



## THIRD PARTY CERTIFICATION IMPLEMENTATION

### ENERGY STAR<sup>®</sup> PRODUCTS

**SUBJECT:** ENERGY STAR Verification Testing Supplement: Selecting Products, Obtaining Products, and Reporting Results

DIRECTIVE NO. 2011-06

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The following guidance is a supplement to the *Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR program*, and pertains to selecting and obtaining products for verification testing, as well as reporting results to EPA.

#### **Product Selection**

All unique models on EPA's qualified products lists (QPLs) - products currently available for sale in the U.S. - are candidates for verification testing. For purposes of determining unique models, certification bodies (CBs) should take into account both privately labeled models and product families. Privately labeled model(s) and the associated OEM model should count as one unique model; however, any one of the models may be selected for verification testing. Likewise, product families only count as one model for purposes of determining unique models, but any member of the product family may be selected for verification testing.<sup>1</sup> At minimum, 10% of unique models should be tested each year for verification testing purposes. The 10% should be based on product categories at the ENERGY STAR product specification level (e.g., 10% of all imaging equipment products, 10% of products covered under the computers specification, etc.). CBs should round up to the nearest integer to determine the number of models to test. CBs should also select replacement models in the event that one or more of the selected models cannot be tested that year.

Verification testing to a new or revised specification may not commence until the specification is effective. Each CB will have distinct testing cycles and selection date(s) and may select 10% at once at the beginning of the year, 5% twice a year, or follow an alternative selection schedule. The percent selected shall be based on the number of unique models the CB has certified, and the QPL on the date of product selection. At least 50% of the models should be randomly selected, though this number may be higher if the CB is not able to select 50% of models based on the factors in section 3(C) of *the Conditions and Criteria for Recognition of Certification Bodies*. On a rolling basis, EPA will accept nominations for products from energy efficiency program sponsors (EEPS) and others to include in verification testing, and share these with CBs. CBs are responsible for tracking other factors that influence product selection.

Before obtaining units, CBs should confirm availability of selected models. A model may be excused from testing where its manufacturer or private labeler is able to demonstrate that an identical model or model from the same family was procured for verification testing by a CB in the preceding 12 months, or has already been procured by a CB for verification testing. For off-the-line testing, manufacturers must provide a production schedule. CBs may decide to select alternative models for testing based on the production schedule.

As stated in the *Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR program*, off-the-line testing is only appropriate where procuring products from the shelf or obtaining them from a warehouse is not feasible. Examples include where the selected

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<sup>1</sup> The term, "basic model groups," is used in certain ENERGY STAR specifications and should be treated the same way as product families for purposes of verification testing.

product is prohibitively expensive to purchase and/or transport, is made-to-order, or is otherwise unavailable through normal retail channels. Based on these examples, the following list of ENERGY STAR product categories are eligible for off-the-line procurement:

- All Commercial Food Service products
- All Imaging Equipment products with speeds greater than 50 ipm (images per minute)
- Servers
- Workstations
- Light Commercial HVAC

For other product categories, CBs may procure units off-the-line if they are made to order or otherwise unavailable for off-the-shelf testing or from a warehouse. In the case of products that are prohibitively expensive, CBs should confirm with EPA if the model is eligible for off-the-line testing.

All objections to testing should be referred to EPA within five business days of the CB notification of the objection.

### **Obtaining Units**

At the time of model selection, manufacturers are required to provide notification of unit availability. Since verification testing is only for products sold in the U.S., these locations must be in the U.S. For online ordering, the product must be shipped to a U.S. address. CBs should consult with EPA if they opt to obtain a product directly from a warehouse that is located near but outside the U.S.

To ensure that units are available for verification testing, they must be obtained shortly following model selection. Both selection and procurement must occur when the same version of the specification is in effect so that units are not procured when they are no longer on the list of qualified products.

If a selected model is not available in commerce in the U.S., there are two options. If it is part of a product family, the CB should determine if another member of the family is available in the market and select that one for testing. Otherwise, the model should be removed from the QPL and the following actions taken:

1. The manufacturer responsible shall reconfirm availability of ALL its certified models.
2. CB will select another model for testing from that manufacturer.
3. CB will consider flagging the manufacturer for testing in subsequent years if there are ongoing issues with availability of selected models.

CBs should try to procure testing samples from retail locations identified by the manufacturers and online outlets of those retailers. For lighting products, CBs should procure testing samples from at least three geographically diverse locations. Other locations selling legitimate products are also allowed. However, CBs may not procure samples from otherwise unknown internet sources (i.e., grey market sources). The product will be tested against the specification version in effect at the time of product procurement.

### **Reporting**

CBs shall report failures within 2 business days of the CB determination of a testing failure to [enforcement@energystar.gov](mailto:enforcement@energystar.gov) using the subject line "FAILURE" followed by the manufacturer name(s) and model number(s). This report must include a spreadsheet with basic information on the testing failure. This will include:

- a. Product name, model number, and serial number
- b. Related products, including other members of the product family and/or privately labeled models
- c. Relevant initial test results
- d. Relevant verification test results
- e. Date(s) of verification test(s)
- f. Where unit(s) was/were obtained
- g. Date unit(s) was/were obtained
- h. Lab name and EPA org ID# where unit(s) was/were tested

Twice per year (January and July), CBs shall provide a summary of models tested during the previous 6 months. This summary will include the model name, number, and top-level test results, as well as information about where the units were obtained and tested. If units were not obtained off-the-shelf and/or tested in a third-party laboratory, the CB shall provide an explanation. The summary shall also include a list of models selected for testing that were not tested, along with the reason. EPA will provide a summary reporting template for CBs to use.