

24 June 2010

Subject: ENERGY STAR Draft Certification and Verification Requirements

On behalf of the International Accreditation Forum, I offer the following comments on the draft Conditions and Criteria for Recognition of Certification Bodies for the Energy Star Program document. IAF members are very pleased that the first requirement for a product certification body to maintain accreditation to ISO/IEC Guide 65 by a signatory of the IAF MLA for product certification.

Some additional comments:

1. Add a requirement that a certification body notify EPA and any affected customer (Energy Star manufacturer) of any suspension or withdrawal of accreditation.
2. Specify the length of time test reports for certified products need to be maintained. See clause 1)d) of the draft document.
3. In consideration of international accreditation bodies or certification bodies, provide for any meetings to also allow for remote participation via the internet. See clause 1)e) of the draft document.
4. The second portion of this requirement, “and that the personnel conducting the testing are properly trained and qualified” is an unnecessary duplication of effort if a testing laboratory has been accredited to ISO/IEC 17025. See clause 1)f) of the draft document.

Regards,

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