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WHITEPAPER

THE 2025 FLUORESCENT BAN:

STATE-BY-STATE ANALYSIS AND ORGANIZATIONAL IMPACT

Produced by LogicSource Indirect Category Leaders

This report leverages insights from LogicSource's Indirect Category Leaders and $150B+ in pricing data to provide actionable strategies for organizations navigating these regulatory changes. Our recommendations leverage LogicSource's experience in sourcing, procurement, and implementing sustainable lighting solutions while ensuring compliance with evolving state regulations.

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TABLE OF CONTENTS

EXECUTIVE SUMMARY

States across the nation are implementing comprehensive bans on fluorescent lighting technologies due to their hazardous components and environmental impact. This transition aligns with the broader adoption of LED technology, which delivers superior energy efficiency, longevity, and environmental benefits.

LogicSource's analysis reveals varying levels of regulatory implementation across different lighting categories:

+ **Linear Fluorescent lighting faces restrictions in 13 states**
+ **Compact Fluorescent Lamps (CFL) are banned in 8 states**
+ **General Service Lamps (GSL) are prohibited in 5 states**
+ **Three additional states will implement new restrictions for both CFL and Linear Fluorescent categories**

The bans are driven by multiple strategic objectives: reducing energy consumption, minimizing environmental impact from hazardous materials, improving public health, supporting climate change mitigation efforts, and decreasing long-term utility expenses for consumers and businesses. These policy changes reflect a growing recognition of the need to transition away from technologies containing harmful elements in favor of more sustainable alternatives.

Organizations must now evaluate their current lighting infrastructure, develop phase-out strategies, and budget for new technology adoption. While this transition may require initial investment, the long-term benefits include reduced energy consumption, lower maintenance costs, and improved environmental performance. Organizations should also consider available utility incentives and rebates for LED adoption while planning for proper disposal of fluorescent bulbs containing hazardous materials.

The coordinated implementation of these restrictions across multiple states signals a decisive move toward eliminating fluorescent lighting in favor of more sustainable alternatives. This trend is expected to accelerate as additional states join the initiative, making proactive transition planning essential for organizations across all sectors.

This report is designed to:

+ Provide a comprehensive analysis of current and upcoming fluorescent lighting bans across different states and their implications for businesses.
+ Examine the regulatory landscape and timeline for implementation of restrictions across different lighting categories.
+ Offer strategic recommendations for organizations to effectively manage the transition from fluorescent to LED lighting technologies while minimizing operational disruption.

LIGHTING PRODUCTS WITH RESTRICTIONS OVERVIEW

Lighting product restrictions vary across three main categories, with Linear Fluorescent products facing the most widespread regulations. Currently, 13 states have implemented Linear Fluorescent restrictions, while 8 states regulate Compact Fluorescent Lamps (CFL), and 5 states restrict General Service Lamps (GSL). An additional three states have announced upcoming restrictions for both CFL and Linear Fluorescent categories. Below is a detailed breakdown of these restrictions.

Lamp Types	Current Restrictions	Upcoming Restrictions
General Service Lamps (GSL)	5	0
Compact Fluorescent Lamps (CFL)	8	3
Linear Fluorescent	13	3

