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



**OFFICE OF AIR AND
RADIATION**

February 24, 2021

Dear ENERGY STAR LED Lamp Partners:

The purpose of this letter is to inform you about a change in the verification testing obligation for ENERGY STAR certified LED lamps. Effective beginning in testing year 2021, the Environmental Protection Agency (EPA) has decided to reduce the verification testing requirement applicable to ENERGY STAR recognized certification bodies (CBs) from 10% of unique ENERGY STAR listed bulbs to 5%. EPA considers this to be an appropriate reduction in testing burden at this time in recognition of several factors: the extent to which this category has been tested, the improvements observed in product quality, and the cost of testing relative to the market value of the product.

Since EPA began testing LED bulbs through its ENERGY STAR verification testing program in 2013, approximately 1200 LED light bulb models have been tested. Our review of verification testing data indicates that partners representing a significant share of ENERGY STAR LED bulbs have been disproportionately sampled. Because of the shared CB/EPA nomination structure, partners with a high proportion of listed products may be tested heavily, despite successful testing histories. To that point, 9 of the 10 most heavily tested original equipment manufacturers (OEMs) and labelers, representing nearly 40% of the tested products, yield pass rates above the product average. Additionally, while the product disqualification rate has remained relatively steady over the past 5 years, verification testing data reveals an improvement in quality among many large LED bulb OEMs and labelers. Increased inclusion of previously untested and undertested partners and those with histories of repeated product failures have precluded a more significant reduction in the overall disqualification rate for this product category.

LED bulbs are a unique product in that they are the most expensive ENERGY STAR product to test relative to their typical market cost. As such, EPA recognizes that given the vast number of models a partner may carry, the potential verification testing burden in any year can be significant. This underscores the decision to target nominations more directly and limit the number of CB (randomly) selected products by reducing testing overall.

As you may be aware, the percentage of products tested by way of ENERGY STAR verification testing is applied to a product category overall, and not individual partners. Thus, reducing the verification testing rate overall will better accommodate the unique considerations for testing this product type and limit disproportionate testing burden while ensuring that sufficient testing of new and existing products in the market occurs. EPA intends to make use of product nominations primarily to test partners with histories of product failures or limited testing histories, and will continue the practice of heightened oversight (testing in addition to verification testing) for partners with products from OEMs with high product failure rates.

Sincerely,



Ann Bailey, Chief
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency

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