



THIRD PARTY CERTIFICATION IMPLEMENTATION

ENERGY STAR® PRODUCTS

SUBJECT: Component Inspection of ENERGY STAR® Commercial Food Service Products

DIRECTIVE NO. 2019-02

Date: 11/21/2019

Overview

In consultation with stakeholders, the Environmental Protection Agency (EPA) developed an option for verifying ENERGY STAR commercial food service products via component inspection. Beginning with commercial steam cookers, the program verifies components that may impact ENERGY STAR certification, with these components documented in the *Energy File Report for Commercial Food Service Products* (Energy File). This description of critical energy components forms the basis for conducting component inspections. The procedures used for component inspections are aligned with those used to verify compliance with safety certifications in commercial food service (CFS) products.

Participation

Participation in the CFS component inspection program is optional for EPA-recognized Certification Bodies (CBs) and brand owner partners. Products that are not covered by the component inspection option will remain subject to verification testing. Prior to participation, CBs must submit accreditation information and program procedures to EPA and receive approval. Brand owner partners must provide information and access to the CB such that the CB can create an Energy File for all models that the brand owner would like to include in this program. In addition, brand owner partners must provide the CB information regarding when models will be manufactured and available for inspection.

Procedures for Certifying and Verifying ENERGY STAR Commercial Food Service Equipment Using the Component Inspection Approach

Energy File Requirements

In advance of each verification test cycle, EPA publishes the [ENERGY STAR Verification Testing by Product Category](#) document. The CB should affirm that the prospective model to be covered under the component inspection approach falls within one of the eligible CFS categories listed in the document. The CB may then create an Energy File to accompany each unique commercial food service product certification. This file will list all critical components that affect energy usage. As applicable, the components must include, but are not limited to, those outlined in the [Energy File Report Requirements for ENERGY STAR Commercial Food Service Equipment](#) document. This document will be updated by EPA as needed. The Energy File is required to be kept on record in association with the product certification, listing clearly identifiable components with electrical ratings and any features relevant to energy usage (e.g. material, construction, location etc.). General coverage for a component based on electrical rating will not be allowed without prior approval from EPA. Components and permissible alternates must be specifically listed.

Partners are required to report any component changes to the CB in advance of production. In response to any potential component changes, the CB is required to assess the potential for the change to impact energy use and determine if retesting is warranted to maintain ENERGY STAR certification. CBs must document any changes to the Energy File, along with information on the nature of the change and new test information, as applicable.

Verification

Products opted into this approach will not be subject to the verification testing requirements outlined in the [*Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Program*](#). Instead, CBs are required to conduct random inspections of manufacturing facilities throughout the year, similar to the process for verifying product safety.

At a minimum, each relevant manufacturing facility is to be inspected twice annually. Every model covered by the component inspection program and available at the facility at the time of inspection must be inspected, with a minimum of one (1) currently certified model inspected per visit. Inspectors will document which products are available and make observations about product compliance with components listed in the Energy File, for the CB to make a compliance determination.

Should an inspection uncover component changes not previously approved, the CB provides EPA information regarding the component change(s) within two (2) business days, and updates the product's Energy File if appropriate. Products that fail component inspections are subject to full product verification testing and the ENERGY STAR Disqualification Procedures. No sooner than 20 days from receipt of inspection failure information, EPA will assess and direct the CB to conduct end-product verification testing of the affected product with its replacement component(s). If an end-product verification results in a testing failure, the CB will report the failure to EPA consistent with standard reporting procedures.

Reporting

In addition to reporting component changes not previously approved as outlined above, CBs are required to report to EPA in July and January each year a list of the locations visited, models available, models inspected, and inspection results, consistent with reporting for standard verification testing of ENERGY STAR products.