

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



OFFICE OF  
AIR AND RADIATION

May 11, 2021

Dear ENERGY STAR® Small Network Equipment Partner or Other Interested Stakeholder,

The purpose of this letter is to present a proposal from the U.S. Environmental Protection Agency (EPA) to sunset the ENERGY STAR specification for Small Network Equipment (SNE) products. Relevant background and the rationale for sunsetting are provided below. The Agency requests feedback on this proposal no later than June 22, 2021.

**ENERGY STAR SNE Products Background**

Recognizing the potential to advance energy efficiency in this ubiquitous product, EPA began working with stakeholders in 2009 and through a multi-year, engaged process developed both the first test method to evaluate efficiency and the first recognition program for leadership in efficiency. The ENERGY STAR SNE product specification was introduced in 2013 with the intention to increase energy efficiency primarily in the home and small office networking space. These products were of interest due to their 24/7 activity and large sales. EPA developed a specification to recognize SNE products that were efficient when connected to a network and passing minimal traffic, the most common operating condition in residential environments.

**Rationale for Proposed Sunset SNE**

Under certain circumstances, EPA makes the determination that an ENERGY STAR specification for a particular product category should be sunset rather than revised for one or more of these reasons:

- A standard exists or is forthcoming at the current ENERGY STAR level that will serve as a backstop so efficiency gains are maintained.
- *Additional, cost-effective efficiency gains are not available or anticipated.*
- *The market has evolved such that the product type is being discontinued.*

The Small Network Equipment Voluntary Agreement (VA), designed to serve as a back stop, was introduced in 2015 leveraging the ENERGY STAR Test Method for Small Network Equipment as well as the program's definitions and structure to set minimum levels that all signatories commit to meeting. The VA has been signed by all major internet providers, estimated to provide approximately 60% of SNE products to the market with continued growth expected.

In addition, a recent review showed that the opportunity for further efficiency gains beyond ENERGY STAR's current requirements may be constrained by the energy needs associated with product features that are valued by consumers. In particular, we anticipate the industry will be evolving products to accommodate functionality such as increased range, speed, and the ability to support more clients. EPA will, however, continue to monitor the SNE landscape and will revisit this decision if the technology or market changes and significant energy savings become available.

**Proposed Milestones for Sunsetting the ENERGY STAR for SNE Products**

EPA proposes the following milestones associated with implementing this proposal:

- Existing certifications of ENERGY STAR SNE products will remain valid until July 13, 2022.
- Certification Bodies will be instructed to stop certifying new product submittals as of January 13, 2022.

- No new promotional materials for SNE products (printed and electronic) that use the ENERGY STAR mark may be produced after January 13, 2022. Brand owners are permitted to use up existing printed material, including packaging to minimize waste.
- Brand owners must stop using the ENERGY STAR name and ENERGY STAR mark in association with all SNE products manufactured on or after July 13, 2022.
- To minimize the cost of labeling changes and be in compliance by July 13, 2022, brand owners of SNE products are encouraged to remove ENERGY STAR references on Web sites or in other collateral materials as these materials are reprinted or changed.

Stakeholders are invited to comment on this proposal to sunset the ENERGY STAR for SNE products. Any feedback or data you wish to share with EPA may be submitted via email to [networking@energystar.gov](mailto:networking@energystar.gov), no later than June 22, 2021. All comments will be posted to the ENERGY STAR SNE [page](#), unless the stakeholder requests otherwise.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Fogle".

Ryan Fogle  
EPA Manager, ENERGY STAR for IT and Data Center Products