



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

May 14, 2012

Dear ENERGY STAR[®] Stakeholder:

The U.S. Environmental Protection Agency (EPA) is pleased to share a finalized update to the Vision and Guiding Principles for ENERGY STAR products. As previously noted, this document re-affirms the government's longstanding commitment to the core ENERGY STAR program principles that have made it successful. These include a focus on products that meet the highest energy conservation standards without sacrifice in performance or functionality and an emphasis on transparency and a collaborative relationship with industry and other stakeholders.

EPA appreciates the thoughtful and constructive input provided on the draft update, which informed a number of refinements to the document. A general summary of the feedback received is provided below. A more detailed comment response document is also available on the ENERGY STAR website at: www.energystar.gov/productdevelopment.

Focus on Energy Efficiency

A broad range of stakeholders supported the ENERGY STAR program's continued focus on energy efficiency and delivering savings to consumers without sacrifice in performance or quality. While there was general agreement that ENERGY STAR products should be of the same or better quality than non-labeled products, industry comments raised concerns about how and when the Agency might address product attributes not directly related to energy consumption. Consumer and environmental organizations were supportive of EPA's approach to other performance/non-energy attributes and noted that including such requirements is essential to ensuring ENERGY STAR products are attractive to consumers. EPA remains interested in protecting the ENERGY STAR label against any association with undesirable products, but has adjusted the Vision and Guiding Principles to include more explicit conditions that would prompt the Agency to address consumer benefit attributes on a product-by-product basis.

Product Certification and Verification

EPA's new third-party certification program was the subject of significant comment. Consumer and environmental organizations expressed support for recent improvements to the ENERGY STAR program in this area and encouraged the Agency to be more explicit in the Vision and Guiding Principles affirming its importance. Industry feedback raised concerns ranging from potential duplication of effort to unwarranted added testing burden. As the Agency gains more experience with the on-going verification testing element of the program, adjustments will be considered as warranted by the results for different product categories.

Sunsetting ENERGY STAR Product Categories

Stakeholders expressed interest in having EPA clarify the drivers for or conditions under which the Agency sunsets rather than revises an ENERGY STAR product specification. A discussion of circumstances, such as the lack of additional, cost-effective savings, has been added to the Vision and Guiding Principles.

Subdivision of Product Categories and Recovering Purchaser Investment

Some stakeholders provided feedback on the topics of subdivision of product categories while others commented on the period during which purchasers recover any up-front investment they make when purchasing an ENERGY STAR model. On the topic of subdivision of product categories, a consumer organization cautioned against over subdividing product categories such that consumers are misled about their best choice when it comes to efficiency. On the other hand, some manufacturing stakeholders urged the Agency to avoid collapsing product classes in cases where doing so results in some product types being ineligible for ENERGY STAR. On the topic of recovering purchaser investment, EPA also received varied feedback with some commenters noting that consumers should realize any return on up-front investment for an ENERGY STAR model in 2-3 years and others saying that a return longer than 5 years is appropriate for longer lived products. EPA believes that the current language in the Vision and Guiding Principles adequately balances the varied input received and prioritizes consumer utility and savings.

Transparency and Collaboration

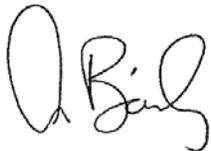
Issues of transparency and collaboration were raised by some stakeholders. EPA was encouraged to more explicitly note the Agency's commitment to these principles. We see transparency and collaboration as two critical tenets of the program and now address this in the introduction to the Vision and Guiding Principles.

International Harmonization

Support was expressed for continued international harmonization. EPA added a statement reflecting the Agency's commitment to international harmonization of test methods, definitions, and approaches to efficiency requirements through the ENERGY STAR program's agreements and engagement in international efforts with this focus.

EPA recognizes the importance of engaging stakeholders early and often in its application of these principles going forward. We look forward to working with you and thank you for your support of the ENERGY STAR program.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Bailey". The signature is fluid and cursive, with the first name "Ann" and last name "Bailey" clearly distinguishable.

Ann Bailey, Director
ENERGY STAR Product Labeling