

CB Training

ENERGY STAR® Program Integrity
May 5, 2016





Purpose

- Provide CB staff with information on the following:
 - Overview of ENERGY STAR Third-Party Certification (3PC) policies and resources
 - Certification and product submissions
 - Verification testing policies and procedures
 - Enforcement policies
 - CB best practices
 - Additional resources

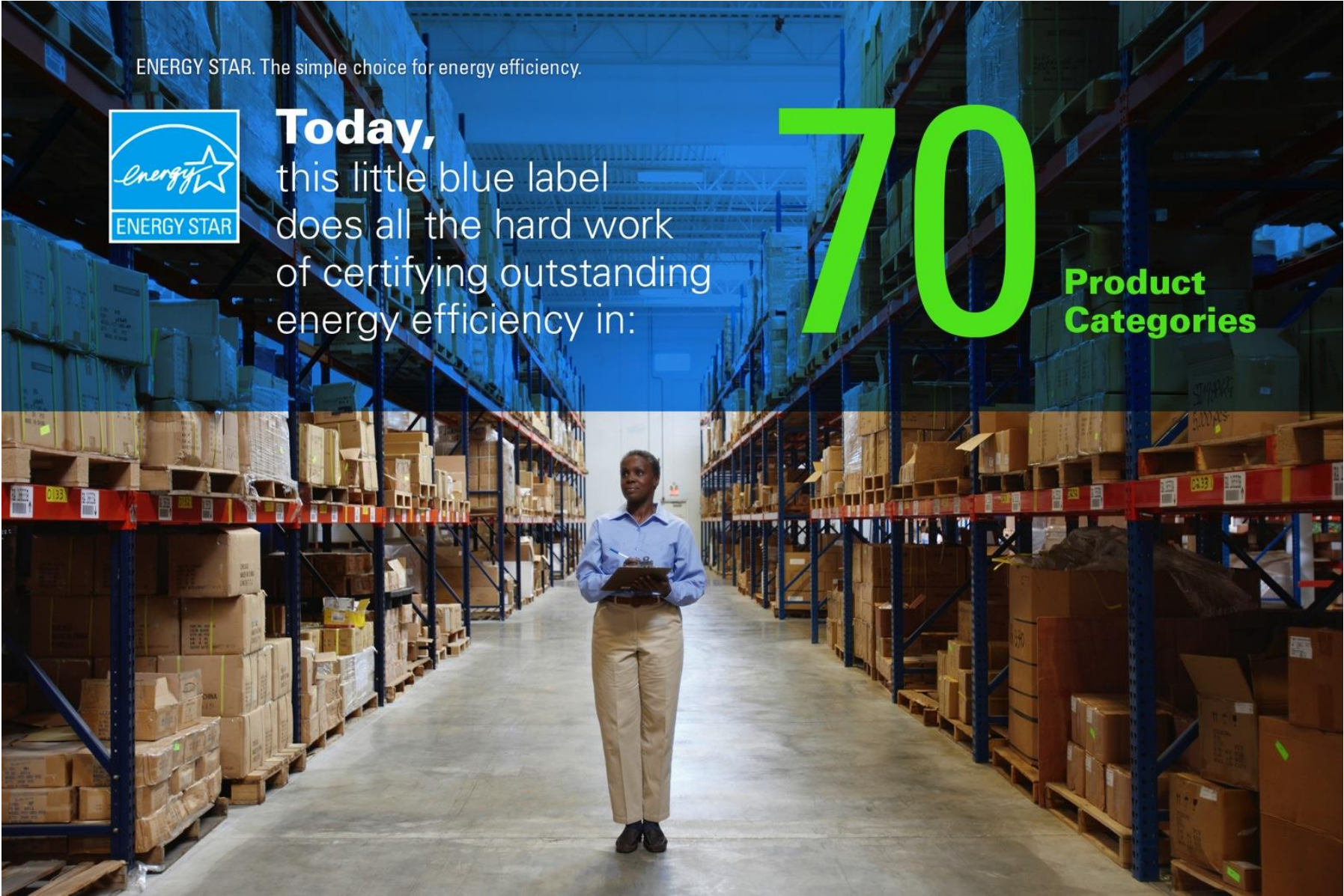
ENERGY STAR. The simple choice for energy efficiency.



Today,
this little blue label
does all the hard work
of certifying outstanding
energy efficiency in:

