

February 2021

Carbon Labeling

The Issue: Carbon labeling of consumer appliances.

Background: Federal law regulates the efficiency of many types of consumer appliances, including furnaces, water heaters, heat pumps, and air conditioners. The efficiencies of these products are required to be measured at the appliance itself and do not reflect other aspects beyond the appliance.

The federal government has moved to reflect the overall efficiency of consumer appliances more accurately through Full Fuel Cycle (FFC) policy. Following a 2009 study on FFC, the National Academy of Sciences recommended that the Department of Energy (DOE) move to an FFC approach over time. DOE subsequently published a Statement of Policy announcing the adoption of FFC analyses into the Energy Conservation Standards Program to measure national energy consumption (upstream extraction, processing, and transportation or distribution) and emissions to supplement the site (or point of use) energy measurements.

Another critical aspect of the DOE approach is their intention to work collaboratively with the Federal Trade Commission (FTC) to make readily available to consumers information on the FFC energy and greenhouse gas emissions impact of specific products. This information will enable consumers to make "cross-class comparisons of product energy use and emissions."

Considering Congress' interest in updating federal policies related to energy efficiency, we have developed language that would require the FTC to include carbon emissions information on all yellow EnergyGuide labels. As America heads down the path where significant reductions in carbon output will be a top national priority, giving consumers carbon output information will provide them with essential information to help them play their part in achieving this national goal.

The Ask: Congress should enact language to require carbon footprint information to be included on EnergyGuide labels placed on consumer appliances, thereby giving consumers additional information during the purchasing decision.