

NRCAN Comments on ENERGY STAR Program Requirements for Residential Light Fixtures Draft 1 Eligibility Criteria – Version 4.0

This email represents NRCAN's comments for the Residential Light Fixtures criteria revision 4.0. NRCAN is seriously looking at adding RLF's to the group of products that we market and promote, including implementing regulatory changes to address the power factor requirements for ballasts used in some ESTAR fixtures.

We generally support the changes with the following comments:

1. Table 2A: we are concerned that this table does not include LED as an energy efficient light source. White LEDs are not able to meet the lumen per watt requirements, but due to a very good visibility and because they can be installed on low voltage circuits can provide exterior lighting very efficiently. We have seen installations where 300 Watts of incandescent are effectively replaced by 80 watts of LED. While this is an emerging application for a fairly mature technology, we believe that it should be acknowledged and have the marketing advantage of Energy Star qualification.
2. On a similar note (although we don't have a strong opinion) I was wondering what consideration was given to solar lighting. I believe that the exit sign criteria was recently amended to include photoluminescent signs, I wonder if solar shouldn't also be considered.
3. The final comment is that we strongly oppose the removal of the recognition of test result from NVLAP MRA signatory partners (In section 4B). The Standards Council of Canada is a signatory and the APLAC agreement recognizes the equivalency in accreditation, by these agencies, of test laboratories. Issues with data quality should be addressed specifically and not with a blanket statement.

We are trying to get this added to the CFL criteria and see this as a step backwards for international participation. International ENERGY STAR partners are responsible for ensuring compliance in our jurisdictions and not being able to use test results from local Laboratories in our market surveillance (ala PEARL) is a restriction. Canadian Labs can get NVLAP accreditation, but at an added cost for essentially duplicate accreditation.

We have our own national standards system and the MRA's were designed to recognize this.

I look forward to discussing these issues further.

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