

ENERGY STAR - Audio/Video Sunset Comment Response Document

Topic	Comment Summary	EPA Responses
Transition	Several stakeholders requested guidance on how products should be handled if sunsetted. One stakeholder asks if manufacturers can continue to apply the ENERGY STAR label to products that were certified prior to a specification sunset date, but which remain in production after that date. Another stakeholder recommends a grace period to allow existing certified products to continue to feature ENERGY STAR mark in marketing materials and product labeling in accordance with the program's certification conditions.	Details regarding the sunset timeline and key milestones have been laid out in the final sunset letter. No products may continue to apply the label after the sunset date. EPA is providing until August 20, 2025 to allow manufacturers time to stop labeling products and promoting them as ENERGY STAR in their marketing materials.
Soundbars	Three stakeholders indicated that ENERGY STAR serves as signal for energy efficient options and plays a crucial role in recognizing manufacturer efforts to prioritize energy efficiency with technology advancements (voice assistant, wireless streaming.) One stakeholder add that ENERGY STAR plays a critical role in establishing and maintaining a minimum efficiency baseline and if the program is phased out, consumers may not be able to effectively differentiate between efficiency of models.	While EPA appreciates the role ENERGY STAR can play in backstopping efficiency gains, the current engagement is very low with less than 2% ENERGY STAR market share. With the entire market evolving beyond ENERGY STAR to consume low power, ENERGY STAR loses its ability to differentiate efficient models for consumers.
Soundbars	One stakeholder recommended the sound bars portion of the AV specification be incorporated in the TV's specification as there is a growing interdependence between soundbars and TVs, especially with HDMI eARC	The current ENERGY STAR television specification allows for control of soundbars with HDMI eARC. As technology evolves, EPA will explore whether or not additional requirements for soundbars are merited within the Televisions specification.
Smart Speakers	Stakeholders identified that smart speakers are in SHEMS specification. One stakeholder asks EPA to ensure the future standby mode limits for smart speakers do not limit innovation and future technology developments such as additional sensors, features and networking capabilities. One stake holder commented that they would like to see the ENERGY STAR specification continue for connected audio products.	EPA is interested in promoting energy savings through connected products and has stood up the Smart Home Energy Management (SHEMS specification), which includes smart speakers; EPA will consider within that specification whether limits on standby mode need to be revisited in the future.
Commercial Products	<p>One stakeholder commented that institutional purchasers rely upon ENERGY STAR A/V products to decrease their carbon foot and maintain their green credentials, particularly commercial amplifiers. This stakeholder shared comments from several consultants in this field, as well as a study conducted to show the importance of energy efficiency for AV in Europe.</p> <p>One commercial amplifiers manufacturer found it surprising that a lack of performance information was key to the proposal to sunset the program, noting that many customers, particularly designers dealing with other environmental regulations, such as LEED, depend on ENERGY STAR certification for individual components within their buildings. Several designers providing supporting letters noting their use of ENERGY STAR in AV equipment to contribute to design of efficient buildings</p>	While EPA appreciates the value that ENERGY STAR serves in the facilitating efficient design decisions for commercial buildings, the ENERGY STAR brand comes with a promise of delivering savings relative to other products. Without any current performance information for ENERGY STAR products based on the new test method or relative to other products in the market, there is no credible way to set meaningful levels at this point.
Blu-Ray	Physical hardware is becoming less common and therefore, stakeholders agree that the Blu-Ray portion of the specification be removed.	EPA appreciates this corroboration as the decline of physical hardware such as DVD players and Blu-Ray players was noted as a driver for EPA to sunset this aspect of the program.