

## Executive Summary

### Potential WaterSense® Commercial and Institutional Program Summary of Comments Received

#### Background

The U.S. Environmental Protection Agency (EPA) established WaterSense with the goal of saving water for future generations. By helping transform the market for water-efficient products, services, and practices, WaterSense is working to relieve the strain of expanding water supply and wastewater infrastructure. Since 2006, the WaterSense label has helped consumers identify products and services that meet EPA's criteria for water efficiency and performance.

In an effort to further this mission, WaterSense is now considering including partnership and participation options for users in the commercial and institutional (CI) sector. With this in mind, EPA is seeking input from its partners and other stakeholders on the current state of data related to water use in the CI sector as well as potential program options.

On August 20, 2009, EPA released a white paper, "Water Efficiency in the Commercial and Institutional Sector: Considerations for a WaterSense Program," and opened a public comment period that extended until September 20, 2009. The white paper summarizes the current state of knowledge regarding water use in the CI sector. While there are gaps in the water use data, this paper contains the best information available to use as a basis for decision-making regarding a national CI program. The paper also includes a discussion of the various forms that a WaterSense CI program could take.

On October 5, 2009 in Las Vegas, Nevada, EPA held its first stakeholder meeting to solicit comments on the white paper and discuss potential CI program options for WaterSense. EPA will hold its second stakeholder meeting to gather additional comments and discuss program options via webinar on January 27, 2010. Additional information can be found at [www2.gotomeeting.com/register/176949330](http://www2.gotomeeting.com/register/176949330).

In general, stakeholders are supportive of EPA developing a CI component of WaterSense. The consensus of the stakeholders was that labeling products should remain the primary focus of the WaterSense program. This Executive Summary summarizes the comments collected via e-mail during the public comment period and in-person at the October 5, 2009 stakeholder meeting.

#### Scope of a Potential CI Program—Choosing a Broad Sector or Subsector Approach

Most stakeholders recommended EPA develop a potential CI program addressing individual subsectors in sequence, rather than addressing the CI sector as a whole. Stakeholders indicated that water consumption and end uses are too varied among subsectors to attempt to address the entire CI sector initially. Stakeholders were in favor of EPA targeting subsectors with the highest water consumption and the most interest in participating in a CI program, and focusing on multiple subsectors with common end uses. Laundries, the hospitality sector (e.g., restaurants and hotels), and medical facilities were identified as subsectors with high potential.

However, stakeholders acknowledged that there may be insufficient water use data to accurately prioritize subsectors at this time.

Stakeholders suggested that WaterSense align its product specifications with the subsector-based approach to provide for the simultaneous labeling of products used in the subsector with a CI subsector program roll-out.

### **Certification and Labeling Program**

Stakeholders are in favor of a building certification and labeling program. They indicated that certification and labeling specifications should be separate for new and existing construction. Stakeholders did not agree on which type of construction should be addressed first or if the programs should be multi-tiered or single-tiered. Most agreed that third-party certification is needed to protect the WaterSense brand and assure performance. They recommended the program include percent reduction target goals and/or commitments to meet a set of best management practices (BMPs). They urged EPA to require metering and submetering to assist with developing accurate baselines and to assure that water savings from a CI program are measurable and verifiable. Stakeholders also urged EPA to consider the crossover between energy savings and water savings when developing a program.

Stakeholders recommended that EPA work with existing building certification programs to identify and fill existing gaps rather than develop a duplicative program. Stakeholders stated that EPA should learn from the WaterSense new homes program while developing a potential CI program that includes building certification and labeling.

In addition, stakeholders suggested that EPA issue BMPs for water uses applicable to multiple subsectors. EPA could also offer a broader commitment-based program for facilities that do not fit into a subsector of interest.

### **Commitment-Based Program**

Stakeholders maintained that a commitment-based program could be a good first step for WaterSense to take towards a multi-faceted CI program. Declared partners could set and commit to their own water reduction goals, or they could commit to a percent reduction identified following a water audit of their facility. If water audits are performed to develop partner commitments, EPA could collect data generated from the audits to begin building a benchmarking database. A building certification and labeling program could then be developed after the commitment-based program is underway and more labeled products are on the market.

### **Professional Certification Program**

Stakeholders indicated that EPA could label certification programs for professionals working in the CI sector, such as water auditors, facilities managers, and plumbers.

## **Technical Assistance**

Stakeholders identified the need for a national repository for CI water use and benchmarking data. Stakeholders suggested that EPA develop a benchmarking tool and create a questionnaire to collect necessary data. They were in favor of EPA developing consistent naming conventions and clear definitions for CI subsectors, so utilities collecting baseline data for CI subsectors can assure that data are consistent and translatable.

Stakeholders noted that EPA could use its Web site to provide technical tools to interested parties in the CI sector. They suggested EPA create a list of available tools helpful to CI sector stakeholders (including propriety tools of interest) and suggested EPA develop needed tools like water audit methodology and self-audit templates. Stakeholders indicated that EPA could post case studies of CI water efficiency success stories on its Web site.

## **Awards**

Stakeholders agreed that an awards program for the CI water sector is needed, especially to recognize early adopters. However, an awards program alone would not be sufficient to motivate change in this sector.