

EPA Creates Bedlam With Amendment for Residential Light Fixtures

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Governmental interference in private enterprise is always disastrous. What's worse is when innovation is stifled by bureaucratic finagling and pc notions of impartiality (or as some would say, preventing a "competitive disadvantage"). You can't give a chimp a skateboard and call him Tony Hawk.

On June 2, 2008, the EPA distributed [Version 4.2](#) [1] of the Energy Star specification for Residential Light Fixtures (RLF), detailing how RLFs employing LEDs could earn the coveted Energy Star Label. 7 days later, the Lighting Program Office issued an [addendum](#) [2], stating that, *"the amendment was offered to remove a competitive disadvantage for these general illumination or decorative light fixtures...without this technical amendment, these types of fixtures would not be eligible for the Energy Star Program."* I was confused by the EPA's explanation, so I e-mailed Alex Baker, Lightning Program Manager, asking him, "Which specific technologies do you feel will be given a more level playing field as a result of this amendment?" Mr. Baker's answer astounded me.

In the span of a single paragraph, Mr. Baker said, *"the RLF Program has maintained a technology-neutral approach."* He then went on to say, *"With this approach, the Program currently has nearly 12,000 qualified fixtures from more than 120 manufacturing Partners...even incandescent technologies (the latter only allowed when used with a motion sensor to minimize operating time)."* This is akin to saying that I can play quarterback as well as Tom Brady...if Brady were blind...and crippled...and had terminal cancer. How is the EPA maintaining a technology neutral approach if they use artificial means to prop up legacy systems?



The technical amendment (and its addendum) has created turmoil in the industry. Most of the complaints concerned the EPA's lack of an open forum. Tom Griffiths said on [Compound Semi Online](#) [3], *"You've got to read the EPA letter to believe it. Keep in mind that this is the same group that insisted the specification did not need to be created in an open forum."* Most famously, Jim Brodrick (head of the US Department of Energy Solid State Lighting Program) blasted the EPA's amendment in a [mass e-mail](#) [4]. Among other concerns, Mr. Brodrick said, *"EPA's recent Energy Star decisions and explanations for those decisions are troubling in many ways. EPA issued its criteria without allowing for any public comment. EPA declared the new amendments as final and effective immediately."*

In the July 9th addendum letter, the EPA announced that they were accepting comments pertaining to the amendment. Specifically, they set an August 25th deadline, and claimed, *"After this period, EPA will compile any comments received and consider the appropriateness and timing of any suggested changes."* This is patently ridiculous. The EPA is not rescinding their amendment, as they should, and opening it to public feedback. They are merely claiming to be interested in concerned parties' opinions. Because the amendment is still out there, no one can be sure what the EPA will do with submitted comments. We've been told they'll be placed on the Energy Star website, but beyond that, it's a complete mystery. EPA

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could file each comment in the circular bin for all we know. As Mr. Griffiths stated emphatically, *“Don’t fall for the EPA’s initiation of an after-the-fact comment period that is being used to legitimize an illegitimate specification.”*

There’s an old expression that one is, “so open-minded that their brains fell out.” EPA’s supporting legacy systems by allowing them to use modifications that address the letter, but not the spirit, of energy conservation, is doing a disservice to the industry. Clearly, these lighting systems are inferior, but the EPA refuses to acknowledge that they’re outdated technologies. Not to mention the fact that compact fluorescent lamps (one of the technologies suffering from a “competitive disadvantage”) contain mercury, which ought to be a concern for the Environmental Protection Agency. Innovation can not and should not be stifled by refusing to let legacy systems expire past their expected lifetime. This will not help the industry, nor will it allow the US to stay competitive on the world scene. The only solution, as Mr. Griffiths mentioned, is to immediately rescind the amendment, and open it up to a public forum.

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Links:

[1] http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/fixtures/RLF_V4_2_FINAL.pdf

[2] <http://img.ledsmagazine.com/objects/news/5/7/11/EPA.pdf>

[3] <http://www.compoundsemi.com/documents/view/generic.php?id=10451>

[4] <http://www.ledsmagazine.com/news/5/7/13>