

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

August 19, 2014

Dear ENERGY STAR® Commercial Steam Cooker Stakeholders:

With this letter, the U.S. Environmental Protection Agency (EPA) is updating stakeholders on the effort to develop an alternative approach to verification testing for commercial food service (CFS) equipment. Since 2011, all ENERGY STAR products must be certified by an EPA-recognized certification body (CB) and a subset of these products are selected for ENERGY STAR verification testing each year. Third party certification and verification testing is used to protect the integrity of the program and to ensure consumer confidence in the ENERGY STAR label.

Background

On November 20, 2013, the EPA launched an effort to evaluate an alternative approach to verification testing for CFS. As noted in the launch letter, verification testing for CFS equipment presents challenges unique to this industry given the product size, production, and sales volumes compared to other equipment categories in other industries. Because of these challenges, EPA is considering allowing an alternative approach to verifying the performance of CFS equipment through component level inspections, similar to those used in current safety and sanitation certification and verification procedures. Commercial steam cookers were chosen for an initial component inspection pilot program to determine whether such an approach is feasible.

Proposed Energy Inspection Report

The attached draft energy inspection report follows the template of a safety file and is based on an initial draft developed by ITW Food Equipment Group and Underwriters Laboratory (UL). It includes: general product information, electrical ratings, photos, drawings, and a list of critical components that impact the energy efficiency performance of the electric steam cooker. This report, along with the qualified product data associated with ENERGY STAR eligibility criteria, would constitute the energy file. EPA has also created a summary document of the proposed list of critical components for electric, boiler-less steamers. Similar lists would need to be created for gas and boiler-based systems in order to develop these energy reports. The Agency is interested in evaluating stakeholder's level of support of this approach and whether the information and listed components in this draft report are sufficient to identify potential impacts on energy performance. Stakeholders are encouraged to review the proposed list of components and the inspection report and provide comments or proposed changes to the report to commercialsteamcookers@energystar.gov by **September 26, 2014**.

Anticipated Procedures for Certifying and Verifying Products Using the Component Inspection Option

EPA is proposing the following procedures for implementing the component inspection approach and solicits stakeholder input.

Partners would have the option to certify products based on a routine review by their CB of critical components in lieu of the standard verification testing requirements. An energy file would be generated by the CB at the time of product certification and kept on file by the manufacturer and their CB for reference during regular energy efficiency inspection activities referenced below. Per the conditions and criteria for recognition of CBs for the ENERGY STAR Program, CBs are required to re-evaluate a product's performance if there are changes made to the product which could affect the ENERGY STAR qualification of a product the CB has certified. Any change to components deemed to be critical in this context would be considered a significant change and would require the Partner to notify the CB, have the product retested, and obtain approval by the CB prior to making the change, in order to maintain ENERGY STAR certification.

In order to execute this option, the CB must be recognized by EPA for verifying products in this manner. Aligning with the analogous procedures for product safety, CBs would be required to conduct random inspections of facilities throughout the year. At a minimum, each relevant manufacturing facility would be inspected at least every 6 months. Each inspection would include a review of documentation for all currently certified products and compliance to listed components. Should an inspection uncover changes not previously approved, additional measures including retesting of the modified unit and potential disqualification would be triggered.

Third-Party Certification of Legacy Steam Cookers

When EPA instituted third-party certification requirements for ENERGY STAR products starting in January, 2011, the Agency sought to minimize the burden on partners by transitioning previously qualified products as ENERGY STAR specifications changed for each category. In light of the significant time that has passed and uncertainties related to when a test method and requirements based on intended application (i.e., "batch" vs. "a la carte") will be completed for steam cookers, EPA intends to require third-party certification of all legacy (i.e. "registered") commercial steam cookers beginning in 2015. This will require that all models for which partners wish to maintain their ENERGY STAR qualification be tested in an EPA recognized lab and certified by an EPA recognized CB. EPA will provide 9 months lead time, potentially tied to finalization of a component inspection approach, for brand owners to either withdraw ENERGY STAR qualification or have their models certified.

To view the launch letter, webinar slides, and other materials related to this compliance assessment pilot effort, go to www.energystar.gov/products/specs and click on The Compliance Assessment Pilot Program link under the notes section for Commercial Steam Cookers.

For any questions related to this effort, please feel free to contact me at (202) 343-9046 and kent.christopher@epa.gov or Adam Spitz at (202) 862-1266 and adam.spitz@icfi.com. Thank you for your support of the ENERGY STAR program.

Sincerely,



Christopher Kent,
ENERGY STAR Product Manager
Commercial Steam Cookers