

Please accept these comments on behalf of the Natural Resources Defense Council regarding Draft 2, ENERGY STAR Test Method for Determining Residential Dishwasher Cleaning Performance.

We support the adoption of a test method for cleaning performance for Energy Star-labeled dishwashers.

We question the proposed specification for detergent in the cleaning performance test, which incorporates by reference the detergent specification in the DOE energy and water test procedure in 10 CFR Part 430. The purpose of the cleaning performance test is to ensure that products that meet future iterations of Energy Star energy and water performance criteria will also deliver cleaning performance that is satisfactory to consumers. The detergent specified in the energy and water test is a powder, even though the majority of consumers have abandoned powder in favor of gels and monodose packets during the past decade. It is important that the cleanability test replicate consumer useage. We note that a similar rationale has been provided for the inclusion of criteria for water hardness for the cleaning performance test even though no such criteria exist in the energy and water test, namely, that hard water is a prevailing condition of usage for consumers in many parts of the country. We understand that manufacturers would prefer that the same test runs produce results for both tests, although even on this point, Draft 2 proposes that cleaning performance and energy and water tests be run sequentially, rather than concurrently, for non-soil sensing dishwashers. On balance, we believe that the cleaning performance test should be performed with detergent that most consumers are likely to use. For that reason, we believe that Energy Star should reconsider the specification of a powder detergent for the cleaning performance test.

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