

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

January 23, 2012

Dear ENERGY STAR Lighting Partner, Stakeholder or Other Interested Party:

In October 2011, the U.S. Environmental Protection Agency (EPA) advised partners and stakeholders of anticipated procedural changes related to the ENERGY STAR Compact Fluorescent Lamps (CFL) specification. The changes pertain to the qualification of GU24-based compact fluorescent lamps, elimination of the 36-month requalification requirement, and adjustment of verification testing procedures. In the interest of greater clarity prior to finalizing these changes, EPA has opted to distribute a copy of the specification with the changes highlighted.

As noted in the October letter, EPA is pursuing a limited set of changes to the ENERGY STAR CFL specification to improve its utility in the interim before it is replaced by the new ENERGY STAR Lamps V1.0 specification, anticipated to go into effect sometime next year. In particular,

- A qualification pathway for GU24-based replacement CFL lamps, previously included in the Residential Light Fixture specification, has been restored.
- The 36-month requalification requirement has been removed in light of the expectation that products will be requalified as part of the transition to the new Lamps 1.0 specification (page 12).
- The limit on the number of models that may be selected for verification testing per partner has been removed, without changing the overall testing limit (page 15).
- Specification language has been adjusted to align with the Program's third party testing and certification requirements.
- Elevated Temperature Test procedures have been placed into a specification annex to facilitate laboratory accreditation activities.

Since October, EPA has worked closely with interested stakeholders to explain the rationale for removing the per-partner verification testing limit and has carefully considered industry feedback. The Agency remains concerned that the cap results in testing inequities among partners and keeps a range of products beyond the reach of program oversight. EPA anticipates that removing the cap will allow for more genuine random product selection and will lead to testing exposure that is proportionate to the number of products a partner has qualified. The Agency will closely monitor the effect and fairness of this change during this interim period, and will use the experience to help shape the next phase of verification testing, which will be run by EPA-recognized Certification Bodies.

It is important to note that removal of the cap will have no effect on the total number of products tested. By maintaining the current limit on total products selected for testing (annually 20% of the qualifying product list for CFLs), overall testing costs will remain the same, but those partners that were systematically oversampled (by as much as 37%) no longer will be.

If you have outstanding questions or concerns about these changes, please contact us by Monday, February 6th. Questions or concerns about the specification's performance or testing requirements may be brought to my attention at (202) 343-9272 or baker.alex@epa.gov. Questions or concerns about removal of the verification testing cap may be directed to Leslie Jones at (202) 343-9305 or jones.lesliea@epa.gov.

Thank you for your support of ENERGY STAR.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Baker', with a long horizontal flourish extending to the right.

Alex Baker
ENERGY STAR Lighting Program Manager
U.S. Environmental Protection Agency