



## **NRDC Supplemental Lighting Labeling Comments – Wattage Equivalency Claims**

### **Lamp Labeling Amendments, Project No. P084206 (RIN 3084-AB03)**

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On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and on line activists, enclosed are supplemental comments to our September 10, 2010 submission to the FTC on its rulemaking on light bulb package labeling.

In our previous submissions we urged the FTC to establish rules governing the content of manufacturer “wattage equivalency” claims. Manufacturers of energy saving bulbs are already making claims to the effect of 13W = 60W, or 60W replacement, and this trend will increase as today’s incandescent bulbs as we know along with their common wattages of 40, 60, 75, 100 and 150 Watts will be phased out beginning in January 2011. When done correctly such claims help consumers pick a replacement bulb that provides the same amount of light as their current bulb; unfortunately exaggerated claims may result in a consumer unknowingly buying a bulb that provides 15% to 50% less light than the bulb it is claiming to replace.

Since we submitted our comments, we have learned that the European Union has adopted policies on the topic of wattage equivalency claims that are conceptually identical to those we recommended. In short, as part of its regulations that phase out inefficient light bulbs, the EU established minimum light output levels that must be achieved when incandescent power equivalency claims are being made. These regulations were published in the Official Journal of the European Union on March 24, 2009. Consistent with our recommendations, wattage equivalency claims are optional in Europe.

The European precedent in this area is noteworthy and provides further justification for the FTC to add wattage equivalency requirements to its final labeling rules. Failure by the FTC to add these requirements paves the way for a continuation of exaggerated equivalency claims and provides an unfair competitive advantage to those manufacturers who do. Establishing explicit requirements for wattage equivalency claims upfront will help create a level playing field for industry, minimize consumer confusion and enhance the FTC’s ability to pursue successful enforcement actions against inaccurate claims.