



# Product Certification System & Product Notification Process Training

October 2011



# Housekeeping

- All participants will be muted until called upon
  - Press \*6 to unmute your line. When finished speaking, press \*6 to mute your line.
- **Do not place the call on hold**
  - **If you need to take a call, please disconnect from the conference line and call back when you are finished**
- Ask questions between sections or type your name in the 'question' box to the right to be called on



# Meeting Objectives

- The purpose of the meeting is to review:
  - Changes to the WaterSense Product Certification System
  - The new product notification process
  - Transitional licensing for irrigation controllers
  - Registered trademark version of the WaterSense label
  - Proper use of the WaterSense label
  - Annual reporting
- WaterSense will not be discussing:
  - Issues related to individual product specifications
  - The new homes program or certification process
  - New product categories for consideration



# Background

- EPA revised its product certification system to:
  - Allow for program growth and expansion
  - Better manage the volume of certifications
  - Better focus and more efficiently use program resources
  - Streamline and improve the certification process
  - Clarify the intent of vague or unclear requirements
  - Align with the new and revised ENERGY STAR Third-Party Certification Procedures to facilitate future joint product labeling
  - Simplify the product notification and listing process



# Helpful Resources

- **Product certification page**  
<http://www.epa.gov/watersense/partners/certification.html>
  - WaterSense Product Certification System Version 2.0
  - Response to comments on the certification system
  - Product notification templates and information on the transition
- **Compendium of WaterSense Specifications**  
[http://www.epa.gov/WaterSense/partners/product\\_program\\_specs.html](http://www.epa.gov/WaterSense/partners/product_program_specs.html)
  - Links to all WaterSense specifications and technical clarifications
  - Link to the certification systems and other relevant program documents



# OVERVIEW OF REVISIONS TO PRODUCT CERTIFICATION SYSTEM



## Effective Date

- The product certification system is effective as of September 29, 2011
- LCBs must become accredited to and begin certifying products in accordance with the revised product certification system by September 29, 2012



# Scope

- EPA has established a Compendium of WaterSense Specifications with access to all final specifications, technical clarifications, and product certification information
  - [http://www.epa.gov/WaterSense/partners/product\\_program\\_specs.html](http://www.epa.gov/WaterSense/partners/product_program_specs.html)
- LCBs and manufacturers are required to comply with all of the relevant documents contained in this compendium



# Program Mark Guidelines

- Reference WaterSense Program Mark Guidelines, which replaces the WaterSense Label Use Guidelines
- WaterSense Program Mark Guidelines can be found at:  
[http://www.epa.gov/watersense/docs/WaterSenseProgramMarkGuidelines\\_Combined\\_6-29-2011\\_508.pdf](http://www.epa.gov/watersense/docs/WaterSenseProgramMarkGuidelines_Combined_6-29-2011_508.pdf)
- WaterSense Program Guidelines can be found at: <http://www.epa.gov/watersense/docs/programguidelines.pdf>



# LCB Impartiality

- Clarified LCB impartiality requirements
  - Does not allow commercial, financial, or other pressures to compromise its impartiality.
  - Identifies risks to its impartiality and demonstrates how it eliminates or minimizes such risks
  - Does not design, manufacture, install, distribute, maintain, or act as an advocate for the certified product in the marketplace, or provide consultancy to its clients related to the products it certifies



# LCB Accreditation

- Clarified that LCBs only need to update scopes of accreditation when a major change is made to a specification test method
- EPA will notify stakeholders when a major change requires an updated scope of accreditation



# Testing Laboratory Options

- Allow four testing options:
  - LCB's internal laboratories
  - Independent testing laboratories
  - Witnessed manufacturer's testing laboratories
  - Supervised manufacturer's testing laboratories
- ALL laboratories must demonstrate compliance with ISO/IEC 17025 and the relevant product specification



# External Testing Laboratory Types

- Independent Testing Laboratories
  - Laboratory independent of manufacturer's interest recognized by LCBs to test specified product categories
- Witnessed Manufacturer's Testing Laboratories (WMTL)
  - Manufacturer's laboratory that conducts testing that is 100% witnessed by the LCB
- Supervised Manufacturer's Testing Laboratories (SMTL)
  - Manufacturer's laboratory that conducts testing under supervision of an LCB; LCB's supervision includes reviews, audits, and periodic witness testing; does not require 100% witness by the LCB



# External Testing Laboratory Requirements

- **General Requirements for External Laboratories**
  - Testing personnel must have necessary competence and expertise
  - Activities must be managed to provide confidence in the test results
  - LCB must have a legally binding contract with the external lab
  - LCB is responsible for all evaluation activities outsourced
  - External labs must conform to ISO/IEC Guide 65 and the product certification system
  - External labs must not be involved in activities that could compromise the credibility of the test results
  - LCB must have documented policies and procedures for the qualifying, assessing, and monitoring all external labs
  - External labs must participate in proficiency testing as deemed necessary by EPA or the accreditation body
  - LCB must maintain a list of all external resources and make it available to the AB



