

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



OFFICE OF  
AIR AND RADIATION

October 3, 2011

Dear ENERGY STAR Lighting Partner, Stakeholder or Other Interested Party:

The purpose of this letter is to advise you of anticipated procedural changes to the ENERGY STAR Compact Fluorescent Lamps specification. The changes pertain to the qualification of GU24-based compact fluorescent lamps, elimination of the existing 36-month requalification requirement due to the forthcoming ENERGY STAR Lamps V1.0 specification, and adjustment of verification testing procedures.

### **Background**

On December 4, 2009, the U.S. Environmental Protection Agency (EPA) issued a proposal to integrate the Program's four existing lighting specifications into two, new, technology-neutral specifications: Luminaires and Lamps.

On February 16, 2011, EPA finalized the Luminaires V1.0 specification, which replaces the Residential Light Fixture (RLF) and Solid State Lighting Luminaires specifications. The new specification was revised to V1.1 on July 5, 2011, and becomes effective on April 1, 2012. To carry the ENERGY STAR, all light fixtures manufactured on or after April 1, 2012 must be certified to meet the new specification requirements.

EPA is currently developing draft 1 of the Lamps V1.0 specification, to replace the existing Compact Fluorescent Lamps (CFL) and Integral LED Lamps specifications. The new Lamps specification will include GU24-based self-ballasted compact fluorescent lamps ("GU24 lamps"), previously qualified under the RLF specification.

### **Interim Relocation of GU24 Replacement Lamp Requirements to the Compact Fluorescent Lamps Specification**

With the phase-out of the ENERGY STAR Residential Light Fixture specification, EPA recognizes the need for an interim pathway for qualification of GU24 replacement lamps, until the Lamps V1.0 specification is finalized. EPA intends to temporarily relocate qualification requirements for GU24 lamps to the CFL specification. In doing so, the CFL specification (V4.3) will include the same GU24 lamp performance levels previously detailed in the RLF specification, including levels for covered, reflector and dimmable models. Sample sizes for GU24 testing will be harmonized with the CFL specification. Testing requirements will remain mostly unchanged, except that all GU24 lamps will now be tested using the Rapid Cycle Stress Test in place of the Accelerated Cycling Thermal and Voltage (ACTV) Stress Test referenced in

the RLF specification, and reflector GU24 lamps for recessed downlights / indoor use will undergo the Elevated Temperature Test.

All currently qualified GU24 lamps will be migrated to the CFL qualified product list, without need for retesting, and will remain listed until the Lamps specification effective date in late 2012.

### **Elimination of the 36 Month Requalification Requirement**

EPA anticipates finalizing the ENERGY STAR Lamps V1.0 specification in early 2012, with an effective date in late 2012. In light of this upcoming transition to a new specification, EPA is eliminating the 36 month requalification requirement in the CFL specification which would begin to affect some qualified models at the end of this year. Instead, manufacturing Partners will be encouraged to focus on qualification using the new specification as soon as it is finalized.

### **Changes to Verification Testing Procedures**

The existing CFL specification establishes a six-product testing cap per partner per fiscal year (per two-cycle timeframe). An analysis of preliminary test results from the first three testing cycles reveals a significant inequity of testing burden among CFL manufacturing partners. That inequity is a direct result of the six-product testing cap. EPA's primary concern with testing inequities is the impact it has on small businesses participating in the ENERGY STAR program.

As the CFL verification testing requirements establish, product selection is comprised of 50% nominated models, and 50% randomly selected models. The six-product cap applies to all CFLs selected by this method, and applies to all manufacturers regardless of size or total number of qualified products. As a result of the product cap, small businesses (some with as few as 3-6 employees) may and do experience a number of tested products and costs similar to those of major manufacturers. A comparison of manufacturers whose products were tested in cycles 1 through 3 reveals:

- three of the largest partner manufacturers, with total qualified products per partner ranging from 122 to 284, each incurred selection of 3-7% of their qualified products, with associated costs from \$29,000 to \$33,000; and,
- three of the smallest partner manufacturers, with total qualified products per partner ranging from 7 to 12, each incurred selection of 33-43% of their qualified products, with associated costs from \$10,000 to \$25,000.

The testing inequities caused by the six-product cap not only create a disproportionate financial burden on small manufacturers, but also inhibit opportunities for them to increase their participation in ENERGY STAR.

As a result of these concerns, EPA is proposing to remove the 6-product cap from the CFL Third Party Testing and Verification Program. Removing the cap will create a level playing field for small businesses that participate in the ENERGY STAR CFL labeling program, and will also provide greater consistency and fairness in product selection and costs among large manufacturing partners.

In addition to the above, to facilitate accreditation, EPA intends to place the Elevated Temperature Test Method in an annex to the specification.

The Agency intends to finalize these changes by October 31<sup>st</sup>, 2011. Partners or stakeholders with concerns about changes to the verification testing procedures are encouraged to contact Leslie Jones, EPA, at [jones.lesliea@epa.gov](mailto:jones.lesliea@epa.gov) or (202) 343-9305. Please forward comments about other changes proposed in this letter to [CFL@energystar.gov](mailto:CFL@energystar.gov).

Thank you for your consideration of the above, and for your support of ENERGY STAR.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Baker', with a long horizontal flourish extending to the right.

Alex Baker  
ENERGY STAR Lighting Program Manager  
U.S. Environmental Protection Agency