

## METI's Comment on Draft ENERGY STAR Enhancement Plan

Thank you very much for sharing information regarding “ENERGY STAR program Enhancement Plan.”

In 1995, EPA and METI signed an agreement to implement ENERGY STAR program in Japan. Since then, we have been implementing the program, with the use of the same standards and logo as in U.S. Based on the mutual recognition principle, currently a product which becomes qualified in one of these countries is treated in the same manner in the other country as those qualified there.

While EPA is forwarding the effort to finalize the product enhancement plan, it seems that EPA is requiring other ENERGY STAR implementing countries/regions to ensure the same level of strictness in product qualification process. Such changes which EPA is planning to introduce in ENERGY STAR program will probably demand significant changes in the program in Japan.

METI now understand that EPA is eager to enhance the program in order to maintain the value of ENERGY STAR brand. However, we still believe that the possible increase of social cost due to such changes needs more close attention.

Moreover, the proposed scheme for qualification is requiring multiple third-party certifications. It seems excessive, even though it is for the sake of ensuring data accuracy. METI believes that the accuracy of data can be sufficiently ensured with a simpler scheme.

Applying EPA's enhancement plans to ENERGY STAR program in Japan will possibly require significant changes in current program implementation. We must review and discuss carefully when transitioning to the new program. METI would like to spend development and reviewing period enough to have this program change successful in Japan. In order to avoid confusion among partner manufacturers, METI proposes to maintain the current mutual recognition as it does now until the enhanced new ENERGY STAR program is introduced in Japan.

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METI