LIGHTING PRODUCT WITH RESTRICTION – GENERAL SERVICE LAMPS

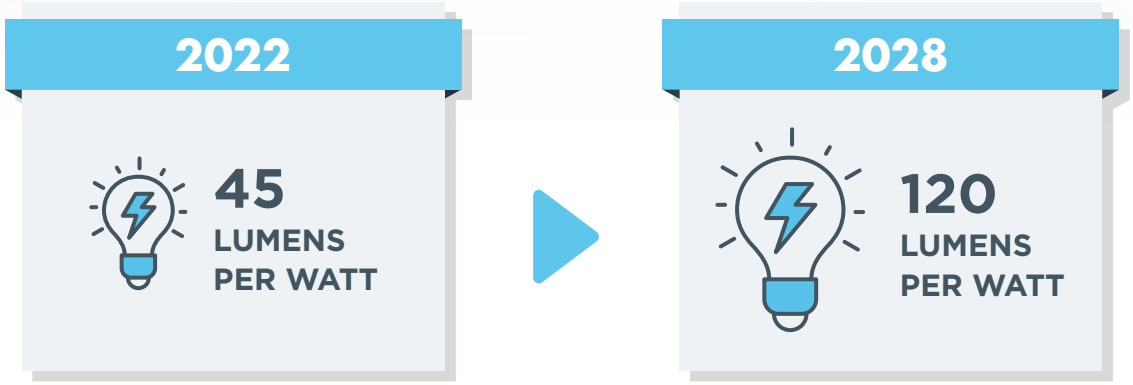
- They include the most common types of residential and commercial light bulbs (excluding linear fluorescent).
- Has an ANSI base (with the exclusion of light fixtures, LED downlight retrofit kits, and exemptions for specific base types).
- Has an initial lumen output of greater than or equal to 310 lumens (or 232 lumens for modified spectrum GSIL) and less than or equal to 3,300 lumens.
- Is used in general lighting applications.
- These can include incandescent (GSIL) and some fluorescent (GSFL).

GENERAL SERVICE LAMP RESTRICTIONS

A federal rule requires general service lamps (GSLs) and general service incandescent lamps (GSILs) to meet or exceed 45 lumens per watt. Most incandescent and halogen products cannot meet these new efficacy requirements.

Simply put, light bulbs commonly used in homes and some commercial buildings must now be much more energy efficient. Incandescent and halogen products use most of their energy-producing heat and cannot meet the new requirements, which is why you will no longer find them on store shelves (there are exceptions).

Another set of standards will go into effect in July 2028, moving from the 45 lumens per watt requirement to 120 lumens per watt. This next phase will apply to newly produced or imported products.



LIGHTING PRODUCT WITH RESTRICTION – COMPACT FLUORESCENT LAMPS

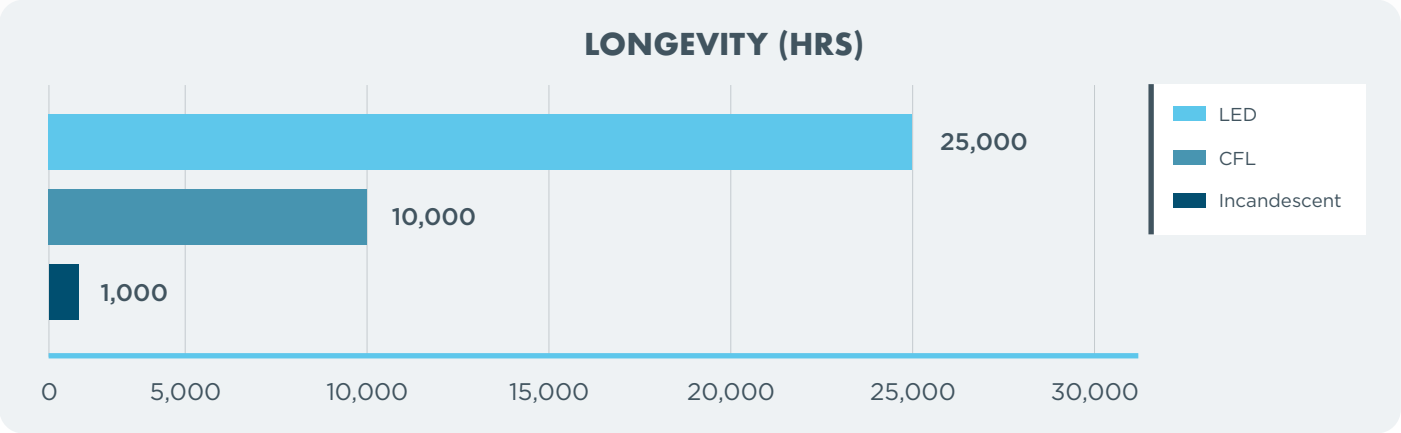
- A compact fluorescent lamp (CFL) is a light bulb that uses a bent tube and gas reactions to produce light. CFLs are designed to be more energy efficient than incandescent bulbs and can fit into standard light fixtures.
- CFLs are typically spiral-shaped but can also be U-shaped. They can be integrated or non-integrated, with the ballast either built into the lamp or separate.
- Compact fluorescents use about 70% less energy than incandescent bulbs but contain mercury, which is toxic and makes them hazardous waste.
- CFLs last 10X longer than GSIL bulbs but nearly 2.5X less than LEDs.

