

## European Commission

### Public consultation on ecodesign and energy labelling on refrigerators, dishwashers, washing machines, televisions, computers and lamps

May 2018

#### General

1. UK Music is the umbrella body representing the collective interests of the UK's commercial music industry, from songwriters and composers to artists and musicians, studio producers, music managers, music publishers, major and independent record labels, music licensing companies and the live music sector.
2. UK Music exists to represent the UK's commercial music sector, to drive economic growth and promote the benefits of music to British society. A full list of UK Music members can be found in annex.
3. The UK creative industries are of huge economic and cultural importance. According to the most recent DCMS economic estimates the creative industries account for £91.8 billion in GVA.<sup>1</sup> The music industry is worth £4.4 billion to the UK economy with the live music industry contributing £1 billion and employing 28,538 people and generating exports of £80 million.<sup>2</sup>

#### Professional Stage Lighting

4. We are writing in response to the European Commission's "Public consultation on eco-design and energy labelling on refrigerators, dishwashers, washing machines, televisions, computers and lamps"<sup>3</sup> and in particular the new draft Regulations on lighting under the proposed Ecodesign Directive 2009/125/EC as part of the Ecodesign Working Plan 2016-2019.

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/662958/DCMS\\_Sectors\\_Economic\\_Estimates\\_2016\\_GVA.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/662958/DCMS_Sectors_Economic_Estimates_2016_GVA.pdf)

<sup>2</sup> [https://www.ukmusic.org/assets/general/Measuring\\_Music\\_2017\\_Final.pdf](https://www.ukmusic.org/assets/general/Measuring_Music_2017_Final.pdf)

<sup>3</sup> [https://ec.europa.eu/info/consultations/public-consultation-ecodesign-and-energy-labelling-refrigerators-dishwashers-washing-machines-televisions-computers-and-lamps\\_en](https://ec.europa.eu/info/consultations/public-consultation-ecodesign-and-energy-labelling-refrigerators-dishwashers-washing-machines-televisions-computers-and-lamps_en)

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5. UK Music is committed to energy efficiency, contributing to sustainable development and taking steps to mitigate harm to the environment. The Association of Independent Festivals, a member of the UK Live Music Group, recently led the Drastic on Plastic initiative. Over 60 UK music festivals signed a three-year pledge to eliminate single use plastic such as plastic straws and drinks bottles from their festival sites by 2021.<sup>4</sup> UK Music also strongly backs Julie's Bicycle, a charity that supports the creative community on climate change and environmental sustainability.<sup>5</sup>
6. Far from enabling environmental goals to be achieved, UK Music believes that the proposals as currently set out could lead to energy targets not being met. We are concerned that the proposals seek to remove the existing exemption from energy labelling and ratings for professional stage lighting. We therefore call on the European Commission to maintain the exemption under EU regulation 1194/2012 (article 2(4)(b)(ii) and article 3) until a suitable and sufficient assessment has been made of the impact of the change, and proposals brought forward based on that assessment
7. If energy ratings were currently applied, many lights used in live events would not achieve lower ratings. This is particularly the case for Tungsten lightbulbs but also for some LED fixtures used for live music events.
8. Should the existing exemption be lifted by September 2020, as currently planned, then this could increase environmental waste as opposed to eliminating it. Tungsten lighting fixtures typically have a lifespan lasting several decades yet whole fixtures would have to be discarded when one bulb does not work due to a lack of replacement sources being available.
9. Music venues play a vital role in supporting the industry's infrastructure and ensuring a healthy music industry across the country. They also nurture the music industry's talent pipeline. According to the Music Venue Trust 35 per cent of venues have closed over the past decade. Given that some venues are operating at such small financial margins even the slightest increase in costs to update equipment could have a devastating impact on some music businesses ability to continue to operate. It should also be noted that stage lighting accounts for only 5 per cent of energy use in live music spaces and venues.

## **Annex**

UK Music's membership comprises of:-

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<sup>4</sup> <https://aiforg.com/initiatives/drastic-on-plastic-campaign/>

<sup>5</sup> <http://dev.juliesbicycle.com/about>

- AIM – The Association of Independent Music – the trade body for the independent music community, representing over 850 small and medium sized independent record labels and associated music businesses.
- BASCA exists to celebrate, support and protect the professional interests of all writers of music.
- BPI - the trade body of the recorded music industry representing 3 major record labels and over 300 independent record labels.
- FAC – The Featured Artists Coalition represents and promotes the interests of featured recording artists in the music industry.
- MMF – Music Managers Forum - representing over 500 UK managers of artists, songwriters and producers across the music industry with global businesses.
- MPG - Music Producers Guild - representing and promoting the interests of all those involved in the production of recorded music – including producers, engineers, mixers, re-mixers, programmers and mastering engineers.
- MPA - Music Publishers Association - with 260 major and independent music publishers in membership, representing close to 4,000 catalogues across all genres of music.
- Musicians' Union representing 30,000 musicians.
- PPL is the music licensing company which works on behalf of over 90,000 record companies and performers to license recorded music played in public (at pubs, nightclubs, restaurants, shops, offices and many other business types) and broadcast (TV and radio) in the UK.
- *PRS for Music* is responsible for the collective licensing of rights in the musical works of 114,000 composers, songwriters and publishers and an international repertoire of 10 million songs.
- UK Live Music Group, representing the main trade associations and representative bodies of the live music sector.