



Sent by e-mail to appliances@energystar.gov

February 24, 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 Draft 2 Specification

Dear Ms. Park:

Samsung Electronics America, Inc. (“Samsung”) respectfully submits the following comments on the ENERGY STAR Residential Dishwasher Version 7.0 Draft 2 Specification (“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 eight times, including the ENERGY STAR Corporate Commitment Award in 2021 – a recognition that was last granted nine years ago. 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 strongly supports EPA’s proposal to include per cycle cleaning in the testing requirements and a required minimum cleaning threshold to qualify for ENERGY STAR certification. We support EPA’s proposed cleaning index threshold value of 65. Samsung agrees that requiring a minimum level of cleaning functionality is essential to protect and enhance an ENERGY STAR certified product’s basic function, which is aligned with ENERGY STAR’s guiding principles.¹ As we have previously shared in comments regarding draft specifications for other product categories, Samsung believes consumers must be able to trust that the ENERGY STAR brand signifies energy efficiency without compromising product performance. This is especially important for those consumers who want innovative products that perform their basic function effectively while saving energy and water. In particular, the modes of

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

operation in which appliances are tested – generally, the default mode – should perform at a minimum level of acceptable functionality, or else consumers may be dissatisfied and instead use more energy and water intensive modes, unknowingly sacrificing energy efficiency. Samsung believes the Draft 2 Specification will deter product configurations from achieving efficiency by compromising on performance in the tested mode.

II. EPA Should Consider Adding an Extra Heavy Soiling Level in the Test Procedure to Encourage Consumers Not To Pre-rinse

Samsung maintains that pre-rinsing drastically increases the water and energy use beyond what the dishwasher uses and what the test procedure measures today. The 2021 Lawrence Berkeley National Laboratory (LBNL) survey shows that 55 percent of respondents still pre-rinse dishes before loading them into the dishwasher.² Samsung believes the consumer advocacy by dishwasher manufacturers, consumer advocates, detergent manufacturers and the EPA to educate consumers against pre-rinsing would only be successful if consumers believe their dishwasher will provide satisfactory cleaning without pre-rinsing. To that end, Samsung recommends that EPA consider updating soil loads that do not assume pre-rinsing by introducing extra heavy soil load that match the best practice of scraping foods off the plates rather than 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. Samsung appreciates EPA's Guiding Principles, which state that, "As a general rule, product specifications will be reviewed for possible revision at least once every three years or when the market share of qualified products reaches about 35%." Therefore, we applaud EPA's proposal to revise the specification and the minimum energy and water efficiency requirements in the Draft 2 Specification.

ENERGY STAR is 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. 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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² Dishwashers in the Residential Sector: A Survey of Product Characteristics, Usage, and Consumer Preferences <https://doi.org/10.2172/1827934>

Samsung appreciates the opportunity to comment on EPA's ENERGY STAR Residential Dishwasher Version 7.0 Draft 2 Specification. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

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