



EPA
WaterSense

WaterSense
Certification and Labeling

September 15, 2008



Meeting Agenda

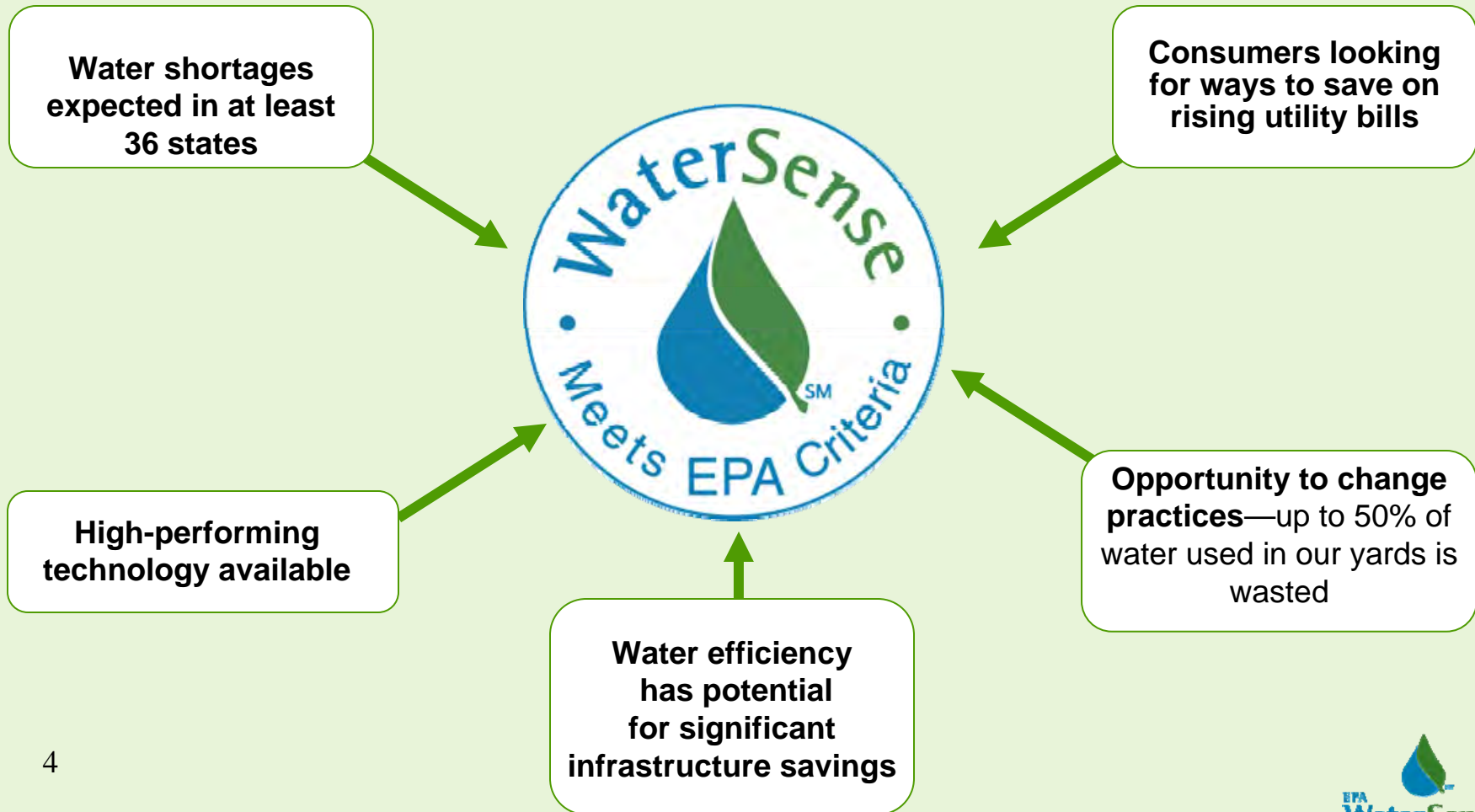
- Introduction and Purpose
- Overview of WaterSense
- Product Certification and Labeling Background
- Overview of WaterSense Certification Scheme
- Presentations from Certifying Bodies and Small Plumbing Company
- Discussion and Questions
- Schedule/Next Steps



Meeting Objectives

- Review the need for and benefits of third-party certification
- Summarize general WaterSense certification requirements
- Discuss the balance between accessibility of product certification with the rigor of requirements
- Hear concerns from the small business and irrigation industry perspective
- Help the irrigation industry understand certification and encourage participation

Need for Water Efficiency





What Is WaterSense?

