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TESTIMONY

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On Behalf of
The Association of Home Appliance Manufacturers

Before the Maryland Senate Committee on
Education, Health, and Environmental Affairs

HEARING

SB 418
Relating to Energy and Water Efficiency Standards

February 10, 2021

Chair Pinsky, Vice Chair Kagan, and members of the Committee, the **Association of Home Appliance Manufacturers (AHAM) strongly urges the committee to oppose SB 418**, an act concerning appliance efficiency standards. Although AHAM understands the bill's intent to save energy, the legislation has a number of problems relating to home appliances that need to be addressed.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members support more than one million jobs, have a \$198 billion economic impact, and produce more than 95% of the household appliances shipped for sale. In Maryland, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Maryland is \$1.2 billion, nearly 8,000 direct and indirect jobs, \$194.1 million in state tax revenue and more than \$426.6 million in wages. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection. The purchase of new appliances often represents the most effective choice a consumer can make to reduce home energy use and costs.

SB 418 will restrict the availability of air cleaners/purifiers in Maryland and effectively remove approximately 60% of air cleaners from the shelves. No other state has created this type of standard for air cleaners, and for very good reason. In 2004, California was considering energy standards for air cleaners and reversed course after careful consideration and input from industry. Please find the attached report by AHAM on this issue, which outlines the reasons why energy standards for air cleaners are not appropriate.

Maryland consumers will be faced with fewer options at higher cost, potentially putting them out of reach for lower-income residents. Air cleaners/purifiers are a critical tool in the fight against COVID-19, asthma, allergies, and other health risks. Now, especially for people with health concerns, is the exact wrong time to limit the availability of the lower cost products by setting unnecessarily strict requirements with a product people depend on for their health at home.

The legislation also completely undercuts the very purpose of the ENERGY STAR program, which has successfully created a label designating the more efficient products in the marketplace. For air cleaners/purifiers, SB 418 points to an old Energy Star version, making it difficult to identify which products meet the levels. ENERGY STAR had an October 2020 effectivity date for revision 2.0 on air cleaners. Even with this new version, ENERGY STAR standards are not intended to serve as a minimum, but are a goal for companies to strive towards by maximizing a product's efficiency. The ENERGY STAR label designation informs the consumer about the more efficient products that are available. ENERGY STAR never was and never should be used as a mandatory minimum. Furthermore, the bill sets levels that are based on smoke CADR (Clean Air Delivery Rate). The current version sets a CADR/Watt based on dust, not smoke. The implications of this bill's standard level is based on no justification or understanding of the marketplace.

Clean Air Delivery Rate (CADR)

CADR indicates the volume of filtered air delivered by an air cleaner. The higher the tobacco smoke, pollen and dust numbers, the faster the unit cleans the air in the room. The AHAM label (below) is found on the packaging of more than 15 million air cleaners shipped per year and lists the three CADR particulate reduction numbers — one for tobacco smoke, one for pollen and one for dust. But even more importantly, this label indicates the suggested room size, as tested, that is appropriate for the consumer, avoiding the tendency to just buy bigger and bigger units. This rating system, which indicates performance at the most efficient room size, greatly advantages the people with limited financial resources.



AHAM's Verifide program provides a uniform and practical verification of energy, volume and certain performance criteria for each product, with an independent laboratory performing the verification testing. AHAM is recognized by the EPA as a Certification Body and is approved to administer verification testing for purposes of the ENERGY STAR program. Manufacturers that participate in the programs are identified by the AHAM Verifide Mark (see below) that appears on the product packaging or rating label.



For purchasing the right air cleaner, a person can easily find the AHAM suggested room size noted prominently on the label. This suggested sizing should match the size of the room the consumer is trying to clean. Air cleaners today exist across the full range of CADR. If the CADR rating, which is directly linked to performance and room size, is limited based on wattage as a result of this bill, it will likely cause customers to buy multiple or bigger air cleaners to obtain the performance they were trying to achieve. The reason for this is because any air cleaner first and foremost has to move air across a filter to clean it. The denser the filters, the more watts

are needed to move the air through the filtration system. In order to reduce the wattage of the fan/motor system, the filters could be made either less dense or move less air. For example, an optimal air cleaner for a small bedroom for a child that is 10 x 10 feet, or 100 square feet; is a unit with a smoke CADR of 65. In order to be ENERGY STAR in that small size, the product's wattage would be limited to half the dust CADR. If the dust CADR were 65 then the product would be limited to 32 watts. On 120 volts power, that means it would have to operate at less than 1/4 of an amp. That is not many amps to move air through a filter.

The electricity cost for the needed wattage is very low for the important health benefits. For example, if one unit used 100 watts and another used 40 watts, and even assuming it runs 12 hours a day, 365 days a year, the energy difference is only 263 kWh/year or \$2.77/month.

As leaders in energy efficiency and active participants in efficiency matters before the U.S. Department of Energy, AHAM is opposed the bill's language authorizing the Maryland Energy Administration to adopt rules to enforce minimum efficiency standards for certain products and establish or amend appliance efficiency standards. Under federal law, manufacturers have three years to comply with regulations, which allows for redesign, retooling of factories, pilot product testing, safety testing, and many other requirements to ensure the product is ready for the market. Technical standards such as these are very costly to develop and the Maryland legislature should consider whether it is economically feasible for the Energy Administration to absorb these costs.

Conclusion

AHAM appreciates the opportunity to provide comments on SB 418 and strongly urges the Education, Health, and Environmental Affairs Committee to oppose the bill. The goal of saving energy is important but should not be considered irrespective of other consequences, such as impacts to healthy indoor air quality and the products' availability to lower income and disadvantaged populations. AHAM strongly urges you to reconsider this bill for the reasons set forth in this testimony. For future reference, my contact information is (202) 202.872.5955 x327 or via electronic mail at jcassady@aham.org.