COMPACT FLUORESCENT LAMP RESTRICTIONS

The federal rule on general service lamps essentially eliminates most halogen and incandescent products, but not compact fluorescent lamps (CFLs). Because CFLs contain mercury, some states have banned these products.

CFLs fall under the definition of general service lamps (GSLs), but most of them meet the 45 lumens per watt requirement and can still be sold under the federal rule. Most CFLs will be phased out in 2028 when the DOE requires GSLs to meet the 120 lumens per watt requirement.

The DOE estimates that the new standard will represent an energy savings of 17% relative to the current status quo.



LIGHTING PRODUCT WITH RESTRICTION – LINEAR FLUORESCENT TUBES

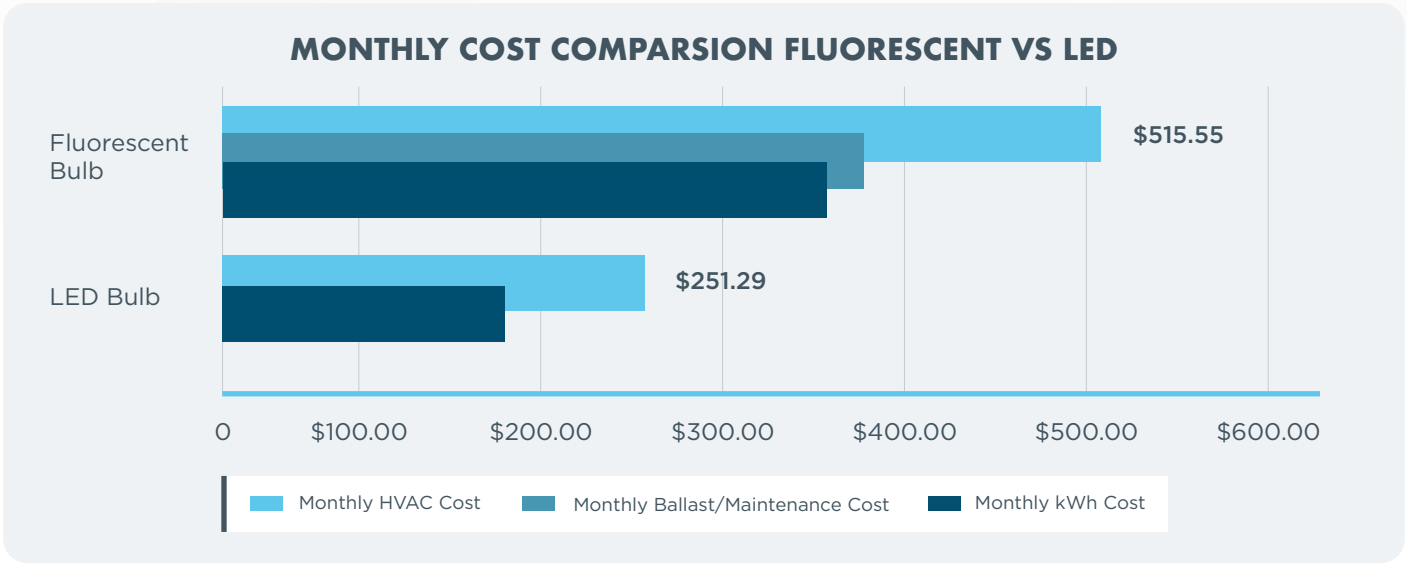
- A linear fluorescent light bulb or lamp is a type of gas-discharge lamp. It comes in a wide variety of lengths, diameters, wattages, and color temperatures.
- They are known for high energy efficiency, long life, and relatively low cost.
- Fluorescent tubes have two dimensions: diameter and length. The type of tube is determined by its diameter, with T2 (7mm), T4 (12mm), T5 (15mm), T8 (25mm), and T12 (38mm) all available in multiple lengths and wattages.
- Fluorescent tubes contain mercury, which is toxic and makes them hazardous waste and drives significantly higher maintenance and energy costs than LED replacements.

