

August 29, 2026

Jamie Hulan
Senior Director
Equipment and Housing Division
Office of Energy Efficiency
Energy Efficiency and Technology Sector
Environment and Climate Change Canada
580 Booth Street
Ottawa, Ontario, K1A 0E4

Efficiency Canada's Comments for the Consultation on [Canada Gazette, Part I, Volume 160, Number 25: Regulations Amending the Energy Efficiency Regulation, 2016 \(Amendment 19\)](#)



General comment

Thank you for the opportunity to provide feedback on the proposed Amendment 19 to Canada's Energy Efficiency Regulations.

Efficiency Canada is the national voice for energy efficiency. Our mission is to create a sustainable environment and better life for all Canadians by making our country a global leader in energy efficiency policy, technology, and jobs. Efficiency Canada is housed at Carleton University's Sustainable Energy Research Centre, which is located on the traditional unceded territories of the Algonquin nation.

Efficiency Canada supports the Energy Efficiency Regulations being updated to strengthen standards for major home appliances, electric motors, and oil and gas-fired water heaters, and expanded to include air cleaners, computer room air conditioners, gas clothes dryers, E/HRVs, and pool heaters and pump motors.

However, it is concerning that the compliance dates for a significant number of water heater and furnace product categories put forward for harmonization with the U.S. are needlessly delayed – often by several years. The proposed water heater and furnace standards are generally modest improvements; for example, for commercial gas furnaces, a one per cent AFUE improvement. Compliance dates as belated as 2032 would thus stall overdue cost and emissions savings and likely prevent the next few future amendments to the Energy Efficiency Regulations from pursuing more ambitious cost-effective improvements.



Executive summary comment

Efficiency Canada is encouraged by the significant energy, cost, and emissions savings — and the negative cost per tonne of greenhouse emission reduction — that the proposed Amendment 19 to Canada’s Energy Efficiency Regulations would achieve.

Issues comment

Efficiency Canada agrees with the importance and many benefits of energy efficiency.

We are concerned that the failure to exclude the Energy Efficiency Act and associated Regulations from the 2025 Free Trade and Labour Mobility Act and Regulations could create a patchwork of lower provincial efficiency standards considered “comparable” to the federal standards, thereby undermining the benefits of federal Energy Efficiency Regulations.



Description comment

(a) Increase energy savings by introducing products into the Regulations with associated requirements for energy efficiency standards, testing standards, verification, labelling, and provision of information

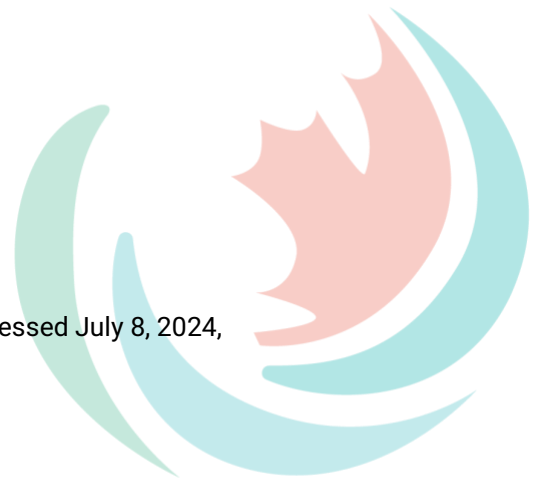
Air cleaners

Efficiency Canada supports the proposed introduction of air cleaners as regulated energy-using products, harmonization of energy efficiency and test standards with those of the United States, and the introduction of EnerGuide labelling requirements for air cleaners.

The U.S. standards for air cleaners were finalized in 2023 from a consensus agreement between energy advocates and manufacturers. They represent energy savings of nine to 40 per cent, depending on the product category, relative to the least efficient models on the market when the standards were established.¹

As air cleaners have gained in popularity and necessity due to the COVID-19 pandemic and air pollution from increasing wildfires, introducing strong minimum energy performance standards (MEPS) for air cleaners in Canada is essential.

