



# CB Training

ENERGY STAR® Program Integrity  
May 5, 2016





## Purpose

- Provide CB staff with information on the following:
  - Overview of ENERGY STAR Third-Party Certification (3PC) policies and resources
  - Certification and product submissions
  - Verification testing policies and procedures
  - Enforcement policies
  - CB best practices
  - Additional resources

ENERGY STAR. The simple choice for energy efficiency.



**Today,**  
this little blue label  
does all the hard work  
of certifying outstanding  
energy efficiency in:

**70**

**Product  
Categories**





Every single day,  
consumers choose  
**ENERGY STAR**  
products more than

**800,000** times





Awareness now exceeds **85%** and preference is growing





to protect the environment  
and fight climate change.

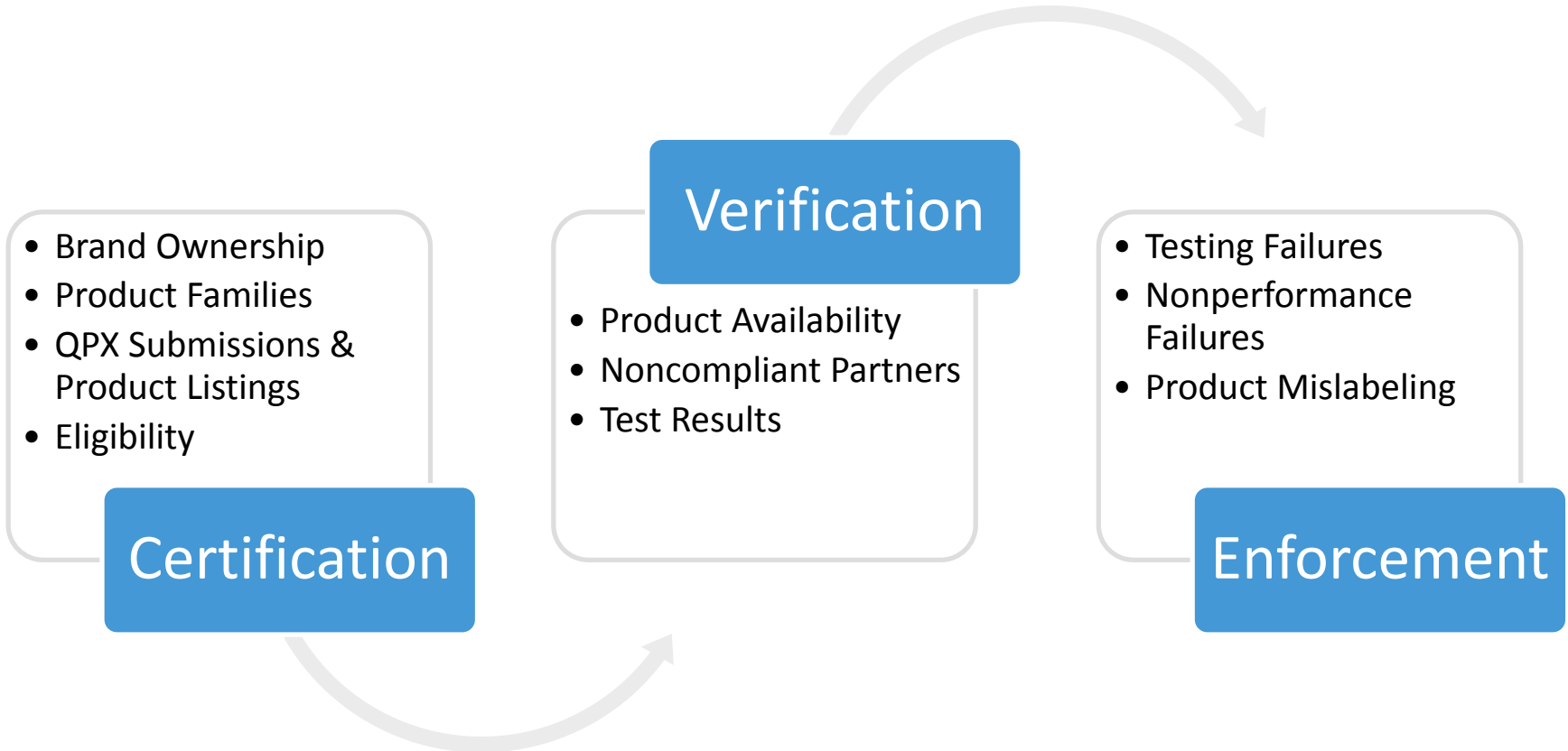


**ENERGY STAR has over**

- **16,000 partners**
- **50,000 product model listings**
- **More than 320 million units shipped in the U.S. in 2014**

