

March 22, 2019

By E-mail: [senka.krsikapa@ontario.ca](mailto:senka.krsikapa@ontario.ca)

Ms. Senka Krsikapa  
Ministry of Energy, Northern Development and Mines  
Conservation and Renewable Energy Division  
77 Grenville St., 5th Floor  
Toronto ON M7A 2C1

**Re: Proposal to amend Ontario's Energy and Water Efficiency Regulation under the Electricity Act, 1998 – ERO Number 013-4675**

The Association of Home Appliance Manufacturers (AHAM) Canada respectfully submits the following comments to the Ontario Ministry of Energy, Northern Development and Mines, proposal to amend Ontario's Energy and Water Efficiency Regulation under the Electricity Act, 1998 – ERO Number 013-4675.

AHAM represents manufacturers of major, portable, floor care home appliances and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In Canada AHAM members employ thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$5 billion annually. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM has been a strong supporter and contributor to the U.S. - Canada Regulatory Cooperation Council (RCC) and the efforts of both NRCAN and the U.S. DOE of aligning energy efficiency standards and test methods for energy-using equipment through enhanced information sharing and implementation efforts. We note that Ontario's energy efficiency standards for household appliances are aligned and harmonized with those of the U.S. DOE.

AHAM also advocated for and was pleased to see Energy Efficiency Standards for Household Appliances added to the Canadian Free Trade Agreement's (CFTA) first Regulatory Reconciliation and Cooperation Table work plan (2018-2019). AHAM is a strong advocate of regulatory alignment between Canada, the provinces and the U.S. for home appliances. An aligned and harmonized regulatory environment is key to providing the best outcome for consumers, retailers, regulators, and manufacturers. The market for home appliances is truly a North American one. Home appliance manufacturers that sell products in Canada and the U.S. are predominantly global companies and generally design and manufacture products to sell in both Canada and the U.S., and not for any specific province or state.

## Battery Chargers and External Power Supplies

The proposed amendment would amend the regulation to allow a prescribed label (i.e. the Certification Body's Energy Efficiency Verification mark) to be placed on either the product or the product's packaging, aligning with federal energy efficiency labelling requirements for battery chargers and external power supplies.

AHAM is supportive of this proposed amendment as it aligns and harmonizes Ontario's Energy Efficiency Verification marking requirements with those of NRCan, thus ensuring that no regulatory misalignment between Ontario and NRCan exists.

Thank you for the opportunity to comment on Ontario's ERO Number 013-4675. We look forward to continuing to work closely with the Ministry of Energy, Northern Development and Mines with respect to the regulation of home appliance products. AHAM will continue to be an active stakeholder and we look forward to future consultations with you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bruce Rebel".

Bruce Rebel  
Vice-President and General Manager