



January 27, 2022

Dr. Stephanie Johnson
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121.

VIA EMAIL (GSL2021STD0005@ee.doe.gov)

RE: Retail Trade Association Response to Energy Conservation Program: Backstop Requirement for General Service Lamps; 86 Fed. Reg. 70755; Docket Number: EERE-2021-BT-STD-0005

Dear Dr. Johnson,

On behalf of the National Retail Federation (NRF), the Retail Industry Leaders Association (RILA), and the 52 million working Americans the retail industry represents, thank you for the opportunity to comment on the Department of Energy's effort to improve general service lamp (GSL) energy efficiency. We strongly support the Department's objective to reduce greenhouse gas emissions associated with the use of products and offer our recommendations focused on the timeline for implementation of the final rule.

NRF is the world's largest retail trade association, representing discount and department stores, home goods and specialty stores, Main Street merchants, grocers, wholesalers, chain restaurants and Internet retailers from the United States and more than 45 countries. Retail is the nation's largest private-sector employer, contributing \$3.9 trillion to annual GDP and supporting one in four U.S. jobs.

RILA's members include the nation's largest and most innovative retailers, which together account for more than \$1.5 trillion in annual sales, millions of American jobs, and more than 100,000 stores, manufacturing facilities, and distribution centers domestically and abroad.

The retail industry is committed to leading on sustainability initiatives. Dozens of retailers operating in the United States have made commitments to reduce their greenhouse gas emissions. Many of these commitments address both direct (scope 1) and indirect (scopes 2 and 3) emissions alike and increasingly include the emissions from consumers' use of the products that retailers sell to consumers. Many retailers are also proud sellers and active promoters of products with high energy efficiency performance, such as products that are ENERGY STAR certified.

Retailers take these commitments very seriously. NRF and RILA members see the transition to more energy-efficient GSLs as one important step towards collectively achieving critical greenhouse gas emission reduction milestones.

The retail community also recognizes and must clearly state that the 60-day implementation timeline that DOE is proposing is a significant challenge for the industry. While sales of LED bulbs have been accelerating, retailers still maintain a 6- to 12-month inventory of incandescent bulbs. Part of the reason for this is that not all consumers have transitioned to LEDs. Because of higher initial purchase costs, lower-income households have not transitioned to LEDs at the same rates as higher-income households. It will be important for DOE to consider ways to make it easier for lower-income households to purchase energy-efficient lighting at an accessible price.

NRF and RILA urge the Department to modify its proposed implementation timeline to recognize that retailers will need time to sell through their existing inventories. Some retailers are reporting that they will need at least 12-months beyond a potential stop-manufacture date to fully deplete existing inventories and to reduce unnecessary waste resulting from the disposal of unsaleable inventory – an outcome that would be both costly and environmentally burdensome. Retailers can use the time to educate consumers about the pending changes and give consumers sufficient time to adjust to the new product mix. You will likely hear from individual retailers and manufacturing stakeholders with additional details on appropriate timelines.

The retail community fully supports the Department’s efforts to improve GSL energy efficiency and to reduce corresponding emissions. NRF and RILA want to ensure the resulting changes avoid adverse environmental and economic impacts and to ensure the resulting product assortment changes are widely accepted by consumers.

Thank you again for the opportunity to share our perspective.



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Susan Kirsch
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