

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

May 18, 2020

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, Draft 1, Version 7.0

Dear Ms. Kaplan:

BSH Home Appliances Corporation (“BSH”) respectfully submits the following comments on the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Draft 1, Version 7.0.

BSH is headquartered in Irvine, California, and manufactures major home appliances under the Bosch, Thermador® and Gaggenau® brands. BSH has factories in North Carolina and Tennessee, with warehouses, sales offices and showrooms throughout the United States. BSH supports efforts to protect our environment and is committed to building a sustainable future for all.

BSH has offered dishwashers for sale in the US since 1991 under the brand Bosch, and has operated a dishwasher factory in North Carolina since 1996. Recognizing that the dishwasher is an indispensable helper and clearly a convenience star, Bosch dishwashers have a long history of incorporating innovation based on extensive consumer insight to provide satisfaction. For example:

- Bosch is known for being the quietest dishwasher brand;
- Bosch dishwasher technology eliminates the need for sink pre-rinsing, thus saving water;
- Bosch has met or exceeded water and energy efficiency standards for ENERGY STAR;
- Bosch introduced the third rack in the year 2000 to improve loading capacity, thus cleaning more dishes per load;
- In 2019, Bosch introduced CrystalDry™ technology, which transforms moisture into heat to get even plastics 60% dryer (while maintaining ENERGY STAR certification).

BSH corporate philosophy considers it an obligation to future generations to reduce our footprint on this planet. BSH supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for energy efficiency improvement, as long

page 2

as product performance can be maintained for the consumer. BSH believes, for residential dishwashers, the opportunities for additional savings beyond those already achieved are severely diminished as products are nearing maximum energy and water efficiency under available technology. Further revised ENERGY STAR specifications such as the one EPA is proposing in Version 7, are likely to result in limited energy savings as compared to increased costs to consumers and diminished dishwasher performance and consumer satisfaction – making it no longer the convenience star of the kitchen.

BSH proposes that EPA and DOE sunset the ENERGY STAR program for residential dishwashers at this time until reliable tools are available to successfully decrease ENERGY STAR market saturation and/or new technologies are available to further improve energy and water efficiency – all without adverse performance consequences to consumers.

There are several reasons BSH proposes that EPA and DOE sunset the ENERGY STAR program for residential dishwashers:

- The ENERGY STAR goals of attaining 25% market saturation have reached its useful life with current reliable methods and technologies for dishwashers.
- ENERGY STAR efforts to implement a cleaning performance “threshold” using methods that have proven to be unreproducible is ill advised and will yield problems for the dishwasher manufacturers and Certifying Bodies to contend with.
- We have arrived at the point that further reduction in dishwasher water and energy consumption cannot be achieved without sacrificing some aspect of consumer utility to the point that BSH feels the cycle will become undesirable for consumer selection and use.  
Once cycles become undesirable, consumers resort to hand-washing, pre-washing, or using cycles that use more water or energy to achieve desired cycle times, drying results, or noise levels.
- Because performance factors are all interrelated, consumers purchasing an ENERGY STAR V7.0 dishwasher will find reductions in consumer utility resulting in dissatisfaction. Examples of this include reductions in cleaning performance, increased cycle times, reduced drying performance or increased noise levels. Upon implementation of the more stringent ENERGY STAR V7.0, qualifying manufacturers will be forced to determine which consumer utility(s) to reduce in order to qualify for the program.
- When used properly, the ENERGY STAR brand is a valuable tool to drive innovation and reduce energy consumption. When the tool is implemented improperly, it will result in uncertainty for consumers, jeopardizing the valuable ENERGY STAR brand with added risk of compromising consumer trust in other ENERGY STAR categories that do have great promise of reducing our footprint on this planet for future generations.

...3

page 3

EPA proposed a development cycle for a new Specification that includes a final version released sometime during the third quarter of 2020, followed by an effective date in the second quarter of the year 2021. With companies sourcing components all over the world, this schedule would strand resources and result in parts discarded into landfills; BSH encourages both DOE and EPA to consider long lead times for regulatory changes to give manufacturers the opportunity to blend changes into product lifecycles. Changes to product lineups cost energy by using development, marketing and production resources to implement design changes and transport new equipment; retail floor models must be replaced; all increasing our footprint on this planet. This is a very aggressive timeline for revision. We are confident that EPA will not rush the timeline and will fully consider the comments and concerns it receives. We appreciate that EPA granted extensions on the comment deadline for this first draft and we hope that EPA will continue to be flexible as future drafts are released.

BSH contributed to and supports comments prepared and submitted by AHAM proposing EPA and DOE sunset the dishwasher product specification. BSH appreciates the opportunity to submit these additional comments on the ENERGY STAR Product Specification for Residential Dishwashers, Draft 1, Version 7.0 and would be glad to further discuss these matters should you so request.

Respectfully Submitted,

BSH Home Appliances Corporation  
Vice President, Government Relations



Alicia Cafferty