

Conditions and Criteria for Recognition of Laboratories for the ENERGY STAR[®] Program

In order to serve as an EPA-recognized accredited¹ laboratory for the ENERGY STAR program, a laboratory shall agree in writing to comply at all times with the following requirements:

General Requirements:

- 1) Maintain accreditation to ISO/IEC 17025, “General requirements for the competence of testing and calibration laboratories,” by an EPA-recognized Accreditation Body (AB). Noteworthy elements of ISO/IEC 17025 include requirements that laboratories shall:
 - a) Have a policy that sets out quality objectives, commitments and operational procedures;
 - b) Employ experienced personnel who have the education and training needed to conduct the tests;
 - c) Have the physical plant facilities and test equipment needed for proper testing;
 - d) Ensure that measuring equipment is accurate and calibrated and that calibration records are maintained;
 - e) Maintain a record of all original observations, test data and calculations; and,
 - f) Maintain arrangements to ensure the freedom of laboratory management and personnel from any undue internal or external commercial, financial or other pressures and influences that may adversely affect the quality of their work.

NOTE: It is EPA’s expectation that laboratories will consistently maintain the impartiality of product testing. Demonstration of impartiality, consistent with the requirements of ISO/IEC 17025, shall include but may not be limited to the following:

- i) organization chart showing that the responsibilities, authorities, and inter-relationships of all personnel who manage, perform or verify laboratory results are free from influence that may adversely affect the quality of their work;*
- ii) dates of internal audits, audit findings, and any corrective actions taken;*
- iii) any customer complaints and corrective action taken;*
- iv) original testing records containing sufficient information for repeatability, including the names of staff who participated;*
- v) evidence that laboratory employees participate in and regularly pass ethics and compliance audits; and,*

¹ As an alternative to maintaining accreditation to ISO/IEC 17025, the laboratory may participate in an EPA-recognized Certification Body’s supervised or witnessed manufacturers’ testing laboratory program (SMTL/WMTL). Please refer to Appendix A of “Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Program” for details regarding this option.

vi) *evidence that mechanisms for reporting and responding to attempts to exert undue influence on test results are in place.*

- 2) Develop and maintain separate laboratory test procedures for each accredited ENERGY STAR test method that detail how testing will be conducted utilizing the laboratory's test facilities, fixtures, equipment and personnel.
- 3) Notify EPA/DOE immediately of any attempt to hide or exert undue influence over test results.
- 4) Have recorded in its Scope of Accreditation its specific competence to carry out the test methods as outlined in the ENERGY STAR program for which the laboratory intends to test products.²

NOTE: To decrease the burden to laboratories and accreditation bodies, EPA will not require laboratories to update their Scopes of Accreditation when an ENERGY STAR specification is revised. However, EPA will require that the laboratory ensures its methods remain consistent with the test methods described in the program requirements of the currently effective version of the specification. Further, major changes in test method, for example, when a specification revision calls for a different test method altogether from the preceding specification version, will necessitate a Scope of Accreditation update to reflect the newly required test method.

- 5) Allow EPA or an EPA-appointed representative, at its discretion, to witness any testing performed for qualification or verification of qualification to the requirements of the ENERGY STAR program. EPA or its appointed representative agrees to operate solely as an observer and not participate in any way with the testing activities of the laboratory.

Inter-laboratory Comparison Testing:

- 1) Agree to participate in relevant and available inter-laboratory comparison testing (ILC) when EPA/DOE deems it necessary.
- 2) Carry out ILC in accordance with normal testing/calibration and reporting procedures, unless otherwise specified in the instructions from the proficiency test provider.
- 3) Submit to EPA/DOE upon request:
 - a) The results of ILC;
 - b) The analysis of those results; and,
 - c) Detailed corrective action responses for any outlying or unacceptable results.

Reporting:

- 1) Submit to EPA a digital copy of the accreditation certificate and scope of accreditation. This shall include at a minimum:
 - a) Accreditation effective date;
 - b) Accreditation expiration date (if applicable); and,

² The relevant test procedures are included in the product testing section of each ENERGY STAR specification.

- c) ENERGY STAR-relevant accredited test methods.
- 2) Authorize the laboratory's AB to share with EPA copies of assessment documentation related to ENERGY STAR testing, including corrective action plans and deficiency resolutions.
 - 3) Report to both EPA and the laboratory's AB within 30 days of any major changes that affect the laboratory's:
 - a) Legal, commercial, organizational, or ownership status;
 - b) Organization and management, e.g., key managerial staff;
 - c) Policies or procedures, where appropriate;
 - d) Location;
 - e) Personnel, facilities, working environment or other resources, where significant; and,
 - f) Other such matters that may affect the laboratory's capability, scope of recognized activities, or compliance with the ENERGY STAR requirements and relevant technical documents.
 - 4) Forward any questions related to ENERGY STAR test methods to EPA for resolution, and abide by the decisions of EPA relative to the resolution of those questions.