

From: [Michael Bloom](#)
To: lighting@energystar.gov
Subject: ENERGY STAR Lighting Feedback
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We appreciate the U.S. Environmental Protection Agency's letter of November 14, 2022 notifying the ENERGY STAR stakeholder community of the intent to sunset the ENERGY STAR specifications for lamps, luminaires, and ceiling fan light kits.

We are concerned that sunsetting the lighting program removes a critical source of guidance and public performance data from the marketplace for which there is no current alternative. Sunsetting now, especially during this time of heightened attention to ecolabels and 3rd party standards, sends a confusing signal to consumers.

For decades, ENERGY STAR has been a universally recognized and trusted label for purchasers. It is the authoritative source for critical performance data that allows buyers to go beyond compliance and optimize the energy efficiency of the bulbs they buy and install. ENERGY STAR is not only a trusted label, it is a critical source of product energy consumption information that it provides to the public.

If the Energy Star Lighting program sunsets without an equal or stronger replacement in place, we worry that the marketplace and Federal buyer / Building Operator/Manager community will:

- Have difficulty finding high-performance product options quickly and effectively
- Struggle to wade through the greenwashing that will flood into the marketplace
- Become distrustful of LEDs due to potential increase in low-quality products that may meet narrow LED + lumens per watt luminaire efficiency thresholds but fail very early in their life cycle, reducing ROI and increasing E-Waste.

ENERGY STAR certification sends a clear and strong signal to the marketplace. We at GSA, through SFTool.gov and SFTool Product Search, have seen how product categories without a strong major ecolabel proliferate into competing eco-labels, certifications, and first-party claims that complicate and confuse the marketplace and cost manufacturers and decision makers valuable time and money. While consumers may ultimately bear the cost of product certification and testing, this cost for ENERGY STAR is less than a DLC certification for commercial bulbs and significantly less costly and complex than the patterns we've observed in the Resilient Floor Covering industry that grapples with over 20 ecolabels/certifications and more than 20 additional product performance attributes.

Sunsetting the program now puts a critical source of trusted and public product data at risk. Building decisions and major procurements need to be data-driven to achieve the Administration's energy, decarbonization and sustainability goals. Energy efficiency leads to carbon reductions and lighting is one of the fundamental Energy components of most buildings –[17% of all electricity consumed in US Commercial buildings](#). Lighting is often the first component targeted in building renovations and modernization projects.

Comparative performance data is key to optimizing performance. SFTool Product Search depends upon the ENERGY STAR registry for compliant lighting product data. Without ENERGY STAR specifications for lamps, luminaires, and ceiling fan light kits, consumers would be unable to quickly access a database of compliant products. Even if the registry maintained historic data, it would quickly become out-of-date,

lacking data on new lamps and luminaires. Consumers would also be unable to use ROI calculators because those tools rely on constantly updated ENERGY STAR registry data for energy inputs and other performance criteria.

At a minimum, the ENERGY STAR specifications for lamps, luminaires and ceiling fan light kits should be replaced by clear guidance for consumers to buy LEDs only. Effective “buy LEDs only” guidance would need to replace the straightforward “Look for the ENERGY STAR certified label” guidance with clear naming and labeling conventions that make the technology behind each product abundantly clear. As an example, 29,741 ENERGY STAR certified light fixtures appear on SFTool Product Search. (See <https://sftool.ecomedes.com/?category=Lighting+and+Ceiling+Fans&subcategory=Light+Fixtures> as an example.) However, the word “LED” is often missing from the name of compliant fixtures altogether, even in a list of all ENERGY STAR certified products. Products in this category may be called “LED Downlight” but are just as likely to be called by other, brand specific names that omit LED altogether including: Accent Lights, Fixed Luminaires, Ceiling Mount Luminaire, Track Light or more arcane names like “6LT Light Fixed Track” or 3G-DL45RF Round Fixed.”

Finally, attributes beyond energy efficiency that the ENERGY STAR Program considers when certifying lights matter and ought to be addressed in the new regulations, such as:

System level tests

- Documents: ANSI C78.377, LM-79, LM79, LM-82 Documents: ANSI C78.377, LM 82
- Performance characteristics: photometry and colorimetry
- Electrical characteristics: for calculation of efficacy
- Thermal characteristics: lumen output temperature dependency

Sub-component level tests

- Documents: LM-80, TM-21, UL8750
- Durability of the performance: light output (lumen and color) changes over time
- Safety: UL recognized LED packages with conditions of usage

Lack of clear direction quickly leads to confusion and lack of compliance. The Federal purchasing community needs to rely on specific guidance while waiting for any new regulations to take effect. Even if the market is trending towards only energy efficient lamps there should not be a gap in clear guidance before the U.S. Department of Energy’s published rules pertaining to general service lamps come into force.

ENERGY STAR certified lighting helps Federal purchasers quickly identify the products they are required to purchase. Without the ENERGY STAR label, purchasers are left to identify for themselves whether lighting products meet Federal requirements. Consumers will simply buy whatever lighting is available because figuring out compliance will become too costly.

We ask EPA to reconsider the proposed timeline and delay sunseting the ENERGY STAR specifications

for lamps, luminaires, and ceiling fan light kits until the available lighting is sufficiently compliant and until another viable multi-attribute data source for lighting product performance is established. At a minimum, EPA should provide clear and unambiguous guidance that only LED lighting can be considered energy efficient.



U.S. General Services Administration

Michael F. Bloom

High-Performance Buildings Program Advisor
Office of Federal High-Performance Green Buildings
Office of Government-wide Policy
Office [312-353-0729](tel:312-353-0729) | Mobile [312-805-6799](tel:312-805-6799)

<http://www.gsa.gov/hpb>