

Feedback on "Draft Conditions and Criteria for Recognition of Laboratories for the ENERGY STAR Program ("Draft Lab Requirements")"

May 27, 2010

To the U.S. Environmental Protection Agency

In response to your "Draft Conditions and Criteria for Recognition of Laboratories for the ENERGY STAR Program ("Draft Lab Requirements")" issued on May 17, the Display Energy Saving Working Group of the Display Technical Committee in the Japan Electronics and Information Technology Industries Association (JEITA) provides its feedback as follows. The content of this feedback is based on the results of a questionnaire survey (5 respondent companies) covering the member companies of this Committee.

(Please refer to the appendix for the content and results of this questionnaire survey)

(Comments)

- The requirements for laboratory accreditation (ISO/IEC17025) provided as your proposal are considered appropriate since existing testing laboratories generally meet the requirements.
- With regard to Accreditation Body ("AB") to be recognized by the EPA, we expect the recognition of ABs in a sufficient number so as to cover testing laboratories in Japan, China, and Taiwan, as well as in the U.S.

Reason: Because application for testing will be very difficult if there is no accredited laboratory in the country of the manufacturer. Note that none of the companies who answered in the questionnaire survey has an in-house laboratory.

- We request the postponement of application of the proposed system until a sufficient number of laboratories are accredited in Japan, China, and Taiwan.

Reason: To prevent the extensive time required to acquire accreditation due to the concentration of requests for testing to the relevant laboratory.

- The use of an outside laboratory will require payment of testing expense, which will lead to an increase in the product cost. For this reason, we request a grace period of at least 6 to 12 months to be set in application of the proposed system so that the products that are already under development may be excluded from the application of the system.

(Question)

- Is it correct to understand that this system will only apply to products applied for in the U.S. and products exported to the U.S.?

We sincerely appreciate your understanding about our comments.

JEITA Display Technical Committee
Chairperson Toru Kobori

Appendix: Content and Results of the Questionnaire Survey

[Question 1] ISO/IEC 17025 certification

- How many companies in the industry have acquired ISO/IEC 17025 certification through the in-house laboratory?

[Answer 1] None of the five companies who answered this question has an in-house laboratory.

Company A: Not acquired the certification.

Company B: No in-house laboratory.

Attach test data to the application for official certification, as necessary.

Company C: Not acquired the certification.

Company D: Not acquired ISO/IEC17025 certification.

Company E: Not acquired the certification.

[Question 2] Is it possible to newly acquire the certification through an in-house laboratory?

- Issues in acquiring the certification.
- Of the requirement items of ISO/IEC17025, specify items, if any, that are difficult to satisfy in acquiring the certification.

[Answer 2] Each company answered "Don't know" or "Difficult."

Company A: We don't know because we have not acquired the certification.

Company B: Don't know.

Company C: We don't know details since we have not acquired the standards, but the draft we received describes the following strict conditions concerning "in-house laboratory."

* Compensation or bonus payable to the laboratory employees is unrelated to the financial performance of the parent company.

* No laboratory engineers must be from the parent company or return to their post in the parent. Also, they must not expect the parent company to promote their position.

These conditions are in fact considered impossible to satisfy.

Company D: Little need for in-house calibration of measuring equipment and no plan to acquire ISO/IEC 17025 certification in the future.

(i) Since we had no idea about acquisition of ISO/IEC 17025

certification, we would have to prepare from scratch.

(ii) Since our Measuring Equipment Control Office functions across the company, it would take much time to use it as a laboratory for ISO/IEC17025 accreditation exclusively for the ENERGY STAR Program.

Company E: No comments because of no information about the details of ISO/IEC17025 standards.

[Question 3] Regarding the draft conditions and criteria for laboratory accreditation proposed by the EPA, is it possible to comply with requirements other than those for acquisition of ISO/IEC17025 certification? If compliance is difficult, what is specifically difficult?

[Answer 3] Each company has different views.

Company A: With regard to Accreditation Body ("AB") to be recognized by the EPA, unless a sufficient number of ABs are recognized so as to cover testing laboratories in Japan, China, and Taiwan, as well as in the U.S., Japanese manufacturers would suffer disadvantage.

Company B: Don't know.

Company C: There would be no major issues.

We would be able to check the performance of our product as before.
Additional expense and time would be required to some extent since final check by an outside laboratory would be needed.
(This might be a major issue, if any)

Company D: Would have no choice but to ask a third party certification body for testing.

Company E: The obligation imposed on in-house laboratories to report the following two items seems impossible to abide by.

* Compensation or bonus payable to the laboratory employees is

* No laboratory engineers must be from the parent company

[Question 4] What issues would there be when using an outside testing body?

[Answer 4] Each company is concerned about information on third-party certification bodies and cost of acquiring certification.

Company A: Extensive time required to acquire accreditation due to the concentration of requests for testing to the laboratory, increase in the product cost due to the occurrence of testing expense, etc.

Company B: Testing expense might be costly. (it depends on how many sets required for testing)

Also, assessment period may become lengthy.

Company C: Occurrence of cost will pose a problem.

Company D: (i) No information about a third-party certification body that can conduct testing under the ENERGY STAR Program.

(ii) Cost is required for testing under the ENERGY STAR Program.

Company E: Cost and time might depend on the number of accreditation bodies and their locations.

[Question 5] If Japan refuses to receive applications for accreditation under the ENERGY STAR Program, what problems would occur?

[Answer 5] In general, each company thinks that application abroad would be very difficult or problematic.

Company A: Application abroad would be difficult since it must be made in English. For this reason, some manufacturers might stop application. As a result, recognition of ENERGY STAR Program might decrease in Japan.

Agreement with the U.S. EPA needs to be concluded to make application in the U.S. If such agreement is allowed only for U.S. businesses, some Japanese companies might be unable to make application under the ENERGY STAR Program. It would be difficult for Japanese users to search products accredited under the ENERGY STAR Program (because information is provided only in English).

Company B: Time and effort for application will increase.

Company C: We will have to acquire accreditation from the U.S. EPA, won't we?

It would be a major issue that there are too many items we need to study from scratch, such as procedures for registration in the EPA. It would also be disadvantageous to Japan that we cannot apply for accreditation or register product in Japan using the Japanese language under the ENERGY STAR Program, which is an international leading standard.

Company D: For some products, we often consulted with the executive office of ENERGY STAR Program in Japan (ECCJ) to acquire certification, so we feel uncertain about how to respond to inquiries in the future and how much time we need for response.

Company E: No comments since we have no information about the new system to receive application for accreditation (collectively by the EPA?).

[Question 6] Other opinions

[Answer 6]

Company D: We request no change, i.e., continuation of the present system.