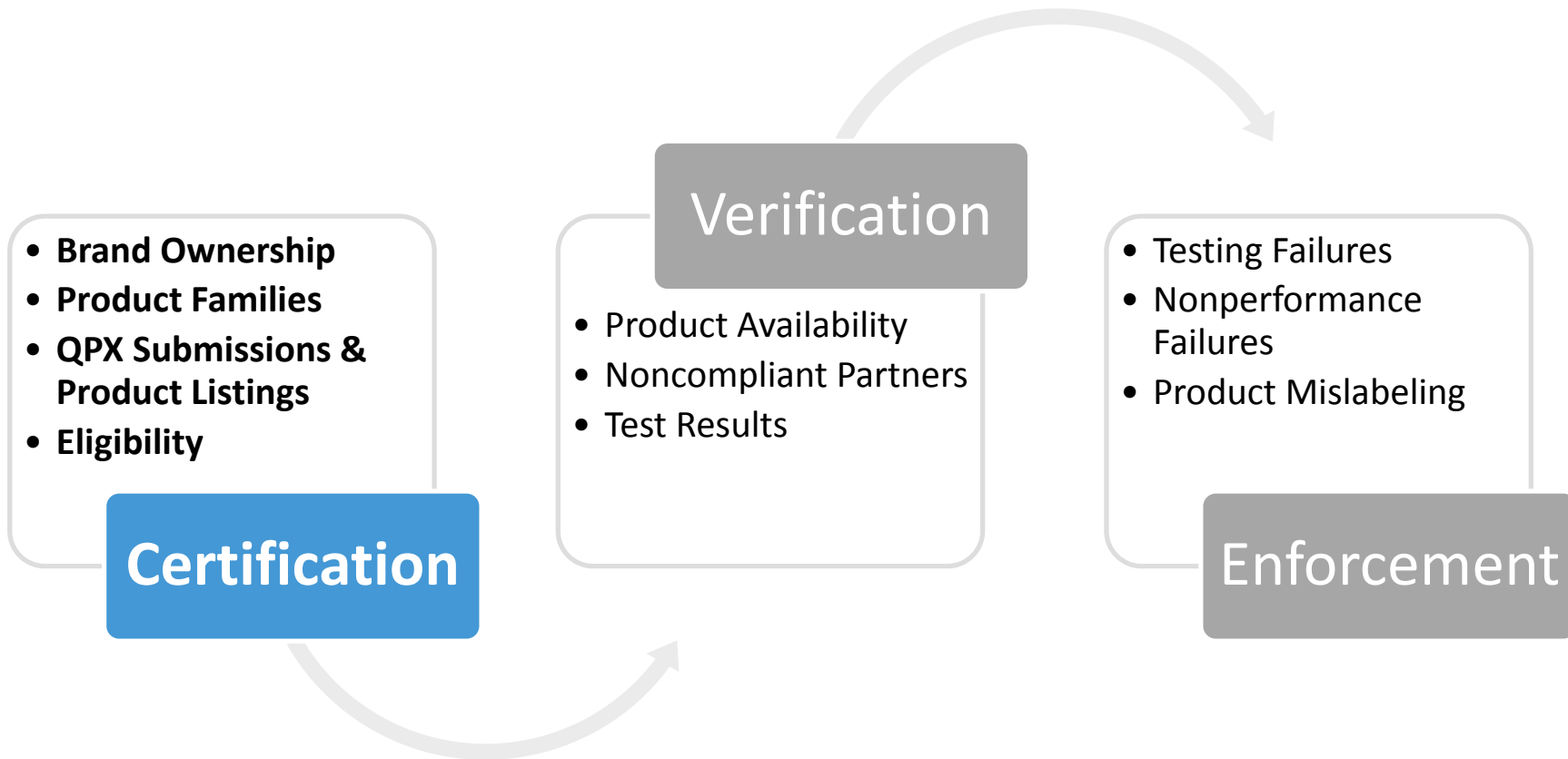


# ENERGY STAR Program Integrity - 3PC Overview





# Product Certification







## Certification Process and Policies

- Refer to Standard Operating Procedures for CBs to confirm partner eligibility
  - Partnership restrictions due to failure to submit unit shipment data will impact certification eligibility
- EPA-recognized laboratories
  - Confirm testing was completed at an EPA-recognized laboratory
  - First-party non-accredited laboratories must be enrolled in the CB's witness/supervised manufacturer's test laboratory (W/SMTL) program
- Establish brand ownership
  - ENERGY STAR partner should be the brand owner of the products certified under its partnership
  - CBs may only certify products under brand licensee's partnership with explicit approval from EPA
  - Retail partners not permitted to license their brands to private labelers
  - See Brand Owner Directive #2012-02
- Product families
  - Refer to the product specification for family definitions and confirm tested model is representative of the certified product family
  - Note: in the event of a testing failure and disqualification, all family models may be affected. See FAQ.



## Certification Process and Policies – Cont'd

- **Ineligible models**

- Refer models which do not meet the relevant ENERGY STAR specification requirements (outside scope, fail to meet performance levels, etc.) to Certification@energystar.gov via the Ineligible Product Form

- **Association of Home Appliance Manufacturers (AHAM) Verification Program**

- For relevant appliance categories, confirm AHAM verification program participation during certification
- Re-confirm AHAM participation during product availability outreach
- Partners participating in AHAM's program should be excluded from CBs' verification testing pool

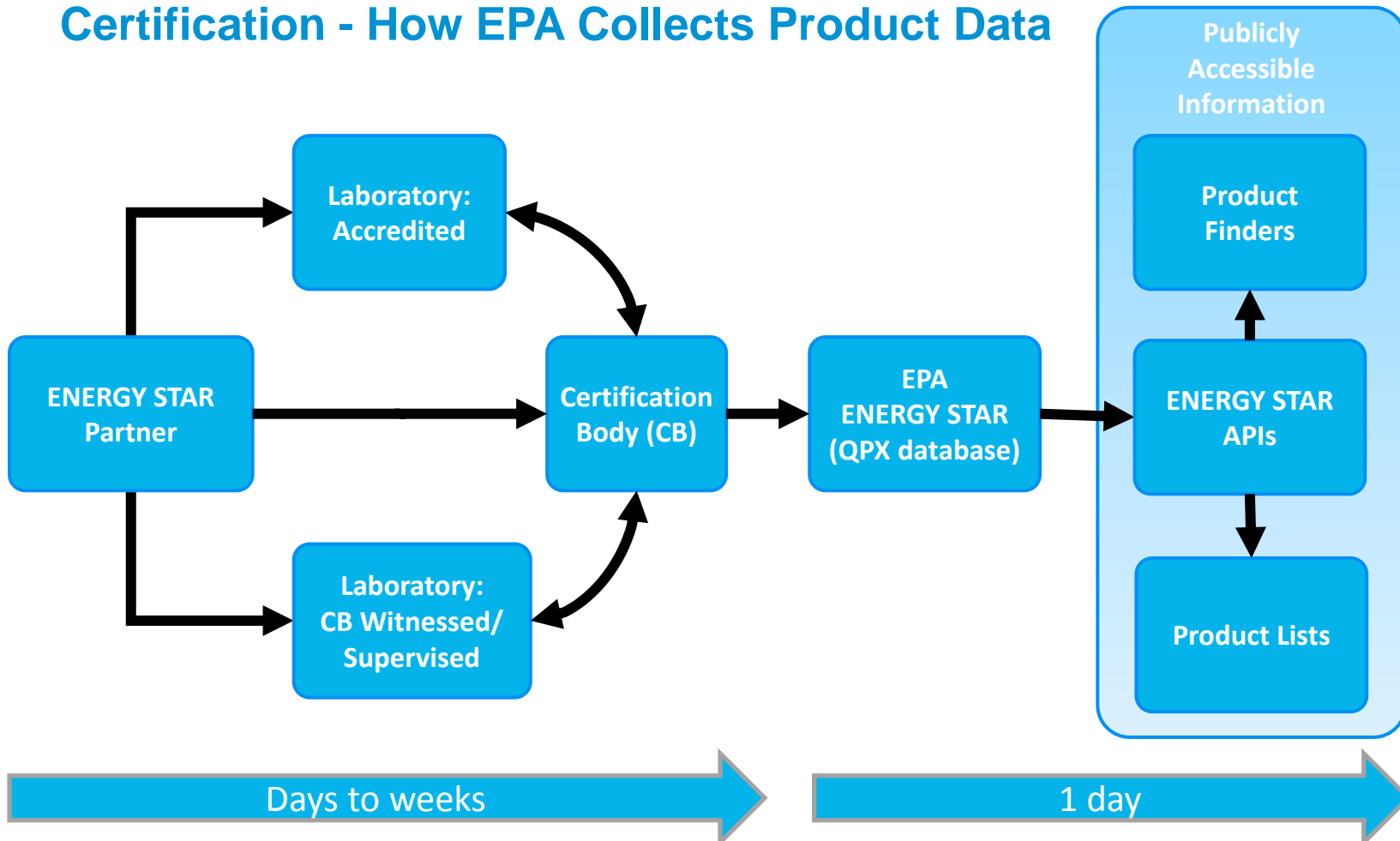
- **Submitting and updating certified product data**

