Third-Party Certification of ENERGY STAR Products

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ENERGY STAR Program Integrity
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Learn more at energystar.gov
Changes to Program Requirements

• Partner Commitments
  – Require third-party certification of all products
  – Require annual reporting of unit shipment data
  – Effective January 1, 2011

• Product Specifications
  – Minor changes to ensure a clear and effective product qualification process; where manufacturer concern, reverted to original language
  – EPA will continue aligning testing and other requirements through the specification revision process
Transition from Self-Certification to Third-Party Certification

- **Self-Certification (1992-2010)**
  - Partners test products, confirm conformance to specification, and label with the ENERGY STAR
  - Partners submit test data to EPA to qualify their products
  - EPA reviews test data and adds products to lists of qualified products
  - EPA verifies energy performance of select models only

- **Third-Party Certification (starting in 2011)**
  - Partners will have products tested in EPA-recognized labs prior to qualification and labeling
  - CBs will certify that products meet program requirements based on a review of test data
  - CBs will upload certified data to EPA for creation of qualified product lists
  - CBs will conduct verification and challenge testing after qualification
  - CBs will evaluate retested products that have undergone significant post-qualification changes
Program Updates: Implementation of ENERGY STAR® Certification Requirements
Qualifying Products as ENERGY STAR

Submissions received by EPA through December 31, 2010

- Continue using the existing system of a Qualified Product Information form or the Online Product Submittal tool.
- EPA must receive complete and correct submissions, including lab reports, in order to process the product submission through OPS.
- For IT product categories (computers, displays, imaging equipment and servers), EPA will review for qualification product data constituting a complete submission, pending a test report, received by EPA through December 31, 2010.
  - These submissions must include model name/type, model number, and estimated introduction date.
  - EPA must receive the test reports for these submissions no later than February 1, 2011 or submission will be returned to the partner for subsequent submission to a certification body for review.
Qualifying Products as ENERGY STAR
Submissions on or after January 1, 2011

- New products must be certified by an EPA-recognized Certification Body (CB)
  - Products may not be submitted to EPA for qualification
  - List of CBs maintained on www.energystar.gov/testingandverification
- Products must be tested in an EPA-recognized laboratory
- CBs will certify products, conduct regular verification testing of products, and conduct challenge testing per EPA requirements
- EPA will continue qualification of products that are additions to a product family qualified prior to January 1, 2011 until the specification revision is effective
Laboratory Requirements under New Third Party Certification Scheme

- CBs may accept data for certification only from labs that are recognized by EPA
  - Based on accreditation to ISO 17025; or
  - If lab participates in CB’s Supervised or Witnessed Manufacturers Testing Lab Program
- Manufacturers labs are not required to participate in an SMTL or WMTL if they are recognized by EPA
- CB is responsible for ensuring that test data is acceptable if testing conducted prior to accreditation
ENERGY STAR Standard Operating Procedures (SOP)
Product Certification Overview

• The Guide for Certification Review: An ENERGY STAR Standard Operating Procedure (SOP) for Product Evaluation
  • Designed by EPA to reflect the steps followed when reviewing products against ENERGY STAR product specifications
  • Key Sections of the SOP
    – General Requirements
    – Eligibility Criteria
    – EPA-Recognized Laboratory Report Checklist
    – Product-Specific Appendices
Collecting Required Data

- CBs will collect all information needed to determine that the product can be certified
  - The information on the Certified Product Data Submission form usually only represents a subset of this data
- Collect other information as needed for purposes of verification and challenge testing
- The ES partner must submit information to certify a product
  - If a recognized lab or other party submits a subset of data and includes the partner in the correspondence, the CB should consider this information submitted by the partner
Verifying Product Family Membership

• If Applicant/Partner wishes to certify a product in a member of a specification-appropriate product family, it must provide:
  – Test report(s) for representative model(s)
  – An explanation of any variations within the family
  – An up-to-date list of models included in the family

• CBs must maintain a list of all products in a family
Certifying Product-Specific Aspects and Performance

- Product must meet Program Requirement to be certified.

