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Unapproved LED Products

LED lights are regulated by the US Food and Drug Administration because they are an electronic product that emits electromagnetic visible radiation. However, the FDA has not yet published the necessary Performance Standards for LED products, including LED street lights, LED General Service Lamps, LED flood lights, etc. This means that the California Energy Commission has no legal basis for recommending or authorizing the use of LED products in California.

The Soft Lights Foundation submitted a petition to the FDA to require the FDA to comply with the 1968 Radiation Control for Health and Safety Act and publish comfort, health and safety standards for LED products on June 12, 2022. Currently, the FDA claims this petition is under review. Docket FDA-2022-P-1151.

The Soft Lights Foundation also submitted a petition to the US Department of Energy to repeal the 45 lumen/watt requirement for GSLs. The DOE has acknowledged receipt of this petition, but has refused to provide a docket number. This 121-page petition is located here: <https://www.softlights.org/wp-content/uploads/2022/12/Combined-DOE-Petition.pdf>

LED products must use "luminance" as the metric for standards and regulations. To date, the industry has failed to use this metric. Here is a link to a research paper calling on the industry to correctly use "luminance". https://peterveto.me/wp-content/uploads/2023/01/A-quest-for-new-LED-glare-metrics_Veto-Chamberlin-Sabatier-Baker_2023.pdf

Members of Congress are initiating an investigation into the lack of Performance Standards for LED products and the widespread reports of serious adverse health impacts from the directed energy visible radiation emitted by LED products. The California Energy Commission would be ill-advised to ignore this.