



Third-Party Certification of ENERGY STAR Products

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Changes to Program Requirements



- Partner Commitments
 - Require third-party certification of all products
 - Require annual reporting of unit shipment data
 - Effective January 1, 2011
- Product Specifications
 - Minor changes to ensure a clear and effective product qualification process; where manufacturer concern, reverted to original language
 - EPA will continue aligning testing and other requirements through the specification revision process

Transition from Self-Certification to Third-Party Certification



- Self-Certification (1992-2010)
 - Partners test products, confirm conformance to specification, and label with the ENERGY STAR
 - Partners submit test data to EPA to qualify their products
 - EPA reviews test data and adds products to lists of qualified products
 - EPA verifies energy performance of select models only
- Third-Party Certification (starting in 2011)
 - Partners will have products tested in EPA-recognized labs prior to qualification and labeling
 - CBs will certify that products meet program requirements based on a review of test data
 - CBs will upload certified data to EPA for creation of qualified product lists
 - CBs will conduct verification and challenge testing after qualification
 - CBs will evaluate retested products that have undergone significant post-qualification changes



Program Updates: Implementation of ENERGY STAR[®] Certification Requirements

Qualifying Products as ENERGY STAR

Submissions received by EPA through December 31, 2010



- Continue using the existing system of a Qualified Product Information form or the Online Product Submittal tool.
- EPA must receive complete and correct submissions, including lab reports, in order to process the product submission through OPS.
- For IT product categories (computers, displays, imaging equipment and servers), EPA will review for qualification product data constituting a complete submission, pending a test report, received by EPA through December 31, 2010.
 - These submissions must include model name/type, model number, and estimated introduction date.
 - EPA must receive the test reports for these submissions no later than February 1, 2011 or submission will be returned to the partner for subsequent submission to a certification body for review.

Qualifying Products as ENERGY STAR

Submissions on or after January 1, 2011



- New products must be certified by an EPA-recognized Certification Body (CB)
 - Products may not be submitted to EPA for qualification
 - List of CBs maintained on www.energystar.gov/testingandverification
- Products must be tested in an EPA-recognized laboratory
- CBs will certify products, conduct regular verification testing of products, and conduct challenge testing per EPA requirements
- EPA will continue qualification of products that are additions to a product family qualified prior to January 1, 2011 until the specification revision is effective

Laboratory Requirements under New Third Party Certification Scheme



- CBs may accept data for certification only from labs that are recognized by EPA
 - Based on accreditation to ISO 17025; or
 - If lab participates in CB's Supervised or Witnessed Manufacturers Testing Lab Program
- Manufacturers labs are not required to participate in an SMTL or WMTL if they are recognized by EPA
- CB is responsible for ensuring that test data is acceptable if testing conducted prior to accreditation



ENERGY STAR Standard Operating Procedures (SOP)

Product Certification Overview



- The Guide for Certification Review: An ENERGY STAR Standard Operating Procedure (SOP) for Product Evaluation
 - Designed by EPA to reflect the steps followed when reviewing products against ENERGY STAR product specifications
 - Key Sections of the SOP
 - General Requirements
 - Eligibility Criteria
 - EPA-Recognized Laboratory Report Checklist
 - Product-Specific Appendices

Collecting Required Data

- CBs will collect all information needed to determine that the product can be certified
 - The information on the Certified Product Data Submission form usually only represents a subset of this data
- Collect other information as needed for purposes of verification and challenge testing
- The ES partner must submit information to certify a product
 - If a recognized lab or other party submits a subset of data and includes the partner in the correspondence, the CB should consider this information submitted by the partner

Verifying Product Family Membership



- If Applicant/Partner wishes to certify a product in a member of a specification-appropriate product family, it must provide:
 - Test report(s) for representative model(s)
 - An explanation of any variations within the family
 - An up-to-date list of models included in the family
- CBs must maintain a list of all products in a family

Certifying Product-Specific Aspects and Performance



- Product must meet Program Requirement to be certified.

