ENERGY STAR® Most Efficient 2021 Stakeholder Comments and Responses

Topic	Comment Summary	Responses
General		
ENERGY STAR Most Efficient Program	One stakeholder commented they strongly support EPA's ENERGY STAR program and the ESME designation. Another two stakeholders commented they support the proposed ESME 2021 criteria as a way of identifying the products that deliver cutting edge energy efficiency along with the latest in technological innovation. They expressed that ESME recognition is important to incentivize innovation and further advance energy efficiency for consumers who are specifically seeking the most energy efficient products.	EPA thanks stakeholders for these comments.
Boilers		
Criteria	One stakeholder commented that they support the decision to no longer feature Boilers in the ENERGY STAR Most Efficient Criteria. They stated that they agree with EPA's assessment that there is a large portion of gas-fired boilers that meet the Most Efficient criteria (i.e.,95%AFUE) and that there is little technical difference amongst these top-tier efficiency products.	EPA thanks stakeholders for these comments. EPA will not recognize boilers as Most Efficient in 2021.
Clothes Dryers		
Criteria	Two stakeholders support the proposed 2021 ESME criteria.	EPA thanks stakeholders for these comments.
Clothes Washers		
Criteria	A stakeholder urges EPA to begin documenting which clothes washer models will incorporate microfiber plastic filters or filter technology. With consumers becoming more interested in ecological impacts, they say that ENERGY STAR can help to identify leading products that offer effective microfiber filtration solutions. The stakeholder argues that ENERGY STAR is well positioned to do this by not only being a trusted symbol of energy efficiency, but also the representation of products with features and performance that	EPA understands the importance of helping consumers identify product features that are important to them. EPA will encourage partners to identify products with microfiber plastic filters at the time of certification so consumers can identify products with this feature using the ENERGY STAR certified product list. If partners are interested, EPA will consider ways to raise the profile of products with this feature using ENERGY STAR outreach tools like ENERGY STAR Ask the Experts.

	consumers demand, such as microfiber filtration. They further backed their claim with the use of a U.S. survey on microfiber plastics, which stated that 95% of respondents reported they are willing to take action, 38% reported that they would be willing to purchase a filter for their washing machine and 26% would be willing to replace their washer or dryer in order to reduce microplastic pollution. Two stakeholders confirm their support for EPA's ESME recognition of clothes washers. However, the stakeholders state EPA's policy of the one product bin for clothes washers is not as impactful as it could be. Based on the review of the 2019 ESRPP sales data, the stakeholders found that 29% of front-load models and zero percent of top load models meet the proposed 2021 ESME criteria. They state that this stratification has made it so that the ESME category is not a significant differentiator for front-load washers and if the criteria remains as proposed, over half of all front-load models sold would be recognized as ESME, whereas no top-loading models would be recognized for ESME. They recommend two updates to the standard front-loading washers and top-load washers of ≥ 3.0 integrated modified energy factor (IMEF) and ≤ 3.2 integrated water factor (IWF) and ≥ 2.38 integrated modified energy factor (IMEF) and ≤ 3.7 integrated water factor (IWF), respectively. Additionally, these stakeholders expressed support for EPA's planned efforts to educate consumers about the benefits of front-load washers versus top-load washers. However, the stakeholders believe that until the front-load washers are the dominant product bin, EPA should also work to educate all consumers about the most efficient products within all market segments.	Recognizing the superior energy and water performance of the front load design and the intention of ENERGY STAR Most Efficient to recognize products that deliver top efficiency for customers who prioritize it, EPA has maintained one product bin for clothes washers. EPA continues, in close collaboration with partners, to educate consumers about the benefits of front load washers with the intention of increasing their prevalence in the US market.
Televisions		
Criteria	Two stakeholders support a review of the 2020 ESME criteria, as well as a delay until the new ENERGY STAR specification is more complete.	EPA thanks stakeholders for these comments.
Refrigerators/Freezers		
Criteria	Two stakeholders support the proposed criteria for refrigerators and freezers.	EPA thanks stakeholders for these comments.
Refrigerators/Freezers		

Connected Criteria	Two stakeholders recommend EPA add connected criteria guidelines for ESME similar to the current ENERGY STAR specification. This is so that connected products can be identified and supported through ESME as well.	EPA currently recognizes both ENERGY STAR and ENERGY STAR Most Efficient models with Connected Functionality, providing a connected filter on their respective qualified product lists.
Room Air Conditioners		
Refrigerant Reporting	Two stakeholders recommend that refrigerant reporting for room air conditioners should be a requirement.	EPA currently enables partners who wish to post this information to voluntarily submit it through their certification body at the time of certification or have it added to currently certified products through their certification body. EPA will continue this approach in 2021. If partners are interested, EPA will consider ways to raise the profile of products with this feature using ENERGY STAR outreach tools such as ENERGY STAR Ask the Expert.