**A partnership program
sponsored by the U.S. EPA**

Promotes the value of water and helps Americans make smart decisions regarding water use and water-using products.

Aims to increase the adoption of water-efficient products and services by consumers and organizations.





WaterSense Product Evaluation Factors

WaterSense uses the following factors in determining which products to label. Products must:

- Offer equivalent or superior performance
- Realize significant water savings on a national level
- Achieve water efficiency through several technology options
- Provide measurable results
- Be cost-effective
- Be effectively differentiated by the WaterSense label
- Be independently certified



Weather- or Sensor Based Control Technology Specification Development

- Issued the NOI (April 2007)
- Held Working Groups (Summer 2007)
- Awaiting Draft 8 of the SWAT Protocol (Fall 2008)
- WaterSense is testing additional controllers (Fall 2008)
- Establish draft specification criteria (Winter 2008/2009)
- Hold public comment period and resolve comments (Winter 2009)
- Publish final specification (TBD)
- Begin certifying and labeling products once final specification is published (TBD)



Product Certification and Labeling: Background

- Process evolved from original draft HET specification
 - Required testing by a “qualified testing laboratory”
 - Limited manufacturer business relationships
 - No oversight or means of ensuring competent qualified testing laboratories
- In response, EPA considered
 - Supplier’s declaration of conformity
 - EPA acts as certifier
 - Independent third-party certification
- EPA chose to establish requirements for independent third-party product certification



Product Certification and Labeling: Background

- **Third-Party Certification Benefits**
 - Focuses EPA resources on marketing and specification development
 - EPA is in compliance with National Technology Transfer and Advancement Act (NTTAA)
 - More rigorous, which is good from a marketing perspective
 - Better policing of label and on-going surveillance of products
 - Faster product approval times and no limit on business relationships
 - Increases consistency in product testing



Product Certification and Labeling: Background

- The interim third-party product certification process is working for high-efficiency toilets and lavatory faucets
 - Final specifications released in 2007
 - EPA has licensed 7 certifying bodies to conduct certification
 - 19 toilet manufactures have partnered
 - WaterSense has labeled 209 high-efficiency toilet models
 - 10 lavatory faucet manufacturers have partnered
 - WaterSense has labeled 264 lavatory faucet models
 - In 2007 WaterSense labeled high-efficiency toilet shipments comprised 2% of all toilets shipped in the U.S.



Product Certification and Labeling: Background

- The product certification process
 - EPA requires WaterSense labeled products to be certified by an accredited third-party licensed certifying body
 - Manufacturers apply for certification directly to licensed certifying body
 - Licensed certifying body certifies product and authorizes the use of the WaterSense label
 - Licensed certifying body conducts follow-up and helps EPA ensure proper use of the WaterSense label



Guest Speakers

- CSA International
- IAPMO R&T
- Underwriters Laboratory
- Water Quality Association
- Niagara Conservation, Corp.



Product Certification and Labeling: Background

- Why is EPA developing a final certification scheme?
 - Interim certification scheme was designed to accommodate plumbing products
 - Need to make the requirements applicable and accessible to a variety of industries and business sizes
 - Provides a mechanism to ensure that certifying bodies have capability and competence to certify a variety of products for WaterSense
 - Ensures uniform minimum certification requirements among certifying bodies
 - Ensures open process for including certifying bodies accredited by different organizations (ANSI, IAS, A2LA)
 - Process open for public input



Draft Certification Scheme: Product Certification

- **Initial Production Inspection**
 - Not required by WaterSense, but can be conducted at licensed certifying body's discretion
 - May include an audit of production process and quality management system
- **Initial Product Testing – Sample Selection**
 - Representative of the model to be certified
 - Made using the components and subassemblies identical to production
 - Made from production tools and assembled using methods established for production run



Draft Certification Scheme: Product Certification

- Initial Product Testing
 - Conducted in accordance with relevant WaterSense specification
 - Test facilities must demonstrate compliance with ISO/IEC 17025, *General requirements for the competence of calibration and testing laboratories*
- Licensed certifying body may determine how it will conduct initial testing
 - In-House – testing done at the licensed certifying body’s own facilities
 - Subcontract – testing subcontracted by the licensed certifying body to another party in compliance with ISO/IEC 17025
 - On-site – testing conducted at manufacturer’s facility when overseen by licensed certifying body