¹ "Air Cleaners," ASAP Appliance Standards Awareness Project, accessed July 8, 2024, <https://appliance-standards.org/product/air-cleaners>.



Computer room air conditioners (CRACs)

We support the proposed introduction of CRACs as regulated energy-using products and the harmonization of energy efficiency and test standards with those of the United States.

The current U.S. standard came into effect May 28, 2024, and is equivalent to the American Society of Heating, Refrigerating and Air-Conditioning Engineers Standard 90.1-2019.² The standard also introduced a new cooling energy efficiency metric, the net sensible coefficient of performance (NSenCOP), which is expressed as the net sensible cooling capacity (kW) divided by the power input (kW).³

Strong efficiency standards for CRACs are essential given the increasing number and size of data centres in Canada, due in part to the rise of cloud computing, artificial intelligence, and machine learning.⁴

² U.S. Department of Energy, "Energy Conservation Program: Standards for Computer Room Air Conditioners; Final Rule," Regulations.gov, June 2, 2023, <https://www.regulations.gov/document/EERE-2020-BT-STD-0008-0015>.

³ "Computer Room Air Conditioners," ASAP | Appliance Standards Awareness Project, accessed July 8, 2024, <https://appliance-standards.org/product/computer-room-air-conditioners>.

⁴ "Canada | Data Center Market Overview," Cloudscene, accessed July 8, 2024, <https://cloudscene.com/market/data-centers-in-canada/all#>; Business Wire, "Canada Data Center Market Investment Analysis Report 2024: Investments of \$9.04 Billion by 2029, Growing at a CAGR of 10.26% during 2023-2029," Financial Post, March 1, 2024, <https://financialpost.com/pmn/business-wire-news-releases-pmn/canada-data-center-market-investment-analysis-report-2024-investments-of-9-04-billion-by-2029-growing-at-a-cagr-of-10-26-during-2023-2029-researchandmarkets-com>; Danny Kucharsky, "Canada's Data Centre Market to Grow 'in a Big Way': Cologix President," accessed July 8, 2024, <https://renx.ca/canadas-data-centre-market-to-grow-in-a-big-way-cologix-president>.

Gas clothes dryers

We support the proposed introduction of gas clothes dryers as regulated energy-using products, harmonization of energy efficiency and test standards with those of the United States, and the introduction of EnerGuide labelling requirements for gas clothes dryers.

The U.S. DOE estimates that adopting these MEPS would yield a simple payback period of 1.9 years for standard-sized consumer gas clothes dryers,⁵ compared to their average lifespan of 10–15 years,⁶ suggesting significant cost savings for households. The proposed Appendix D2 test standard would also more accurately reflect actual energy usage and reduce the likelihood of overdrying, which can shrink and/or damage clothing. All 166 ENERGY STAR®-certified standard-size gas clothes dryers currently on the Canadian market would be compliant with the proposed MEPS.⁷

⁵ U.S. Department of Energy, “Energy Conservation Program: Energy Conservation Standards for Consumer Clothes Dryers; Direct Final Rule,” Regulations.Gov, March 12, 2024, <https://www.regulations.gov/document/EERE-2014-BT-STD-0058-0063>.

⁶ Rebekah Henderson, “How Long Do Dryers Last? 5 Signs It’s Time to Replace,” The Spruce, June 19, 2024, <https://www.thespruce.com/how-long-do-dryers-last-8660890>.

⁷ Sarah Riddell, *Benchmarking Canadian Minimum Energy Performance Standards for Appliances and Equipment* (Efficiency Canada, Carleton University, 2026), <https://www.efficiencycanada.org/benchmarking-report/>.

Pool products

Efficiency Canada supports the proposed introduction of electric and gas pool heaters and pool pump motors as regulated energy-using products, the harmonization of energy efficiency and test standards with those of the United States, and the introduction of EnerGuide labelling for pool heaters.