70

**Product
Categories**



Every single day,
consumers choose
ENERGY STAR
products more than

800,000 times



Awareness
now exceeds **85%** and preference
is **growing**



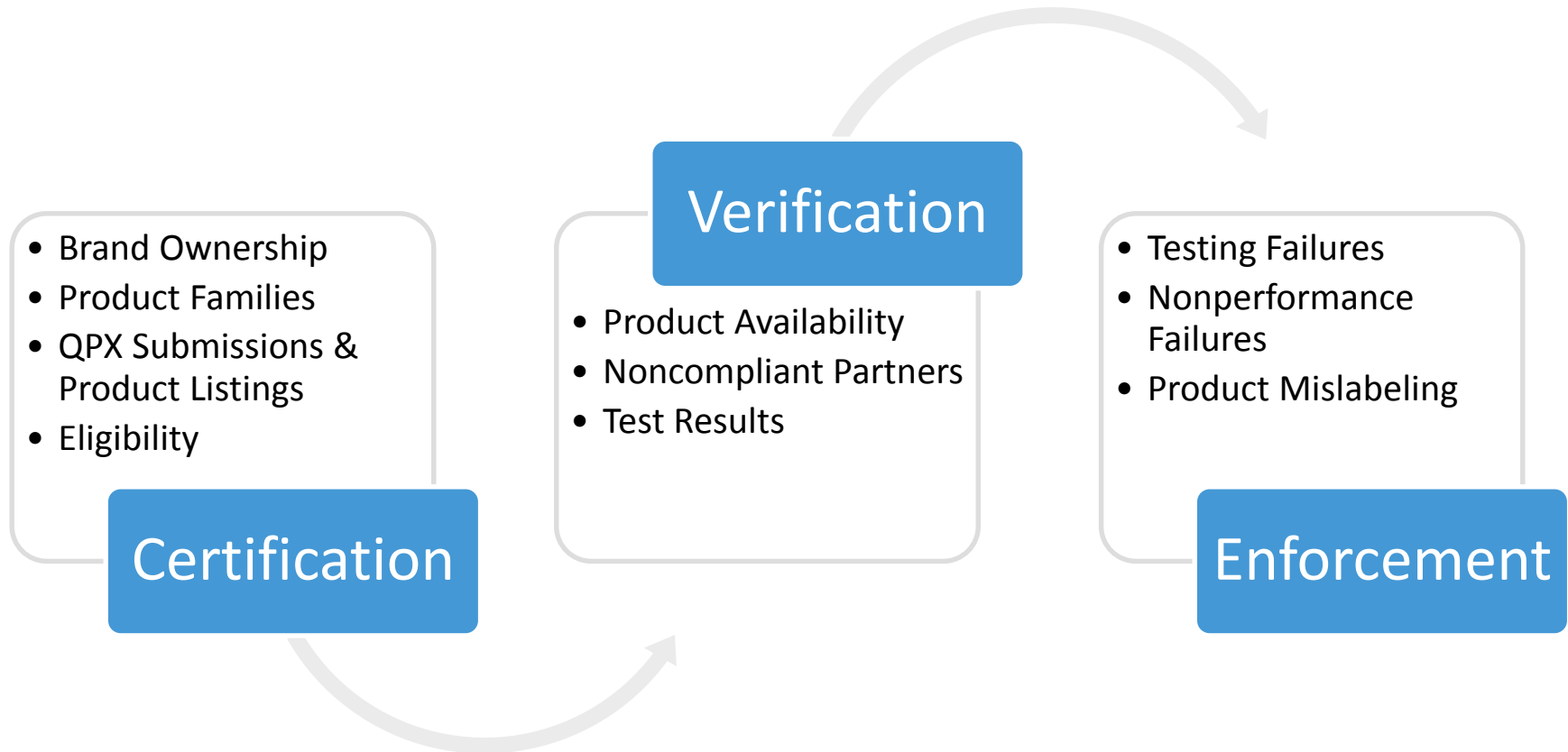
to protect the environment
and fight climate change.



