

Canadian Standards Association Mississauga, Ontario To the Part I Committee

Subject No. 3132 Chair: R. Leduc Date: November 10, 2003

Title: Cord-connected Dishwashers, Rules 26-710(x) and 26-744(x)

Submitted by: Ted Olechna of Electrical Safety Authority on July 16, 2003.

Proposal: Amend Rules 26-710 and 26-744 as follows:

Add the following Subrule

26-710(?) where a dishwasher is intended to be installed and fastened or secured in position in a dwelling unit, a receptacle shall be installed for the supply of energy to the appliance.

Reword the header of 26-740 to state **Electric Heating and Cooking Appliances**

Add a new Subrule 26-744(?)

Where a dishwasher is used in a dwelling unit, it shall be cord-connected by means of cord and attachment plug.

Reasons for Request: Dishwashers are being installed in most dwelling units, by requiring a cord connected dishwasher, hazards that are traditionally left behind before and after installation can be eliminated. Once a receptacle is installed it will facilitate easy installation This will also facilitate the replacement of dishwashers by consumers without a need for qualified electrical installers or inspection. This is no different than the requirements that exist in the CEC for stoves and dryers.

Supporting Information: In Ontario the Industrial Advisory Committee and the Consumer Advisory Committee have supported the intent of this change,

It has been identified that during installation, or replacement of dishwashers the following problems and issues exist.

Chair's Comments:

The Part II Standard for household dishwashers is a bi-national standard C22.2 No. 167-97 Household Dishwashers (bi-national standard with UL 749). The standard currently recognizes both types of dishwashers, permanently connected and cord-connected.

Some questions that come to mind are:

- 1. a) How will contractors and inspectors deal with situations where a dishwasher is supplied without a cord (intended to be permanently connected) and the dishwasher cubicle has a receptacle?
 - b) If the contractor installs a cord and attachment plug, is this contrary to what the dishwasher was designed for in accordance with Part II?
 - c) If the contractor removes the receptacle and makes the connection using permanent wiring methods to comply with the Part II intent, would he then not be in compliance with the proposed Rule?
- 2. Traditionally, permanently installed appliances are connected using permanent wiring methods and portable/moveable appliances are connected using cord and plug attachments. Is a dishwasher that is permanently connected to the water and sewer system any different that a furnace permanently connected to a gas supply? Either one may need to be replaced from time to time.
- 3. Is this a safety issue or is this a matter of convenience/design?

Members should weigh the impact that this change may have on the manufacturing process. Manufacturers will potentially need to alter their assembly process to accommodate the Canadian market differently from the US market.

Subcommittee Deliberations (1st Round)

11 of 14 members responded, 6 disagreeing with the submission and 5 agreeing, 2 of which had comments but both those comments appear to indicate general lack of support for the proposal:

- "This is a nice to have. It is not safety related. In fact until all dishwashers on the market are equipped with cords, it can be quite hazardous where some well-intended homeowners attach their own cords and do not do so correctly. The proper sequence is to go for a change to the Part 2 standard. I can give a general consent to this provided the Part 2 standard is changed and time is given to clean the old dishwashers out of the stream."
- "If we feel the need to address dishwashers specifically, perhaps the rule should suggest a dishwasher be permanently connected unless it is supplied with a cord and cap, in which case a receptacle would be required. The receptacle could be surface mounted under the dishwasher. This would eliminate conflict with the Part II standards while preventing cords from being added or removed."

The main reasons for disagreeing:

- Support for some of the observations made by the Chair in his initial comments
- Any change should be initiated at Part II to see if there is support at that level.
- A similar proposal concerning hot water heaters was unsuccessful.
- Having inexperienced persons making up their own attachment cords and plugs may increase the risk of incorrect installations.

Chair's Comments (1st Round)

Based on the opinion that the comments made by the agreeing members do not directly support the proposal, the Chair suggests that we actually have 8 opposed, and 3 in favour of the proposal and declares consensus to reject the proposal.

Subcommittee Recommendation

Reject the proposal and close the subject.