

EU Regulations Update - October 2018 26Oct18

Rob Halliday - The Association of Lighting Designers (www.ald.org.uk)

The European Union has now made available new drafts of its Ecodesign 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_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_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 issues that were problematic to our industry. These included:

- the inability of entertainment lighting products to achieve the required 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.

- 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-tuneable fixtures, which is not set at the right point for the most efficient design of such fixtures
- and a number of specific lamp bases and lamp types, including some tungsten and fluorescent lamps used in film/TV production, which have not been granted an exemption.

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):

https://www.ald.org.uk/sites/default/files/resources/PEARLEecodesignlightingamentproposal_15102018.pdf

and Philips have prepared a more graphical explainer of the issues, which you can find here:

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

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, leading up to the regulations being voted in to law; some are suggesting the date for this vote has been set as early as December 17th this year.

In the UK the body responsible for working with the EU on Ecodesign is the Department of Business, Energy and Industrial Strategy (BEIS). The ALD, the film lighting trade organisation ASPEC 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, we believe that the key is getting as many EU countries as possible (and particularly countries that are not Britain - we are not flavour of the month in Europe at the moment) to respond with the same message. The group that has been dealing with this from entertainment lighting is working to get lighting organisations in key countries to respond to their relevant government body. However, if you know people or organisations based in other countries, it would be incredibly helpful if they could contact the relevant department in their country to make sure that department is informed and poised to help. The Pearle response document linked to above provides a good basis for this discussion. If people need more help and support, the ALD is happy to assist; email savestagelighting@ald.org.uk.

It goes without saying that time is now very tight on this. If you know people who can help, please don't delay in contacting them.

In case that fails, the entertainment lighting 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.

The EU aims to review its rules on a five year rolling basis - which means they will start working on the next version of these rules quite soon after this version is voted in. They are already giving clear indications that they intend to become much, much stricter in the next version, the aim being to remove any remaining exemptions for tungsten and other light sources that they consider inefficient. Pearle has now won a place on the European Commissions' Ecodesign and Energy Labelling Consultation Forum, which is incredibly helpful. But we should not consider that we have escaped from the entertainment lighting 'doomsday scenario' that was predicted earlier in the year - rather that is just been postponed for a few years. We all need to start using that time to prepare for our future.

As always, the latest updates will be posted regularly on the ALD website:
<https://www.ald.org.uk/resources/savestagelighting>

Check in there often to stay up to date.