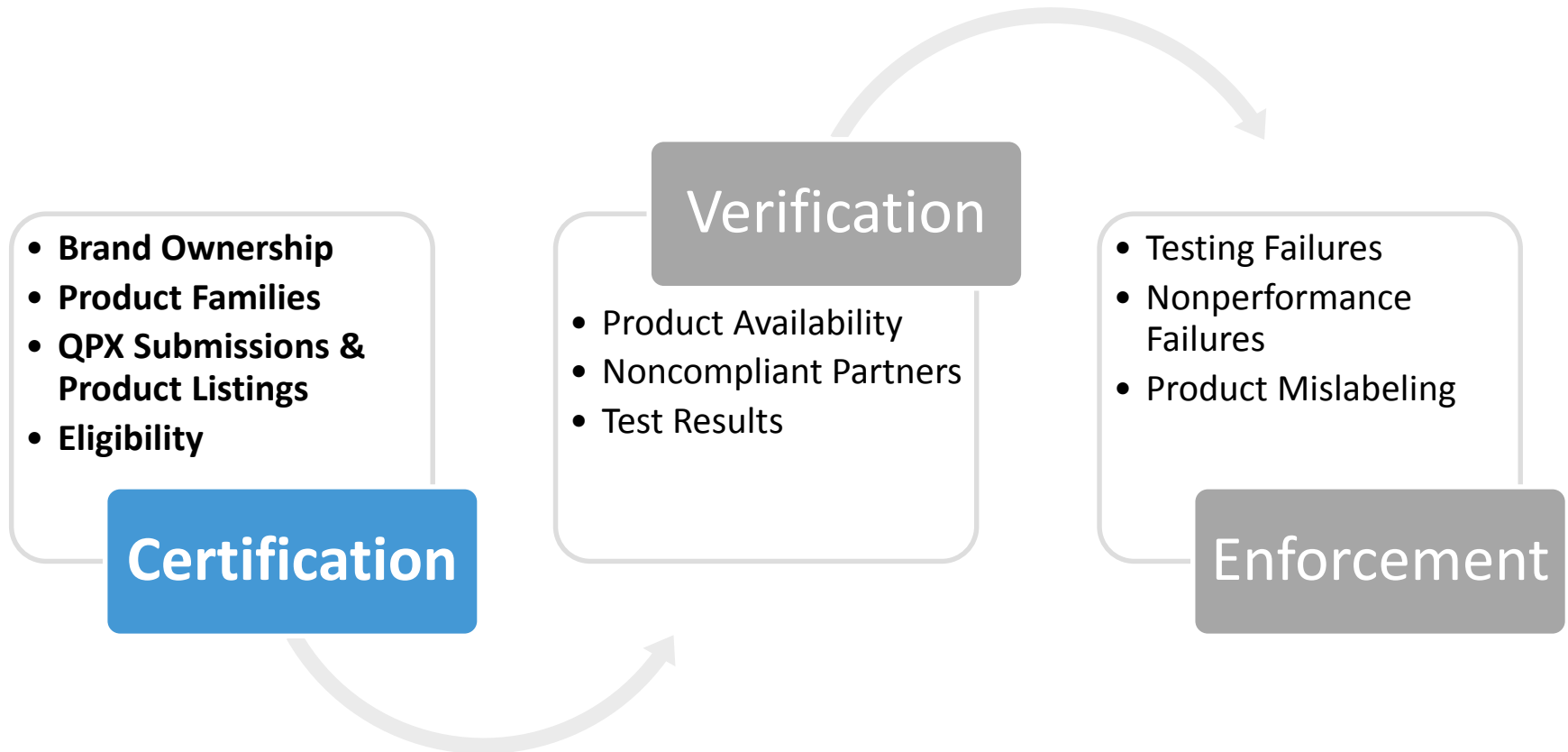
ENERGY STAR has over

- **16,000 partners**
- **50,000 product model listings**
- **More than 320 million units shipped in the U.S. in 2014**

ENERGY STAR Program Integrity - 3PC Overview



Product Certification





Certification Process and Policies

- Refer to Standard Operating Procedures for CBs to confirm partner eligibility
 - Partnership restrictions due to failure to submit unit shipment data will impact certification eligibility
- EPA-recognized laboratories
 - Confirm testing was completed at an EPA-recognized laboratory
 - First-party non-accredited laboratories must be enrolled in the CB's witnessed/supervised manufacturer's testing laboratory (W/SMTL) program
- Establish brand ownership
 - ENERGY STAR partner should be the brand owner of the products certified under its partnership
 - CBs may only certify products under brand licensee's partnership with explicit approval from EPA
 - Retail partners not permitted to license their brands to private labelers
 - See Brand Owner Directive #2012-02
- Product families
 - Refer to the product specification for family definitions and confirm tested model is representative of the certified product family
 - Note: in the event of a testing failure and disqualification, all family models may be affected. See FAQ.



Certification Process and Policies Cont'd

- **Ineligible models**

- Refer models which do not meet the relevant ENERGY STAR specification requirements (outside scope, fail to meet performance levels, etc.) to Certification@energystar.gov via the Ineligible Product Form

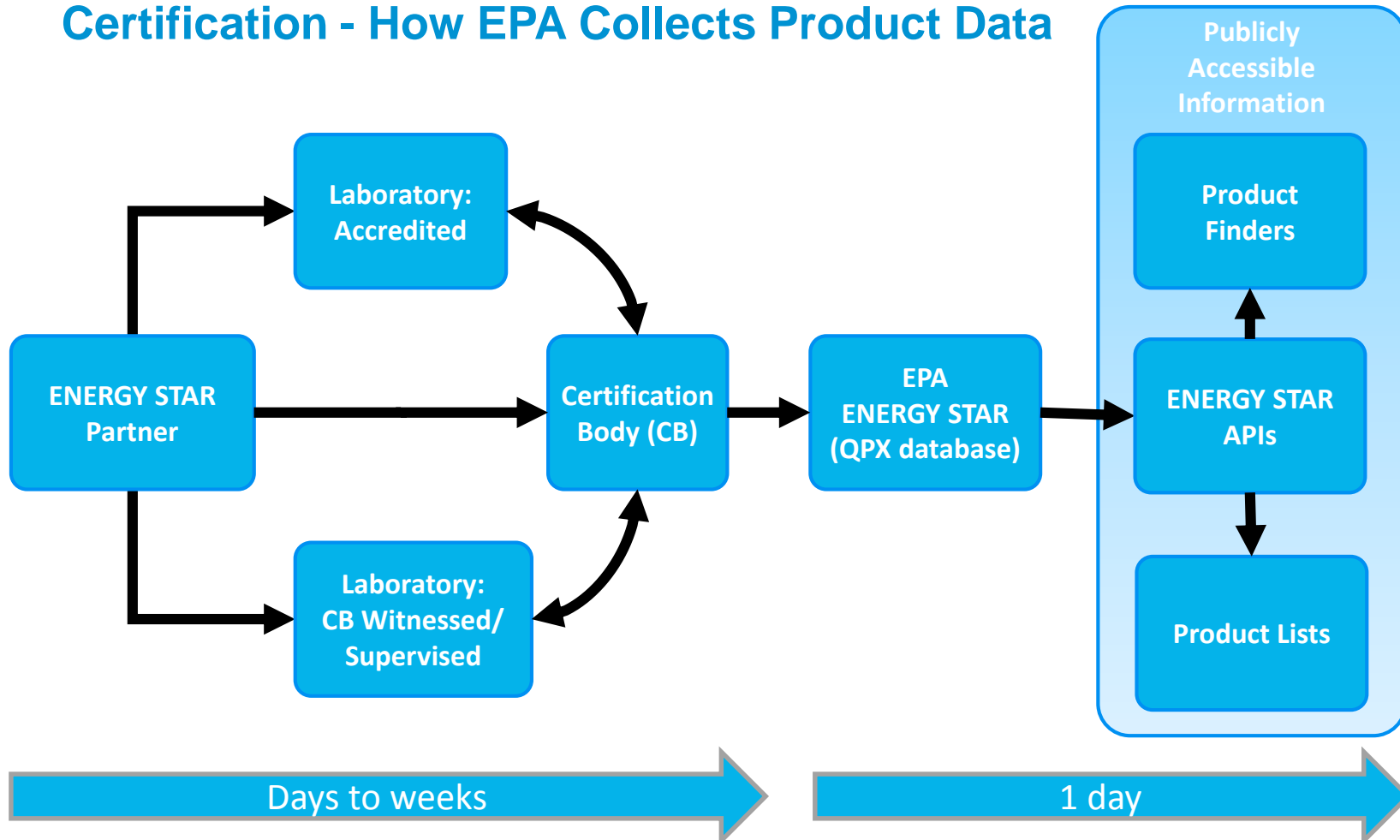
- **Association of Home Appliance Manufacturers (AHAM) Verification Program**

