

Brussels, may 26th 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C.
20460

Object: Indesit comments on the decision to remove the Energy Star logo from combination washer and dryers

Dear Sirs,

We thank you for the opportunity to comment on the notification sent by you on May 14th 2010 on Energy Star regulations on combination washer and dryers.

We would like to comment on both the content and timing of this provision. First and foremost we believe the provision will be to the detriment of the complete and fair information which is needed for an aware consumer choice; second the short notice of this provision may jeopardize investments on washer and dryer energy efficiency which had already been made by manufacturers.

An informed choice for consumers helps the environment

Consumer have the right of choice, currently those who wish to buy a washer and dryer are given an indication of which model is more energy efficient, this allows them to make an informed choice while helping the environment and fostering technological development. Typical MEFs for combo washer and dryers range from 1,92 to 2,76 with water factor from 3,5 to 7,5; by removing the Energy Star logo, the incentive for achieving the best energy efficiency in combo for washer and dryers will be lost.

Abrupt changes in labeling rules put at risk manufacturers investments

Companies need legal certainties to plan investment and see the planned returns, therefore any change affecting product plans must be announced with due advance time; the change in labeling criteria clearly affects sales volume and price, therefore it is a non planned loss for the industry; government intervention should be limited to cases of proven necessity and in any case at least 1 year time is needed for companies to adapt.

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The DOE energy test standards is appropriate for testing washer and dryers

Washer and dryers share the washing components with the washing machine, the energy test standard for washing machines is suitable to measure the efficiency of washer and dryers. In Australia the washer and dryer energy efficiency rating system is obtained by joining the washer ratings with the dryer ratings.

Ratings in Place for Dishwashers

In the North American market the dishwasher is Energy Star rated although it does provide both a wash and a drying function. Is there any way to adapt some of the regulations that are used in those circumstances to meet those of a washer dryer combination unit.

Possible solutions

Coherently with the intent of making information more clear and relevant for consumers, rather than reducing it, there are 2 preferred solutions, which we would like to suggest:

- The Energy Star logo could have an indication specifying “washer”.
- Since vented washer and dryer bear separate EnergyGuide labels for the washing and drying part: the Energy Star logo could be included in the washer EnergyGuide. This solution would require no change to the current graphics and does not pose any risk of misunderstanding

We hope you can take into consideration our remarks and preferred alternative solutions,

Best regards,



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