

**FINAL DRAFT:
CONDITIONS AND CRITERIA FOR RECOGNITION OF CERTIFICATION
BODIES FOR THE ENERGY STAR PROGRAM**

COMMENTS FROM THE STANDARDS COUNCIL OF CANADA (SCC)

1) b: The term *substantial* in this proposed clause requires clarification. Substantial is not measurable. Therefore, it is subjective and not easily audited. It may be better to describe the intent or re-write in a different way. For example, *the Certification body shall have a North American presence, with at least one certification office established and operating in North America.*

1) e: The term “*Energy Star Partner*” requires clarification within this document. Recommend a definition be inserted either at the beginning of this document or in this clause. Also, clearly identify the types of groups (eg. manufacturers, distributors, etc) which could be considered partners.

If a Partner is a Certification Body (CB) client, such as a manufacturer or distributor recognized by EPA, then SCC disagrees that the description of the management of competencies of the CB’s personnel involved in the certification process shall be made available to the Partners. ISO Guide 65 does not require the CB’s application package or information made publically available to include this type of document. The CB’s competency requirements and its conformity is subject to oversight by the Accreditation Body. Furthermore, SCC does support the clause requirement for provision of the competency information to the EPA, upon request. Therefore, EPA would also have oversight of the competencies as well.

1) e (i): This clause requirement as it is currently written, does not clearly identify that the agreement *form or template* must be submitted. It could be misinterpreted that a copy of the signed agreements must be submitted.

Therefore, to clarify, replace the clause: to read:

A copy of the *form or template which serves as the* legally enforceable agreement for the provision of certification activities to the CB’s client

1) j: This clause requirement is not clearly written and needs clarification. In order to clarify, add a comma after the word “certified” as follows:

Notify EPA and any ENERGY STAR partner whose product(s) the CB has certified, of any suspension or withdrawal of the CB’s accreditation.