



National
Association of
Innovative
Lighting
Distributors

To Tina Halfpenny and DLC,

September 5th 2025

Since 2018, we have consistently provided feedback that has been disregarded by your organization. When we joined your industry stakeholder committee, we raised issues and concerns that many of our colleagues had expressed. Rather than engaging in meaningful dialogue, you simply fired us from your committee.

In 2023, we mailed you our Accreditation Agency Advisory Committee Report. Rather than addressing the substantive points raised, your only response was to note that the Design Lights Consortium is technically not an "agency." Earlier this year, we sent additional letters, which received no formal response. Get a Grip on Lighting and Restoring Darkness, two podcasts NAILD is involved with, have offered you an open door to speak to our industry at any time, but you consistently declined. You ignore stakeholder feedback when it does not align with your position or interpretation of events, demonstrating a pattern that leads us to conclude that input from the lighting industry is a formality - that is designed to be ignored.

And once again, we find DLC issuing "deadlines" to our industry—the nightmare circus starting up all over again—requiring us to submit feedback within narrowly defined timeframes and through processes you orchestrate. Regardless of the feedback provided, we are ultimately expected to accept new certification standards that you impose. These certifications are then billed to lighting manufacturers, and these costs are naturally passed down the chain to lighting distributors and, ultimately, to the consumer.

With each iteration our industry is then expected to "design lights" according to the standards that the DLC, in its sole discretion, dictates. Of course technically, we are free to design any products we choose—but unless our products align with your latest specifications and we dutifully send checks to your organization, they will not be approved by your members, the electrical utilities, for participation in rebate programs that you control access to. In practical terms, that leaves us with little choice.

What of the costs? Since the industry began designing lighting to meet your certification criteria, light pollution of all kinds has risen drastically across the country. That's one of the unintended—but entirely predictable—consequences of your approach that we warned you about. Not a mistake for you to acknowledge and admit but rather an opportunity to slap a new certification label together to supposedly solve the very problem your previous certifications created. You chose a sleek name—LUNA—to market the new certification to cover all the mistakes you made with previous QPLs.

You're not solving any problems or creating a more sustainable future; you're feeding off us, milking our industry for rent while your certifications are the causes of the very harms you claim to fight.

Flickering LED TLEDs and flat panels? All DLC certified. And now, most of the products bearing your seal are on track to become a catastrophic tidal wave of DLC-certified e-waste garbage. We warned you over and over again with our feedback about future lighting waste. Yet DLC intentionally ignored us, the only lighting industry association that represents the distributors who actually stock and supply the replacement components that repair light fixtures. You asked for feedback but expected cheerleading.



The current issues facing the lighting industry are tied directly to the design criteria imposed by your certification. We outlined these in detail in the report we referenced earlier which you ignored. We sent it privately to you out of courtesy but it is now available at www.NAILD.org/DLCreport.

Has anyone stopped to ask you what the actual mandate of your 501 (c) 3 charity is? Why are you a charity? Why are American taxpayers subsidizing product labelling for electrical utility lighting rebate programs? Americans are already paying for these programs through increases in the price of electricity. What charitable service could you possibly be providing? Or is all this about something else entirely?

Is it simply time for another round of industry-wide extractions, dressed up as progress, to keep the cash rolling for DLC and its for-profit partners who absorb the vast majority of your charity's revenue? Whatever the motivation, another round of "what can DLC tinker with now" makes absolutely no sense to us whatever your tax status is. It's directionless, disconnected from reality, and completely out of touch with the real challenges the industry is facing.

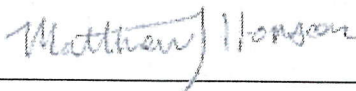
In any event, here is our stakeholder feedback—from the people on the frontlines of this industry, the distributors who stock and sell the components that repair light fixtures, the people who filled out and filed tens of thousands of rebate applications trusting in your certification for our customers, the stakeholder group you intentionally ignore:

1. Put a 5 year moratorium on all revisions or changes to current DLC Product Labelling certifications for lighting products, including LUNA, and guarantee that they will stay in place until 2030.
2. Plan for the sunseting of all DLC Product Labels and Certifications in the lighting industry by the year 2030.
3. In 2030, leave the lighting industry permanently.

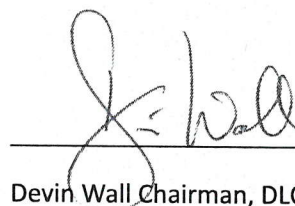
In summary, DLC-certified equipment lies at the heart of the most pressing problems facing the lighting industry today—from the erosion of sustainability and the collapse of the right to repair, to the unchecked rise in light pollution and the loss of the night sky. From disrupted circadian rhythms to declining animal health, the environmental and biological consequences of your interventions are catastrophic and undeniable. The vast majority of negative impacts associated with electric lighting share a single common thread: they were certified by you—with trust in your certification as the key that unlocked mass adoption. It is time for you to call it a mandate and begin winding things down. You have done enough damage already.

All questions and concerns with respect to this letter should be directed to the NAILD office at info@naild.org.

Sincerely,



Matt Honson President, NAILD


Devin Wall Chairman, DLC Committee