



**General Statement for Public Meeting
Tuesday, November 7, 2023**

**DOE EERE-2017-BT-STD-0007
Energy Conservation Standards for Commercial Refrigerators, Freezers and Refrigerator-
Freezers**

- I am Charlie Souhrada, and I serve as Vice President, Regulatory and Technical Affairs, for the North American Association of Food Equipment Manufacturers, also known as NAFEM.
- NAFEM is a trade association of more than 500 commercial foodservice equipment and supplies manufacturers – a \$14.9 billion industry.
- These businesses, their employees, and the products they manufacture, support the food away from home market – which includes more than one million restaurants in the U.S., colleges and universities, healthcare facilities, prisons, retail operations, schools, and hotels, and countless more operations worldwide.
- Because of this broad scope, NAFEM’s core market was one of the most severely hit from the impacts of COVID-19 and shutdown mandates.
- NAFEM supports, and its members actively seek, opportunities to engage with DOE in the regulatory process to assure certainty and clarity. We do this to help our members manufacture equipment and supplies that consumers need to enjoy food away from home safely.
- NAFEM members include manufacturers of the Commercial Refrigeration Equipment (CRE) that are the subject of this proposed rule. NAFEM has engaged extensively with DOE on this and previous CRE standards rulemakings.
- NAFEM and its members have substantial concerns with the requirements set forth in the proposed CRE rule, which fall into four major categories.
 - First, our analysis shows that the proposal will require NAFEM’s members to attempt to meet energy efficiency standards that are up to 60% more restrictive than current standards, which simply cannot be practically achieved.
 - Second, our analysis indicates that DOE has drastically underestimated the costs that are involved in trying to comply with those proposed standards – costs that will be borne by NAFEM members that manufacture foodservice equipment, by

the foodservice establishments that purchase the products, and ultimately, by consumers themselves.

- Third, DOE has severely overestimated the energy efficiency benefits of its proposed rule. NAFEM members have already taken extraordinary measures, over the last several years, to improve the efficiency of their products, and the proposed rule would not result in major improvements in energy usage. Many benefits that DOE believes will occur here are based on the erroneous assumption that NAFEM's members are not already using these technologies — when, in fact, they are.
- Finally, the proposal does not consider that the actions needed to meet the new standards, or to attempt to meet them, could result in worse food quality and preservation, and therefore could increase food safety-related risks to public health.
- For all these reasons, NAFEM strongly recommends that DOE not issue a new CRE standard at this time. Instead, DOE should continue to require compliance with the current standard, which was issued only six years ago. Under that standard, NAFEM members can continue to take actions to improve energy efficiency of their products, while minimizing additional cost burdens on consumers, in a manner that will fully protect food safety.
- We will provide additional details concerning these issues in written comments that will be submitted to DOE. NAFEM looks forward to continued dialogue with DOE and other stakeholders concerning energy efficiency standards for our members' products. Thank you very much for the opportunity to participate in this process.

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