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May 12, 2021

Via Email

Ms. Tanja Crk
Product Manager
ENERGY STAR
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: IBWA Comments on Final Draft of ENERGY STAR 3.0 Specifications for Water Coolers

Ms. Crk:

The International Bottled Water Association (IBWA) appreciates this opportunity to provide feedback on the U.S. Environmental Protection Agency's (EPA) final draft of ENERGY STAR 3.0 specifications for water coolers. The bottled water industry appreciates your willingness to listen to and work with industry partners during this process.

IBWA supports EPA's efforts to create separate categories with different energy use specifications based on the capacity of units in the market. As noted in the EPA second draft on water cooler specifications for ENERGY STAR 3.0, first draft specifications would have excluded large capacity coolers that serve a significant portion of the market in commercial spaces. This differentiation which is included in the second and final draft will provide the industry a better opportunity to meet the customer demand for ENERGY STAR certified products. In addition, as customers have come to expect a certain level of performance from their water coolers, this differentiation will help ensure that customers continue to value the ENERGY STAR brand and seek to include these coolers in their homes and offices across the country.

IBWA supports the inclusion of separate energy-use specifications for high- and low- capacity coolers. IBWA appreciates EPA's understanding of this concern and fully supports the final draft specifications of 0.80 kWh/day for high-capacity coolers and 0.68 kWh/day for low-capacity coolers. This will help ensure that EPA ENERGY STAR specifications push manufacturers to improve the energy efficiency of their products while still meeting consumer preference. In this same vein, IBWA strongly supports language included in the final draft changing the 0.61 gallons per hour (GPH) capacity to 0.50 GPH. As noted in the final draft, this aligns with other industry standards.

IBWA members continue to have concerns regarding the definition of high- and low-capacity cold water coolers. Specifically, the final draft defines high-capacity cold water coolers as those offering more than 0.50 GPH and low-capacity coolers as those offering 0.50 GPH or less. IBWA suggested in comments submitted on the second draft that high-capacity cold water coolers be defined as offering water at or above 0.50 GPH, and low-capacity cold water coolers include those with output below 0.50 GPH. If this were to remain in place as described in the final draft, it would represent a shift in how the industry has operated in the past. This shift would likely limit the market volume of coolers that will meet new ENERGY STAR 3.0 specifications. We respectfully encourage EPA to revise the definition to reflect that high-capacity cold water coolers should include those at and above 0.50 GPH, and low-capacity coolers should include those below 0.50 GPH.

Thank you again for your efforts to work with the bottled water industry regarding EPA ENERGY STAR 3.0 specification for water coolers. We appreciate your willingness to work with the industry throughout the drafting process.

Sincerely,

A handwritten signature in black ink, appearing to read "Cory Martin", followed by a horizontal line extending to the right.

Cory Martin
Vice President, Government Relations