- For relevant appliance categories, confirm AHAM verification program participation during certification
- Re-confirm AHAM participation during product availability outreach
- Partners participating in AHAM's program should be excluded from CBs' verification testing pool

- **Submitting and updating certified product data**

- Products are considered certified as soon as the CB confirms product certification
- CBs should submit certified product data as soon as possible – utility rebates, international partner implications (e.g. EPA shares data with European Union)
- Updates to product availability/ performance should be submitted in a timely fashion as well

Certification - How EPA Collects Product Data






Certification - Product Submission via Qualified Product Exchange (QPX)

- Basic QPX resources

- [XML Web Services Submission Process](#) page includes all web services
- Refer to the [QPX XML Transaction System Documentation](#) for definitions and instructions
 - **Certification IDs** are unique for *each product family* and can be revised
 - **ENERGY STAR Model IDs** are unique for *each product version submission* and cannot be changed
 - **ENERGY STAR Unique IDs** are unique for *each product + version* and EPA-assigned.
- Subscribe to the [RSS feed](#) for notices of major and minor specification updates

- CB review of new web services

- All web services, which outline the required data collection fields, are specific to the product specification version
- CBs should review web services for new or upcoming specifications and provide feedback
- Major changes/releases EPA will email CBs; Minor web service updates posted in RSS feeds

Appliances		
Product	XML Web Service Files	Phase
Clothes Dryers	V1 <ul style="list-style-type: none">▪ FINAL Data Requirements▪ Sample XML	Final Subscribe: 

Certification - Product Submission via Qualified Product Exchange (QPX) Cont'd

- Specification transitions
 - CBs will receive reminders from Certification@energystar.gov
 - Note the following timeline as new specifications are finalized





Certification - Common QPX Model Submittal Issues

- Currently available on market
- Date available on market
- Certified models not currently available on the market
- Certification IDs not indicative of product families
- Product list and product finder display of core fields (partner name, brand, model number, etc.)
- Misspelled model numbers
- Web services stalled
 - Email Certification if models not validated after ~1+ hours
- More information can be found in the [QPX XML Transaction System Documentation](#), Common Model Submittal Issues section.



Certification - Common Questions

- **Product Availability:**

- How should EPA-recognized certification bodies (CBs) report information about product availability if the product is intended for sale in the U.S. or Canada, but the date of availability to consumers is unknown?

- **Publishing Timeline:**

- As a product brand owner partner, when will my recently certified product appear on the ENERGY STAR website?

- **Product Eligibility (example):**

- Are refrigerator-freezers with a bottom freezer and through-the-door ice eligible for ENERGY STAR qualification?

- **Laboratory Testing:**

- Can a certification body (CB) enroll a laboratory in its witnessed or supervised manufacturer's testing laboratory (W/SMTL) program on the basis of supervision or auditing that another CB has performed of that laboratory?
- Will test reports produced by a lab prior to receiving EPA recognition be accepted for ENERGY STAR certification?

