



Sent by e-mail to appliances@energystar.gov

June 30, 2022

Ms. Ga-Young Park
Product Manager for Appliances
ENERGY STAR Labeled Products
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC, 20004

Re: ENERGY STAR Residential Dishwasher Version 7.0 Final Draft Specification

Dear Ms. Park:

Samsung Electronics America, Inc. (“Samsung”) respectfully submits the following comments on the ENERGY STAR Residential Dishwasher Version 7.0 Final Draft Specification.

Samsung is one of the leading home appliance brands in the U.S. and we are committed to providing energy efficient products to U.S. consumers. Samsung has won the ENERGY STAR Partner of the Year Award for Sustained Excellence nine times, including in 2022, and in 2021 we won the ENERGY STAR Corporate Commitment Award – a rare and distinguished recognition. Samsung has also won several ENERGY STAR Emerging Technology Awards, including the 2021 Award for Induction Cooking Tops, 2020 Award for Advanced Adaptive Compressors, 2017 Award for Innovative Refrigerant Systems, and 2013 Award for Advanced Clothes Dryers.

I. Basic Functionality and Minimum Cleaning are Essential for ENERGY STAR Dishwashers

Samsung applauds EPA’s decision to maintain per-cycle cleaning in the testing requirements and a required minimum cleaning threshold to qualify for ENERGY STAR certification. Samsung agrees that requiring a minimum level of cleaning functionality in the tested mode of operation is essential to protect and enhance an ENERGY STAR certified product’s basic function, which is aligned with ENERGY STAR’s guiding principles.¹ We support EPA’s cleaning index threshold value of 65 to align with DOE’s proposed cleaning index.

¹ See ENERGY STAR® Products Program, Strategic Vision and Guiding Principles, May 14, 2012, p. 3

II. EPA Should Continue to Consider Adding an Extra Heavy Soiling Level in Future Versions to Encourage Consumers Not To Pre-rinse

Samsung appreciates EPA's openness to raising awareness of the environmental benefits of using dishwashers over handwashing, educating consumers on the need to "scrape, not rinse," and informing consumers on the best ways to load a dishwasher. In parallel with consumer awareness, Samsung recommends that EPA continue to consider updating soil loads that do not assume pre-rinsing by introducing an extra-heavy soil load that match the best practice of scraping food off the plates rather than testing only with the soil levels one would find after pre-rinsing dishes with water.

III. The ENERGY STAR Dishwasher Category Remains Important and Continues to Help Consumers Save Money on Energy

Samsung agrees with EPA that the consistently high annual market share of ENERGY STAR certified dishwashers indicates the significance that consumers, and thereby manufacturers, continue to place on the ENERGY STAR label on dishwashers. ENERGY STAR continues to be a top driver of consumer purchasing decisions for dishwashers. The ENERGY STAR dishwasher category is important to Samsung, the marketplace, and consumers and therefore, we recommend that it be implemented in a robust way through continuous improvement. ENERGY STAR offers value to consumers by providing a way to identify energy efficient products and offering other useful energy saving tips on its website. This is why Samsung is proud to support the program. We appreciate EPA's proactive work with stakeholders to maintain the strength of the ENERGY STAR program through brand awareness and continuous development of specifications.

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Samsung appreciates the opportunity to comment on EPA's ENERGY STAR Residential Dishwasher Version 7.0 Final Draft Specification. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

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