

Input on the revision of the Eco Design Regulation and the necessity of an exemption for specific stage lighting in concert venues

Representing big and small concert venues and festivals in Denmark – Dansk Live would like to give input to the consultation on the revision of the Eco Design Regulation for Lighting.

Concert venues – especially small and medium sized ones – are most concerned about the revision which would replace Commission Regulation (EU) No 1194/2012, without considering an existing exemption for special purpose lights in concert venues.

Whilst we support the EU's general aim to reduce the energy consumption for lighting, we urge the Commission to carefully consider the specificities of professional sectors such as concert venues when it comes to the revision and implementation of new rules on lighting.

We therefore call for a ***narrow and limited exemption*** which is restricted to ***Professional entertainment lighting products*** in concert venues which are used to make the scene and objects visible on stage.

Notable negative Impact

We would like to draw the attention on the *economic, artistic and technical* impact which the ban of traditional lighting used for professional purposes for stages in concert venues would have on the sector.

It is essential to keep an exemption for ***Professional entertainment lighting products*** for the following reasons:

- **TECHNICAL** – For the time being, there are no viable alternatives which can be used to replace Professional entertainment lighting products. LED lighting is not as precise and does not have the same range of warm colours as professional entertainment lighting products. LED lighting cannot replace sunlight.
- **ECONOMIC** – Changes of EU rules on stage lighting would affect in particular smaller concert venues which could not afford to replace all technical equipment which has been used for years and is still fit for purpose for many years ahead.
- **ARTISTIC** – The quality of performances made in Europe is at stake, as LED lighting doesn't have the same quality and range of light as currently used professional entertainment lighting products. A loss of artistic excellence will ultimately have an impact on audiences which today enjoy high-level professional live concerts and events.