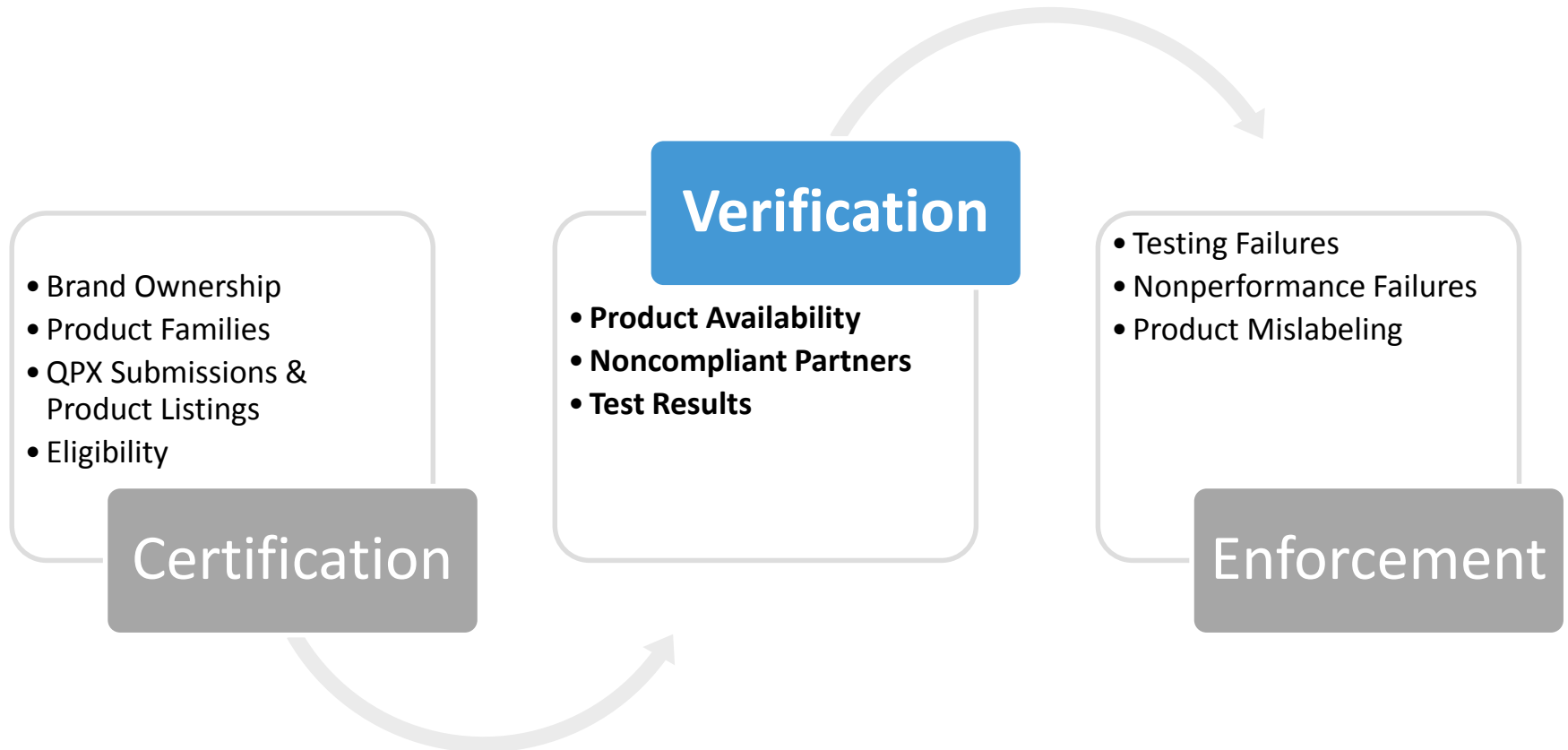
- **CB Selection:**

- Is a partner required to use only one certification body?

- **Recertification:**

- Must a product be retested and certified under a revised specification if it already exceeds the required minimum energy efficiency requirements?