- Products are considered certified as soon as the CB confirms product certification
- CBs should submit certified product data as soon as possible – utility rebates, international partner implications (e.g. EPA shares data with European Union)
- Updates to product availability/ performance should be submitted in a timely fashion as well





## Certification - How EPA Collects Product Data






## Certification - Product Submission via Qualified Product Exchange (QPX)

### - Basic QPX resources

- [XML Web Services Submission Process](#) page includes all web services
- Refer to the [QPX XML Transaction System Documentation](#) for definitions and instructions
  - **Certification IDs** are unique for *each product family* and can be revised
  - **ENERGY STAR Model IDs** are unique for *each product version submission* and cannot be changed
  - **ENERGY STAR Unique IDs** are unique for *each product + version* and EPA-assigned.
- Subscribe to the [RSS feed](#) for notices of major and minor specification updates

Appliances		
Product	XML Web Service Files	Phase
Clothes Dryers	V1 <ul style="list-style-type: none"> <li>▪ <a href="#">FINAL Data Requirements</a></li> <li>▪ <a href="#">Sample XML</a></li> </ul>	Final Subscribe: 

### - CB review of new web services

- All web services, which outline the required data collection fields, are specific to the product specification version
- CBs should review web services for new or upcoming specifications and provide feedback
- Major changes/releases EPA will email CBs; Minor web service updates posted in RSS feeds





## Certification - Product Submission via Qualified Product Exchange (QPX) Cont'd

- Specification transitions
  - CBs will receive reminders from [Certification@energystar.gov](mailto:Certification@energystar.gov)
  - Note the following timeline as new specifications are finalized





## Certification - Product Submission via Qualified Product Exchange (QPX) Cont'd

- Specification transitions
  - CBs will receive reminders from [Certification@energystar.gov](mailto:Certification@energystar.gov)
  - Note the following timeline as new specifications are finalized







## Certification - Product Submission via Qualified Product Exchange (QPX) Cont'd

- Specification transitions
  - CBs will receive reminders from [Certification@energystar.gov](mailto:Certification@energystar.gov)
  - Note the following timeline as new specifications are finalized





## Certification - Common QPX Model Submittal Issues

- Currently available on market
- Date available on market
- Certified models not currently available on the market
- Certification IDs not indicative of product families
- Product list and product finder display of core fields (partner name, brand, model number, etc.)
- Misspelled model numbers
- Web services stalled
  - Email Certification if models not validated after ~1+ hours
- More information can be found in the [QPX XML Transaction System Documentation](#), Common Model Submittal Issues section.



## Certification - Common Questions

- **Product Availability:**

- How should EPA-recognized certification bodies (CBs) report information about product availability if the product is intended for sale in the U.S. or Canada, but the date of availability to consumers is unknown?

- **Publishing Timeline:**

- As a product brand owner partner, when will my recently certified product appear on the ENERGY STAR website?

- **Product Eligibility (example):**

- Are refrigerator-freezers with a bottom freezer and through-the-door ice eligible for ENERGY STAR qualification?

- **Laboratory Testing:**

- Can a certification body (CB) enroll a laboratory in its witnessed or supervised manufacturer's testing laboratory (W/SMTL) program on the basis of supervision or auditing that another CB has performed of that laboratory?
- Will test reports produced by a lab prior to receiving EPA recognition be accepted for ENERGY STAR certification?

- **CB Selection:**

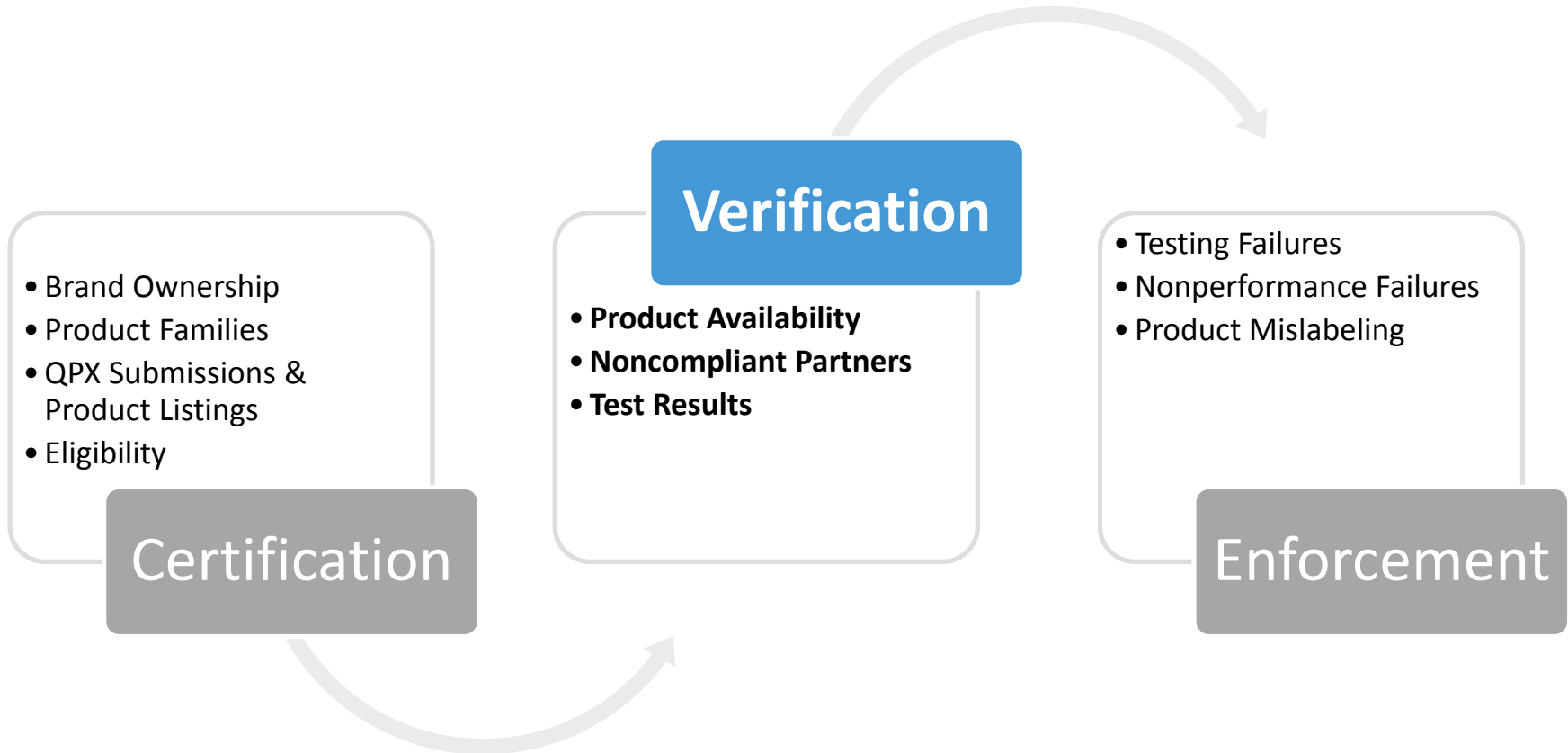
- Is a partner required to use only one certification body?

