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What You Should Know About DLC Logo Compliance and Enforcement

Energy efficiency programs, manufacturers, distributors, designers, and building owners across Canada and the United States rely on the DesignLights Consortium® (DLC) Qualified Products Lists (QPLs) to confirm eligibility for incentive programs and to guide lighting procurement decisions. When a product is marketed as DLC qualified, one can reasonably assume that:

- The product appears on the applicable QPL (SSL, LUNA, Hort, or NLC)
- The product meets DLC technical performance requirements
- The product has obtained appropriate safety certifications

Improper use of the DLC logos or false claims of qualification mislead stakeholders across the industry value chain, which delays the procurement and incentive verification process. Knowledge of how improper use arises and how it affects others benefits all stakeholders. This paper outlines the role of the DLC logo in the marketplace, common forms of misuse, risks for stakeholders, and the actions stakeholders can take to mitigate that risk for themselves and others.

1. The Role of the DLC Logo

The DLC logos are registered intellectual property assets and must be used in accordance with the DLC Logo and Trademark Use Guidelines.¹ The role of the DLC logo is to identify products that meet the DLC's qualification requirements and appear on the QPLs, which identify products that meet defined technical requirements for performance and energy efficiency. Approximately 75% of efficiency programs across Canada and the United States use the QPLs to determine incentive eligibility. Therefore, the value of DLC logos depends on consistent, accurate use, as they signal that a product has successfully completed the DLC qualification process.

2. Why Accuracy Matters

Improper logo use affects manufacturers, efficiency programs, and purchasers. Manufacturers invest resources to qualify products, maintain listings, and comply with logo requirements. When others bypass those obligations, it creates unfair competition and diminishes the value of a legitimate qualification. Efficiency programs ultimately rely on the QPLs to verify eligibility, but product marketing materials such as specification sheets and catalogs are often the first place where qualification claims appear, which influences purchasing decisions. When those materials display a DLC logo without a



corresponding QPL listing, programs must spend additional time verifying eligibility which can delay project and increase administrative costs. Specifiers, contractors, and building owners also rely on these materials when selecting products. Because safety certification documentation is reviewed during qualification, inaccurate claims can create misplaced confidence and lead to problems discovered only after installation. Consistent and accurate use of the DLC logos protects all parties involved.

3. DLC Qualification and Safety Certification

DLC qualification determines whether a lighting product is eligible to be listed on a DLC QPL. To qualify, a product must meet the applicable DLC Technical Requirements, submit required documentation, and complete the DLC application and review process.

Because lighting products may present hazards if not properly designed, constructed, and installed, third-party safety certification helps reduce the risk of fire, electrical shock, and other hazards.² While the DLC does not act as a safety certification body, the qualification process requires manufacturers to provide documentation demonstrating that each listed product has obtained appropriate safety certification from an accredited body. DLC staff review that documentation as part of the qualification process, and a product cannot be listed on the QPL without it.

4. Common Forms of Misuse

4.1 Products Falsely Claiming DLC Qualification

The most serious form of misuse occurs when a product that is not eligible and does not appear on the QPL is marketed as “DLC qualified” through DLC trademarks or logos. Products sold through online platforms frequently leverage the value of the DLC logo to boost buyer confidence in their product and make quick sales. If a product does not appear on the QPL under the exact manufacturer or brand, and if the model number does not align with the QPL listing, it is not qualified and is not eligible to use the DLC’s trademarks and logo.

4.2 Private/White Label Misrepresentation

A common misconception is that the DLC qualification obtained by an Original Equipment Manufacturer (OEM) automatically applies to those products labeled under a different manufacturer (typically called private labeling or white labeling). Without a separate DLC qualification, there is no way to verify that a private labeler has a business relationship with the OEM and that the private labeler’s products have undergone required testing and review. An OEM listing does not automatically extend to a private label brand, so organizations using their own name and model number must submit a Private Label Application.¹



4.3 Specification Sheets that Imply Universal Qualification

Not every product variation within a product line may be eligible for DLC qualification, but manufacturer specification sheets may include models that do not meet the DLC technical requirements or models that the manufacturer elected not to qualify. If not all variations are qualified, materials must clearly indicate that only some products are qualified.¹

4.4 Improper Use of DLC Logos and Trademarks

The qualification status of products may change due to the outcomes of surveillance testing, product misrepresentation, logo violations, updated DLC technical requirements, or a manufacturer choosing to remove their product from the QPL. Once a product no longer qualifies, the DLC trademark must be removed from all material associated with that product. DLC logos appearing on materials that are not easily updated such as domain names or packaging are less likely to reflect current qualification status and are therefore disallowed.

Altering DLC logos are not allowed under any circumstance. Only official, current logo files provided by the DLC may be used in marketing materials. Outdated logos are an indication that the product's DLC qualification may have expired or be non-existent. The correct use of logos is detailed on the [Logo and Trademark Use Guidelines](#) page on the DLC website.

5. Best Practices for Applying the DLC Logo

To avoid disruptions to the incentive process caused by improper DLC logo usage, here are some best practices:

Manufacturers should:

- Ensure that all marketed model numbers align with QPL listings
- Clearly indicate whether all or only some variations are qualified
- Understand that private labelers are required to obtain their own DLC qualification
- Use only official, current DLC logo files¹

Distributors should:

- Verify DLC qualification claims on the QPL before selling or purchasing products
- Request the DLC Product ID when in doubt
- Clearly identify which variations are qualified
- Display both the manufacturer and brand name to prevent false private label claims



Energy efficiency programs should:

- Request the DLC Product ID when reviewing incentive submissions
- Not rely solely on DLC logo usage and verify DLC qualification status directly through the QPL
- Avoid custom reviews of non-DLC listed products by educating trade allies about model number and private label requirements
- Not accept products unless the manufacturer/brand and model number align with QPL listings

Specifiers and purchasers should:

- Review QPL listing status prior to procurement to avoid losing out on potential incentives and to confirm the presence of proper safety certifications

6. Enforcement

The DLC actively monitors use of its logos and trademarks and encourages stakeholders to report suspected misuse. If you observe misuse of the DLC logos, false qualification claims, or product misrepresentation, report the issue to the DLC. Improper logo use and false qualification claims are taken seriously. The DLC will investigate and take appropriate action under its policies. Protecting the integrity of the QPL protects all stakeholders and the value of participation.

If:

- The product cannot be found on the QPL under Listed Products and
- The submitter cannot provide a valid DLC Product ID

Then the product is not qualified. Qualification is binary: A product is either listed on the QPL, or it is not. Unauthorized or improper use of the DLC logos and trademarks may result in corrective action, including:

- Public notice on the DLC website
- Required modification of marketing materials
- Suspension of applications
- De-listing of qualified products¹

To report false or improper qualification claims, use the [Logo Misuse Reporting / Surveillance Testing Nomination](#) form on the website.



References

1. DesignLights Consortium®, [Logo and Trademark Use Guidelines](#), Updated April 21, 2022.
2. National Electrical Manufacturers Association (NEMA), [The Importance of Proper Safety Certifications for Lighting Products](#), NEMA LS 20035-2025.