Verification Testing





Verification Testing

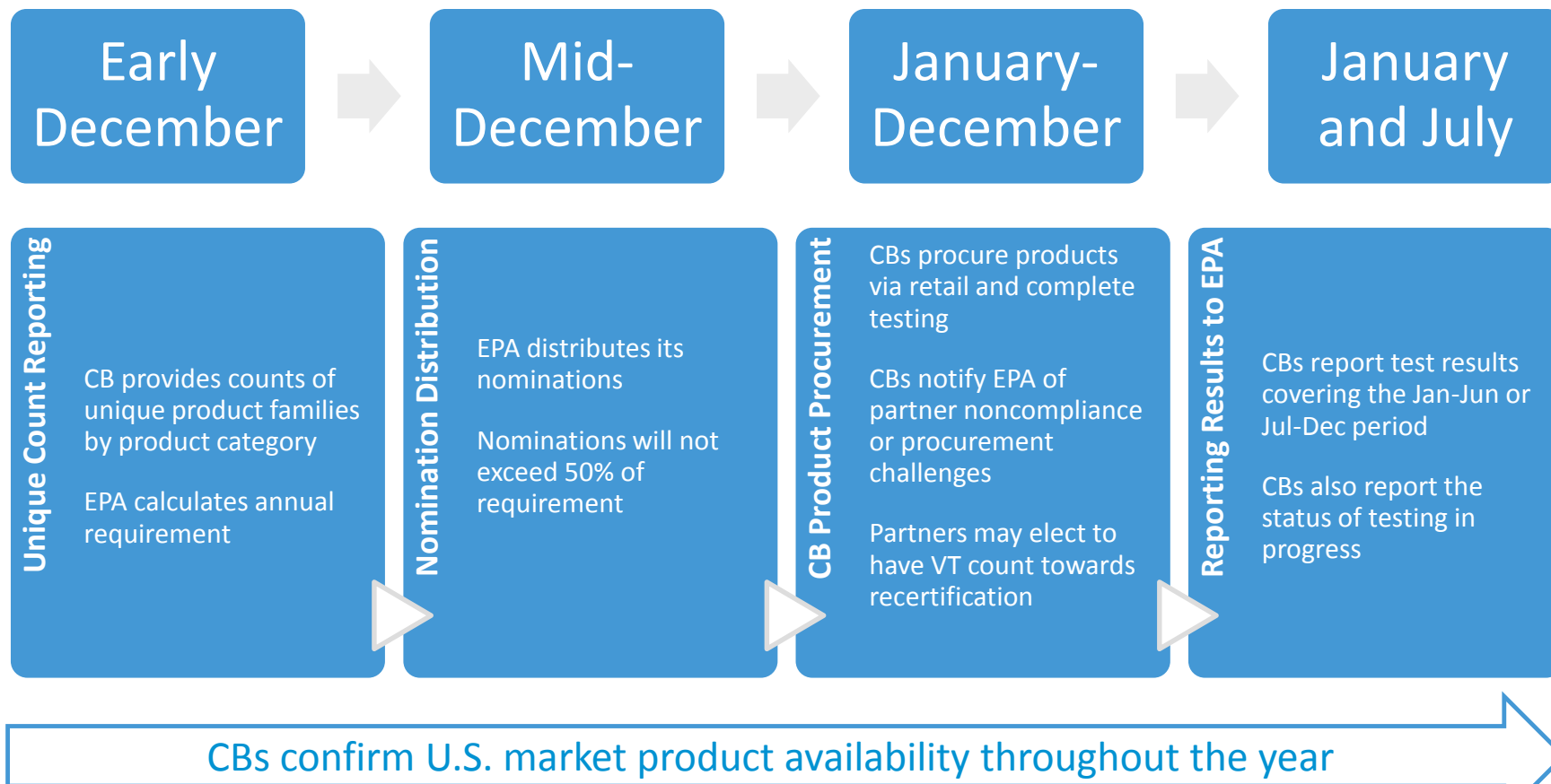
- **Purpose**

- Confirm products perform as consumers expect
- Remove products that do not meet program requirements
- Uphold confidence in ENERGY STAR brand

- **Approach**

- CBs confirm availability of products at least once per year per Directive #2014-01 (early fall recommended)
- CBs provide EPA unique product family counts by product category based on certified models currently available in the U.S. market
 - Counts should include products not on certified products lists due to partnership restrictions
- EPA calculates VT requirements annually based on CB unique product family certifications
- EPA distributes nominations to CBs by beginning of the year
- CBs procure, test, and report product testing during the calendar year
 - Procurement should reflect blind purchase
 - Notify EPA of any noncompliant/unresponsive partners encountered
 - Report failures to EPA; all failures are reviewed individually and partners have opportunity to dispute

Verification Testing – Timeline





Verification Testing - Procurement Do's and Don'ts

- **Do's**

- Purchase products via standard retail if possible
- If products are unavailable (per Directive #2011-06):
 - The partner responsible shall reconfirm availability of ALL its certified models.
 - CB will select another model for testing from that partner.
 - CB will consider flagging the partner for testing in subsequent years if there are ongoing issues with availability of selected models.

- **Don'ts**

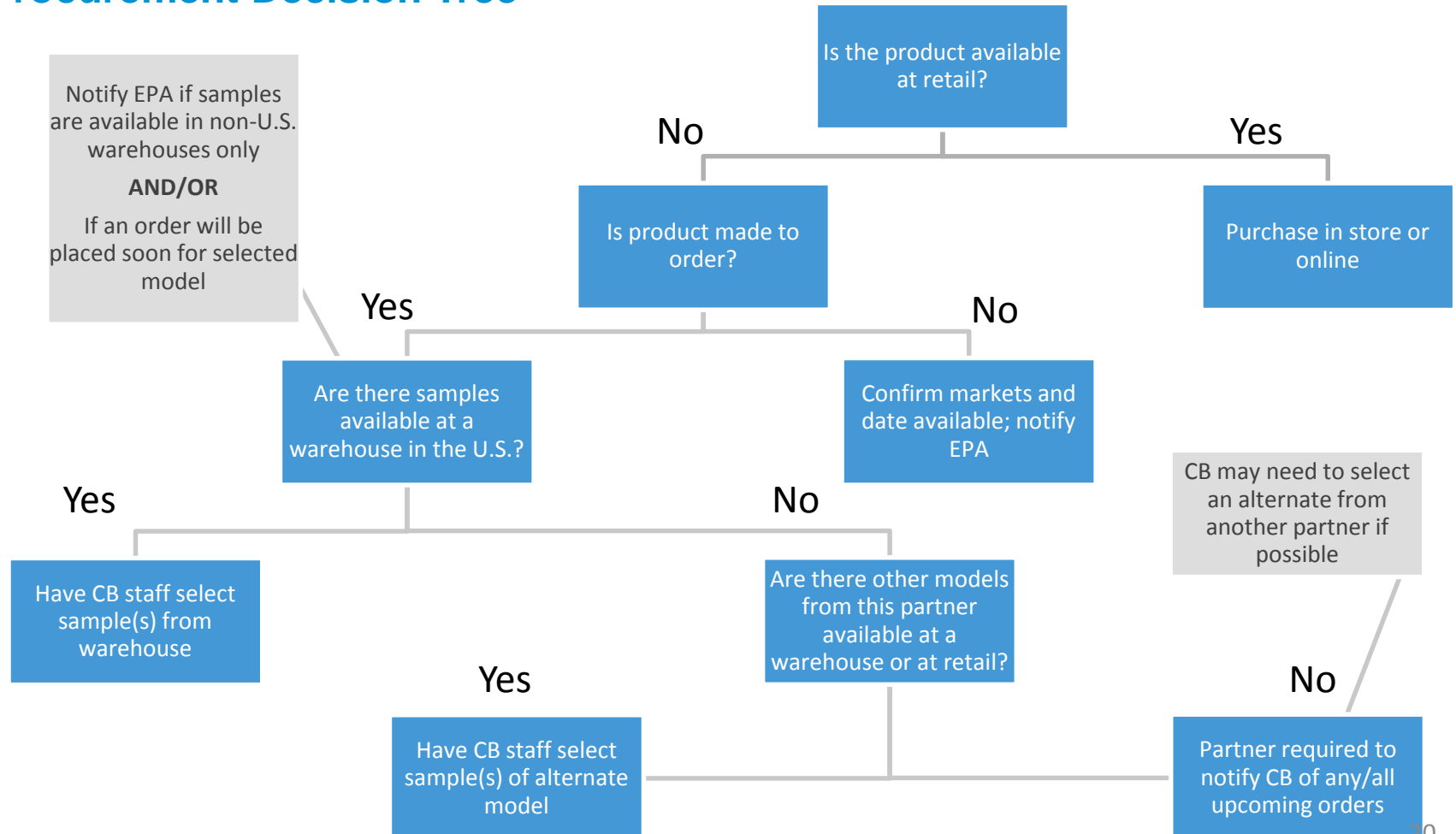
- Procure products off the line without prior EPA approval (unless product is eligible per **Directive 2011-06**)
 - Refer to Directive #2011-06 for product types pre-approved for off-the-line procurement
- Conduct testing in non-North America or first-party laboratories without prior EPA approval
- Inform partners of EPA nomination vs. CB random selection

- **What do we mean by “product availability”?**

- An end-user or distributor in the U.S. must be able to purchase the ENERGY STAR certified product.



