

**From:** [Energy Efficiency Certification Intertek](#)  
**To:** [ENERGY STAR Lighting](#)  
**Subject:** ENERGY STAR Lighting Sunset Proposal - Intertek Testing Services NA Comments  
**Date:** Friday, January 6, 2023 2:40:01 PM  
**Attachments:** [image002.png](#)  
[External ENERGY STAR Lighting Sunset Proposal.msg](#)  
**Importance:** High

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To Whom it May Concern,

We have compiled our comments in opposition to the attached proposal. Please help review thoroughly and reach out should we need to clarify any further.

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Thank you for the opportunity to comment on the sunset proposal. Since the start the lighting program has been instrumental in moving energy efficient lighting forward while including some critical features for consumer acceptance.

While we do agree that LED components have progressed to be as bright and as energy efficient as needed for the residential sector, the ENERGY STAR mark indicates a level of quality that is much higher than the low bar of the federal regulations of 45 lumens per watt. Even at the bulb (lamp) level the majority of the LED bulbs are obtaining double that minimum. Many luminaires with their greater heat sinking ability and other design advantages frequently test out higher than 100 lumens per watt. The absence of this voluntary program would allow inferior products such as the CFLs to flood back into the north American market.

Our certifications are not reflecting the same assumption that the bulbs (lamps) are the majority of light sources used. In addition, many private labelers and retailers use the QPL to verify claims and find the verification aspect to be a key indication of quality. As for the residential sector, there is not enough assurance that the utility rebates are the main driving force for consumers to seek out certified products.

Rather than sunsetting the program it would be comprehensible if the testing burden to the partners was reduced and only the minimum requirements needed to fulfill the quality aspects of this program were kept. This would be positive in two regards: first, financial incentive to continue to put out better than minimum performing products; secondly, it would help further the political and business friendly model of the program. Lighting is the easiest and simplest way to reduce the stress on our power grids and all consumers have the ability to participate.

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The ENERGY STAR mark on certified luminaires, lamps and ceiling fans provides consumers with confidence that the product they are purchasing has been tested and certified against a higher standard. The federal baseline of 45 lumens per watt is a low bar and does not address the other important factors including color quality (CRI, R9, uniformity etc), longevity, flickering, electrical noise, and thermal management that consumers have come to expect.

Sunsetting the ENERGY STAR program for these products will roll back the advancement the EPA has made in eliminating inefficient lighting and ceiling fan products from the US market and our landfills. For example, with the introduction of Energy Star Lamps V2, inefficient and unpleasant CFL lamps were essentially eliminated from the market. This pushed manufacturers to develop LED

products that lasted longer, performed better and did not need special disposal instruction.

If manufacturers only need to meet the 45 lumens per watt requirement as offered by the federal government, the strive to provide high quality products to consumers will end leaving them with low quality options and greater environmental waste.

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The lack of an established program for rebates, will result in local utility companies/jurisdictions generating their own programs/requirements. This will make things very challenging for manufacturers and even test labs to keep up on the ever changing landscape. We have already started to see this process in California, and the starts of another program in NY. The potential also exists for other agencies to create competing programs, which would result in confusion in the marketplace.

Efficacy (products efficiency) is a key item of concern for global climate change. However, product quality should also be a concern. If the end consumer is not happy with a purchase/installation after a few months, where does the product end up? Most likely in the landfill... Light and overall product quality should be and currently is an important aspect of the current program that is overlooked.

Best Regards,

**Intertek Testing Services NA**

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