



Comments of the Regulatory Action Center

RE: [Short-cycle product classes for residential dishwashers, residential clothes washers, and consumer clothes dryers](#)

Document ID: EERE-2021-BT-STD-0002

October 12, 2021

The Regulatory Action Center at FreedomWorks Foundation is dedicated to educating Americans about the impact of government regulations on economic prosperity and individual liberty. FreedomWorks Foundation is committed to lowering the barrier between millions of FreedomWorks citizen activists and the rulemaking process of government agencies to which they are entitled to contribute.

On behalf of our activists nationwide, FreedomWorks Foundation appreciates the opportunity to offer these comments opposing the proposed rule concerning short-cycle product classes for residential dishwashers, clothes washers, and clothes dryers. This comment mentions only dishwashers, but the same arguments apply to washers and dryers.

In its Notice of Proposed Rulemaking, DOE wants to eliminate the faster class of dishwashers--those designed to thoroughly wash and dry dishes in an hour--that the Trump Administration made possible by reversing an Obama Administration rule limiting the water and electricity dishwashers could use. These limits forced manufacturers to extend the cycle to wash and dry dishes to more than two hours--and generally, dishes were neither clean nor dry even after that long.

The Obama Administration's 2018 regulation severely hampered dishwashers' utility by limiting the amount of water and power they could use. Consumers purchasing these new dishwashers were extremely dissatisfied; they had to either wash dishes by hand or run the dishwasher several cycles to get clean dishes. This resulted in more energy and water consumption than the old dishwashers used.

The Biden Administration's DOE now claims that the 2020 Trump DOE rule is illegal under the EPCA--an argument the statute's language plainly contradicts--and seeks to return to the old rule that allows only mediocre dishwashers. The EPCA explicitly requires DOE to consider whether a "performance-related feature justifies the establishment of a higher or lower standard." In the Trump Administration, the DOE determined that a new class of dishwasher--one that could clean and dry dishes in an hour--was such a "performance-related feature" that justified creation of a



standard that allowed use of more energy and water. The thousands of consumers who took the time to file comments in support of this new class of dishwasher clearly agreed.

Americans have busy lives--many of us are raising children while working full-time--and appliances that make our daily tasks easier are critical for maintaining a household. The Obama/Biden dishwasher rule shows just how little the left cares about our daily concerns. And in the name of "environmentalism," the Obama/Biden rule wastes more water and electricity than did older dishwashers by requiring several cycles or hand-washing to get dishes clean. This is ironic indeed--and makes a mockery of regulating in the public interest.

Respectfully submitted,

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