Procurement Decision Tree





Verification Testing – Reporting Results to EPA

- VT summary report (found on [CB Resources page](#)) has three tabs:
 - **Completed Testing**
 - Report here if initial testing/ lifetime testing (if lighting) or full testing was completed during the relevant January-June or July-December period
 - **In Progress**
 - Report here if initial testing (lighting) is in progress or was completed in a previous 6-month period
 - Report here if procurement or testing is in progress
 - **Model Not Tested**
 - Report here if the model was selected for VT but could not be procured. Sample reasons include:
 - Not available in U.S. market (e.g. discontinued, market doesn't include U.S.)
 - Partner was noncompliant



Verification Testing – Reporting Results to EPA – Lighting

- Lighting VT reporting **if long term “life” testing is required**:
 - Initial testing completion will count towards CBs’ annual requirement; **report on Completed Testing tab**
 - Report lifetime testing completion on **Completed Testing tab**
 - Otherwise report on **In Progress** tab
- For **initial vs. lifetime testing** milestones for LEDs and CFLs, see next slide.



Verification Testing – Reporting Results to EPA – Lighting Cont’d.

- Initial vs. Lifetime Testing Milestones (verification testing):
 - **LEDs:**
 - **Initial testing completion:**
 - 0-hr scan and
 - any shorter tests (per Directive 2015-01) required depending on product type
 - **Lifetime testing completion:**
 - **6k hour** scan - CBs are expected per the Directive to evaluate lumen maintenance and ISTM at 3k hours for products that used early initial certification. This is **not** considered “initial testing” completion for reporting purposes.
 - Any failures observed at any point should be reported to EPA.
 - **CFLs:**
 - **Initial testing completion:**
 - 100-hr seasoning scan and
 - any shorter tests (per Directive 2015-01) required depending on product type
 - **Lifetime testing completion:**
 - 4k hour observational check (per the Directive) to confirm at least 50% of units survived



Verification Testing – Resources

- Directive #2011-06 provides instructions on:
 - Product selection
 - Procurement
 - Off-the-line procurement considerations
 - Reporting results to EPA:
 - Verification Testing Summary Report
 - Product Failure Form
- Directive #2014-01 – Responsibilities for Maintaining Product Certifications
 - Verification testing responsibilities (by **partner** and **CB**) webpage is also helpful
- Directive #2015-02 – Verification Testing for Independent Coil Manufacturers (ICM) Combinations



Verification Testing – Common Questions

- **Reported Values:**

- Are ENERGY STAR performance criteria subject to verification testing when they are specified for reporting purposes only?

- **Recent Certification:**

- Are recently certified models (i.e. models that were certified within the last twelve months) excluded from verification testing?

- **Decorative Light Strings:**

- For verification testing of decorative light strings, how many samples/strings should be procured and tested?

