

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



OFFICE OF
AIR AND RADIATION

June 26, 2007

Dear ENERGY STAR[®] Solid Door Refrigerator and Freezer Partner,

Over the last few months, the Environmental Protection Agency (EPA) has received a number of inquiries about the types of products that can qualify under the current ENERGY STAR Specification for Commercial Solid Door Refrigerators and Freezers. In addition, ENERGY STAR representatives identified a number instances of improper use of the ENERGY STAR mark during the National Restaurant Association (NRA) Show in May 2007, indicating that confusion exists in the marketplace as to what can qualify as ENERGY STAR.

ENERGY STAR is a registered mark of EPA and the Agency protects our right to use the mark by enforcing its appropriate use on product, product packaging, advertisements, marketing materials, and the Internet.

The purpose of this memo is several-fold: 1) to clarify what product types are eligible for ENERGY STAR qualification under this specification, including a specific clarification regarding undercounter units with worktops; 2) to strongly recommend that Partners revisit their ENERGY STAR logo use to ensure it is proper; 3) to outline the action steps EPA will take when improper logo use is identified; 4) to remind Partners of their commitment to provide annual updates to the qualified products list; and 5) to provide an update on the revision process for this specification.

Equipment Eligible for ENERGY STAR Qualification

As defined in the current specification, the following types of commercial solid door refrigerators, freezers, and refrigerator-freezers may qualify for ENERGY STAR:

- **Reach-in Cabinet:** An upright commercial, self-contained refrigeration cabinet with hinged, solid doors but excluding undercounter, roll-in, roll-through, or pass-through cabinets.
- **Undercounter Cabinet:** An upright commercial, self-contained refrigeration cabinet without a worktop surface which has hinged, solid doors and which is intended for installation under a counter. (See clarification below regarding worktop surfaces.)
- **Roll-in or Roll-through Cabinet:** An upright, self-contained commercial refrigeration cabinet with hinged, solid doors that allows wheeled racks of product to be rolled into or through the refrigerator or freezer.

- **Pass-through Cabinet:** An upright commercial, self-contained refrigeration cabinet with hinged, solid doors on both the front and rear of the refrigerator or freezer.

If the product does not meet all of the characteristics provided in these definitions then it cannot qualify as ENERGY STAR. In particular, the following products are NOT eligible and should NOT be labeled: glass door, sliding door, and drawer units; direct-draw or keg dispensing units; and preparation table units. Manufacturers with questions about whether their products meet the definitions above can contact ENERGY STAR at commercialfoodservice@icfi.com.

Undercounter Cabinets with Worktops As defined above, undercounter cabinets are eligible for qualification only if the unit comes without a worktop surface. EPA's intention in including this requirement was to exclude equipment also designed to heat or cool food on top of the unit, such as in the case of preparation tables. At the time this specification was written, it was EPA's understanding that the term "worktop" indicated that the unit had a preparation table surface that would add to the total energy consumption of the unit. However, EPA has received a number of requests to allow undercounter cabinets with stainless steel or other worktops, which do not add to the total energy consumption of the unit, to qualify for ENERGY STAR.

After considering these requests, EPA has decided to allow undercounter cabinets with worktop surfaces to qualify for ENERGY STAR provided that the worktop surface does not affect the energy consumption of the unit. Therefore the following change has been made to Section 2 of the current specification regarding undercounter cabinets:

Undercounter Cabinet: An upright commercial, self-contained refrigeration cabinet with or without a worktop surface (see definition in Section 1) which has hinged, solid doors. In the case where the unit does not have a worktop surface, the unit is intended for installation under a counter. In the case where the unit has a worktop surface, this surface may not add to the total energy consumption of the unit. Preparation tables are not eligible for ENERGY STAR qualification under this specification.

In addition, the following definition for worktop surface has been added to Section 1 of the existing specification:

Worktop surface: A solid working surface and backsplash. The working surface may be a cutting board, a stainless steel work surface, or a stone slab.

Use of the ENERGY STAR Label

Based on the clarification provided above regarding which product models may qualify for ENERGY STAR, Partners are strongly encouraged to revisit their existing product lines to ensure conformance with the definitions provided above. EPA is in the process of revisiting the current ENERGY STAR qualified product list to identify equipment that fails to meet the requirements of the current specification. If it is discovered that

equipment is improperly labeled, EPA will send a formal communication requiring that the Partner cease using the ENERGY STAR mark for the equipment in question and take steps to remove the label from product in the distribution chain. Failure to appropriately address mislabeling can result in termination of the ENERGY STAR partnership.

Equipment with a la carte Options: Manufacturers that offer equipment with multiple door-type options must make it clear in all specification sheets and other marketing materials that only options that meet Section 2 of the specification may qualify for ENERGY STAR.

Reminder Regarding Partner Commitments

When manufacturers became ENERGY STAR Partners by signing the ENERGY STAR Partnership Agreement, they agreed to abide by several Partner Commitments. In particular, Partners agreed to provide annual updates to the ENERGY STAR qualifying product list. These annual updates allow EPA to provide accurate information to potential purchasers and ensure that the Agency is made aware of any models that have been discontinued. After much effort, EPA recently identified a significant number of discontinued models on the ENERGY STAR qualifying product list that have since been removed. Manufacturers are strongly encouraged to review the ENERGY STAR qualifying product list for commercial solid door refrigerators and freezers (at www.energystar.gov) and submit any additional updates to commercialfoodservice@icfi.com as soon as possible. Please note that Partners are also required to do this in each subsequent year.

Specification Revision Update

In the course of revisiting the ENERGY STAR specification for commercial solid door refrigerators and freezers, EPA is considering expanding the specification to include other product types, such as units with glass doors, sliding doors, and drawers, which are currently ineligible for qualification. Over the next few months manufacturers are encouraged to send information and energy consumption data (kWh/day) to Bijit Kundu, ICF International, at bkundu@icfi.com for consideration during the specification revision process.

If you have any questions or concerns about this letter and the clarifications it contains, please contact Bijit Kundu at (202) 862-1157 and bkundu@icfi.com. Thank you for your continued support of ENERGY STAR.

Sincerely,



Ann Bailey
Director ENERGY STAR Product Labeling
US EPA