

EPA ENERGY STAR® FAQ – Third-Party Certification

1. **Q: [When did the ENERGY STAR Third - Party Certification requirements go into effect?](#)**

A : January 1, 2011.

2. **Q: [Will products I qualified prior to January 1, 2011 have to be retested after the effective date in order to remain qualified?](#)**

A : **For products with specifications that will change in 2011 or early 2012**

Partners do not need to take any action to maintain the ENERGY STAR qualification status of previously-qualified models until the revised specification takes effect. **When the revised specification becomes effective, EPA will remove all previously-qualified products from the ENERGY STAR Qualified Product (QP) list.** Partners must ensure all products, including those previously qualified, are third-party certified through an EPA-recognized Certification Body (CB). These certified results will be the source of the new QP list.

Products Not Slated to Undergo Specification Revisions Prior to Early 2012

For a small number of product categories, EPA is not anticipating near-term specification changes. For those product categories, **EPA will require that manufacturers enroll their products with an [EPA-recognized CB](#) by March 31, 2011 in order to subject them to possible verification testing.** These product categories are:

- Commercial Steam Cookers
- Commercial Refrigerators and Freezers
- Commercial Griddles (Gas)
- Central Air Conditioners & Air Source Heat Pumps
- Geothermal Heat Pumps (Water-to-Water)
- Light Commercial HVAC
- Roof Products
- Room Air Cleaners

The information partners will need to submit to their CB to keep these products qualified includes (but is not limited to):

- A list of models submitted to EPA for qualification prior to January 1, 2011 that they wish to maintain as ENERGY STAR qualified (and therefore subject to verification testing.) (Please note, only products currently sold in the U.S. or a [partner market](#) are eligible to remain qualified.)
- Any additional information a partner's CB may require (this will be similar but not necessarily limited to the information submitted upon submission of the original product qualification package).

Partners must provide this information to their CB no later than March 31, 2011. **Any models not registered by that date will be removed from the ENERGY STAR Qualified Products lists beginning with the April 15 update, and continued labeling of those products will be considered a logo violation.**

3. **Q: [How do ENERGY STAR partners qualify products under the third - party certification requirements?](#)**

A : ENERGY STAR partners had historically been able to test their products in any laboratory of their choice, and submit product data directly to EPA for review pursuant to qualification. Under the new requirements, which were effective January 1, 2011, partners are required to have their products certified by an EPA - recognized Certification Body (CB) of their choice. Upon certification of a product, the CB will notify the partner that the product meets the ENERGY STAR requirements and will submit the qualified product data to EPA for listing on the ENERGY STAR website. See a [flowchart describing the details of the new procedure](#).

4. **Q: [Must I use an accredited laboratory?](#)**

A : Yes, you are required to have products tested for ENERGY STAR in a laboratory that is accredited to ISO/IEC 17025 for the relevant test procedures. EPA has made an exception for first - party

laboratories to conduct testing if they are enrolled in an EPA - recognized CB's supervised or witnessed manufacturers' testing laboratory (SMTL/WMTL) program, which includes demonstrating compliance with ISO 17025 as described in Appendix A of the [Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Program](#).

5. **Q: Can I just test my product in an EPA - recognized lab and send the result to a CB?**

A : No, manufacturers must confirm with an EPA - recognized CB which labs are appropriate for conducting testing depending on the product type and the specific nature of the CB's Program.

6. **Q: How can an ENERGY STAR manufacturing partner add new models to previously-qualified product families after 1/1/11?**

A : Consistent with product family definitions in the relevant specifications, manufacturers may add models to families previously qualified by EPA without additional testing. Partners should follow their current procedure (i.e., submit through OPS or product specific web addresses) for submitting additional members of an existing qualified family for review.

Product categories that allowed for product family qualification prior to January 1, 2011 include:

- Audio/Video Products
- Residential Ceiling Fans
- Commercial Hot Food Holding Cabinets
- Commercial Ovens
- Commercial Steam Cookers
- Computers
- Displays
- Integral LED Lamps
- Imaging Equipment
- Residential Dishwashers
- Residential Refrigerators and Freezers
- Computer Servers
- Solid-State Lighting Luminaires
- Residential Ventilating Fans
- Residential Water Heaters

For all other product categories, any third-party certified product families, manufacturers must work with an EPA-recognized Certification Body to add new models to previously-qualified product families.

7. **Q: How does EPA recognition of ABs, Laboratories, or CBs work?**

A : The requirements that each organization must meet in order to gain recognition are available at www.energystar.gov/testingandverification.

8. **Q: Where can I find a list of EPA - recognized Accreditation Bodies (ABs), Laboratories, or CBs?**

A : The list of [EPA-Recognized Accreditation Bodies](#).

The list of [EPA-Recognized Certification Bodies](#).

The list of [EPA-Recognized Laboratories](#).

EPA continues to process applications for recognition, and will update these lists on an ongoing basis.

9. **Q: When may I begin to market my product as ENERGY STAR qualified?**

A : Partners may begin to market products as ENERGY STAR qualified as soon as they receive written notice from their CB that the product meets the ENERGY STAR specification. The only exception to this is the *first* product that a prospective Partner qualifies. In this case, EPA will need to complete the partner application process and provide the new ENERGY STAR partner with the label and ENERGY STAR Identity Guidelines to market its product as ENERGY STAR qualified.

10. **Q: Will EPA continue to provide international recognition of products for ENERGY STAR?**

A : EPA supports ongoing mutual recognition internationally. However, all products entering the US must meet EPA's third - party certification requirements effective January 1, 2011.

