



A partnership program of the
U.S. Environmental Protection Agency

May 24, 2007

Dear Interested Party:

The U.S. Environmental Protection Agency (EPA) recently launched a voluntary water efficiency program, WaterSense[®], that seeks to protect the future of our nation's water supply by promoting water efficiency and enhancing the market for water-efficient products and services. EPA's WaterSense program seeks to change the way the American public and businesses think about water efficiency and make decisions regarding water use and water-using products.

To achieve and maintain a high level of credibility and assured level of performance, EPA requires all products bearing the WaterSense label to be certified by accredited third-party product certification bodies. To that end, EPA is establishing certification and accreditation requirements for third-party product certification bodies that assess product conformance to WaterSense specifications and authorize the use of the WaterSense label.

The purpose of this letter is to make you aware of and ask for your feedback regarding the draft WaterSense certification scheme. The draft WaterSense certification scheme outlines the requirements that product certification bodies must be accredited under when certifying products for WaterSense and authorizing the use of the WaterSense label. EPA will accept written comments and will hold a public meeting to discuss interested party comments. Following the comment period, EPA will make any necessary revisions to the certification criteria, publish the final certification scheme, and allow product certification bodies to begin the accreditation process. This process will ultimately supersede the interim product certification body approval and certification requirements (interim process) that are outlined in Appendix A of the WaterSense program guidelines. It is anticipated that the WaterSense certification scheme will be effective by September 2008.

Draft WaterSense Certification Scheme

EPA requires products bearing the WaterSense label to be assessed for conformance to the relevant WaterSense product specification by accredited third-party product certification bodies. This is not a new requirement, but the procedures regarding how the third-party product certification bodies are accredited are changing. Under the existing interim process, EPA approves product certification bodies that are currently accredited by the American National Standards Institute (ANSI) to certify plumbing products or other products directly related to WaterSense specifications. These approved product certification bodies test products for conformance with WaterSense specifications, but carry out all other certification functions in accordance with their existing individual ANSI accredited certification schemes. EPA is establishing a WaterSense certification scheme to:



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- Ensure consistent application of minimum certification requirements;
- Establish uniformity in the certification body accreditation process, while making the process open to all qualified accreditation organizations; and
- Provide fully transparent criteria for certification and the accreditation of product certification bodies.

The draft WaterSense certification scheme, representing the final accreditation process, is attached. Specifically, the draft WaterSense certification scheme specifies the minimum requirements that a product certification body shall observe when operating third-party certifications of product conformance to WaterSense product specifications and authorizing the use of the WaterSense label. The WaterSense certification scheme will be implemented by internationally recognized accreditation bodies.

To minimize the burden on manufacturers and facilitate the transition from the interim process to the final accreditation process, EPA gathered information regarding accreditation and certification requirements currently implemented by product certification bodies as part of their ANSI Scope of Accreditation (i.e. current manufacturer requirements for product certification). These requirements form the basis for the minimum requirements contained in the draft WaterSense certification scheme.

Under the draft WaterSense certification scheme, product certification bodies must be accredited by an accreditation body that: 1) operates in accordance with ISO 17011, *Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies*, 2) offers accreditation services to ISO Guide 65, *General requirements for bodies operating product certification systems*, and 3) is either an International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement (MRA) Signatory or International Accreditation Forum (IAF) Multi-lateral Recognition Agreement (MLA) Signatory. In addition, product certification bodies must have the specific WaterSense specification(s) for which they intend to certify products listed under their Scope of Accreditation. Product certification bodies can seek accreditation for any or all of the final WaterSense product specifications.

Manufacturers seeking WaterSense certification and the WaterSense label for their products must apply directly to a product certification body that is accredited for the relevant WaterSense specification. The product certification body will conduct an initial evaluation (if necessary), will select and test samples for conformance to the relevant WaterSense specification, and will issue the applicant manufacturer an evaluation report, authorize the use of the WaterSense label, and provide the manufacturer with the appropriate WaterSense graphic artwork.

In addition, the product certification body shall provide continuing ongoing surveillance of product conformance with the relevant WaterSense specification. This process will involve periodic production inspection and product testing and surveillance of products on the market.



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The product certification body is also responsible for handling suspension or withdrawal of the WaterSense label from products in the case of product non-conformance, misuse of the WaterSense label, or infringement of the WaterSense certification scheme.

Providing Input on the Draft WaterSense Certification Scheme

EPA welcomes your input on the draft WaterSense certification scheme. All interested parties are encouraged to review the draft certification scheme and provide written comments by July 24, 2007. Written comments should be directed to watersense_certification@erg.com. All comments become a part of the public record.

EPA will hold a public meeting to discuss comments on the draft WaterSense certification scheme with all interested parties that would like to provide comments in that forum. The public meeting will be held at the Navy League Conference Center in Arlington, Virginia on June 20, 2007 from 1:00 to 4:00 pm. If you plan to participate in the public meeting, please submit your registration by June 13, 2007 using the form found at www.epa.gov/watersense/register.htm. Meeting materials and other necessary information will be distributed to registered participants in advance of the public meeting.

Following the close of the comment period, EPA will review all comments, and provide a consolidated response. The certification criteria will then be finalized, and EPA will open the process for the accreditation of product certification bodies.

If you have questions about the draft WaterSense certification scheme or the WaterSense program in general, please contact Stephanie Tanner at (202) 564-2660 or tanner.stephanie@epa.gov. We look forward to receiving your feedback on the draft WaterSense certification scheme, as well as your organization's participation with EPA's WaterSense program.

Sincerely,

A white rectangular box containing a handwritten signature in black ink that reads 'Cynthia A. Simbanin'.

Cynthia A. Simbanin
WaterSense Program Manager