

August 2, 2024

By E-mail

Ms. Tania Donovska, MEng, PMP
Ministry of Energy, Conservation and Renewable Energy
77 Grenville Street, 5th Floor
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Re: AHAM Comments on OME's Proposal to Amend O.Reg. 509/18 under the Electricity Act, 1998 ("Efficiency Regulation"); ERO number 019-8831; Proposal Number 24-ENDM007

Dear Ms. Donovska,

The Association of Home Appliance Manufacturers (AHAM) Canada writes to provide our support for the Ontario Ministry of Energy's (OME) proposal to expand rolling incorporation by reference with NRCan standards for 42 products that are already harmonized with current NRCan requirements (test method, scope, and efficiency requirements), which includes all AHAM products.

As mentioned in the proposal, implementation of rolling incorporation (by reference) will ensure that Ontario's requirements would update automatically when NRCan changes / updates their standards. This will allow home appliance manufacturers to seamlessly continue to be compliant with Ontario energy efficiency regulations as they transition to newer federal and international standards.

Regulatory harmonization is a top priority for AHAM and its members as home appliances are designed for the larger U.S. and Canada markets combined. This larger market drives down costs and increases efficiencies and economies of scale, which benefits consumers. Many home appliance manufacturers that sell products in Ontario are global companies and generally design and manufacture their products for this larger market. Disharmonized efficiency standards between provincial and federal regulatory bodies creates unnecessary burden on companies in the form of double testing, which can jeopardize product availability in the province. Harmonized efficiency standards provide manufacturers the flexibility to design and produce the most technologically advanced and product feature rich appliances for Ontario consumers and not be burdened with divergent regulatory requirements.

Key to the concept of rolling incorporation by reference is that not only will the standards levels and test procedures be aligned, but that they also be on the same timeline as the federal

requirements. It would be counter to the intent of this modern regulatory tool were Ontario's regulations, because of rolling incorporation by reference, to outpace that of the federal regulations. In other words, Ontario should ensure—and we believe this to be consistent with Ontario's intention—that its regulations do not become effective before the federal or U.S. compliance dates for the same standards and test procedures.

We appreciate the opportunity to submit comments to the Ontario Ministry of Energy (OME) and would be glad to discuss these matters in more detail should you request.

Respectfully Submitted,



Kevin Girdharry
Senior Manager, Data & Policy Analysis

About AHAM: AHAM represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in Canada. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives. The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the Canadian economy. In all, the industry drives nearly \$6 billion in economic output throughout Canada and manufactures products with a factory shipment value of more than \$5 billion.