



KOLAS

Korea Laboratory Accreditation Scheme
Korean Agency for Technology and Standards
Ministry of Knowledge Economy
Republic of Korea

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Subject: Comments from Korea's national laboratory accreditation body, KOLAS, regarding the proposed Draft conditions and criteria for Recognition of Laboratories for the ENERGY STAR Program

Dear Ms. Kathleen Vokes,

We appreciate the opportunity to submit the following comments to EPA with regard to the proposed draft conditions and criteria for Recognition of Laboratories for the Energy Star Program ("Draft Lab Requirements).

Additional Check by EPA on Laboratory Assessment

A laboratory accredited by Accreditation Body(AB) which is one of the ILAC-MRA signatories means that the AB has already completed a procedure to verify technical competence and quality management system of the laboratory, based on the ISO/IEC 17025. As for the requirements to become a recognized laboratory for ENERGY STAR program by a separate procedure of EPA, therefore, it is considered that the plan for EPA and DOE is against the spirits of WTO/TBT Agreement and the ILAC-MRA. Re-checking by EPA of the laboratory's assessment reports, corrective actions on nonconformities of laboratory is considered to be against the principles of ILAC-MRAs, which are based on mutual trust between the MRA signatories. We respectfully urge the EPA to reduce the re-check items.



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Inter-laboratory Comparison (ILC) Testing

It is indicated that EPA could operate ILC if necessary. We are of the opinion that such provision is unnecessary since the ILCA MRA member ABs already operate internationally recognized proficiency tests.

We would be grateful if our concerns are taken into account.

In addition, we would like to know whether EPA is currently establishing an additional procedure for the assessment and verification of LABs. If so, we would appreciate it if EPA sends the detailed information.

Huh. Kyung

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