



NRDC Comments on EPA ENERGY STAR's Version 6.0 Final Draft Specification for Residential Dishwashers

April 13, 2015

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.4 million members and activists we respectfully submit the following comments on the EPA ENERGY STAR Version 6.0 Final Draft Specification for Residential Dishwashers.

NRDC is pleased that EPA is updating the dishwasher specification and generally supports the proposed criteria. NRDC supports EPA's effort to update the ENERGY STAR specification for dishwashers, given the availability of higher efficiency products on the market and the opportunity to increase energy and water savings. According to the Version 6.0 Final Draft cover letter, standard residential ENERGY STAR dishwashers would use 12% less energy and 25% less water than those just meeting the minimum federal efficiency standards. Compact ENERGY STAR dishwashers would use 9% less energy and 11% less water than those just meeting the minimum federal efficiency standards.

NRDC continues to emphasize the importance of cleaning performance; while EPA encourages cleaning performance reporting, NRDC believes this reporting should be mandatory. NRDC strongly supports testing cleaning performance to ensure that all new Energy Star-labeled dishwashers continue to perform their essential functions at levels that maintain customer satisfaction. In Draft 1, EPA had proposed the mandatory reporting of cleanability test results, and we still believe this to be the right approach. Without sufficient data on cleaning performance, it is likely that the ENERGY STAR program for dishwashers will need to eventually sunset, as it will be difficult to update the specification further if cleanability is not ensured. This would be counter to both consumer and manufacturer interests, and so we continue to emphasize the need to make reporting of cleaning performance test results mandatory as soon as possible, so that cleaning performance requirements can be considered when the specification is next updated.

Thank you for the opportunity to submit these comments.

Sincerely,

Elizabeth Noll
Energy Efficiency Advocate

Edward R. Osann
Senior Policy Analyst