



Kathleen G. Vokes
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW, MC 6202J
Washington, DC 20460

April 27, 2010

Subject: Comments regarding Enhancements to the Energy Star Program.

Dear Kathleen:

Following your "Energy Star" stakeholder communication sessions, CSA International would like to take this opportunity to comment on the proposed enhancements to the Energy Star program. Our comments on these enhancements relate to: 1) the added costs to manufacturers with the introduction of third party qualification and verification, 2) the costs associated with obtaining and maintaining accreditation to specific versions of Energy Star program requirements, and 3) use and qualification of manufacturer's testing laboratories.

1) Cost to Manufacturers for Third Party Qualification and Verification.

As we listened to stakeholder input during various sessions, it was apparent that the additional cost associated with third party qualification and verification was of concern to the manufacturing sector, recognizing that these costs would ultimately flow through to the consumer. So long as Energy Star remains a voluntary program, those manufacturers that chose not to subscribe to Energy Star could realize a pricing advantage over those that do.

Any organization engaged in the certification, testing and on-going verification of products, and allows their trademark to be used as evidence of compliance, understands the need to protect the integrity of that trademark at all cost, just as the EPA is with the Energy Star mark. As a result, these organizations have had to install processes for initial product qualification (or certification), for assuring continued compliance through factory / production surveillance, for product retesting (verification), and for open market surveillance, that address these integrity concerns. In addition, these processes and systems are all subject to auditing by and under the scrutiny of the accreditors of these organizations.

Anything EPA, certification organizations and industry can collectively do to streamline and integrate EPA processes with those already developed and deployed in the "certification" arena will help testing laboratories and certification organizations minimize costs associated with Energy Star programs and thereby minimize additional expenses for manufacturers and ultimately consumers.

2) Cost of Accreditation for Energy Star Program Requirements.

As both an accredited Certification Body and accredited Testing Organization, we fully appreciate your approach to wanting third party testing performed by an accredited testing laboratory and wanting those accreditations to reflect testing capabilities to specific Energy Star Program Requirements. Our concern here is only with respect to having specific versions of any given program requirement reflected in our accreditations, especially in light of commitments made by EPA to update and reissue requirements on a more frequent basis.

Although the expense associated with accreditation is accepted as a cost of doing business in our industry, we foresee the possibility of endless audits by accreditors and ever increasing accreditation costs, related to the publication of revised requirements, especially when revisions may have no bearing on the actual testing requirements or product performance.

Under existing accreditation schemes delivered by ILAC signatory accreditors, it is customary that accreditations are issued for either a product category or standard (less version date). Accreditors then assume the responsibility to ensure that the most recent versions of test requirements are being used during their subsequent annual laboratory audits.

We recognize that our accreditations must now reflect Energy Star program requirements and are making appropriate arrangements, but ask that you reconsider the need to be accredited to specific versions of any given requirement.

3) Use & Qualification of Manufacturers' Testing Laboratories.

Again, as we listened to manufacturer's comments, we are also aware of their concern over the possibility that EPA will be reluctant to accept their "factory generated" test data as evidence of compliance with applicable Energy Star Program Requirements, without them becoming an ISO / IEC 17025 accredited testing laboratory.

Through our many years of delivering energy efficiency verification (EEV) services, we have come to appreciate the competencies of several manufacturers' in house testing laboratories. Many are state-of-the-art, fully calibrated, and in some cases exceed the capabilities of some third party commercial testing laboratories.

In recognition of these capabilities CSA has introduced an ISO / IEC 17025 based qualification process that allows us to utilize these facilities, in place of our own testing laboratories, when qualifying and verifying products for our Energy Efficiency Verification (EEV) mark. This process is equally recognized under our energy efficiency accreditations and subject to accreditor audit.

Manufacturers wishing to have their testing laboratories qualified for CSA - EEV programs are subject to an initial audit and must be in full compliance before any further consideration is given. In addition, each facility is subject to an annual audit regardless of how many or how few products they have developed or manufactured over the course of the previous year. Given the integrity surrounding the use of our verification mark, extending this qualification to a manufacturer is not taken lightly and any non-conformances identified through our product testing, through follow up verification, through our annual audit or subsequent follow up re-audits, are addressed swiftly and completely.

Again, in appreciating the need to maintain integrity in the Energy Star mark, while providing timely qualification and verification services, we would encourage EPA to consider recognizing these third party laboratory qualification programs for manufacturers' testing laboratories in your final enhancement deliberations.

In the spirit of assisting EPA through this process we would like to invite you to visit our testing laboratories in either Cleveland, Ohio or Toronto, Ontario to see first hand how we manage our current certification and test schemes, accreditation to specific requirements and our approach to manufacturer's laboratory qualification, under various accreditations including those of ANSI, SCC and IAS, to name only 3. Alternatively, we would be equally pleased to visit you to share the same information. If either of these opportunities interests you, please let us know and appropriate arrangements will be made.

Best regards



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