11. **Q: Can I use a first - party laboratory for verification testing?**
A : Only in some rare cases where off - the - line testing is the only feasible option will verification testing be allowed in a first - party laboratory. If the unit selected for verification is obtained off - the - line from the manufacturing facility, the verification testing may be performed at an EPA - recognized, first - party laboratory provided that qualified CB personnel witness the test. EPA anticipates that off - the - line testing will only be an option for extremely large, expensive, or custom - built products.
12. **Q: How many of my products will be subject to ongoing verification testing, and how often will this occur?**
A : CBs are responsible for annually selecting at least 10% of the products that they have certified for verification testing. At least half of these products will be selected randomly. As such, the number of an individual Partner's products that are subject to verification testing in a given year will vary. CBs also have discretion to determine when products will be selected, so the testing may take place on a quarterly, bi - annual, or annual schedule depending on the CB and product category.
13. **Q: If my company's product is the same as another company's product except for the brand name (for example, product X is a private labeled version of product Y, an OEM product), and product Y undergoes qualification, verification, or challenge testing, or a design change, then can product X be qualified, recertified, or decertified based on product Y's test results?**
A : Yes. If both companies have submitted the product in question for certification through the same CB, and the CB agrees to recognize the two products as identical, then with the CB's consent a single report can fulfill the testing requirements for the products represented by that report.
14. **Q: Who will fund the new third - party certification requirements?**
A : The new testing and verification procedures will be partner - funded. Partners will pay laboratories and CBs directly.
15. **Q: How long will it take the CB to review a test report?**
A : EPA anticipates this will differ between product categories and CBs. As part of its application, a CB is required to provide EPA with a detailed description of its review process in order to allow EPA to estimate its potential impact on partners' product introduction cycles. EPA is working with CBs to ensure that certification occurs within a timeframe that adequately addresses partners' concerns regarding product development cycles, and time - to - market.
16. **Q: Once a product is certified, does it still need to be reviewed by EPA before it is labeled?**
A : No, EPA authorizes use of the ENERGY STAR mark to partners for products that meet all of the ENERGY STAR requirements, including certification by an EPA - recognized CB.
17. **Q: Do partners need to provide updates to products if they still meet the ENERGY STAR requirements?**
A : Beginning January 1, 2011, partners must notify the CB of changes to their certified products that impact the product's energy performance even if the product still meets the ENERGY STAR requirements. The CB will determine if additional test data is required.
18. **Q: What constitutes a product failure under verification testing?**
A : ENERGY STAR products will be considered as failing under verification testing if they exceed the ENERGY STAR requirements outlined in the ENERGY STAR specifications. Partners should consult DOE for questions regarding DOE minimum efficiency requirements.
19. **Q: Must a first party accredited laboratory that has applied for and been granted EPA recognition enroll as a supervised manufacturer's testing laboratory (SMTL) with an EPA-recognized Certification Body?**
A : No. As part of its status as a laboratory accredited by an EPA-recognized Accreditation Body, an EPA-recognized accredited first-party laboratory that has been formally recognized by the Agency by application does not have to have its tests supervised or witnessed by an EPA-recognized Certification Body. However, the CB may enroll such a laboratory as an SMTL if it so chooses.

20. **Q: My laboratory tests External Power Supplies that are intended for ENERGY STAR qualification. Why is this product category not included in EPA's laboratory recognition application form?**
A : The ENERGY STAR External Power Supplies, Digital - to - Analog Converter Boxes, and End - Use Products (with qualified External Power Supplies) programs will be sunset at the end of calendar year 2010.
21. **Q: Will EPA send someone to evaluate my laboratory during the recognition process?**
A : No, EPA will not conduct a site visit. Instead, if you are seeking accreditation, staff from an EPA - recognized AB will conduct a site visit. If you are seeking enrollment in an EPA - recognized CB's supervised or witnessed manufacturers' testing laboratory (SMTL/WMTL) program, staff from that CB will conduct a site visit.
22. **Q: As a manufacturing partner, can I use multiple certification bodies (CBs) to certify different models within the same product category?**
A : While partners should use one CB per product category, EPA recognizes that there may be some cases where the use of multiple CBs for a single product category is warranted. For example, if a partner has a private labeled product where the original product was already certified by a CB, EPA understands that the partner of the private labeled product cannot or simply may not want to use that same CB when certifying the product under its company name. There may also be cases where a number of models must be certified within certain time constraints that would not be met if only a single CB were used. As there may be several other examples of why partners may want to use different CBs for the same product category, EPA has allowed for some flexibility built into the requirements. However, it is still highly recommended that partners use only one CB per product category whenever possible.
23. **Q: How do I qualify "privately labeled" products? (If my company's product is the same as another company's product except for the brand name, must I work with a Certification Body to qualify my product for ENERGY STAR?)**
A : You must work with an EPA-recognized Certification Body (CB) to certify or register your product if any of the following conditions are true:
- Neither product is currently qualified for ENERGY STAR.
 - The other company's product is currently qualified and was certified by a CB.
 - Your product is one of the following:
 - Roof Products
 - Light Commercial HVAC
 - Central Air Conditioners & Air Source Heat Pumps
 - Commercial Refrigerators and Freezers
 - Room Air Cleaners
 - Geothermal Heat Pumps (Water-to-Water)
 - Commercial Griddles (Gas)
 - Commercial Steam Cookers
 - Your product is not on the above list, but has experienced a revision of its ENERGY STAR specification that became effective in 2011 or the first part of 2012.

If your product does not meet any of the conditions in the above list, EPA will process the new qualification directly as an administrative change. Please complete a qualified product information form or OPS submittal, and include a lab report, lab report cover sheet, and letter of equivalency to declare your model is identical to a previously-qualified model with exception of the brand name.