitioning team made a clear case for exemptions for our industry – including for stage, studio, film and live event purposes – and we have received strong indications that the main arguments of the case have been accepted. There will be a list of exempted lamp base types that will include many of the specialised tungsten and discharge lamps we use. We can expect the list to be comprehensive, but we should also expect that a few types we have been using will not be exempted if they are in use for other common non-



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entertainment purposes. There will be an exemption for colour-tunable light sources, but the details have not yet been provided.

The text of the regulation will be published publicly in November this year and is to be enacted in law in September 2020. More specific details will be available shortly, and these will be disseminated as soon as they are confirmed. There may be more work to do and more details to clarify but, until we see the revised draft, it would be prudent to remain calm and patient.

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### **UPDATE 1 : 18th May 2018**

A group of professionals from across member organisations, manufacturers and designers in the live entertainment industry (including Pearle, SOLT/UK Theatre, the ALD, the Association of Swedish Lighting Designers, the IALD, OETHG, PLASA and VLPT) had a very productive meeting in Brussels on 17 May with DG Energy.

As a result we have agreed to channel our work into seeking to draft a specific, technically based, exemption for lighting uses in the Stage and entertainment industries in the new proposed Eco Regulations planned for 2020. This work needs to happen quickly with our collective comments being channelled through Pearle to DG Energy in advance of the next draft of the regulations due in late June.

In order to allow for this process to run as smoothly as possible, the campaign's social media platforms will remain dormant until such a time as we have further updates.

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The Association of Lighting Designers has launched a campaign to protect the futures of venues and theatres across Europe. There is currently an enormous threat being made to the way theatrical productions are presented.

The European Union (EU) is proposing, in its Eco-design Working Plan 2016-2019, to change the rules that govern the light sources used in theatrical productions. In effect, they want to bring the vast majority of quality theatre lights under the same rules that govern domestic and office and industrial lighting.

These new regulations are intended to start from 1 September 2020 and if implemented as written, would dramatically impact all areas of entertainment



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lighting and all who work in this field – lighting creators, lighting users and lighting manufacturers. The impact on theatrical production across Europe would be immediate, and overwhelming.

**Follow this link to read and download a little 'primer' guide** to the current and proposed rules, mainly aimed at collecting all of the information together into one place. There is some confusion or uncertainty about just what is being proposed and just why it's such a problem. Compiled by the Save Stage Lighting team and other members of the entertainment lighting community, this document aims to establish what is currently being proposed and the potential effect on our industry.

Since the middle of April, the campaign has accelerated and there has been an increasing amount of press coverage on the issue. We continue to collate the coverage (predominantly from the UK) **on this page** which includes links to the original articles elsewhere online

The **#SaveStageLighting** Campaign aims to demonstrate to the EU Energy Directorate the widest possible cultural opposition to these proposals. We are encouraging everyone to **sign and share the petition here** and to contact their MEPs.

It is absolutely essential that we are successful in our endeavour of securing an exemption for stage lighting from these proposals. This has the potential to harm everyone from technicians, actors and designers to agents, critics and audience members. The consequences of failure would be catastrophic to the entertainment industry and European culture.

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- **ALD EU Regulations Primer**

ALD document on our understanding to the current and proposed rules, mainly aimed at collecting all of the information together into one place. A less technical document is available via the next link.

- **ALD EU Lighting 2020 Briefing Document**

Used to present the case to government departments, theatre organisations, producers and others rather than lighting specialists. It includes information on the impact these rules would have on those using lighting both artistically and financially, and also looks at the environmental issues around these regulations.



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- **PLASA Document briefing their members on the issues**

ECO Design regulations: Possible effects on the entertainment lighting industry. Call to arms to manufacturers, sellers and installers of entertainment and specialist lighting equipment.

- **Julie's Bicycle Statement on Eco-Design Working Plan 2016-2019**

Julie's Bicycle is a leading international charity that works at the intersection of the creative sector and climate and the environment, supporting the arts and creative industries to understand and take action on their environmental impacts. This is their response to the new draft regulations on lighting proposed under the Eco-Design directive 2009/125/EC as part of the Eco-Design Working Plan 2016-2019.

- **ALD Follow-up Response to EU Proposal - May 2018**

A second submission made to EU as part of the spring 2018 Public Consultation phase of EU Eco-Design Proposals outlining everything discovered and learned on the subject since the original response made in January 2018 (see below)

- **ALD Consultation Submission - January 2018**

A response to the request for comments on the EU's Eco-design and Energy Efficiency of Light Sources proposals, an effect of which would be to ban the supply of light sources which are heavily used in entertainment lighting.

- **Additional Comments from ALD Members**

An appendix to the main consultation document submitted to the EU that included various contributions received on why the imminent ban of supply would be bad for the art of lighting design in live performance as well as the effect it may have on venues who will need to replace equipment that would be rendered obsolete by the implementation.

- **....and it's not just us either!**

Joint statement: Call for a realistic timetable for transitioning to new lighting technologies. "We, the undersigned associations, support the objectives of Eco-design, Energy labelling and RoHS. We call on regulators to adopt a pragmatic and realistic transition timetable to substitute lighting technologies and products. This timetable needs to



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respect the established maintenance and repair cycles of the end-users of these lighting products".

- **EU Consultation Documents**

You can access, read, download and generally digest all of the relevant documents concerning the Eco-design Working Plan 2016-2019 and the proposed legislation that is driving the campaign from our public Dropbox folder.

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