

From: [Hershal Brewer](#)
To: ENERGYSTARVerificationProgram@energystar.gov
Subject: Draft Certification and Verification Comments
Date: Thursday, June 24, 2010 5:44:20 PM

Eamon,

Below are the comments from IAS regarding the CB Draft Requirements for ENERGY STAR®.

We recommend that ENERGY STAR® adopt a transition approach for IAF Signatory status, as more than one U.S. AB is currently in process of attaining the signatory status. Currently, only one is a signatory to IAF. Adopting a transition approach will assure a greater representation of ABs and prevent a reduced number of CB options for ENERGY STAR®. EPA has adopted this approach for the Watersense Program, so there is precedent.

We recommend that ENERGY STAR® adopt the same approach allowed in ISO Guide 65, which is presumed to be included in the upcoming ISO/IEC Standard 17065, which will replace ISO Guide 65. That approach allows the CB to use test reports from both internal and external laboratories. Test report requirements from the Enhanced Testing and Verification Draft Requirements should be enforced for both external and internal laboratories to assure consistency of reports being provided to the CB. During an ISO Guide 65 assessment currently, there must be appropriate provisions between the CB and any internal laboratory or inspection body to prevent conflict of interest, and this approach can be adopted by ENERGY STAR®.

We recommend clarification of the requirement for recognized test laboratories by including appropriate reference back to both the Enhanced Testing and Verification and the Accrediting Body Draft Requirements.

As regards the requirements for testing, we recommend that ENERGY STAR® include a requirement that the CB include a policy and procedure for ensuring that testing of 10% of base models each year be maintained, and that records supporting that be specifically reviewed during assessments by ABs, and documented in the assessment report.

Regarding Appendix A, we are pleased that ENERGY STAR® has included this

provision. We recommend a minimum oversight level be established that is currently consistent with AB requirements and CB practices. That is, a full evaluation by the CB of the Manufacturer's Test Laboratory (MTL) or Witnessed Manufacturer's Test Laboratory (WMTL) at a period not to exceed every two years for requirements to ISO/IEC 17025, and quarterly for oversight of manufacturing of product. This should be considered separate from the requirements regarding retesting under the Draft CB and the Enhanced testing and Verification Program Requirements.

Regarding sampling in the field, ensuring that products are suitably labeled, and similar requirements, we encourage ENERGY STAR® to consider including an allowance for accredited inspection bodies, accredited to ISO/IEC Standard 17020 by a signatory to the APLAC MRA, to include Inspection in the recognized scope. This wording can be changed to reflect ILAC once the ILAC MRA includes Inspection. We also recommend that further details of specific roles of an accredited inspection body be defined either in an Appendix, or in the upcoming Draft Requirements for ENERGY STAR® Program Administration.

Best regards,

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