



Date: October 14, 2005

Subject: Comments in response to the ENERGY STAR CFL specification version 4.0 dated August 30, 2005

OSRAM SYLVANIA submits the following written comments in response to the Department of Energy's Energy Star Program request for stakeholder input on the draft revisions to the CFL Energy Star specification dated August 30, 2005.

The majority of our comments will be submitted through NEMA. However, there was one particular area of concern that were not shared by all the NEMA members, and we appreciate the opportunity to submit the following comments regarding the inclusion of mercury limits in the ENERGY STAR specification.

The ENERGY STAR program was an outgrowth of the Clean Air Act of 1990 to reduce carbon dioxide emissions from power plants. Working with manufacturers of energy-consuming products, ENERGY STAR has been successful in developing these voluntary partnerships to increase energy efficiency of these products. The voluntary ENERGY STAR program has effectively undertaken market transformation activities to reduce electricity and natural gas usage by consumers and businesses, resulting in fewer fossil fuels burned at power plants and in homes, and thereby reducing the overall amount of CO<sub>2</sub> emitted. Subsequently, reducing power plant emissions is the most effective way of reducing mercury emissions, as coal-fired power plants contribute to 40% of all man-made mercury emissions in the US.

Mercury content within a lamp has no bearing on the lamp's energy efficiency and, therefore, has no role in the ENERGY STAR specification. ENERGY STAR has been built as a single attribute label, and the strength of its brand lies in its ability to quickly identify energy-efficient products that save energy and money for the consumer. The ENERGY STAR label was never intended as a "one stop shop" for all environmental attributes, and pursuing this path would undermine its purpose under the Clean Air Act.

We strongly feel that mercury limits have no role in the ENERGY STAR specification and should not be considered.

Thank you.

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