LINEAR FLUORESCENT TUBES RESTRICTIONS

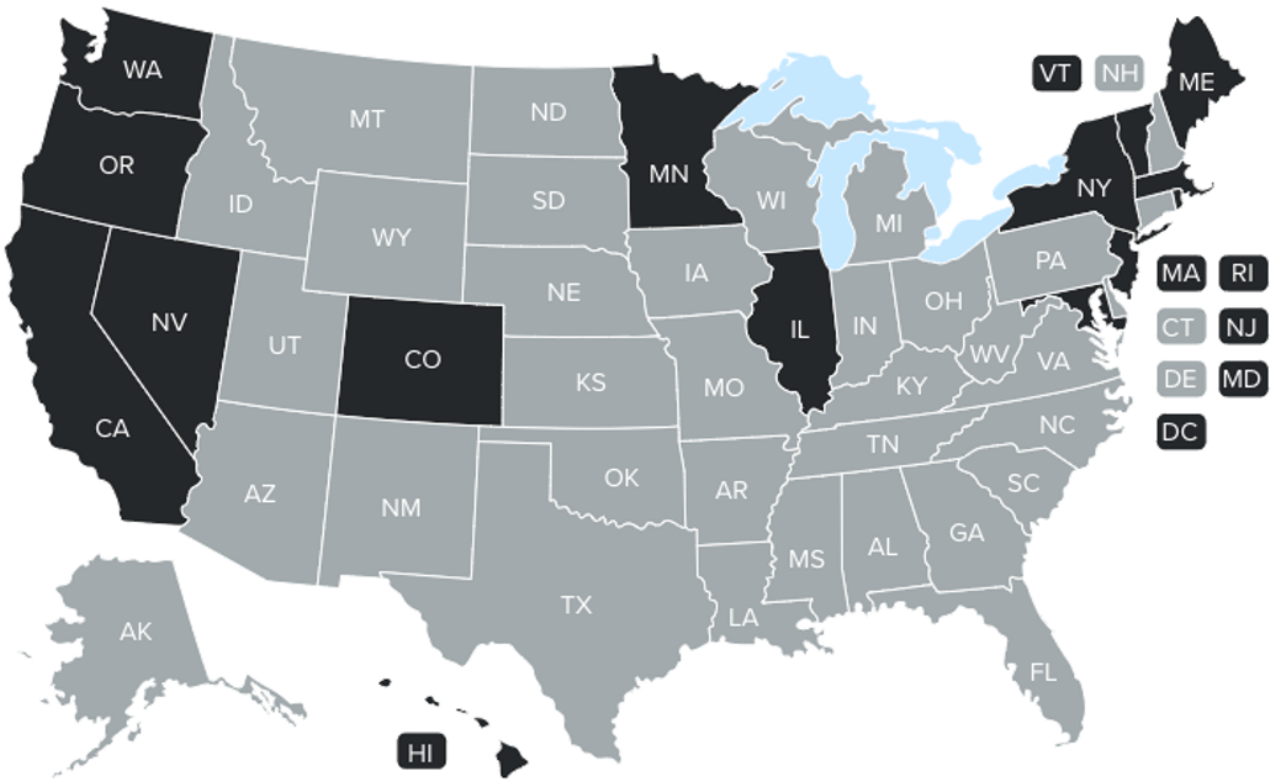
Some states have moved forward with restrictions on T5, T8, and T12 linear fluorescent products because they contain mercury and because LED tubes are much more energy efficient.

