

Department of Energy

Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards and Test Procedures for Consumer Products and Certain Commercial/Industrial Equipment

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As prepared for delivery

The American Lung Association is concerned that this proposed update to the Department of Energy's "Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards and Test Procedures for Consumer Products and Certain Commercial/Industrial Equipment," or "Process Rule," would create unnecessary barriers to the timely adoption of cleaner, more efficient appliances and therefore result in harms to lung health that could have been prevented.

Nearly two-thirds of U.S. households use fuel-burning appliances, exposing families to pollutants linked to asthma attacks, respiratory illness, cardiovascular disease and other serious health harms. Delaying or making it more difficult to implement appliance efficiency standards would prolong American families' exposure to unhealthy air in their homes and undermine important public health protections, all while technology already exists to improve efficiency, reduce costs and improve indoor and outdoor air quality.

Combustion appliances such as furnaces and water heaters that burn fuels emit nitrogen dioxide (NO₂), carbon monoxide, particulate matter and other harmful pollutants. In addition to impacting air indoors, these emissions also contribute to ozone and particle pollution outdoors, worsening air quality and associated health risks in surrounding communities. The American Lung Association's "State of the Air" 2026 report found that nearly half of the nation's children, who are especially vulnerable to the health harms of breathing air pollution due to their still-developing lungs, live in places with unhealthy levels of ozone and particle pollution. Efforts to roll back or delay appliance efficiency standards will expose more people, including children, to harmful air pollution. Because emissions from fuel-burning appliances contribute to the formation of ozone and fine particle pollution, stronger appliance standards are an important tool for reducing the outdoor air pollution that continues to harm millions of Americans.

Efficiency standards also reduce the amount of energy needed to heat water, warm homes and power everyday appliances. Lower energy demand means less fossil fuel combustion at power plants and less demand on the grid, resulting in lower emissions of smog-forming

pollutants, particle pollution, hazardous air pollutants and climate-warming greenhouse gases. Efficiency standards help improve air quality, reduce energy waste and lower utility bills.

At a time when families across the country are seeing their household finances stretched even further - whether by increased energy or healthcare costs - we oppose efforts that weaken policies aimed at allowing consumers or businesses to access more efficient, less-polluting appliances and energy sources. Appliance efficiency standards help reduce harmful air pollution, lower utility bills and improve health outcomes for households across the country.

For these reasons, we urge the Department of Energy to withdraw the proposed revisions to the “Process Rule” and preserve a process that supports the timely development and implementation of strong appliance efficiency standards that protect public health, reduce harmful air pollution and lower energy costs.