The electric pool heater standard would effectively require heat-pump-level performance.⁸ The proposed standards are estimated to produce more than 240 PJ of cumulative energy savings by 2050 and a cumulative benefit of over \$9 billion (2024) for Canadians.⁹

(b) Increase energy savings by expanding the scope, introducing, or updating energy efficiency and testing standards of some currently regulated products

Battery chargers

Efficiency Canada supports the proposed expansion of the scope of battery chargers covered to include uninterruptible power supplies (UPS) and to harmonize energy efficiency and test standards with those of the U.S. DOE.

⁸ U.S Department of Energy, “Energy Conservation Program: Energy Conservation Standards for Consumer Pool Heaters; Final Rule,” Regulations.gov, May 30, 2023, <https://www.regulations.gov/document/EERE-2021-BT-STD-0020-0026>.

⁹ Natural Resources Canada, “Amendment 19 Cost-Benefit Analysis Report Appendix,” 2026.

The U.S. standards came into effect Jan. 10, 2022, reducing the energy consumption of the most common types of UPS by 40–50 per cent.¹⁰

Clothes washers

Efficiency Canada supports the proposed expansion of the scope of clothes washers covered to include semi-automatic clothes washers and to harmonize energy efficiency and test standards with those finalized by the U.S. DOE.

The proposed MEPS for clothes washers are equivalent to those currently required for ENERGY STAR certification. As of 2021, 75.2 per cent of clothes washers shipped in Canada were ENERGY STAR certified and therefore already comply with the proposed standard.¹¹

Dishwashers

Efficiency Canada supports the proposed harmonization of energy efficiency and test standards for dishwashers with the U.S. DOE's finalized standards, with an April 23, 2027, compliance date.

¹⁰ "Uninterruptible Power Supplies," ASAP Appliance Standards Awareness Project, accessed July 9, 2024, <https://appliance-standards.org/product/uninterruptible-power-supplies>.

¹¹ Natural Resources Canada, "Table 1 – ENERGY STAR Certified Appliances as a Percentage of Total Shipments in Canada, 2000–2021 (%)," Government of Canada, Government of Canada, Natural Resources Canada, October 24, 2023, <https://oee.nrcan.gc.ca/corporate/statistics/neud/dpa/showTable.cfm?type=CM§or=AAA&juris=CA&year=2021&rn=1&page=2>.

The federal efficiency standard for dishwashers was last updated in 2013, and the proposed standard represents a 15 per cent improvement for standard-size dishwashers and almost nine per cent for compact-size models.¹²

Electric clothes dryers

Efficiency Canada supports the proposed harmonization of energy efficiency and test standards for electric clothes dryers with the U.S. DOE's finalized standards, with a March 1, 2028, compliance date.

The proposed strengthening of MEPS and introduction of a standard for 120V ventless compact dryers represent important energy cost savings for Canadian households.

Electric motors

Efficiency Canada supports the proposed expansion of the scope of electric motors covered by the Energy Efficiency Regulations to include those with a capacity up to 559 kW and air-over electric motors, as well as the proposed harmonization of energy efficiency and test standards with those finalized by the U.S. DOE.

¹² Riddell, *Benchmarking Canadian Minimum Energy Performance Standards for Appliances and Equipment*.



Electric motor systems are the single largest global electricity consumer,¹³ making strengthened electric motor standards particularly impactful for lowering energy costs, GHG emissions and peak electrical demand.

Electric ranges

Efficiency Canada supports the proposed strengthening of MEPS for smooth electric cooktops and introducing the requirement of switched-mode power supply (SMPS) for electric ovens.

However, the single technological requirement, rather than a traditional technology-neutral MEPS for electric ovens (expressed in kWh/year), could make it more difficult to incrementally strengthen the standard over time. This could disincentivize manufacturers from investing in improvements to other oven components that affect oven efficiency, like insulation and door seals.

The energy savings from the SMPS requirement compared to Canada's current volume-based electric oven MEPS are quite modest, estimated to eliminate only the least efficient three per cent of electric ovens sold in Canada.¹⁴ Therefore, we urge the Office of Energy Efficiency to consider more ambitious MEPS for electric ovens. Three-fifths of oven models on the Canadian market are already at least 20 per cent more efficient than the Canadian MEPS that have been in effect since

¹³ Technology Collaboration Programme on Energy Efficient End-Use Equipment, "Electric Motor Systems: Why Are They Important? - Energy Efficiency Policy Brief," International Energy Agency, December 2025, <https://www.iea-4e.org/wp-content/uploads/2025/12/4E-Policy-Brief-EMSA-9-20251218.pdf>.

