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JA8 Efficiency Requirements for LED sources

JA 8.3.1 Efficacy Test sets a non-equivalent standard for assessing LED efficiency. The efficacy of all other sources are assessed based on source efficacy. However, the LM-79 standard for testing LED efficacy is based on a complete fixture. Although LM-79 is an appropriate standard, since the test yields fixture efficacy - not source efficacy - it puts LEDs at a disadvantage relative to other sources. Would it be appropriate to have an adjustment factor for LED efficacy, either a general adjustment or a specific adjustments per fixture type, based on industry average fixture efficiencies for similar fixtures using legacy sources (eg., 90% for 2x4 troffers; 70% for downlights)?

Elsewhere in the the 2019 code revisions, there is a power adjustment factor for Small Aperture Tunable Luminaires (Section 140.6.4.B). Does this adjustment apply to JA8 efficacy requirements and could a line be added in JA8 for clarification, to reference this adjustment and either confirm or negate its applicability?
"Small Aperture Tunable-White and Dim-to-Warm Luminaires Lighting Power Adjustment. For qualifying small aperture tunable-white and dim-to-warm LED luminaires, the adjusted indoor lighting power of these luminaires shall be calculated by multiplying their maximum rated wattage by 0.75."