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June 30, 2022

Submitted to [Kaplan.Katharine@epa.gov](mailto:Kaplan.Katharine@epa.gov); [vokes.kathleen@epa.gov](mailto:vokes.kathleen@epa.gov)

Katherine Kaplan  
Kathleen Vokes  
U.S Environmental Protection Agency (EPA)  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

Re: Request for a delay in the ENERGY STAR® Ovens 3.0  
implementation date

Dear Ms. Kaplan and Ms. Vokes

The North American Association of Food Equipment Manufacturers (NAFEM) requests a six-month delay in the ENERGY STAR Commercial Oven Specification 3.0 implementation deadline to account for supply chain delays and essential testing/validating of critical new components and technology needed to meet the new specification.

Current supply chain delays are causing a lack of availability of critical components, which means that certified new designs meeting the 3.0 specification will not be available in time to meet the January 1, 2023 deadline. Since many state and local jurisdictions require ENERGY STAR certification for installation, customers are ordering products today that may not be available in January.

During normal manufacturing operating conditions, the cycle time for simple design change implementation can range from 6 to 18 months, depending on the complexity of the design change and the parts or components involved.

The timeline for significant design modifications like those in the 3.0 specification, from conceptualization to implementation, includes the following steps: 3-D modeling, software development, ordering sample materials and experimental components, building lab prototypes, lab testing and validation, field testing, new tooling development, placing purchase orders for re-designed production parts and components, receipt of long lead time parts and components, and phasing out the old design while building inventory of the new design.

The global supply chain crisis has adversely impacted the cycle time in two ways. First, industry suppliers have dedicated most, if not all, of their capacity to current production material in response to the post-pandemic recovery and demand surge. This results in suppliers' unwillingness to interrupt production to provide prototype components and samples. Second, quoted lead times from existing suppliers have

increased exponentially *from an average of 1-2 weeks to as much as 20-25 weeks. In some cases, lead times have been quoted to one year or more.*

One such example is silicone, which is the critical base material needed for silicone processor chips/microchips. This presents a direct barrier to implementing enhanced ENERGY STAR requirements because microchips are a vital component of oven controls. Without new and innovative controls, meeting the enhanced requirements within the specified timeframe required to have the ovens certified to the 3.0 requirements will be extremely difficult.

As you know, NAFEM members are strong supporters of the ENERGY STAR program and actively participated in the stakeholder process to update the Commercial Oven Specification. During the development of the 3.0 draft, NAFEM and others raised concerns with the timing of this specification given post-pandemic recovery cycles and supply-chain delays. Those delays have only gotten worse.

NAFEM members continue to struggle to fulfill existing order backlogs while trying to meet the implementation date for Ovens 3.0. Customers are placing commercial oven orders with manufacturers now that may not be delivered until after January 1, 2023. As noted, many of these orders specify ENERGY STAR certification due to local government/jurisdictional requirements. NAFEM members must either decline the orders until they know they can obtain the components to make 3.0-compliant ovens or accept the order and later disappoint and potentially lose a customer when the product is not available.

NAFEM believes a six-month delay is necessary given the state of the supply chain, especially that of microchips, and we appreciate your consideration of this request. We welcome the opportunity to discuss this situation with the ENERGY STAR team at your earliest convenience.

Sincerely,



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