

Comment on EnergyStar Preliminary Approach to Clothes Washer Performance.

Fisher & Paykel Appliances – 12 July 2013.

Fisher & Paykel Appliances (FPA) is a New Zealand based innovative appliance manufacturer. Our main markets are New Zealand, Australia and the USA. However we sell in many other countries in Asia and Europe. We have been members of AHAM for many years.

FPA strongly agrees with the need for performance to be assessed when measuring for energy & water consumption. FPA's traditional markets have been Australia and New Zealand. In these markets we have had performance requirements with energy labelling for over 20 years. It started with wash performance and water extraction and rinse performance was added when the focus moved to water conservation. Whilst the local scheme is far from perfect, linking performance with energy & water measurement is imperative to prevent abuse with cheating and circumvention.

FPA does have concerns about some of the details proposed, which will be discussed in this comment, but strongly supports the concept.

One important element that must be addressed is that performance and energy/water consumption must be tested and measured simultaneously. Having separate tests opens the doors to extensive circumvention. The proposal has one test using a cotton load with detergent while the other test uses a poly-cotton without detergent. These 2 conditions are very easily detectable and distinguishable. This would lead to a washer which would wash very well with the cotton load using a lot of resources, but then change its cycle to be very energy/water efficient for the same nominal cycle when it detected the J2 poly-cotton. These 2 test conditions would be so easily detected that it could lead to extensive circumvention.

Conceptually the tests (performance and consumption), must be combined. This leads to all of the test conditions and requirements being harmonized between J2 and HLW-1. We appreciate that this is a major task but as this is for the long term we need to be looking well into the future. Until we have a single test regime we will always have circumvention issues.

We do not propose to go into all of the detail as we feel this needs considerable discussion but some aspects are discussed below.

We support the adoption of the AHAM rinsing test. The rinse test is absolutely essential as water consumption is reduced by manufacturers. The AHAM work is leading the world and is accepted as the best available. It is a good refinement of previous work.

Load – The AHAM HLW-1 load should be used. Very little wash performance development work has been done on poly-cotton loads. This load is well proven and as it is used extensively elsewhere, especially Europe, there is good security of supply. The J2 poly-cotton load has had historical supply issues which is unacceptable. The European use of this load also entails considerable control of the age of the load. Whilst this adds considerable complication for the laboratories, it has been found to be necessary by the Europeans and as such should be considered for inclusion.

Ambient – This includes electrical supply, ambient air temperature & humidity, and the water supply hardness, pressure and temperature. These need to be harmonized between the 2 existing tests. Consideration should be given to what is used for clothes dryers as well as they may be tested in the same laboratories.

Test Cycle Choice – The current definition of the J2 Energy Test cycle in 1.13 covers the Test Cycle choice much better than J1. This has been an area of local abuse with manufacturers recommending very obscure cycles which require a number of additional features/options to be selected. These are rarely selected, if ever, by customers. However this needs to be examined carefully to ensure abuse cannot occur.

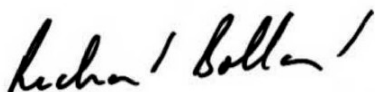
How these test cycles are merged with DOE J2 test cycles needs to be discussed,

Next Step. – We would propose some open meetings/discussions between AHAM, manufacturers and DOE (or its technical consultants) to jointly progress the concept and detail of this single test procedure. The whole issue is extremely complex and does require compromise. With this joint understanding we believe we can develop a test plan for the future.

Summary.

- The principal of performance testing is fully supported.
- However performance testing and energy/water measurement must always be done on the same test cycle. Failure to do this will lead to abuse and circumvention of the standard.
- To achieve the above, J2 and HLW-1 must be merged to provide a single set of test conditions.
- Meet together to discuss and formulate answers to the issues outlined above and in the EPA paper.

Thank you for the opportunity to comment on the paper and please feel free to ask if any further clarification is necessary.



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13 July 2013