¹⁴ Natural Resources Canada, "Amendment 19 Cost-Benefit Analysis Report Appendix."

2003.¹⁵ Therefore, Canadian households could achieve much greater energy and cost savings, while maintaining consumer product choice, by keeping Canada's technology-neutral electric oven MEPS and strengthening its performance over time.

Efficiency Canada opposes eliminating the energy efficiency standard for electric coil cooktops. Standalone electric coil cooktops, or those combined with ovens in ranges, have significantly lower upfront equipment costs than smooth electric styles. They are therefore highly prevalent in rental housing – where tenants often lack control over what appliances are in their homes but pay the resulting utility bills – and low-income households for whom appliance selection is particularly driven by upfront equipment costs.¹⁶ Electric coil cooktops have an average lifespan of 18 years,¹⁷ so any poor-performing products sold as a result of removing the standard could increase affected households' energy burdens for decades.

Efficiency Canada also opposes removing EnerGuide labelling. Comparing labels when shopping for new appliances helps consumers understand the energy use of their products and the tangible benefit of more efficient appliances, moving the market toward better products over time. A 2020 survey on ENERGY STAR® and EnerGuide Labelling Awareness prepared for Natural Resources Canada found that

¹⁵ Natural Resources Canada, "Searchable Product List - Ovens," Government of Canada, accessed August 7, 2026, <https://spl-lpi.nrcan-rncan.gc.ca/en-US/product/?product=ElectricOvens&page=1>.

¹⁶ Marilyn A. Brown et al., "High Energy Burden and Low-Income Energy Affordability: Conclusions from a Literature Review," *Progress in Energy* 2, no. 4 (2020): 042003, <https://doi.org/10.1088/2516-1083/abb954>.

¹⁷ Matt Power, "Don't Throw Out That Electric Coil Stove for an Induction Top Yet," *Green Builder* (Lake City, CO), January 10, 2023, <https://www.greenbuildermedia.com/blog/dont-throw-out-that-old-electric-coil-stove-for-an-induction-top-yet>.

half of respondents who purchased a product with an EnerGuide label were influenced by the label when making their purchase.¹⁸

Freezers

Efficiency Canada supports the proposed harmonization of energy efficiency and test standards for freezers with the U.S. DOE's finalized standards, with a Jan. 31, 2029 or 2030, compliance date, depending on the product type.

Gas-fired instantaneous water heaters

Efficiency Canada supports the proposed harmonization of energy efficiency and test standards for gas-fired instantaneous water heaters with the U.S. DOE's finalized standards. For commercial products, we urge the Office of Energy Efficiency to set a compliance date of Oct. 6, 2027, aligned with the Enforcement Policy Statement issued May 5, 2026.¹⁹ For household products, we urge the Office of Energy Efficiency to set a compliance date of Dec. 26, 2029, aligned with the U.S. DOE Federal Register final rule published Dec. 26, 2024.

¹⁸ EKOS Research Associates, "ENERGY STAR® and EnerGuide Labelling Awareness Survey 2020: Executive Summary," Natural Resources Canada, February 2021, https://publications.gc.ca/collections/collection_2021/rncan-nrcan/M144-295-2-2020-eng.pdf.

¹⁹ U.S. Department of Energy, "Enforcement Policy Statement – Commercial Water Heaters," May 5, 2026, <https://www.energy.gov/sites/default/files/2026-05/2026%20CWH%20Enforcement%20Policy%20-%2005.04.2026%20clarifications.pdf>.

Gas-fired storage water heaters

Efficiency Canada supports the proposed harmonization of energy efficiency and test standards for gas-fired storage water heaters with the U.S. DOE's finalized standards. For commercial products, we urge the Office of Energy Efficiency to set a compliance date of Oct. 6, 2027, aligned with the Enforcement Policy Statement issued May 5, 2026. For household products, we urge the Office of Energy Efficiency to set a compliance date of May 6, 2029, aligned with the U.S. DOE Federal Register final rule published May 6, 2024. This will prevent dumping of less efficient products onto the Canadian market.

