

International Bottled Water Association (IBWA) Comments on the
Stage 1 Draft ENERGY STAR Water Cooler Test Procedure

1. There are some concerns about the potential costs attributed to the elaborate test procedure you are proposing, in particular because of extensive lab time that may be required. Those costs may be substantial considering that, as we understand it, all new products will need to go through the third party testing and all certified product will be re-tested every 3 years.

2. If Congressional energy efficiency legislation under consideration that includes water cooler testing requirements based on ENERGY STAR is enacted, a now "voluntary" testing cost for water cooler manufacturers that choose to be ENERGY STAR compliant will become mandatory for all manufacturers. This does not change IBWA's support of the federal legislation, but does raise concerns/questions about taking away testing choice and having new products be able to support the cost of the new testing program with volume in order to be able to afford to bring product into the market.

I hope this and the information my member companies have provided to you directly is helpful, but please do not hesitate to contact me with any related concerns or questions.

Thanks much for your consideration.