

AWE WaterSense® Comments Factsheet

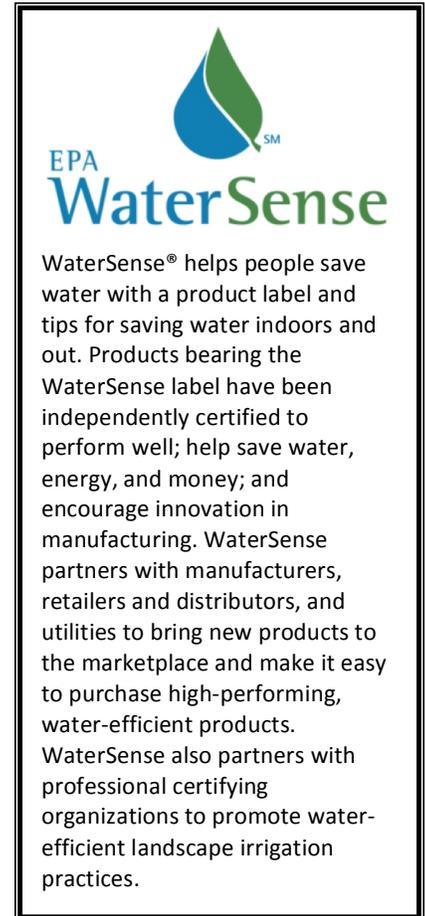


WaterSense is a voluntary partnership program of the U.S. EPA with the goal of protecting the future of the U.S. water supply. By promoting and enhancing the market for water-efficient products and services, WaterSense makes every drop count by leveraging relationships with key utility, manufacturer and retail partners across the U.S.

The Alliance of Water Efficiency (AWE) urges you to share your strong support for the WaterSense program with the Environmental Protection Administration (EPA). Please submit written comments regarding WaterSense in response to the Notice of Recent Specifications Review and Request for Information on the WaterSense Program published on April 10, 2020 in the Federal Register. Here are a few things to include:

EPA should not include customer satisfaction criteria in the WaterSense product specifications and guidelines

- Customer satisfaction criteria do not belong in WaterSense product specifications themselves, but there are reasonable uses for customer satisfaction information within WaterSense.
- Since its inception in 2006, WaterSense has sought to base its product specifications on measured values of performance that are tested in a laboratory and certified by a third-party certifying organization.
- A fundamental adherence to measured performance has provided a level playing field for manufacturers who produce WaterSense products since 2006. The playing field is level because the measured requirement of each specification is uniformly understood by product manufacturers.
- Including a vague, non-scientific concept such as customer satisfaction criteria could introduce uncertainty and bias into what has until now been a fair and scientific process for setting WaterSense specifications.
- Product-specific customer satisfaction research is best left to the marketplace and manufacturers themselves. Product manufacturers conduct customer satisfaction research frequently and keep the results to themselves so they can use it strategically to develop their products and brand to competitive advantage.



What are proper uses of customer satisfaction research for WaterSense?

- The scope of customer satisfaction research should be limited to consideration of the WaterSense brand itself and WaterSense partnerships, like the type of customer satisfaction research ENERGY STAR has conducted in the past.
- Proper uses of customer satisfaction survey results would inform the EPA about Americans' opinion of the WaterSense brand and their experience with WaterSense labeled products in homes and businesses. This information could help EPA guide the direction of the WaterSense brand and program.

What information, data, surveys, and studies are available to help assess customer satisfaction with WaterSense labeled products?

- Fixture performance has improved since the advent of WaterSense.
- WaterSense fuels **innovation in American manufacturing** and is strongly supported by the plumbing and irrigation industries. WaterSense performance standards and independent certifying process helps start-ups get to market more quickly and helps companies differentiate their products in the marketplace.
- **More than 2,000** manufacturers, retailers and distributors, water and energy utilities, state and local government, non-profit and trade organizations, irrigation training organizations, and home builders strengthen their businesses through partnerships with WaterSense.

EPA's recent review of the WaterSense program.

- In the April 10 Federal Register notice it states that EPA has made the decision not to revise any WaterSense specifications at this time.
- AWE believes it is important that specifications move forward and advance in the future.
- This decision is acceptable today in 2020 but must be reviewed regularly so that WaterSense products keep up with changing times and technology.

WaterSense Accomplishments since 2006 (as of 2019)

- WaterSense has saved more than **4.4 trillion gallons of water** since 2006. That's nearly the amount of water used by all U.S. households for 6 months!
- WaterSense has saved more than **\$87 billion** in water, sewer and energy bills since 2006.
- With an **annual budget of only \$2 million**, WaterSense produces benefits that far outweigh its costs – strengthening our economy, protecting water for our communities, and helping families maximize their budgets.
- Without WaterSense, **522.9 billion kilowatt-hours of electricity** would not have been saved. That's a year's worth of power to more than 47.7 million American homes.
- The average family spends more than \$1,000 per year in water costs, but can save more than \$380 annually from retrofitting with WaterSense labeled fixtures and ENERGY STAR certified appliances.
- The WaterSense program is a tremendous success for EPA. Public and private utilities in all 50 states tailor successful water conservation programs around consumer use of WaterSense labeled products.

How to File Comments on WaterSense to the Federal Register:

- Letters must contain the reference to by Docket ID No. EPA-HQ-OW-2020-0026
- File your letter at <https://www.regulations.gov/comment?D=EPA-HQ-OW-2020-0026-0001>
- Send a copy to AWE! office@a4we.org