- **Recertification:**

- Must a product be retested and certified under a revised specification if it already exceeds the required minimum energy efficiency requirements?



# Verification Testing







## Verification Testing

- **Purpose**

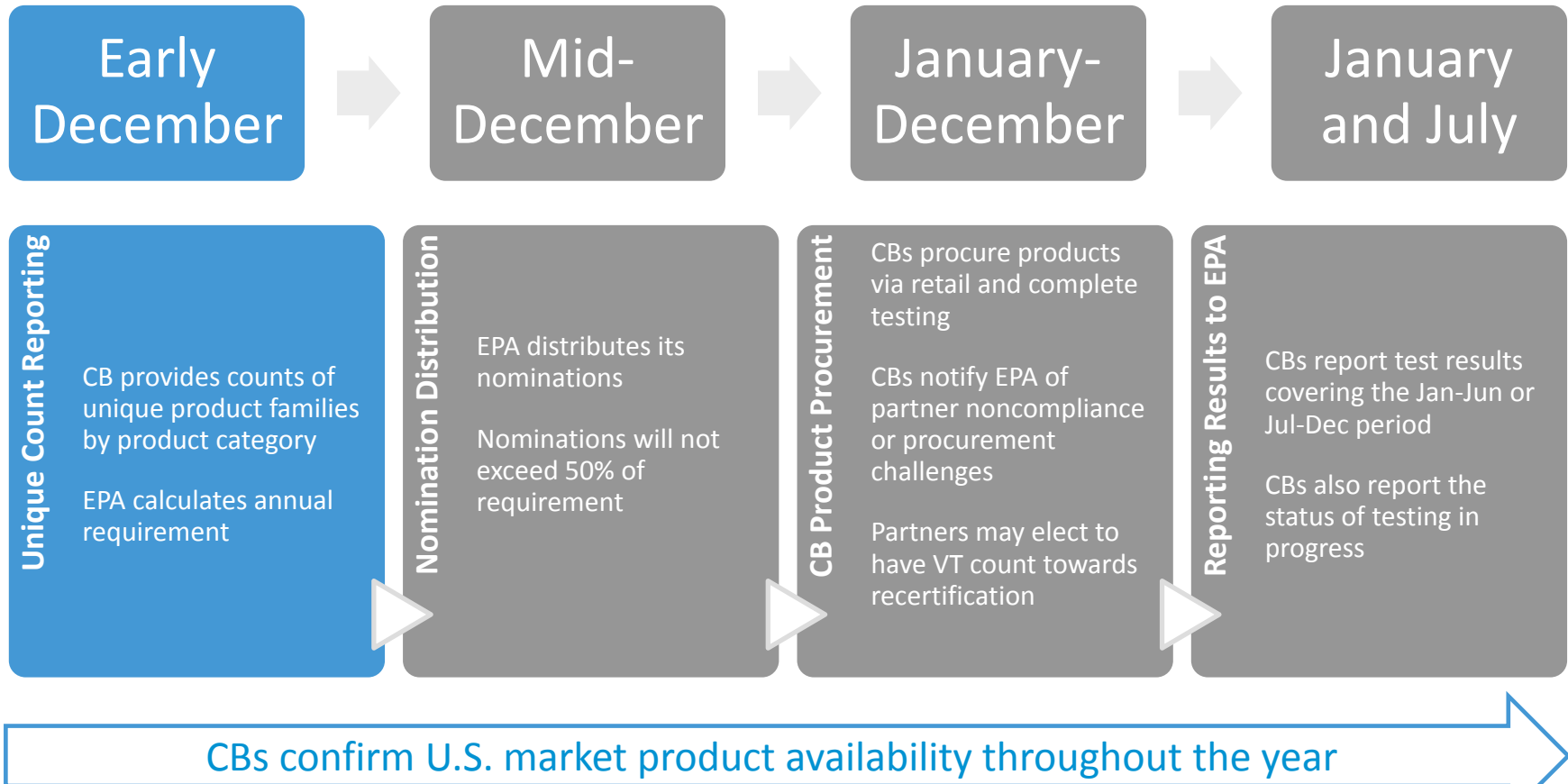
- Confirm products perform as consumers expect
- Remove products that do not meet program requirements
- Uphold confidence in ENERGY STAR brand

- **Approach**

- CBs confirm availability of products at least once per year per Directive #2014-01 (early fall recommended)
- CBs provide EPA unique product family counts by product category based on certified models currently available in the U.S. market
  - Counts should include products not on certified products lists due to partnership restrictions
- EPA calculates VT requirements annually based on CB unique product family certifications
- EPA distributes nominations to CBs by beginning of the year
- CBs procure, test, and report product testing during the calendar year
  - Procurement should reflect blind purchase
  - Notify EPA of any noncompliant/unresponsive partners encountered
  - Report failures to EPA; all failures are reviewed individually and partners have opportunity to dispute

