

Comments on Draft Laboratory Requirements for ENERGY STAR

Beverage Air agrees in principal with the draft laboratory requirements as proposed with the following comments:

Manufacturers must be allowed to perform energy testing in-house under the direction of their program they may have established for safety and sanitation performance testing with a Nationally Recognized Testing Laboratory such as UL, ETL, NSF, etc.

For example; Beverage Air is audited and approved through UL to perform independent testing for Safety and Sanitation through the UL data acceptance program. Through the same auditing and approval procedures Beverage Air would be certified to perform energy testing that could be submitted to the EPA for EnergyStar approval.

If a manufacturer can be certified to perform important safety and sanitation testing through a Nationally Recognized Testing Laboratory then it seems appropriate that it could perform testing for a voluntary energy program.