

# REVISJON AV EU-KRAV TIL ØKODESIGN OG SCENELYS

Til: Olje- og energidepartementet

Kopi: Kulturdepartementet

Vår ref.: 18/65/ST

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Vi viser til pågående revisjon av EUs krav til økodesign for belysning som også har betydning for scenelys innenfor musikk- og scenekunstbransjen.

Norsk teater- og orkesterforening (NTO) er en arbeidsgiver- og interesseorganisasjon for profesjonelle, offentlig støttede virksomheter innenfor musikk og scenekunst. Foreningen representerer en omfattende infrastruktur av forskjelligartede virksomheter. Våre 45 medlemmer består av offentlig finansierte produserende og programmerende teatre, scener, orkestre, musikkensembler og kor.

NTO støtter så vel EUs overordnede klimamål, som konkrete mål knyttet til energisparing og er tilhengere av gode initiativer for å begrense belastningen på miljøet.

Like fullt vil vi påpeke de alvorlige økonomiske, tekniske og kunstneriske konsekvensene for bransjen av det foreliggende utkastet til revidert regelverk.

Vi henviser til vedlagte brev formulert av Pearle\* - Live Performance Europe, som samler europeiske arbeidsgiverforeninger på musikk- og scenekunstmrådet, og som på medlemmenes vegne håndterer denne saken på EU-nivå.

Pearle har i dette brevet formulert noen mindre, men for bransjen essensielle, forslag til endringer i EU-kommisjonens utkast til økodesignkrav.

Vi ber om at Olje- og energidepartementet tar med seg disse løsningsforslagene i den videre diskusjonen om endringer i EU-regelverket. De tekniske endringsforslagene er ytterligere presisert i eget vedlegg.

Vennlig hilsen

Norsk teater- og orkesterforening

*Morten Gjeltén*  
direktør

Form letter to national ministries

29 October 2018

Ref.: SL/P7442

We write regarding the current revision of EU ecodesign regulations, repealing Regulation (EU) 1194/2012, which affects stage and studio lighting in the entertainment and live performance sector. Pearle\* - Live Performance Europe, the European employers federation of live performance associations, follows this topic at EU level. Association of Norwegian Theatres and Orchestras is a member of Pearle\*.

Lighting touches the heart of the professional activities carried out by lighting designers and technicians in the live performance and audiovisual sectors. As it creates the atmosphere of a show and makes it attractive for the audience, it is an essential part of an artistic production and requires specific attention.

Whilst we fully support the EU's goals of reducing carbon emissions and the general aim of reducing energy consumption for lighting, we wish to stress the **economic, technical and artistic** impact on our sector of the proposed draft revisions as currently framed.

In the proposed revision, the currently applicable **sector exemption for stage and studio lighting** is replaced by **exemptions based on technical characteristics**. We welcome that the European Commission considers certain specificities of the live performance sector, and partly exempts professional lighting products used on stage in theatres, concert halls and other venues.

However, **serious concerns remain and we urge the Ministry of Petroleum and Energy to raise them during the forthcoming discussions at EU level.**

New rules on ecodesign would lead to increased costs for organisations in the live performance and affect the artistic design of a live events – and this **without significant energy saving effects** as stage lighting only counts for **5%** of the overall energy consumption of a theatre.

We would also like to underline that some of the **technical requirements** in the proposed regulation cannot be met (in particular as regards the notion of stand-by power) and certain types of light sources which are used to a wide extent in theatres, concert halls and other live performance venues are not taken into consideration, even if **there are currently no replacements on the market.**

The draft proposal on ecodesign includes principles which state that if there are no suitable replacements for certain lamp types on the market, or if higher energy efficiency alternatives are not cost-effective, **exemptions should be foreseen. Both principles are not fully applied to light sources used for stage and studio lighting.**

## Proposed solutions

As outlined in the paper attached to this letter, we propose **targeted but essential amendments** to the Commission draft revision on ecodesign requirements. These changes are essential for the continued professional creation of stage lighting in the context of a live event:

### **A. Exemption from Standby Power mode and Networked Stand-by Power mode**

- Lights sources and the high-speed control networks used for stage lighting are not able to achieve the 0,5W stand-by power as requested in the draft regulation. Moreover, the notion of “stand-by power” doesn’t apply to most of the stage lights, in the sense that they are either “on” (and waiting for a signal, being able to switch on immediately during a show) or “off”. We are therefore petitioning for an exemption from this requirement for stage and studio lighting, in particular as Member States could have differing views on the scope of the text regarding stand-by power.

### **B. Exemption for White Light Sources for specific needs**

- There are no replacements on the market available for some white light sources such as LED spotlights that can highlight an object or follow a person on stage.

### **C. Colour tuneable light sources: Extension of the definition of wave-length of Green**

- The draft proposal considerably reduces the definition of wave-length of Greens, which excludes a variety of commonly produced green LED emitters and would make it impossible to use colours such as mint and lime on stage.

### **D. Further exemptions for specific lamp bases used on stage and in studios**

- Whilst the live performance sector is at the forefront of new technologies and sustainable alternatives in the field of stage lighting, at the present time, some commonly used specific lamp bases cannot be replaced.

To summarise, we urge the Ministry of Petroleum and Energy to take the following points to the upcoming discussions on the revision of EU ecodesign regulations.

- **Stage lighting does not significantly consume power** (5% of overall energy consumption of a theatre). Compared to other sectors, no high energy savings can be expected.
- **Stage lighting is highly specific.** Some of the technical requirements of the proposed regulation cannot be met and although research is ongoing, for several light sources or lamp bases there is currently no replacement on the market.
- **Stage lighting constitutes a part of the production costs.** Much higher costs will have an impact on the budget of an organisation, on audience development and ticketing prices.
- **Stage lighting is a core element of a production.** Theatre, opera, ballet, musicals and music concerts “made in Europe” have a high reputation world-wide. The currently proposed ecodesign rules would lead to a loss in artistic excellence and put at risk international touring activities.