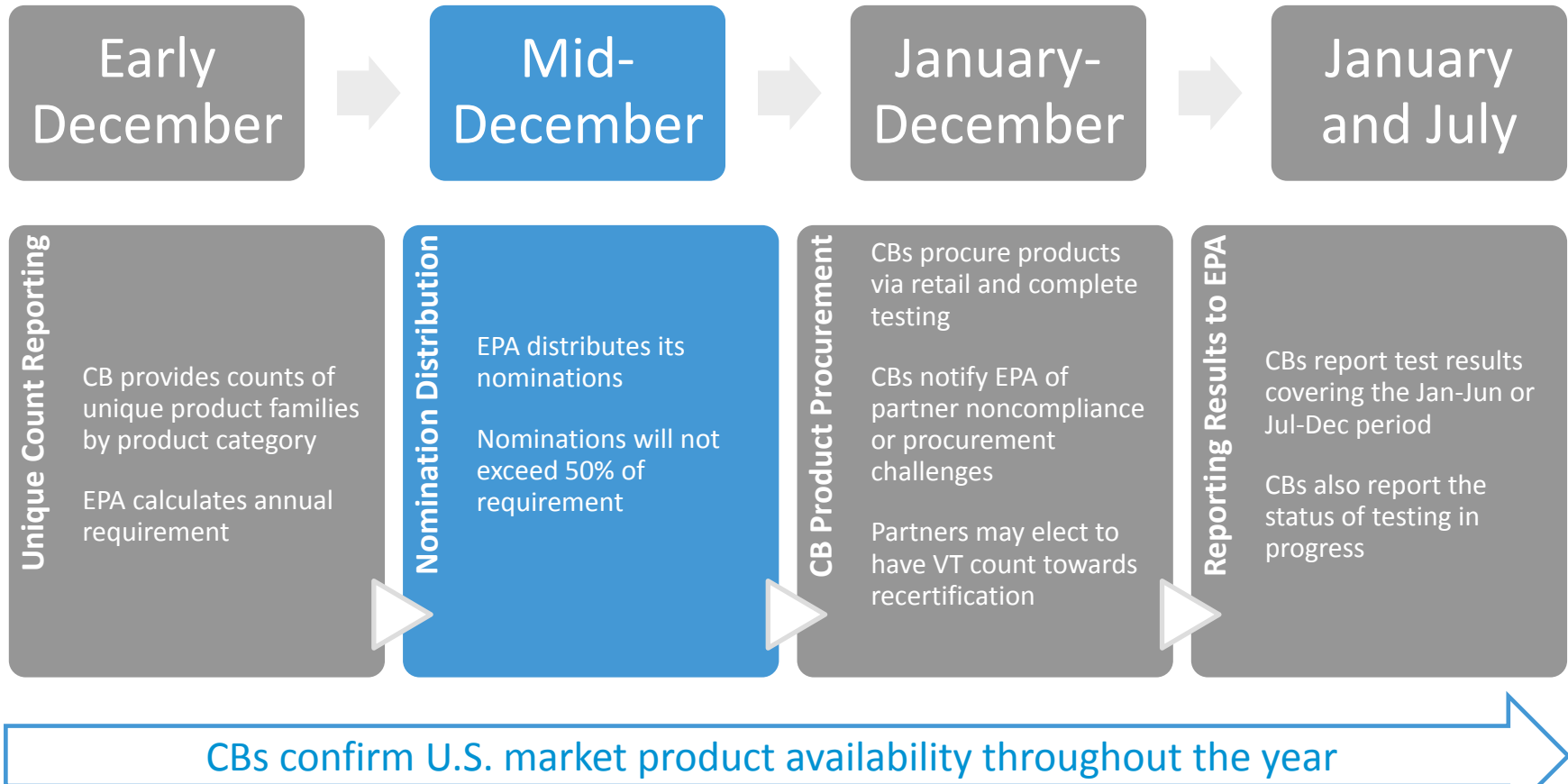


## Verification Testing – Timeline



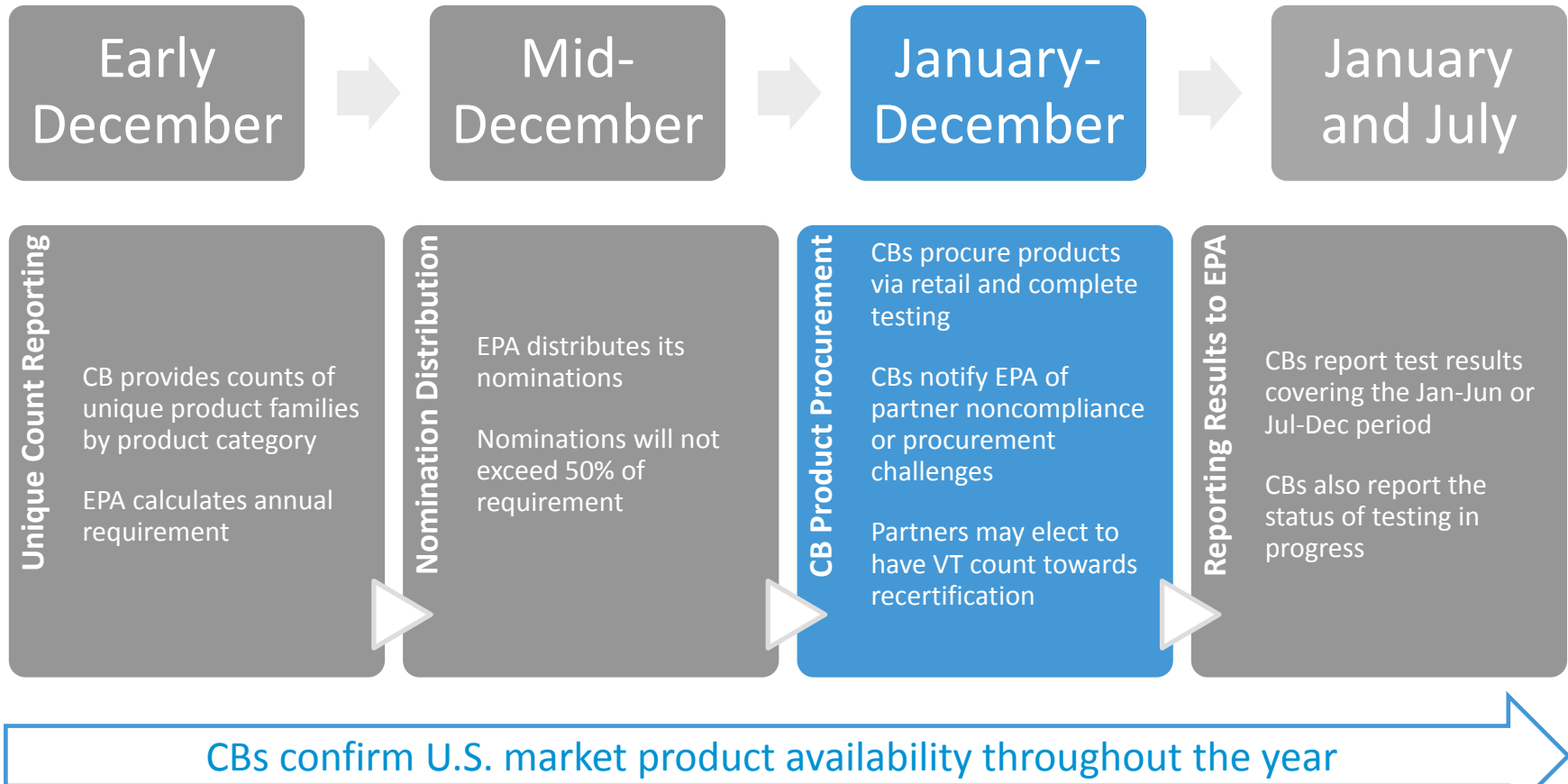


## Verification Testing – Timeline





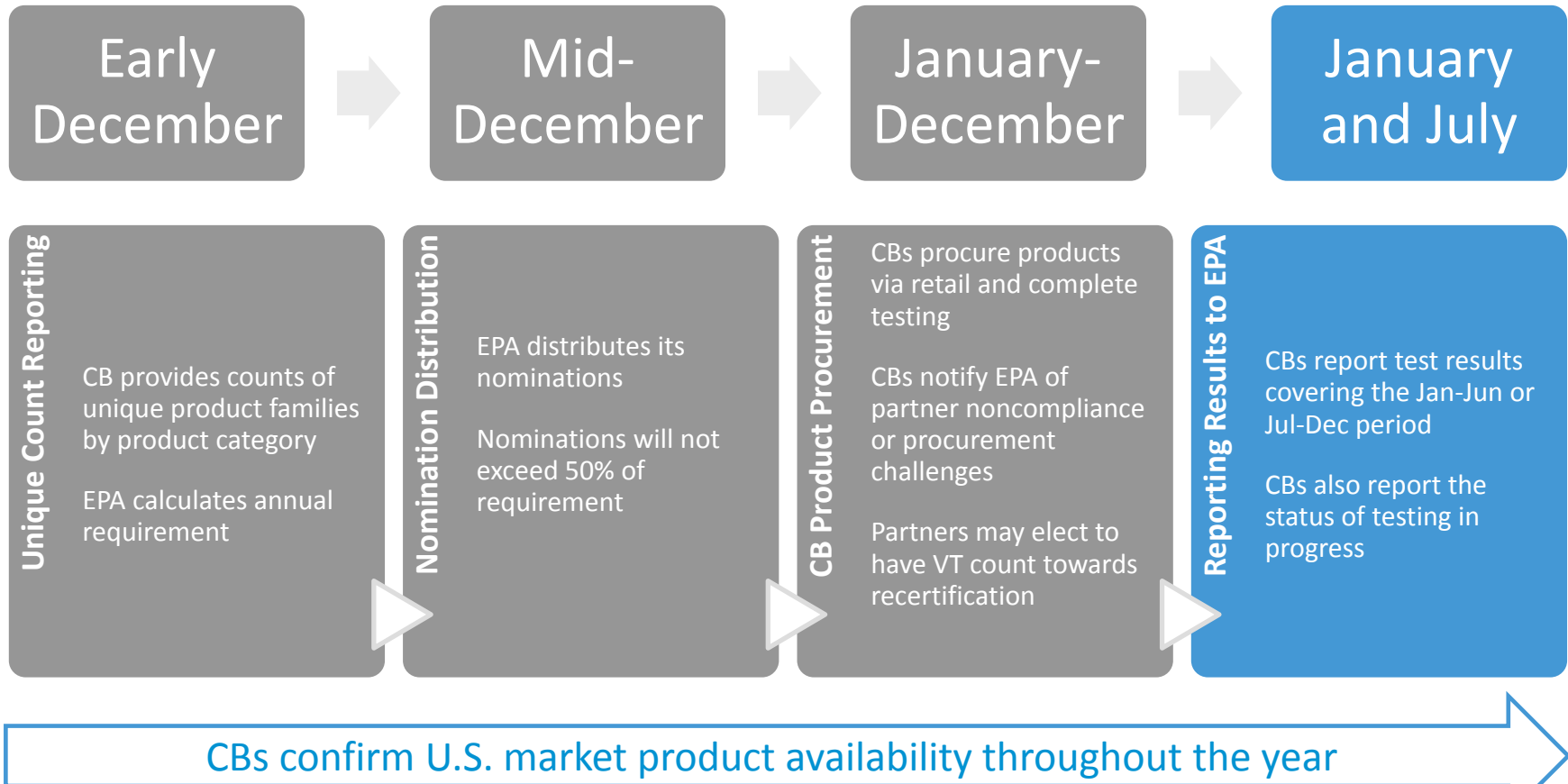
## Verification Testing – Timeline







## Verification Testing – Timeline





## Verification Testing - Procurement Do's and Don'ts

- **Do's**

- Purchase products via standard retail if possible
- If products are unavailable (per Directive #2011-06):
  - The partner responsible shall reconfirm availability of ALL its certified models.
  - CB will select another model for testing from that partner.
  - CB will consider flagging the partner for testing in subsequent years if there are ongoing issues with availability of selected models.