General service fluorescent lamps (GSLFs) are not currently required to meet the 45 lumens per watt requirement and include linear fluorescent tubes.

The Code of Federal Regulations (CFR) defines GSFLs as “any fluorescent lamp that can be used to satisfy the majority of fluorescent lighting applications.” There are several exemptions.



STATE BREAKDOWN OF LIGHT BULB BAN



** States in black are either considering or enforcing some restrictions on lighting products.*

While some states are already enforcing lighting restrictions, as shown above, many others are following a phased implementation approach. Below is the timeline for upcoming regulatory changes.

TIMELINE

CURRENT (2025)

Active bans in 16 states

JANUARY 1, 2026

Additional bans in 7 states

JANUARY 1, 2027

Additional bans in 1 state

JANUARY 1, 2029

Additional bans in 6 states

STATES WITH LIGHTING RESTRICTIONS

As of January 2025, sixteen states have enacted or announced restrictions on fluorescent lighting products, with implementation timelines ranging from current bans to phased approaches extending through 2029. The restrictions vary by state and product category, demonstrating a coordinated movement toward more sustainable lighting technologies.

State	General Service Lamps (GSL)	Compact Fluorescent Lights (CFL)	Linear Fluorescent Tubes
California	⛔	⛔	⛔
Colorado		⛔	⛔ *
Hawaii		⛔ *	⛔
Illinois			⚠ *
Maine	⛔		⚠ **
Maryland		⛔	⛔ *
Massachusetts	⛔		⛔
Minnesota		⛔ *	⚠
Nevada			⛔ *
New Jersey	⛔		⛔ ***
New York			⛔ ***
Oregon		⛔	⛔ ***
Rhode Island		⛔	⛔
Vermont		⛔	⛔
Washington		⚠ ***	⛔ ***
Washington DC	⛔		⛔ ***

Only states with restrictions or upcoming restrictions are shown.

⛔ Current restriction
⚠ Upcoming restriction

* Additional bans coming January 1, 2026
** Additional bans coming January 1, 2027
*** Additional bans coming January 1, 2029

STRATEGIC IMPLEMENTATION GUIDE

This strategic implementation guide outlines a structured approach to transitioning from fluorescent lighting systems to more efficient alternatives, helping organizations reduce energy costs while imxwproving lighting quality.

1

CONDUCT AN INVENTORY OF EXISTING LIGHTING

+ Conduct a thorough audit of your current lighting systems to identify where fluorescent lights are being used, including overhead lighting, task lighting, and decorative lighting.
+ Assess lighting usage and efficiency to understand the energy consumption of existing fluorescents to evaluate ROI and potential cost savings from switching to alternatives.

2

UNDERSTAND LOCAL REGULATIONS AND INCENTIVES

+ Work with your lighting provider to understand specific restrictions and deadlines in each impacted area in which you have locations.
+ Develop an immediate action plan for any locations which are already non-compliant.
+ Identify any potential grants or rebates that may be available from municipalities or utility providers.

3

DEVELOP A TRANSITION PLAN

+ Create a timeline for replacing the fluorescent lights, prioritizing areas where the need for replacement is most urgent (e.g., areas with high energy consumption, safety concerns, or outdated fixtures).
+ Account for the upfront costs of purchasing and installing new lighting solutions.
+ Work with a full-service lighting provider who can provide equipment, installation, and rebate management.