Gas furnaces (commercial)

Efficiency Canada supports the proposed expansion of the scope of regulated products and harmonization of energy efficiency and test standards for commercial gas furnaces with the U.S. DOE's finalized standards and compliance date of Jan. 1, 2028, as part of Amendment 19.

Given Canada's colder climate and historic leadership on residential gas furnace energy efficiency standards, we urge the Office of Energy Efficiency to explore stronger standards for this category as part of Amendment 20.

Gas ranges

Efficiency Canada supports the proposed harmonization of energy efficiency and test standards for gas cooktops and the introduction of the requirement for SMPS for gas ovens.



However, similar to electric ovens, the single technological requirement, rather than a traditional technology-neutral MEPS for gas ovens (expressed in BTU/year), could make it more difficult to incrementally strengthen the standard over time and disincentivize manufacturers from investing in improvements to other oven components that affect oven efficiency, like insulation and door seals.

Efficiency Canada opposes removing EnerGuide labelling for gas ranges. Energy labelling helps consumers understand the energy use of their products and the tangible benefit of more efficient appliances by comparing EnerGuide labels when shopping for new appliances, helping to move the market toward better products over time. It is unreasonable to assume the average household would use the online Searchable Product List to compare product efficiency when making appliance purchasing decisions.

Ground-source heat pumps

Efficiency Canada supports the proposed strengthening of energy efficiency standards and expansion of the scope of ground-source heat pumps covered by the Energy Efficiency Regulations from Jan. 1, 2028.

Integrated clothes washer-dryers

Efficiency Canada supports the proposed strengthening of energy efficiency standards for integrated clothes washer-dryers through harmonization with the finalized United States standard.



Oil-fired water heaters (household)

Efficiency Canada supports the proposed strengthening of energy efficiency standards for household oil-fired water heaters by harmonizing with the finalized United States standard. However, we urge the Office of Energy Efficiency to set a compliance date of May 6, 2029, aligned with the U.S. DOE Federal Register final rule published May 6, 2024. This will prevent dumping of less efficient products onto the Canadian market.

Recovery ventilators

Efficiency Canada supports the proposed introduction of energy efficiency standards for energy- and heat-recovery ventilators.

Given the requirement for new homes to include a recovery ventilator in building codes across Canada, the introduction of a minimum efficiency standard for recovery ventilators will lower energy consumption and costs for the more than 200,000 homes that are built each year in Canada.²⁰

Refrigerators and combination refrigerator-freezers

Efficiency Canada supports the strengthening of energy efficiency standards for refrigerators and combination refrigerator-freezers by harmonizing with the United States, with Jan. 31, 2029 or 2030, compliance dates, depending on the product type.

²⁰ Natural Resources Canada, "Canadian Housing Starts," Government of Canada, March 31, 2026, <https://cfs.cloud.nrcan.gc.ca/statsprofile/economy/canadian-housing-starts.html>.

(c) Allow regulated parties to voluntarily comply with the new requirements earlier by including an early compliance option

Efficiency Canada supports voluntary early compliance with new requirements in the case of updated test standards, expanded product scope, or strengthened efficiency standards. However, where the Office of Energy Efficiency proposes to remove energy efficiency standards or EnerGuide labelling requirements, Efficiency Canada opposes early compliance options.

(d) Support trade and improve regulatory implementation

Central air conditioners and central heat pumps

Efficiency Canada supports the proposed requirement to report additional information regarding testing and reported efficiency metrics.

Commercial electric water heaters

Efficiency Canada supports the proposal to expand the scope of products to include commercial electric instantaneous water heaters and harmonization of energy efficiency and test standards with those finalized by the U.S. DOE. As the commercial electric instantaneous water heater standard has been in effect in the U.S. since 1994,²¹ we urge the Office of Energy Efficiency to apply the new requirements from six months from the date of publication in the Canada Gazette, Part II, rather than delaying compliance to 2028.

