



NRDC's Supplemental Comments on FTC's December 29, 2010 Proposal on Lamp Labeling Exemptions and Timing

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NRDC respectfully submits these comments in response to the Federal Trade Commission's December 29, 2010 publication on the coverage and effective dates for the new lamp labeling requirements. **In summary we are supportive of the decisions made by FTC with one exception – FTC's proposal to exclude conventional 75W lamps from the new labeling requirements.** We think excluding conventional 75 W incandescent lamps is a mistake and recommend FTC require them to be included in the set of products covered by FTC's final rule on lamp labeling. Below we provide additional detail in support of our recommendation.

According to the federal energy lighting standards that were set by the 2007 Energy Bill, EISA, conventional 75W incandescent lamps manufactured after January 1, 2013 are phased out. The law does allow retailers and manufacturers to stockpile and continue to sell the "phased out" lamps for an indefinite period. For example, inefficient 100W lamps that do not meet the European efficiency requirements are still available for purchase on the shelf more than 1 year after the standard has gone into effect. In California we continue to see virtually no change in the availability of 100W (and 95W) incandescent lamps at both large and small retailers after these lamps were phased out in January 1, 2011.

As the inefficient 75W bulbs will remain on the shelf for quite a while, we think it's critical for consumers to be guaranteed access to the information on its operating cost. While a 75 W incandescent may only cost 50 cents to purchase it's a really bad deal for the consumer's wallet and the environment as it uses \$8.25 worth of electricity and only lasts 1 year compared to the more expensive CFL which may cost \$2-\$3 in a multipack but only costs \$2/year to operate and will save the consumer approximately \$30 over its lifetime.

As we will continue to see 75W lamps on the market well beyond January 1, 2103, we encourage the FTC to revisit this matter and to include coverage of these lamps in its final labeling rule. The packaging changes and cost to revise the text on the package is minimal and will be offset by the potentially very large economic and environmental benefits from consumers selecting the more efficient products based in part by their improved access to the true cost of operating these bulbs.

Getting the labeling right for 75W incandescent bulbs may well result in inventory buildups and high "holding" and warehouse costs for the unsold products and discourage manufacturers and retailers from repeating similar stockpiling activities for the inefficient 60W and 40W incandescent lamp products.