



**Comments of the Procter and Gamble Corporation Regarding Discussions Held at the
Dishwasher Stakeholder Meeting in D.C.
Submitted August 15th, 2005**

Procter and Gamble (P&G) is a global manufacturer of laundry and dish detergent products and is the leading detergent manufacturer in North America.

P&G appreciates the opportunity to comment on key points of the dishwasher Energy Star program. As you are aware, Procter and Gamble is very supportive of this program in North America.

Background

Consumers view the appliance and the dish detergent products as the system to help “clean” their dishes. “Clean” in this context relates to more than just cleaning and encompasses all elements of performance of the dishwashing system. It is our understanding that performance and energy/water savings are related: only if the consumer gets the performance she wants, will she realize the savings intended by the dishwashing system. Said another way, if performance needs are not met, consumers will be dissatisfied and will exhibit compensatory behavior that is likely to negate any energy and water savings.

The comments included herein relate to discussions held at the Stakeholder Meeting on July 13th, 2005 and specifically to discussions about the Energy Factor (EF), Water Factor (WF) and performance criteria. Standby power will not be addressed as it in itself does not significantly impact performance.

Comments and Observations:

As P&G is not an appliance manufacturer, we cannot comment on specific numbers for EF or WF as such, but can comment on the performance and consumer practices with current machine designs that today meet those criteria.

Energy Factor:

Today, there are a number of dishwasher models that meet the Energy Factor of 0.62. As evaluated by P&G, there are a significant number of these dishwashers that in conjunction with in-market additives (detergents and rinse-aids) meet the performance expectations of consumers and thus are likely to deliver the intended energy and water savings. P&G is fully supportive of moving the EF from 0.58 to 0.62. Both Maytag and GE suggested a slightly higher EF of 0.64 or 0.65, respectively. Today, P&G has limited data on models with these specific EF's.

Water Factor:

Based on all the information presented by the DoE and AHAM, there is significant evidence that lower energy consumption correlates well with lower water usage. Because of the evidence, P&G does not believe there is a need to include a separate WF in the Energy Star criteria for dishwashers. Dishwashers already use very little water to wash a load and adding this additional constraint on the appliance design could lead to an unnecessary compromise in performance. If water savings beyond that which is delivered by Energy Star dishwashers today is a key objective by key stakeholders, a better route to significant water savings is a campaign to educate consumers on the benefits of using a dishwasher vs. hand washing or using the dishwasher without pretreating.

Performance Criteria:

Maytag proposed adding performance criteria to ensure that consumers are getting optimal performance from their energy and water efficient appliance. While, in principle, P&G agrees that only if performance is achieved, can you expect real energy and water savings, we caution that no one test available in the industry captures the essence of dishwashing performance. Dishwashing performance, which includes the performance by the appliance and the additives, encompasses much more than soil removal and includes not only different types of soil removal (baked on, tough food soils, beverage stains etc), but also substrate filming, substrate etching, other “dish care” vectors, rinsing, drying, etc. While P&G is in favor of measuring performance, P&G opposes doing so with any single test method available today. Significant discussions in the industry are essential prior to moving in that direction.

Again, P&G appreciates the opportunity to comment and we look forward to moving together to more efficient “cleaning” processes.

**Jenny Moe, PhD
The Procter and Gamble Co
Household Care
(513) 627-8128
moe.jl@pg.com**