²¹ U.S. Department of Energy, "10 CFR Part 431 -- Energy Efficiency Program for Certain Commercial and Industrial Equipment," National Archives: Code of Federal Regulations, accessed August 19, 2026, <https://www.ecfr.gov/current/title-10/part-431>.

Commercial oil-fired water heaters

Efficiency Canada supports the proposal to expand the scope of products to include hot water supply boilers alongside commercial instantaneous oil-fired water heaters. As the U.S. efficiency standards for commercial oil-fired hot water supply boilers have been in effect since 2012, we urge the Office of Energy Efficiency to apply the new requirements from six months from the date of publication in the Canada Gazette, Part II, rather than delaying compliance to 2028.

Household electric water heaters

Efficiency Canada supports the introduction of heat pump water heaters as a product regulated under the household electric water heater category in order to facilitate the collection of data with regard to the models available for sale on the Canadian market.

However, we do not support a separate, higher efficiency standard for heat pump water heaters compared to electric resistance storage water heaters. Electric resistance storage water heaters and heat pump water heaters provide the same utility. Therefore, setting a separate higher standard for the more efficient technology misses a significant potential energy- and cost-saving opportunity that strengthening the minimum efficiency of all household electric water heaters would provide. As heat pump water heaters are gaining market share, a separate standard could also prevent less expensive heat pump water heater options — that would help the technology scale — from entering the Canadian market.



Televisions

Efficiency Canada supports updating the definition to harmonize with the U.S. for network-connected TVs and incorporating by reference the CFR testing standard for network-connected TVs.

Standards of other jurisdiction incorporated by reference

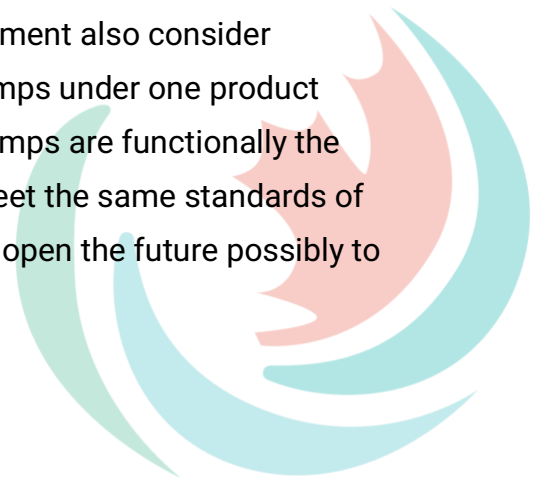
Efficiency Canada strongly supports the clarification in Amendment 19 protecting against potential backsliding of the jurisdiction that could cause the Regulations to no longer work as intended.

(e) Support the government red tape reduction initiative

Efficiency Canada urges caution when applying red tape reduction initiatives to the Energy Efficiency Act and Regulations, given the overwhelming economic benefit that the Regulations provide to Canadian businesses and households, rather than an undue burden.

Efficiency Canada supports the proposed introduction of streamlined clothes dryers, household and commercial water heaters, cooking products and pool products categories.

In addition to the products listed, we suggest the government also consider grouping air conditioning systems and air-to-air heat pumps under one product category. Air conditioning systems and air-to-air heat pumps are functionally the same technology and should therefore be required to meet the same standards of performance and efficiency for cooling. This would also open the future possibly to



require newly installed air conditioning systems to be reversible and be able to deliver heating.²²

Regulatory development comment

Efficiency Canada appreciates the opportunities for consultation throughout the amendment process.

Thank you for considering these comments.

Sincerely,

Sarah Riddell

Senior Policy Research Associate, Appliance & Equipment Efficiency
Efficiency Canada

²² Alexander Gard-Murray et al., "The Cool Way to Heat Homes: Installing Heat Pumps Instead of Central Air Conditioners in Canada," *Building Decarbonization Alliance, Canadian Climate Institute, Efficiency Canada, Greenhouse Institute.*, August 2023.

