



Save Stage Lighting

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**SAMPLE LETTER FOR CONTACTING MPs and MEPs
REGARDING THE PROPOSED 2020 EU LIGHTING REGULATIONS
15th April 2018**

IMPORTANT NOTE:

Please do NOT just send this letter verbatim to your MEP or MP. If multiple copies of identical letters are received they will be marked as being part of an orchestrated campaign. Individual letters may be discounted, or the overall value of all the letters may be diminished.

However, what we have seen from responses already received, is that it is easy for MEPs to dismiss the issue out of hand, or to dismiss it because they assume that the issue is about the current EU regulations. These do not affect theatre lighting because they include an exemption for theatre lighting. The new regulations proposed from September 2020 do not include this exemption, and so all entertainment lighting equipment falls under them.

You should also clearly state your address and that you are a constituent of your chosen representative.

Find Your MP: <https://www.parliament.uk/mps-lords-and-offices/mps/>

Discover who the MEPs are for your region here:

http://www.europarl.europa.eu/unitedkingdom/en/your-meps/uk_meps.html

You can find a Primer document explaining the changes and why they are such a pressing issue here:

<https://www.ald.org.uk/resources/the-proposed-2020-eu-lighting-regulations-a-primer>

The most important things to extract from the letter below and incorporate in your letter are therefore the references to the new plans being formed under the Eco-Design Working Plan 2016-2019, and how they would completely replace the existing regulations (principally EU regulation 1194/2012). In every case where we have clearly identified this to MEPs, they have responded by agreeing that there should be an exemption for stage lighting.

Feel free to extract sections from the text below and re-arrange or adapt them into your own letter. It is also advisable to make your letter shorter than this one. **But please don't use it exactly as it is.**

If you need any further information, please contact the ALD's Save Stage Lighting campaign. Contact information can be found here:

<https://www.ald.org.uk/resources/savestagelighting>

Dear _____,

I work as a **{job title}** in entertainment lighting, the field of providing lighting for live events such as theatre performances and concerts.

I am writing to you because it has been brought to my attention that proposed new EU Eco-Design regulations, due to come into force from 1st September 2020, will severely affect the equipment available for stage lighting. In doing

so, the changes will dramatically affect the way lighting for performances is created, and will impact heavily on performing arts organisations and other venues, from big theatre to school and village halls, some of which may be forced to close.

The new regulations are those proposed for lighting as part of the Eco-Design Working Plan 2016-2019, and my understanding is that these would replace EU regulation 1194/2012 and related regulations (including 244/2009, 245/2009 and 2015/1428). The proposals I am referring to are available here: <https://www.ald.org.uk/resources/eu-consultation-documents>

The goal of these regulations is to improve the efficiency of lighting products, which is of course laudable. However, even the minimum efficiency requirement (85 lumens per Watt) is unobtainable by all current theatre lighting fixtures which use traditional tungsten light bulbs. It also turns out to be unobtainable by many of the new generation of specialist LED theatre lighting fixtures, particularly the highly directional, controllable spotlights upon which theatre relies. In talking to manufacturers of this equipment, the general opinion seems to be that because of the limitations imposed by current and forthcoming LED technology and, ultimately, by optical design and physics, achieving these energy standards in these product types upon which entertainment relies will be impossible by 2020 and possibly beyond.

In the current regulations (1194/2012 and its successors), there has always been a clear exemption for stage lighting - in 1194/2012 this is in Article 2 section 4(b)ii. This recognises the specialist nature of entertainment lighting and the equipment used to create it. As a number of recent studies (for Seattle Rep in the US and for the Mayor of London's Office in the UK) have shown, production lighting is, proportionally, a relatively small user of power - typically 5% or less of a theatre's total power consumption:

<http://www.lightingandsoundamerica.com/reprint/EnvironmentStageLight.pdf>

https://www.london.gov.uk/sites/default/files/green_theatre_summary.pdf

This is because each lighting fixture in the rig of lights used for a production has a particular function; the fixtures are rarely, if ever, all on at the same time, and because they are controlled by dimmers those that are on at any given moment are often not at full power. In addition, the performance lighting is usually only on for a few hours each day, during a performance. The rest of the time it is inactive.

Entertainment lighting has always adopted new technology, and is doing so now. Many venues have already replaced lighting equipment that is on for long periods of time (such as houselights) with low-energy LED alternatives. Where they can afford to do so and suitable products are available, productions are adopting new LED lighting fixtures.

But the danger is that these new regulations will force massive change on organisations very quickly. If the specialist light bulbs we require can no longer be placed on the market from September 1st 2020, supplies will quickly dry up. This will mean that existing lighting fixtures - many of which have given good service for years, sometimes for decades - will immediately become obsolete scrap; unlike domestic fixtures, drop in replacement LED lamps are not available and are unlikely to become available. Replacing these fixtures will require not just replacing the fixtures themselves, but the dimmers and other control infrastructure. This is all expensive and disruptive. Large theatres may be able to afford this, but may perhaps not be able to plan that capital expenditure within two years. Small theatres won't be able to afford it and may be forced, quite literally, to go dark. After September 2020 when there may not be any new, suitable and allowable fixtures available, it is unclear what the options available to any venue or any performance will be - other than perhaps to just end up with plays and concerts with lighting like that found in factories or shops.

Plus because of the relatively small power consumption of entertainment lighting already noted, all this change - all of the waste product created, all of

the energy required to create and ship replacement products - will all achieve only relatively small energy savings. This is surely the opposite of sustainability.

I understand that the EU has to drive standards forward, in order to encourage manufacturers to improve their products. But I do feel that September 2020 is too soon for these changes to be achievable in the field that I work in, and that the requirements may not be achievable because of the particular and specialist optical design requirements that lighting equipment in this field requires.

There is an indication in its proposals that the EU understands the specialist nature of my field: in explaining the 82000 lumen upper brightness range for light sources covered by these regulations it notes that the upper limit is intended to exclude 'very powerful lamps for eg. sports lighting, theatre-, stage- and studio-lighting' adding that 'higher efficiency (LED) lamps are not (yet) readily available for these high power lamps, while users tend to be professionals that already pay attention to energy efficiency' (Explanatory Memorandum - EG - reviewlighting 20171110, 3.(2)).

However, this upper brightness figure is far above the light output of the vast majority of lighting fixtures used for stage and performance lighting. With these limits, and without any specific exemptions, almost all of the lighting fixtures I use would fall under these new regulations with the consequences described above.

I would therefore ask you to become involved in requesting that the EU revise its proposals, ideally to include an exemption for stage or performance lighting as it currently has. I am aware that MEP Tonino Picula has already made a first call for both an extension on the transition period and a special exemption for theatre use, but I strongly feel that further support is required in order to indicate the scale and seriousness of this issue.

I include here a link to further reference material from the UK Association of Lighting Designers (ALD), which may be of use or interest:

<https://www.ald.org.uk/resources/the-proposed-2020-eu-lighting-regulations-a-primer>

<https://www.ald.org.uk/sites/default/files/resources/ResponsetoEUProposalfromtheALD.pdf>

<https://www.ald.org.uk/sites/default/files/resources/ALDResponsetoEUProposalAdditionalComments.pdf>

PLASA (Professional Lighting and Sound Association) Call to arms to manufacturers, sellers and installers of entertainment and specialist lighting equipment: <http://www.plasa.org/img/ECO-Design-regulations-call-to-arms.pdf>

The ALD is publicly campaigning for an exemption through a public consultation period which ends on May 7th. I hope that we can rely on your support.

If I can provide any further information or assistance, please do let me know.

I look forward to hearing from you.

Yours