

August 6, 2010

METI's Comment on Final Draft of
Conditions and Criteria for Recognition of Certification Bodies for
the ENERGY STAR® Program

From an international point of view, ENERGY STAR brand in fact has achieved its current value and status in the international framework. Thus, it is no longer a local program limited within the U.S. METI recommends that EPA should be aware of that this time's enforcement plan will affect each country/region's economy severely.

The U.S. and Japan have been implementing ENERGY STAR program with special cooperative relationship, the mutual recognition agreement. Therefore, when introducing such enhancement plans, comments of METI should be taken carefully into consideration.

Comment 1:

Any product certification bodies, wherever they have a presence, should be treated equally, as long as they maintain accreditation to ISO/IEC Guide 65 by a signatory to the IAF/MLA. The requirement 1) b) "Have a substantial North American presence" is discriminative against product certification bodies outside of North America; therefore, it should be removed from the CB requirement. Even though it is necessary for EPA to maintain a close working relationship with CBs, there is no need for them to physically exist within North America, taking into consideration the current advanced communication means.

Comment 2:

Currently, METI is reviewing and considering how to implement ENERGY STAR in Japan from this time forward. According to the EPA's implementation plan, transition to independent testing and a third-party certification program will be completed by the end of 2010. As noted above, METI is just under way to decide the new policy of ENERGY STAR in Japan; therefore, it is too difficult for us to keep up with EPA's schedule. Whatever decision will be made about the future ENERGY STAR in Japan, METI is going to maintain the current program until the end of 2011 at least.

Regarding EPA's schedule for the enhancement plans, METI feels that completing the transition to a new scheme by the end of 2010 is too fast, and concerns whether it might cause unnecessary confusion in markets. METI believes that EPA's

enhancement plans should provide a preparatory period long enough for markets to be ready for the new scheme; at least a few years should be given as a transitional period.

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