- **Don'ts**

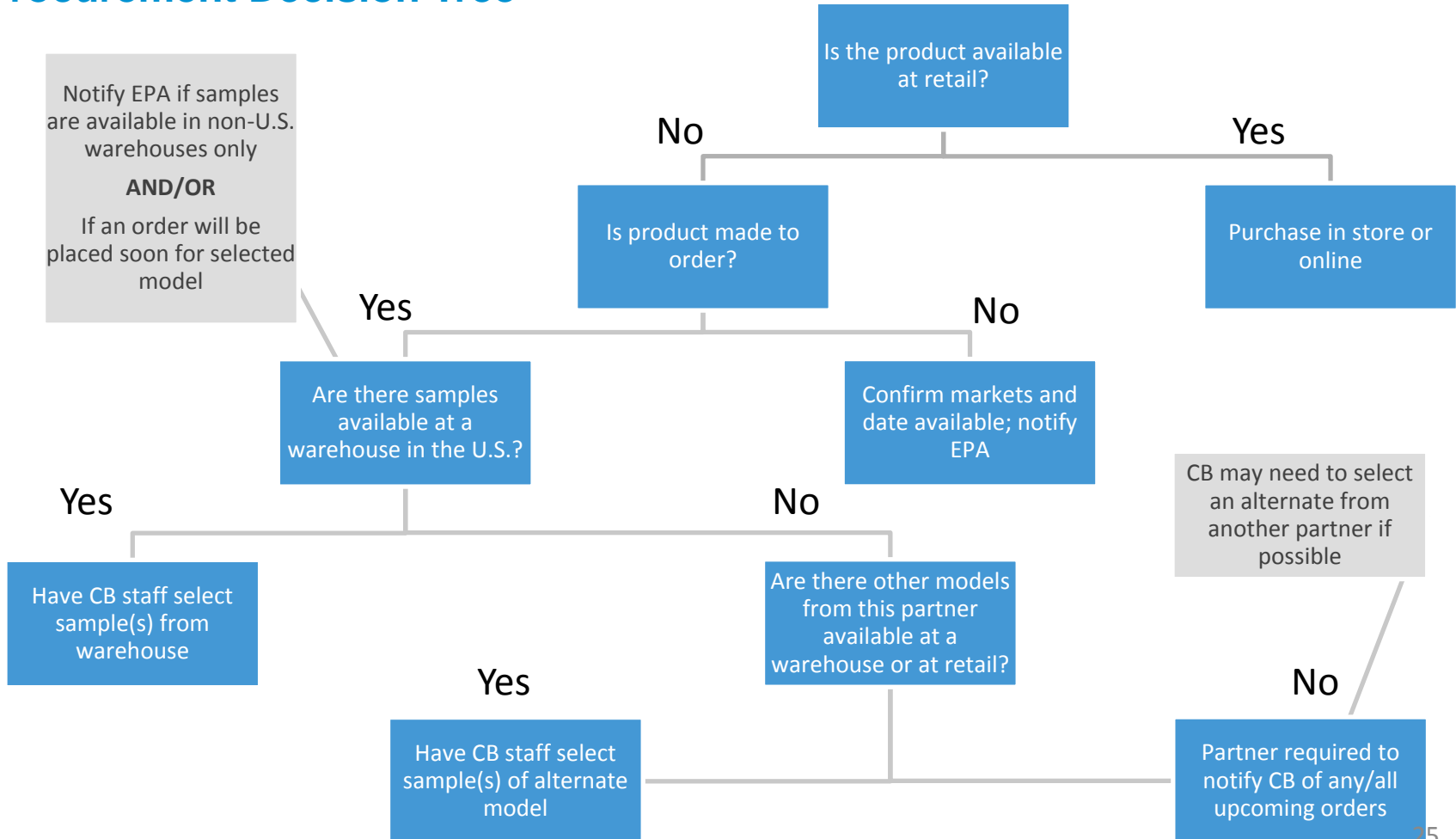
- Procure products off the line without prior EPA approval (unless product is eligible per **Directive 2011-06**)
  - Refer to Directive #2011-06 for product types pre-approved for off-the-line procurement
- Conduct testing in non-North America or first-party laboratories without prior EPA approval
- Inform partners of EPA nomination vs. CB random selection

- **What do we mean by “product availability”?**

- An end-user or distributor in the U.S. must be able to purchase the ENERGY STAR certified product.



## Procurement Decision Tree





## Verification Testing – Reporting Results to EPA

- VT summary report (found on [CB Resources page](#)) has three tabs:
  - **Completed Testing**
    - Report here if initial testing (if lighting) or full testing (if non-lighting) was completed during the relevant January-June or July-December period
  - **In Progress**
    - Report here if procurement or testing is in progress
  - **Model Not Tested**
    - Report here if the model was selected for VT but could not be procured. Sample reasons include:
      - Not available in U.S. market (e.g. discontinued, market doesn't include U.S.)
      - Partner was noncompliant





## Verification Testing – Reporting Results to EPA – Lighting

- Lighting VT reporting **if lifetime testing is required**:
  - Initial testing completion will count towards CBs’ annual requirement; **report on Completed Testing tab**
  - Once initial testing has been reported, **do not report lifetime testing on VT Summary Report**
    - EPA will periodically request separate lifetime testing progress updates
- Initial vs. Lifetime Testing Milestones (verification testing):
  - **LEDs:**
    - **Initial testing completion:**
      - 0-hr scan and
      - any shorter tests (per Directive 2015-01) required depending on product type
    - **Lifetime testing completion:**
      - **6k hour scan** (CBs are expected per the Directive to check at 3k hrs, but this is not considered “initial testing” completion)
  - **CFLs:**
    - **Initial testing completion:**
      - 100-hr seasoning scan and
      - any shorter tests (per Directive 2015-01) required depending on product type
    - **Lifetime testing completion:**
      - **4k hr observational check** (per the Directive) to confirm



## Verification Testing – Resources

- Directive #2011-06 provides instructions on:
  - Product selection
  - Procurement
  - Off-the-line procurement considerations
  - Reporting results to EPA:
    - Verification Testing Summary Report
    - Product Failure Form
- Directive #2014-01 – Responsibilities for Maintaining Product Certifications
  - Verification testing responsibilities (by **partner** and **CB**) webpage is also helpful
- Directive #2015-02 – Verification Testing for Independent Coil Manufacturers (ICM) Combinations



## Verification Testing – Common Questions

- **Reported Values:**

- Are ENERGY STAR performance criteria subject to verification testing when they are specified for reporting purposes only?

- **Recent Certification:**

- Are recently certified models (i.e. models that were certified within the last twelve months) excluded from verification testing?

- **Decorative Light Strings:**

- For verification testing of decorative light strings, how many samples/strings should be procured and tested?