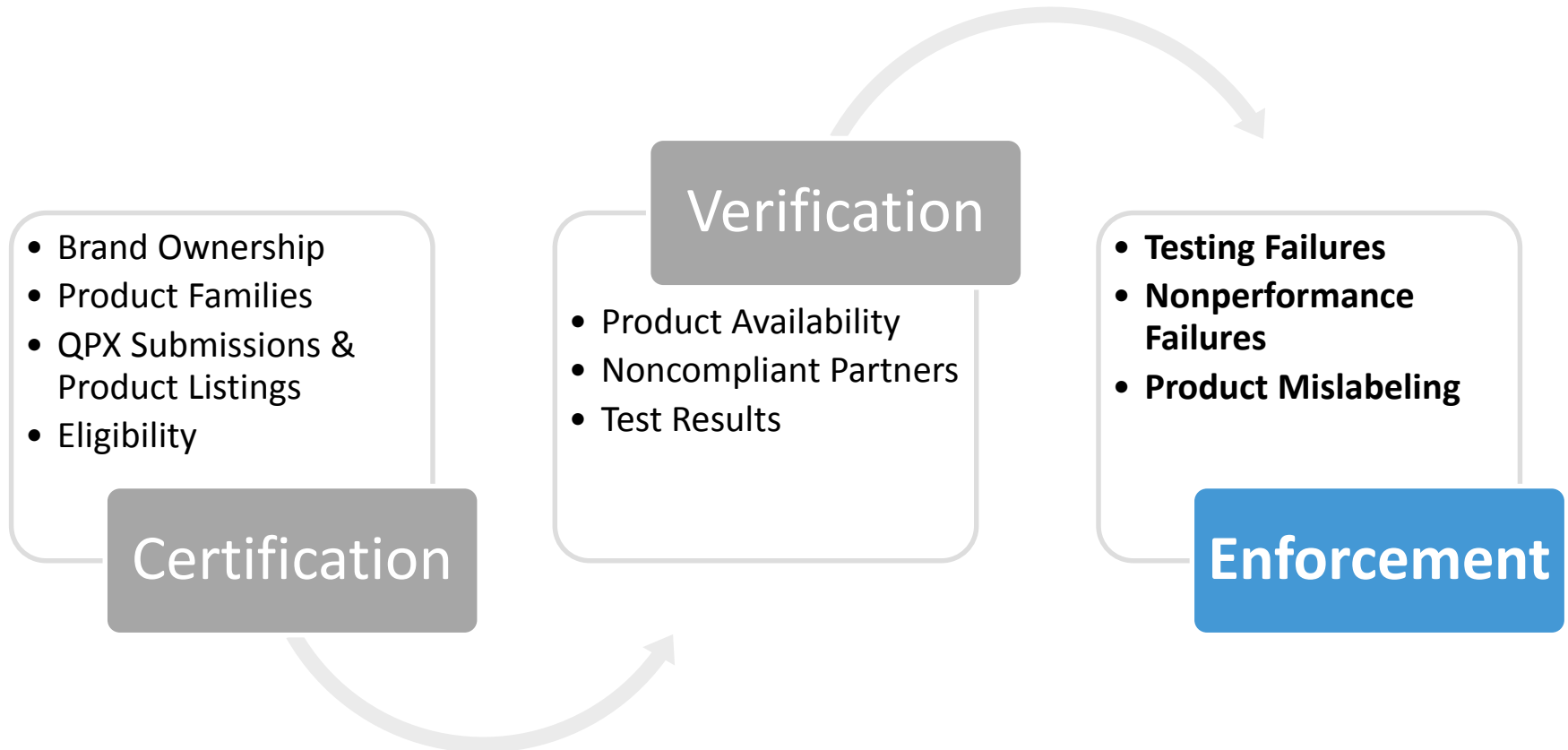
- **Refurbished Products:**

- How should a certification body (CB) proceed if it procures a product for verification testing and determines that it is a refurbished or re-designed version of the certified model?

- **Voluntary Withdrawal:**

- What are the requirements if a partner requests to have certifications withdrawn after being notified that its products have been selected for verification testing

Enforcement





Enforcement – Partner VT Noncompliance

- CBs should refer partners to Enforcement@energystar.gov if:
 - Partner is “noncompliant” with requests for verification testing information. For example:
 - Partner does not provide retail locations in a timely manner
 - Partner delays confirming product availability
 - Partner refuses to participate in verification testing
 - Partner does not respond to other CB requests
- EPA will remind partners of their partnership commitments
 - Initial outreach is non-punitive
 - If partners remain noncompliant, they may face ENERGY STAR partnership restrictions



Enforcement – Verification Testing Failures

- If product packaging or other “non-performance” requirements are not met as samples arrive, notify EPA via Enforcement@energystar.gov
- Testing failures
 - Products that fail to meet the specification requirements during verification testing should be reported to Enforcement@energystar.gov within **2 business days**
 - Includes lamps that have been certified based on “early certification” but fail lifetime testing
 - Ensure that all privately labeled affected model numbers are indicated in the [Product Failure Form](#)
- CB responsibilities during failure dispute process
 - CBs may not notify partners of a failure prior to notifying EPA
 - Update EPA if at any time you think errors may have occurred during testing
 - Respond to EPA questions regarding specific failures
 - Do not communicate with partners regarding case details



Enforcement – Common Questions

- What constitutes a product failure under verification testing?
- When may a certification body (CB) notify a partner of a verification or challenge testing failure?
- What happens to disqualified products and their model numbers?
- What happens when a product that fails verification testing is related to another product via private labeling or product family?
- Who makes a determination of a defective unit for purposes of ENERGY STAR verification testing on non-lighting products?
- When should a certification body (CB) notify the partner and withdraw certification for a lighting model or subcomponent that fails lifetime/full qualification testing?



CB Best Practices

- **Product families**
 - Associate families using Certification ID during certification
- **Communication**
 - Designate one primary point of contact to track information and manage information distribution
- **New specifications**
 - Plan VT timeline per upcoming specification effective dates
 - VT should be conducted per the specification in effect at procurement
- **Product availability/ relevant contacts**
 - Confirm market availability throughout the year to make VT procurement easier
 - Confirm appropriate contacts regularly
- **Delays in verification testing procurement**
 - Notify EPA as soon as possible if there are procurement delays (whether caused by partners, distributors, or something else)



Summary of 3PC Resources

- CB Resources webpage
 - Standard Operating Procedures for CBs document
 - Verification testing summary report template
 - Failure form & Ineligible Products form
 - Enrolling first-party laboratories
 - Past webinars
- Specification lookup page
 - **very useful** for looking up specs that are historical, active, under revision, etc.
- CB Specification Technical Assistance
- 3PC FAQs + Lighting Certification FAQs
- XML Web Services Submission Process
- Directives
- Disqualification Procedures – ENERGY STAR Products
- Archived CB Correspondences



For any questions...

- Specification questions – Certification@energystar.gov
- QPX questions – Certification@energystar.gov
- Laboratories (e.g. enrolling first-party laboratories) – Certification@energystar.gov
- Testing failures and noncompliance – Enforcement@energystar.gov
- Adding new contacts to [My ENERGY STAR Account \(MESA\)](#)
 - CB contacts with access to MESA can create new accounts for new colleagues
- Technical-only (QPX) CB contacts may contact EPA directly

Thank you for your participation in this training.



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www.energystar.gov/CBresources