<table>
<thead>
<tr>
<th>ENERGY STAR ELIGIBILITY</th>
<th>Applicant satisfies requirements? (Yes/No/Not Applicable and Comments)</th>
</tr>
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<tbody>
<tr>
<td>Is the device an Included Product, as outlined in Section 2: Scope of most ENERGY STAR specifications? (Model must be on the Included list and not be an Excluded Product as defined by the specification.)</td>
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<tr>
<td>Does the product meet all of the qualification criteria as outlined in the specification? (Typically, refer to Section 3 of the specification. Be sure to check all requirements, including multiple energy efficiency requirements, warranty requirements, packaging requirements, etc. Also, where applicable, ensure calculations have been performed correctly (e.g., TEC calculations).)</td>
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<td>Are the qualification criteria met using the appropriate significant digits and rounding?</td>
<td></td>
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<tr>
<td>Was the appropriate test method(s) used per the test report?</td>
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<tr>
<td>Were the correct type and number of units tested, based on specification requirements?</td>
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<tr>
<td>Was the product tested for qualification at the relevant input voltage/frequency combination for each market, in addition to the United States, in which it will be sold and promoted as ENERGY STAR?</td>
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Checking Laboratory Test Reports

• CBs must at a minimum locate lab report fields specified on the SOP to ensure that the product was appropriately tested
  – Test procedure name listed
  – Test date listed
  – Serial number listed
  – Sample description listed (e.g., # of products tested)
  – Equipment calibration dates and next due date listed and within range
  – Test engineer and witness names and signatures provided
  – Test results organized by applicable test procedure section and clearly marked to indicate results that are relevant to ES

• If the information cannot be verified, the product cannot be certified until that information is furnished
Adhering to Supplemental EPA Guidance

- SOP Appendix A – product-specific guidance
  - Power supply requirements for IT products
- Routing Further Inquiries
  - If other product-specific aspects of certification review are unclear, route any and all questions back to EPA via product-specific ENERGY STAR inboxes
Certifying Privately-Labeled Products

- CB can certify a different brand of the same model without data review if the model is already certified by the CB
  - EPA encourages CBs to work together to avoid duplicative testing and review
  - CBs will need to flag models that are certified under different brand names
  - CBs will need to maintain a data field with the model tested to help track this information
Keeping Certified Product Lists Current

• CBs are responsible for keeping lists of certified products up to date
  – Need to establish a policy for ensuring that certified products are available for verification testing
  – Partners will need to indicate when products are no longer manufactured and the expected shelf-life
  – CBs will need to flag products that are disqualified
Transferring Data to EPA

• If product can be certified
  – Enter the relevant product and product subtype being certified into the relevant Certified Product Data Submission form

• After data entry
  – Submit data to EPA using the MESA interface

• Frequency of data submission
  – Initially will start on a bimonthly basis, but will move to monthly for most products
Notes on Verification and Challenge Testing
Verification Testing Model Selection

- EPA will be issuing specific guidance regarding selection of products
  - Annually test a minimum of 10% of certified products in each category and included subtype
    - Category: Imaging.
      - Subtypes: copiers, digital duplicators, fax machines, mailing machines, multi-function devices, printers, scanners.
  - Product Families
    - All members of family are subject to testing, but not more than one per round
  - Private labelers
    - Brand A, B, and C are all one product for verification testing purposes
Verification Testing Model Selection

• Information not included in QPL that can inform model selection:
  – All relationships between products, including:
    • Base model and manufacturer for each privately labeled product
    • All privately labeled model numbers associated with each OEM product
    • Clear indication of which qualified products are OEM products and which are privately labeled products
  – All relationships between manufacturers not covered by OEM-PL relationship
    • e.g.: “Acme submitted this product on behalf of Roadrunner”
Procurement of Units for Verification Testing

• Off-the-shelf procurement is favored
• EPA does not define “prohibitively expensive to purchase or transport…”
  – If a CB allows for warehouse or off-the-line procurement, it should be prepared to justify that choice.
• Partners are required to provide at least three locations where a product is available, EPA suggests this be included in product submissions for certification.
Preferred Locations for Verification Testing

- Verification must generally occur only at EPA-recognized third party labs.
- EPA-Recognized first party facilities are permissible ONLY when off-the-line testing is the only practical option, provided that:
  - CBs witness the test
  - CBs must be able to defend their decision to allow use of first party lab (as with procurement)
Re-evaluation of Products in the Event of Significant Changes

• CBs require partners to notify them of product changes

• CB is not required to re-test all changed products
  – The CB retains discretion to decide if changes warrant a re-test

• Notify EPA
  – If there is no change in status, on the normal upload schedule
  – If there is a change in status (product no longer meets ES requirements), within two business days
Challenge Testing

• CB must have a policy built into the contracts it signs with partners.
  – Challenges can be initiated by partners outside of your certification scheme

• CB must judge the legitimacy of a challenge claim

• CBs have discretion to establish the rules for challenge testing program
  – A “loser pays” scheme may be easiest
Questions?

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