- **Refurbished Products:**

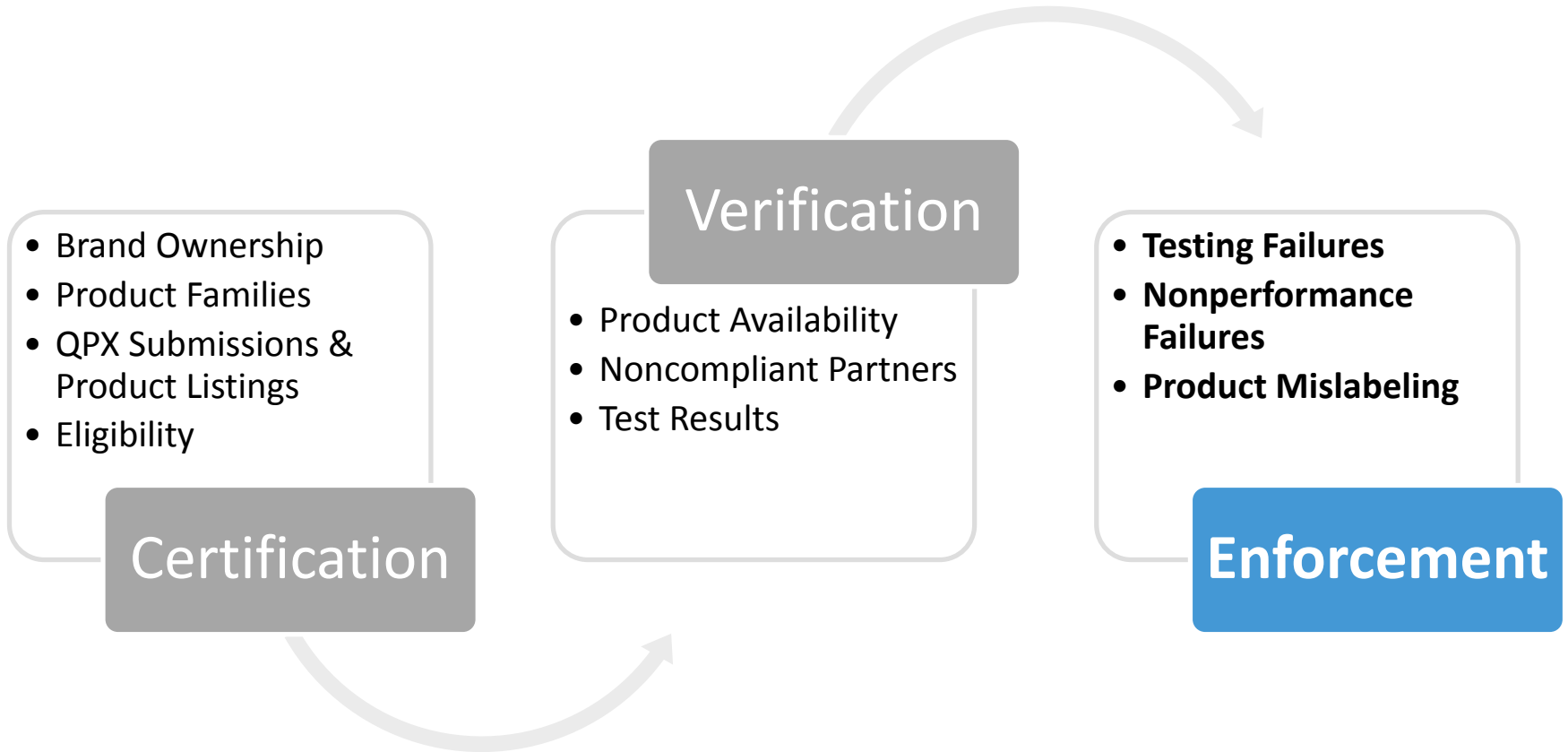
- How should a certification body (CB) proceed if it procures a product for verification testing and determines that it is a refurbished or re-designed version of the certified model?

- **Voluntary Withdrawal:**

- What are the requirements if a partner requests to have certifications withdrawn after being notified that its products have been selected for verification testing



# Enforcement





## Enforcement – Partner VT Noncompliance

- CBs should refer partners to [Enforcement@energystar.gov](mailto:Enforcement@energystar.gov) if:
  - Partner is “noncompliant” with requests for verification testing information. For example:
    - Partner does not provide retail locations in a timely manner
    - Partner delays confirming product availability
    - Partner refuses to participate in verification testing
  - Partner does not respond to other CB requests
- EPA will remind partners of their partnership commitments
  - Initial outreach is non-punitive
  - If partners remain noncompliant, they may face ENERGY STAR partnership restrictions



## Enforcement – Verification Testing Failures

- If product packaging or other “non-performance” requirements are not met as samples arrive, notify EPA via [Enforcement@energystar.gov](mailto:Enforcement@energystar.gov)
- Testing failures
  - Products that fail to meet the specification requirements during verification testing should be reported to [Enforcement@energystar.gov](mailto:Enforcement@energystar.gov) within **2 business days**
    - Includes lamps that have been certified based on “early certification” but fail lifetime testing
    - Ensure that all privately labeled affected model numbers are indicated in the [Product Failure Form](#)
- CB responsibilities during failure dispute process
  - CBs may not notify partners of a failure prior to notifying EPA
  - Update EPA if at any time you think errors may have occurred during testing
  - Respond to EPA questions regarding specific failures
  - Do not communicate with partners regarding case details





## Enforcement – Common Questions

- What constitutes a product failure under verification testing?
- When may a certification body (CB) notify a partner of a verification or challenge testing failure?
- What happens to disqualified products and their model numbers?
- What happens when a product that fails verification testing is related to another product via private labeling or product family?
- Who makes a determination of a defective unit for purposes of ENERGY STAR verification testing on non-lighting products?
- When should a certification body (CB) notify the partner and withdraw certification for a lighting model or subcomponent that fails lifetime/full qualification testing?



## CB Best Practices

- **Product families**
  - Associate families using Certification ID during certification
- **Communication**
  - Designate one primary point of contact to track information and manage information distribution
- **New specifications**
  - Plan VT timeline per upcoming specification effective dates
  - VT should be conducted per the specification in effect at procurement
- **Product availability/ relevant contacts**
  - Confirm market availability throughout the year to make VT procurement easier
  - Confirm appropriate contacts regularly
- **Delays in verification testing procurement**
  - Notify EPA as soon as possible if there are procurement delays (whether caused by partners, distributors, or something else)



## Summary of 3PC Resources

- CB Resources webpage
  - Standard Operating Procedures for CBs document
  - Verification testing summary report template
  - Failure form & Ineligible Products form
  - Enrolling first-party laboratories
  - Past webinars
- Specification lookup page
  - **very useful** for looking up specs that are historical, active, under revision, etc.
- CB Specification Technical Assistance
- 3PC FAQs + Lighting Certification FAQs
- XML Web Services Submission Process
- Directives
- Disqualification Procedures – ENERGY STAR Products
- Archived CB Correspondences



## For any questions...

- Specification questions – [Certification@energystar.gov](mailto:Certification@energystar.gov)
- QPX questions – [Certification@energystar.gov](mailto:Certification@energystar.gov)
- Laboratories (e.g. enrolling first-party laboratories) – [Certification@energystar.gov](mailto:Certification@energystar.gov)
- Testing failures and noncompliance – [Enforcement@energystar.gov](mailto:Enforcement@energystar.gov)
- Adding new contacts to [My ENERGY STAR Account \(MESA\)](#)
  - CB contacts with access to MESA can create new accounts for new colleagues
- Technical-only (QPX) CB contacts may contact EPA directly

**Thank you for your participation in this training.**



## **Kathleen Vokes**

Environmental Protection Agency

[Vokes.Kathleen@epa.gov](mailto:Vokes.Kathleen@epa.gov)

## **Eamon Monahan**

Environmental Protection Agency

[Monahan.Eamon@epa.gov](mailto:Monahan.Eamon@epa.gov)

## **Mariah Steele**

Environmental Protection Agency

[Steele.Mariah@epa.gov](mailto:Steele.Mariah@epa.gov)

[Certification@energystar.gov](mailto:Certification@energystar.gov)

[Enforcement@energystar.gov](mailto:Enforcement@energystar.gov)

[www.energystar.gov/CBresources](http://www.energystar.gov/CBresources)