

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



OFFICE OF  
AIR AND RADIATION

November 16, 2023

Dear ENERGY STAR® Lighting Stakeholders:

This letter announces the Environmental Protection Agency's (EPA) finalization of the [ENERGY STAR Downlights Version 1.0 specification \(V1.0\)](#). EPA would like to thank the many stakeholders who have invested time and effort to contribute feedback that has informed this product specification process. The Version 1.0 specification is effective immediately.

EPA appreciates the detailed and thoughtful comments and questions from stakeholders since the draft final release. This engagement highlighted several points of confusion and oversights that have been addressed in the final version. EPA received a formal letter of support on the final draft of the specification from two industry associations (jointly) which is posted at [www.energystar.gov/luminaires](http://www.energystar.gov/luminaires).

Following are minor revisions made in the final specification:

- Single- and multi-head monopoint accent lights were added to the excluded products list in Section 1.2 and an example photo was added in Annex A. This product is essentially the same category as track lights but was not explicitly called out before.
- Two definitions were modified (one definition was added, and one definition was removed) in Section 4:
  - The "Accent Light" definition was replaced by "Recessed Accent Light" to better clarify the difference between included recessed adjustable accent lights and excluded single- and multi-head monopoint accent lights.
  - A definition of "Communication Link" was added.
  - The "Input Power" definition was modified slightly.
  - The "LED Light Engine" definition and all references to light engines in other sections were removed since a complete unit of the representative model must be tested.
- The requirement for testing color tunable and multi-output models at the default white light setting and reporting input power, light output, CCT, and CRI at that setting have been removed from Section 5.1. This approach is no longer pertinent, as with the new approach the partner is responsible for representing a product certification only at the most consumptive setting. Therefore, only in the case where the default is the most consumptive setting would its performance be reported.

- To further aid in understanding the new approach and provide all relevant requirements for establishing a product family's tested representative model in Section 6.1, EPA carried over language from Section 12.1 on thermal management. "Downlight retrofit kit must be tested in the worst-case thermal condition for which it is rated per ANSI/UL1598C-2014" and "recessed downlight retrofit kits must be tested in the worst-case thermal environment that the product is rated for per ANSI/UL1598C-2014."
- The Start time test method was updated to include ANSI/IES LM-79-19.
- Step Dimming was removed from Section 15.1 for products marketed as dimmable since continuous dimming is required.

While retesting is not required for Version 1.0, based on the new approach to product groupings or "families" (going from least efficient to most consumptive), partners may benefit from doing additional testing to submit a new representative tested model to optimize their product family listings. Specifically for color tunable models certified to Luminaires V2.2, partners should work with their certification body to leverage existing test data to the greatest extent possible since the variation between the least efficient setting and most consumptive may be negligible for certain criteria. Finally, to provide a better understanding of the new approach to product certification EPA included an example of an allowable product family in Section 6 of the specification.

Please review the partner commitments that are now attached to the specification. They are unchanged from Luminaires, however, given the sunset of Luminaires, unit shipment data will not be collected for products shipped in 2023 but will resume for downlights shipped in 2024. Verification testing will resume at a reduced level for the first year based on a subset of certification requirements as described in the new Downlights Verification Testing direction to certification bodies ([Directive 2023-01](#)).

On Tuesday, **December 5, 2023**, at 2:00 PM EST EPA will host a webinar, providing an overview of the major changes from Luminaires V2.2 to Downlights V1.0. Register [here](#) to attend. Partners may now begin to work with their [EPA recognized Certification Body \(CB\)](#) to certify their eligible products to the Downlights Version 1.0 requirements.

EPA appreciates your contribution to the development of this specification and welcomes inquiries; please contact me with questions at [jantz-sell.taylor@epa.gov](mailto:jantz-sell.taylor@epa.gov) or [lighting@energystar.gov](mailto:lighting@energystar.gov). Thank you for your support of ENERGY STAR.

Sincerely,



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