Draft Certification Scheme: Product Certification

- **Product Evaluation**
 - Pre-inspection or pre-testing review of the manufacturer's documentation
 - Verification that the manufacturer has a signed Partnership Agreement with EPA
 - Initial production inspection (if required)
 - Product testing in accordance with the relevant WaterSense specification
- **Product Evaluation Report**
 - Provides the manufacturer with the outcome of the evaluation
 - Informs manufacturer if there are gaps in the evaluation that need to be resolved



Draft Certification Scheme: Licensing

- Licensing Agreement – Between EPA and certifying body
 - Provides conditions for authorizing the use of the WaterSense label
 - Specific to each WaterSense specification
- Licensed certifying body provides EPA:
 - General data on certified products
 - Annual report regarding number of products tested, certified failed, reinstated, and common label misuse issues
 - Notification of label suspensions or withdrawals
 - Permission to accompany accreditation organization on routine assessments of the licensed certifying body's WaterSense related certification operations



Draft Certification Scheme: Licensing

- Licensing Agreement – Between manufacturer and certifying body
 - Certifying body verifies the manufacturer has a Partnership Agreement with EPA
 - Certifying body provides certification decision to manufacturer and authorization to use the WaterSense label in conjunction with the certified product
 - Licensed certifying body ensures that manufacturer abides by the WaterSense label guidelines



Draft Certification Scheme: WaterSense Label

- The WaterSense label has a unique identifier for each certifying body
- The Certifying body ensures the WaterSense label is used in accordance with WaterSense label guidelines
- The WaterSense label may be used on the product or product packaging and by the manufacturer, wholesaler, distributor, or retailer in promotional literature about the certified product





Draft Certification Scheme: WaterSense Label

- Certifying body takes appropriate action against label misuse by manufacturers with certified products
 - Unauthorized, incorrect or misleading use of the certification or WaterSense label - defined in program guidelines and label guidelines
 - Determine when use of label shall be suspended and terms of suspension and reinstatement
 - Determine when use of the label shall be withdrawn – immediately notify EPA and ensure label is no longer used on product
- Certifying body notifies EPA of any label misuse from a manufacturer without a certified product



Draft Certification Scheme: Surveillance

- Minimum Periodic Production Inspection and Product Testing Requirements
 - Annual audit of production process and quality management system of each manufacturer of a certified product
 - Verify that production and quality management operation is capable of maintaining product's conformance with WaterSense specifications
 - Every fifth year, retest each model of each certified product



Draft Certification Scheme: Surveillance

- Annual Post-Market Product Surveillance
 - Random selection and testing of one unit of one model of each certified product per manufacturer
 - For a manufacturer of A,B,C faucets and X,Y,Z toilets – one model A faucet and one model Z toilet is selected and tested
 - Products selected from manufacturer's warehouse or at the project site or retail outlet where the product is sold



Questions?

Questions

- Questions for the guest speakers?
- Questions or concerns regarding the certification process?



Discussion

Discussion Topics

- Balancing the rigor of certification requirements with program accessibility
 - Annual testing frequency (one model per manufacturer)
 - Production inspection frequency and rigor
 - Product recertification frequency

Range of Certification Costs

	Initial Certification (Total)	Annual Certification Maintenance				Recertification (Annualized over 5 years)
		Testing	Listing	Production Inspection	Total	
Range of Costs	\$5,000-\$15,000	\$1000-\$2,500	\$1,300-\$3,700	\$700-\$1,300	\$4,500-\$6,500	\$1,000-\$2,000



Next Steps

- EPA will consider all comments and input and will finalize the certification scheme
- Post the final certification scheme to the WaterSense Web site
- Accrediting organizations (e.g., ANSI, IAS) will begin accrediting certifying bodies for existing specifications
- Continue specification development for irrigation control technology and publish a draft specification
- Hold a public comment period on draft specification
- Work with certifying bodies to obtain accreditation and licensing to certify irrigation controllers
- Finalize specification criteria for irrigation control technology and publish the final specification
- Manufacturers submit products for certification and labeling to certifying bodies



More Information



Web site: www.epa.gov/watersense

E-mail: watersense@epa.gov

Helpline: (866) WTR-SENS (987-7367)