# WMTL Requirements

- Requirements for WMTLs
  - LCB witnesses and checks all critical aspects of test and final data acquisition
  - LCB ensures quality of testing and competence of lab personnel



# SMTL Requirements

- **SMTL Eligibility Requirements**
  - Be currently enrolled in an SMTL program with the licensed certifying body for the relevant product category OR
  - Participate in a WMTL program for the relevant product category for at least two years



# SMTL Requirements

- Requirements for Qualified SMTLs
  - Manufacturer is responsible for products and continued compliance with WaterSense specifications
  - Lab must operate independently of other departments
  - Lab testing staff must not report to staff outside of lab structure
  - Tests must be carried out in accordance with specification
  - Lab must have adequate resources



# SMTL Requirements

- Requirements for Qualified SMTLs (cont'd)
  - Lab must be audited to ISO/IEC 17025 annually
    - LCB will witness testing and review test reports in progress
  - LCB must maintain records of supervision
  - LCB must independently review all test reports generated



# Test Reports

- Shall be accompanied by the following statement, located either on the test report or an attached cover sheet:
  - *“I understand that intentionally submitting false information to the U.S. government or its agent is a criminal violation of the False Statements Act, Title 18 U.S.C. section 1001.”*



# Manufacturer Application

- Application must include the information contained in the Product Notification Templates:
  - <http://www.epa.gov/watersense/partners/certification.html#certifying.html>
- Application must also include this information for any private labeled products
- Product information should match how the products are advertised to consumers
- LCB will verify partnership of manufacturer and any private labelers at time of application



# Production Inspection and Product Testing

- No changes the initial production inspection or product testing requirements



# LCB Certification Listing

- Certification listing must include all information required on the Product Notification Templates:
  - <http://www.epa.gov/watersense/partners/certification.html#certifying.html>
- Certification listing must also contain a key or legend defining model prefixes or suffixes for non-performance-related attributes



## Use of the WaterSense Label

- Require use of the WaterSense label on product packaging
- Use of the label is no longer voluntary
- LCBs must evaluate how the manufacturer and any private labelers intend to use the WaterSense label prior to marketing the product



# Reporting Products to WaterSense

- LCBs, not manufacturers, are required to submit product information to EPA to update the WaterSense product registry
- LCB completes and submits to EPA the Product Notification Templates for all products they have certified:
  - <http://www.epa.gov/watersense/partners/certification.html#certifying.html>



# Market Surveillance

- LCB must sample same number of products for retesting as they did for the initial certification
  - Used to require only one sample for retesting
- No change to production inspection requirements
- At LCBs discretion, sample products may be obtained from:
  - Retail outlet/distribution center or project site
  - Manufacturer's warehouse
  - Off-the line when it is not feasible to obtain it from the other sources



# Product Retesting

- Removed 5 year recertification requirement for all products
- LCB must retest 15% of all the models it has certified in each product category
  - Not every manufacturer will have products retested each year
  - Not every certified model is eligible for retesting (see next slide)



# Product Retesting

- The number of models eligible for retesting and considered when calculating the 15% shall NOT include:
  - Models tested or retested within the previous two years
  - Privately labeled models (a privately labeled model and its corresponding original manufacturer's model are counted as one model)
  - Models covered by a base model or family of models (may be counted as one model and only one of the models covered by the base model would be subject to retesting)



# Product Retesting

- Of the 15% of models eligible for retesting, EPA may designate up to half (i.e., 7.5%) based on:
  - Previous product failures
  - Preferred location (e.g., retail outlet vs. warehouse)
  - Referrals from third parties
  - Models with high sales volume
- The remainder of the models must be randomly selected for retesting by the LCB



# Product Retesting

- To address rounding issues, EPA has clarified:
  - The LCB must retest a minimum of one model or the appropriate number required to comprise the 15%, rounded to nearest whole number, whichever is greater
- If no products are eligible, the LCB does not have to retest products for that year



# Product Retesting

- The LCB shall determine and notify EPA of the number of models requiring retesting by September 30 of each year for the period of October 1 of that year through September 30 of the following year
- EPA will notify the LCB by November 1 of that year with the details of its allotted designation
- Review example surveillance scheme in Appendix A of the certification system

**27 Individual Models**  
*minus 2 Recently Tested Models*  
*minus 5 Privately Labeled Models*  
*minus 3 Models Covered by a Base Model*