4

MONITOR AND EVALUATE EFFECTIVENESS

+ Track the performance of the new lighting systems to ensure they are meeting energy-saving goals and improving overall lighting quality.
+ Keep current with any new restrictions or bans being implemented.
+ Stay informed about emerging lighting technologies that could offer further energy savings or new features. For example, the use of AI for dynamic lighting management or more eco-friendly light sources could be on the horizon.

By following these steps, organizations can efficiently transition their lighting systems while maximizing cost savings and staying ahead of regulatory requirements.

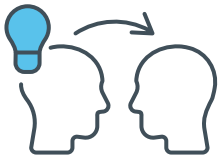
HOW LOGICSOURCE CAN HELP

Regulatory changes in fluorescent lighting present both a challenge and an opportunity for organizations. Leveraging insights from our 180+ category experts and $150B+ in pricing data, LogicSource has developed a strategic framework to help clients navigate this transition efficiently and cost-effectively.

IDENTIFY CLIENTS IMPACTED

Clients with real estate portfolios that have not been retrofitted with LEDs are our key focus areas across these sectors:

+ Retail stores
+ Distribution centers
+ Warehouses
+ Manufacturing plants
+ Offices



INITIATE CONVERSATIONS WITH STAKEHOLDERS

Our structured approach addresses three critical areas of stakeholder engagement:

+ Inform clients about current and upcoming lighting bans
+ Identify and document locations with fluorescent lamps
+ Create actionable transition timelines

SUPPORT THROUGH EXPERTISE

Our access to spend data and supplier/vendor relationships enable lighting solutions delivery through:

+ Preferred Partner agreement with industry-leading lighting equipment provider
+ Strong supplier relationships with multiple national lighting dealers
+ $50MM in lighting sourced over the last 24 months
+ Strong market leverage and procurement expertise

For more information on how we can help, visit **logicsource.com.**

LOGICSOURCE CASE STUDY – 2024 LED RETROFIT

21	10-week	$415K
Stores Retrofitted	Implementation	Annual Savings

1 CLIENT REQUIREMENTS

+ A 21-store LED retrofit was needed for locations in states where fluorescent bulbs are being eliminated. The project needed to be completed between November 15, 2024, and January 31, 2025.
+ Suppliers must provide a turn-key solution that includes equipment, installation, rebate management, and warranty work.

2 STRATEGY AND APPROACH

+ Due to the very aggressive timeline, RFP participation was limited to suppliers already familiar with the Client's current fixture schedules.
+ Five companies were solicited, with four responding with comprehensive turn-key proposals based on the original lighting plans and fixture schedules for each location.

3 RESULTS

+ Project award decisions prioritized historical reliable performance and knowledge of Client processes over the lowest bid price, ensuring speed to implementation.
+ Project completed on schedule, delivering annualized energy and repair/ maintenance savings of $415K.

LOGICSOURCE CASE STUDY – 2024 NEW STORE AND REPLACEMENT LIGHTING

100%	6-week	$155K	8.5%
LED Transition for Multiple Stores	Implementation	Total Savings	Cost Reduction

1 CLIENT REQUIREMENTS

+ High-performing incumbent supplies Client with lighting equipment across two new store formats and replacement equipment.
+ LogicSource is required to negotiate directly with incumbent to secure cost-reduction opportunities across all three spend segments.

2 STRATEGY AND APPROACH

+ LogicSource has a strong, long-standing relationship with incumbent, built through successful completion of multiple projects.
+ Explore alternative equipment options to deliver equivalent lighting characteristics while improving efficiency and eliminating fluorescent tubes.

3 RESULTS

+ Successfully identified reduction opportunities across all spend segments, with a complete transition to LED replacement bulbs.
+ Achieved 11.6% savings on replacement bulbs, with new store formats realizing a 6% - 9% cost reduction.
+ Delivered combined savings of 8.50% ($155K) with implemented pricing within 6 weeks of project initiation.

