

BSH Home Appliances Corporation, 1901 Main Street, Suite 600, Irvine, CA 92614

June 30, 2022

Via E-Mail

Katharine Kaplan
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Program Requirements, Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 7.0

Dear Ms. Kaplan:

BSH Home Appliances Corporation (“BSH”) respectfully submits the following comments to the Environmental Protection Agency (EPA) regarding the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 7.0. BSH continues to have significant concerns with EPA’s proposed Version 7.0 specification.

BSH Home Appliances Corporation, headquartered in Irvine, California, produces and markets small and major home appliances that are known for their high-quality and superior innovation. BSH sells its Gaggenau, Thermador and Bosch branded products throughout North America, through distributors, independent appliance dealers, national and regional retailers, builders and large buying groups. BSH supports efforts to protect our environment and accepts a responsibility in building a sustainable future for all. [HTTPS://WWW.BSH-GROUP.COM/US/](https://www.bsh-group.com/us/)

BSH is a member of the Association of Home Appliance Manufacturers (AHAM) and supports their comments filed June 30, 2022 regarding Final Draft, Version 7.0. These new requirements threaten to undermine the ENERGY STAR program by associating the ENERGY STAR mark with poor value, poor performance, and lack of reliability due to qualification requirements that are ineffective and highly variable.

The ENERGY STAR dishwasher performance test is highly variable. In 2013, AHAM conducted a round robin test (testing the same product at different labs for comparison) to evaluate the ENERGY STAR performance test. The test is not acceptable for establishing cleaning criteria due to its variation. The standard deviations from lab-to-lab varied widely. As a result, BSH is deeply concerned about this testing variation carrying over and impacting the annual surveillance testing (verification testing) of certified product.

Verification testing is designed to ensure continued performance of off-the-shelf products for end-users and other vested parties, such as utilities. ENERGY STAR reported in November 2020:

certification testing is conducted on 5 -10% of ENERGY STAR products annually (depending on the category) and is comprised of both random and nominated products. For an individual partner, this means the number of selected products may vary annually from several to none at all, and averages out over time. In 2021, 740 partners were planned to be tested based on EPA nominations alone. With a narrow exception of certain product types, all active brand owners in the program will have been tested since verification testing started in 2012. While EPA's *Disqualification Procedures* are intended to provide a robust process for partner input on findings of a failed test, we express our deep concern about EPA's intention to rectify a failed performance verification test - which seems inevitable given the high lab-to-lab variation. BSH is equally concerned about the resulting business disruptions which would occur in our labs, with retail partners and our consumers with a failed performance verification test.

ENERGY STAR performance test depends significantly on who is doing the grading, leading to high lab-to-lab variation that will likely yield false findings of both compliance and non-compliance. For these reasons, BSH asks ENERGY STAR to consider our feedback and not finalize Version 7.0 as proposed.

Thank you for your consideration of these comments. I would be very happy to address any questions you may have. You may reach me at alicia.cafferty@bshg.com.

Respectfully submitted,



Alicia M. Cafferty
BSH Home Appliances Corporation
Vice President, Government Relations