**(17 Eligible Models) x (15% retested)**

**3 Total Models Required for Retesting**

**IF EPA DESIGNATES MODELS**

**IF EPA DOES NOT DESIGNATE MODELS**

*(17 Eligible Models) x (7.5% (half of the 15%) May be Designated by EPA)*

**Licensed Certifying Body  
Randomly Selects 3 Models**

**EPA Designates 1 Model**

**Licensed Certifying Body  
Randomly Selects 2  
Remaining Models**



# Label Use Surveillance

- LCB must assess for proper label use all products selected for product retesting



# Amendments, Modifications, & Revisions

- Major revisions
  - Changes to water efficiency or performance requirements and/or related test methods
  - Requires open public process
  - Typically requires recertification of currently certified models
- Minor revisions
  - Editorial in nature, serve to clarify vague or unclear requirements
  - Typically will not require recertification of currently certified models
- EPA will notify stakeholders when revisions are considered major or minor



# Amendments, Modifications, & Revisions

- EPA reserves the right to modify these rules as they apply to specific product categories; modifications will be identified in the specifications
- EPA will designate a title, version number, and date for all documents to facilitate version control
  - WaterSense Specification for [Product Category] or WaterSense Product Certification System
  - Version X.Y
  - Month, Day, Year



## For More Information

- Indicate that all inquiries should be sent to the WaterSense Helpline
  - [watersense@epa.gov](mailto:watersense@epa.gov)
  - (866) WTR-SENS (987-7367)
- For a list of current product specifications and technical clarifications visit the Compendium of WaterSense Specifications page:
  - [http://www.epa.gov/WaterSense/partners/product\\_program\\_specs.html](http://www.epa.gov/WaterSense/partners/product_program_specs.html)



# Questions

- Questions on:
  - Revisions to the certification system
  - Compliance with any new requirements
  - Timeframe for compliance
  - Other issues



# PROPER USE OF THE WATERSENSE LABEL



# Receiving and Using the WaterSense Label

- Manufacturers must properly label and market products in accordance with WaterSense Program Mark Guidelines
  - The label must be used on product packaging unless the packaging is too small
  - The label should also be displayed in association with any labeled product listed on the manufacturer's website
  - The label can be used directly adjacent to a certified product on manufacturer, retailer, and distributor brochures, advertisements, websites, point-of-purchase materials, and trade show displays
  - Never use the label directly adjacent to or imprinted on an unlabeled product



# WaterSense Label Dos and Don'ts

DO



Certified by  
[Certifying Body]



Certified by  
[Certifying Body]



# WaterSense Label Dos and Don'ts

## DON'T



Never use to identify a WaterSense labeled product without the licensed certifying body name and “Certified by” underneath.



# WaterSense Label Dos and Don'ts

## DON'T



Never attempt to create the label or logo yourself.  
Always use digital or camera-ready artwork.



# WaterSense Label Dos and Don'ts

## DON'T





# WaterSense Label Dos and Don'ts

## DON'T

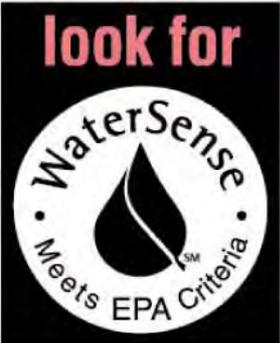
Never add or replace any wording on the marks.\*



# WaterSense Label Dos and Don'ts

## DON'T

**look for**



Never alter the colors of the marks.



# OVERVIEW OF PRODUCT NOTIFICATION PROCESS



# Background

- EPA revised the product notification process to:
  - Streamline the flow of information
  - Improve data quality
  - Accommodate the growth of the program
  - Reduce administrative burden on EPA and its partners



# New Product Notification Process for Certified Products

1. In application to LCB, manufacturers submit product information for all required fields included in the WaterSense Product Notification Templates
2. LCBs use this information to create/update certification listings (information must match what the consumer will see)
3. At least once per month, LCBs submit product information to WaterSense using Product Notification Templates
4. WaterSense uses the template information to update the WaterSense product registry



# Transition to New Product Notification Process

- As soon as possible, LCBs and manufacturers begin working together to update certification listings for **all current and any new** products
- **November 3, 2011:** WaterSense will only accept product information submitted by LCBs
- WaterSense product registry will be incrementally updated with product information submitted by LCBs after November 3, 2011



# Timing of Transition to New Product Notification Process

- Transition will be in effect November 3, 2011 through September 29, 2012
- Any products that have not been updated by September 29, 2012 will be removed from the WaterSense product registry



# Product Notification Templates

- Review example tank-type toilet and flushing urinals notification templates
  - Examples provided use information that is publicly available on the WaterSense product registry
- Please contact the WaterSense Helpline if you would like a list of your products on the WaterSense product registry to assist in updating your certification listing