CONCLUSION

16 states are currently enforcing bans, with 14 more implementing restrictions through 2029. Navigating these regulations demands an agile operational and strategic approach. The analysis demonstrates that while the initial investment in LED technology may be substantial, the long-term benefits — including reduced energy consumption, lower maintenance costs, and improved environmental performance — deliver compelling returns on investment, as shown by the case studies showing 8.5%-11.6% cost reductions.

Organizations must act proactively to navigate this transition successfully. This includes conducting comprehensive lighting audits, understanding state-specific regulations and deadlines, developing strategic implementation plans, and partnering with experienced providers who can deliver turnkey solutions. The data shows that LED alternatives not only meet compliance requirements but also provide superior performance, with up to 70% energy savings and significantly longer lifespans compared to fluorescent technologies.

As more states adopt restrictions and federal efficiency standards continue to evolve, organizations that move early to implement LED solutions will be better positioned to manage costs, ensure compliance, and achieve their sustainability objectives while avoiding potential supply chain disruptions and installation backlogs.

APPENDIX

CRI	CRI stands for color rendering index. It measures a light source's ability to show the true colors of objects compared to natural light. A higher CRI value indicates better color accuracy.
Lumens	Lumens measure how much light you are getting from a bulb. More lumens means it's a brighter light; fewer lumens means it's a dimmer light.
Lumens per Watt	Lumens per watt (LPW) is a unit of efficacy or the rate at which a lamp is able to convert power (watts) into light (lumens).
ANSI Base	A type of lamp base that is defined by the American National Standards Institute

LIGHTING PRODUCTS WITH RESTRICTIONS

	Value
Current Lighting Watts per Bulb	**32**
LED Lighting Watts per Bulb	**18**
Total Bulbs	**140**
Daily Lighting Hours	**24**
Working Days per Month	**30**
kWh Cost	**$0.10**
Ballast/Maintenance Monthly	**$0.30**
Cost per LED Bulb	**$42.00**
Installation Cost per LED Bulb	**$1.00**
HVAC Factor	**1**

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ABOUT LOGICSOURCE

The innovative leader in procurement services and technology, LogicSource is purpose-built to drive profit improvement, mitigate risk, and ensure supply chain continuity through better buying. LogicSource focuses exclusively on the sourcing and procurement of indirect goods and services, which typically represent 20% of an organization's revenue and the area of greatest spending inefficiency. These include complex categories like marketing, packaging, corporate services, facilities, information technology, distribution and logistics, and more, for which organizations often lack the capacity, focus, and scale to achieve best-in-class buying.

Unlike traditional advice-based consultants, LogicSource is a purpose-built buying utility with assets that are configurable to their clients' needs and ready to deploy. By combining decades of sourcing and procurement expertise, superior market intelligence, cross-portfolio spending leverage, and their OneMarket® Source-to-Pay technology, LogicSource executes customized solutions that deliver immediate savings and sustainable value. For more information, visit **logicsource.com**.

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Luis Gile is a capital procurement and strategic sourcing expert with over 20 years of experience helping global enterprises maximize capital investment and minimize risk. He has led procurement efforts for top-tier organizations like IBM, Goldman Sachs, Accenture, and LogicSource, specializing in large-scale real estate, facilities, and construction programs. With deep expertise in market intelligence, stakeholder alignment, and enterprise contracting, Luis has supported over $1B in annual construction spend and built procurement functions that improve execution quality, speed-to-market, and long-term value.

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Tim Rudnick is a strategic sourcing and procurement leader with over 20 years of experience driving cost reduction, operational efficiency, and supplier performance across industries. Tim specializes in tailored sourcing strategies, value engineering, and direct negotiation to deliver measurable results. He has led transformative procurement initiatives that enhance process efficiency and leverage technology and data analytics to inform smarter, faster decision-making.

For more information or to discover how LogicSource can help your organization achieve best-in-class buying, visit **logicsource.com**.