ENERGY STAR ELIGIBILITY	Applicant satisfies requirements? (Yes/No/Not Applicable and Comments)
Is the device an Included Product, as outlined in Section 2: Scope of most ENERGY STAR specifications? ¹ (Model must be on the Included list and not be an Excluded Product as defined by the specification.)	
Does the product meet all of the qualification criteria as outlined in the specification? (Typically, refer to Section 3 of the specification. Be sure to check all requirements, including multiple energy efficiency requirements, warranty requirements, packaging requirements, etc. Also, where applicable, ensure calculations have been performed correctly (e.g., TEC calculations).)	
Are the qualification criteria met using the appropriate significant digits and rounding?	
Was the appropriate test method(s) used per the test report?	
Were the correct type and number of units tested, based on specification requirements?	
Was the product tested for qualification at the relevant input voltage/frequency combination for each market, in addition to the United States, in which it will be sold and promoted as ENERGY STAR?	

Checking Laboratory Test Reports



- CBs must at a minimum locate lab report fields specified on the SOP to ensure that the product was appropriately tested
 - Test procedure name listed
 - Test date listed
 - Serial number listed
 - Sample description listed (e.g., # of products tested)
 - Equipment calibration dates and next due date listed and within range
 - Test engineer and witness names and signatures provided
 - Test results organized by applicable test procedure section and clearly marked to indicate results that are relevant to ES
- If the information cannot be verified, the product cannot be certified until that information is furnished

Adhering to Supplemental EPA Guidance



- SOP Appendix A – product-specific guidance
 - Power supply requirements for IT products
- Routing Further Inquiries
 - If other product-specific aspects of certification review are unclear, route any and all questions back to EPA via product-specific ENERGY STAR inboxes

Certifying Privately-Labeled Products



- CB can certify a different brand of the same model without data review if the model is already certified by the CB
 - EPA encourages CBs to work together to avoid duplicative testing and review
 - CBs will need to flag models that are certified under different brand names
 - CBs will need to maintain a data field with the model tested to help track this information

Keeping Certified Product Lists Current



- CBs are responsible for keeping lists of certified products up to date
 - Need to establish a policy for ensuring that certified products are available for verification testing
 - Partners will need to indicate when products are no longer manufactured and the expected shelf-life
 - CBs will need to flag products that are disqualified

Transferring Data to EPA

- If product can be certified
 - Enter the relevant product and product subtype being certified into the relevant Certified Product Data Submission form
- After data entry
 - Submit data to EPA using the MESA interface
- Frequency of data submission
 - Initially will start on a bimonthly basis, but will move to monthly for most products



Notes on Verification and Challenge Testing

Verification Testing Model Selection



- EPA will be issuing specific guidance regarding selection of products
 - Annually test a minimum of 10% of certified products in each category and included subtype
 - Category: Imaging.
 - Subtypes: copiers, digital duplicators, fax machines, mailing machines, multi-function devices, printers, scanners.
 - Product Families
 - All members of family are subject to testing, but not more than one per round
 - Private labelers
 - Brand A, B, and C are all one product for verification testing purposes

Verification Testing Model Selection



- **Information not included in QPL that can inform model selection:**
 - All relationships between products, including:
 - Base model and manufacturer for each privately labeled product
 - All privately labeled model numbers associated with each OEM product
 - Clear indication of which qualified products are OEM products and which are privately labeled products
 - All relationships between manufacturers not covered by OEM-PL relationship
 - e.g.: “ Acme submitted this product on behalf of Roadrunner”

Procurement of Units for Verification Testing



- Off-the-shelf procurement is favored
- EPA does not define “prohibitively expensive to purchase or transport...”
 - If a CB allows for warehouse or off-the-line procurement, it should be prepared to justify that choice.
- Partners are required to provide at least three locations where a product is available, EPA suggests this be included in product submissions for certification.

Preferred Locations for Verification Testing



- Verification must generally occur only at EPA-recognized **third party** labs.
- EPA-Recognized first party facilities are permissible **ONLY** when off-the-line testing is the only practical option, provided that:
 - CBs witness the test
 - CBs must be able to defend their decision to allow use of first party lab (as with procurement)

Re-evaluation of Products in the Event of Significant Changes



- CBs require partners to notify them of product changes
- CB is not required to re-test all changed products
 - The CB retains discretion to decide if changes warrant a re-test
- Notify EPA
 - If there is no change in status, on the normal upload schedule
 - If there is a change in status (product no longer meets ES requirements), within two business days

Challenge Testing

- CB must have a policy built into the contracts it signs with partners.
 - Challenges can be initiated by partners outside of your certification scheme
- CB must judge the legitimacy of a challenge claim
- CBs have discretion to establish the rules for challenge testing program
 - A “loser pays” scheme may be easiest

Questions?



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