# Checklist for Certification Listings

- ✓ Complies with requirements of the WaterSense Product Certification System Version 2.0
- ✓ Complies with data requirements in Product Notification Templates
- ✓ Includes all certified products, even those that do not currently appear on the WaterSense product registry
- ✓ Product information matches the advertising information that consumers will see in stores or online
- ✓ Product information is current and up-to-date



# Questions

- Product Notification Process
- Timing
- Product Notification Templates



# ANNUAL REPORTING FORMS



# Annual Reporting Forms

- New interactive annual reporting forms to be posted early 2012
  - PDF format
  - Customizable
  - Data restrictions
- Due date: February 17, 2012

# Tank-Type Toilets (DRAFT)

Manufacturer Name on Partnership Agreement: \_\_\_\_\_

## Section IV: Tank-Type Toilets

Please include data for **all tank-type toilets shipped to or within the United States** for the period between January 1, 2011, and December 31, 2011, including products sold both under your brand(s) and any private labelers' brand(s).

Please report the number of individual units shipped rather than the number of models or model lines produced. A combination is a tank and bowl that is packaged and shipped together as a unit (one-piece or two-piece). **To avoid double-counting, only report product shipment numbers in the Tanks and Bowls columns if these components are NOT already counted as part of a product in the Combination column.**

	All Tank-Type Toilets	U.S. Total (Please submit EXACT shipment data; do not round)			Claim as confidential?
		Combination	Tanks (NOT shipped as part of a combination)	Bowls (NOT shipped as part of a combination)	
1.	Total number of tank-type toilets shipped?  <i>Note: Count ALL tank-type toilets shipped, including both WaterSense labeled and non-WaterSense labeled toilets.</i>				<input type="checkbox"/> Yes <input type="checkbox"/> No (Please choose one.)
2.	Total number of high-efficiency tank-type toilets shipped with an effective flush volume of 1.28 gpf or less?  <i>Notes: Count both WaterSense labeled and non-WaterSense labeled toilets that meet this criterion.</i>				<input type="checkbox"/> Yes <input type="checkbox"/> No (Please choose one.)
3.	Total number of WaterSense labeled tank-type toilets shipped?				<input type="checkbox"/> Yes <input type="checkbox"/> No (Please choose one.)

Please include any clarifications regarding your data here:

# Flushing Urinals (DRAFT)

Manufacturer Name on Partnership Agreement: \_\_\_\_\_

## Section VII: Flushing Urinals

Please include data for **all flushing urinals shipped to or within the United States** for the period between January 1, 2011, and December 31, 2011, including products sold both under your brand(s) and any private labelers' brand(s).

Please report the number of individual units shipped rather than the number of models or model lines produced. A urinal system is a valve and fixture that is packaged and shipped together as a unit. **To avoid double-counting, only report product shipment numbers in the Valves and Fixtures columns if these components are NOT already counted as a product in the Systems column.**

	All Flushing Urinals	U.S. Total (Please submit EXACT shipment data; do not round)			Claim as confidential?
		Flushing Urinal Systems	Flushing Urinal Valves (NOT shipped as part of a system)	Flushing Urinal Fixtures (NOT shipped as part of a system)	
1.	Total number of flushing urinals shipped?  <i>Note: Count ALL flushing urinals shipped, including both WaterSense labeled and non-WaterSense labeled flushing urinals.</i>				<input type="checkbox"/> Yes <input type="checkbox"/> No (Please choose one.)
2.	Total number of high-efficiency flushing urinals shipped with average maximum water consumption of 0.5 gpf or less?  <i>Note: Count both WaterSense labeled and non-WaterSense labeled flushing urinals that meet this criterion.</i>				<input type="checkbox"/> Yes <input type="checkbox"/> No (Please choose one.)
3.	Total number of WaterSense labeled flushing urinals shipped?				<input type="checkbox"/> Yes <input type="checkbox"/> No (Please choose one.)

Please include any clarifications regarding your data here:



# Questions

- Annual Reporting Forms



# TRANSITIONAL LICENSING FOR IRRIGATION CONTROLLERS



# Transitional Licensing for Controllers

- EPA will begin accepting applications for licensing for irrigation controllers on October 12, 2011
- To be eligible, LCBs must declare that it and/or any laboratories it uses meets the following requirements:
  - Participated in a specification training offered by EPA OR have worked on the development of the test protocol included in the specification
  - Declare that it has the appropriate testing equipment



# Transitional Licensing for Controllers

- Application must include:
  - Documentation that LCB meets the transitional requirements
  - Signed amendment to the licensing agreement
- Applications must be received by October 24, 2011 in order to be listed on the WaterSense website with the release of the irrigation controller specification
- Transitional licensing process is open through November 3, 2012



## More Information



Web site: [www.epa.gov/watersense](http://www.epa.gov/watersense)

E-mail: [watersense@epa.gov](mailto:watersense@epa.gov)

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