



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

May 14, 2010

Dear ENERGY STAR® Residential Clothes Washer Partner or Other Interested Party:

As you may be aware, the ENERGY STAR program currently includes specifications for residential clothes washers, but not for clothes dryers. There are a small number of combination washer-dryers on the ENERGY STAR qualified product list, qualified based on the residential clothes washing requirements only. Consistent with our ongoing commitment to maintain the integrity of the ENERGY STAR label, EPA intends to discontinue the qualification of combination washer-dryers under the residential clothes washer specification. This letter presents our reasons for issuing this clarification, proposes a schedule for implementing the change and provides stakeholders an opportunity to comment.

In the absence of an ENERGY STAR performance specification for residential clothes dryers, EPA has concluded it is inappropriate to associate the ENERGY STAR label with combination washer-dryers for the following reasons:

1. A combination washer-dryer is functionally different from a clothes washer because it dries clothes as well. Any designation of top performers should be based on a comparison among combination washer-dryers, not to products that only perform clothes washing.
2. Without performance requirements for the drying function, the ENERGY STAR label on a combination washer-dryer does not deliver on its promise in terms of the overall efficiency of the unit, as the dryer energy use is not measured.
3. An average consumer, seeing a labeled product, would naturally assume that the entire product is qualified. There is no way for a consumer to easily distinguish that the ENERGY STAR label on a combination washer-dryer is for the “washing” component only.

The table below provides a proposed schedule for implementing this program clarification.

Change	Effective Date
EPA will no longer accept new qualifying combination clothes washer-dryers to qualify under the clothes washer program requirements.	June 11
Manufacturers must discontinue use of the ENERGY STAR name and mark on product literature, product packaging, and the manufacturer’s web site. (i.e., manufacturers may not apply the mark to products manufactured on or after June 11. EPA understands that existing stock produced prior to June 11 will bear the ENERGY STAR mark as it moves through the distribution channel).	June 11
EPA will remove combination washer-dryers from the qualified product list.	June 11

EPA requests feedback on this proposal by Friday, May 25, 2010. Please send comments to Taddonio.Kristen@epa.gov. On Tuesday, May 29, 2010, EPA will provide stakeholders with a final notice regarding this proposed program clarification.

EPA is open to establishing a separate category for combination washer-dryers in the future if there is sufficient energy savings potential. The Department of Energy has recently proposed an amendment to 10 CRF 430.2 to establish test procedures for vent-less clothes dryers, including combination washer-dryers.¹ EPA believes that this test, when finalized, could allow for comparisons between the energy consumption of different combination washer-dryers available on the market. EPA welcomes feedback on whether other test procedures exist today that could be used to compare the energy consumption of different combination washer-dryers.

Thank your support of the ENERGY STAR program and your shared interest in protecting the integrity of this consumer brand. Please feel free to contact Kristen Taddonio at Taddonio.Kristen@epa.gov with questions.

Sincerely,

A handwritten signature in cursive script that reads "Katharine Kaplan".

Katharine Kaplan
Energy Star Product Development
US Environmental Protection Agency

¹ www1.eere.energy.gov/buildings/appliance_standards/residential/clothes_dryers.html