

IAPMO R&T
POLICY & PROCEDURE

No: R-074

Title: High Efficiency Product Specification (EPA)

Approved by: SM

Revision Date: 11/02/09

1.0 Scope: This procedure establishes the certification requirements for products covered under the EPA WaterSense specification. EPA requires all products bearing the WaterSense label to be assessed for conformance to the latest edition of applicable EPA WaterSense High-Efficiency product specification.

2.0 Responsibility: It is the responsibility of the Sr. Director of IAPMO R&T to ensure that this procedure is followed.

2.1 Accreditation requirement:

The Environmental Protection Agency (EPA) requires that the certification agencies be accredited by American National Standard Institute (ANSI) to certify against the EPA WaterSense Product specification. Moreover, a licensing agreement shall be signed between IAPMO R&T and EPA on annual basis.

3.0 Product Certification Procedure: IAPMO R&T can certify products to the EPA WaterSense specifications in the same manner as any other product provided the products applied for are also UPC® certified by IAPMO R&T to the applicable North American standards and codes. The schedule of fees applies. The difference between regular certification and EPA WaterSense product certification are outlined below. The listee and their additional companies must sign a partnership agreement with the EPA before applying for a WaterSense listing with IAPMO R&T.

- A. **Renewals:** The renewal of such files shall be conducted in accordance to the policies and procedures in this Quality Assurance Manual.
- B. **Continuous Compliance Inspection:** In addition to the audit plan set forth in this QAM, the inspectors shall look for the WaterSense mark of conformity on listed products and assess the infringement upon such mark on products that are not listed.
- C. **Marking:** The listed products shall bear the WaterSense mark of conformity (see Figure 1) in addition to other certification marks outlined on the certificate of listing. The WaterSense mark can be applied to either the product or packaging and need not be permanent. The WaterSense mark shall not be placed in close proximity to the IAPMO certification mark. IAPMO R&T shall bring to EPA's attention, any instances of unauthorized use of a WaterSense label by a manufacturer of a product that has not been certified. EPA will engage in appropriate action with the infringing manufacturer. IAPMO R&T shall not make available the WaterSense mark of conformity to any manufacturer until they have obtained an EPA WaterSense listing. The WaterSense label may not be used for any reason by, or in conjunction with a product of, a manufacturer with a terminated partnership agreement with the EPA. Upon notice of certification, the listee and additional companies listed may both be authorized to use the WaterSense label. The listee is responsible for ensuring the label is used properly. In all cases, a WaterSense labeled product shall bear the name

of a WaterSense partner that holds or is included on a WaterSense labeled product listing.

Flow Rate Marking for Lavatory Faucets and Faucet Accessories: The product and/or product packaging shall be marked in accordance with 16 *CFR* 305.11(f) with the maximum flow rate in gpm and L/min as determined through testing and compliance with this specification. Marking shall be in gpm and L/min in two digit resolutions (e.g., 1.5 gpm [5.7 L/min]).

Where can the WaterSense label be used?

The WaterSense label should only be used in conjunction with and directly adjacent to a specific WaterSense labeled product or professional program. In the case of separately packaged and sold components that make up a labeled product, the manufacturer should clearly indicate which items and/or model numbers are necessary to complete a WaterSense labeled product. Partners can use the WaterSense label on various materials, such as:

- For professional certification programs: In program materials, brochures, or Web sites promoting certification program(s) that meet EPA’s WaterSense criteria, in direct association with the qualified program(s).
- For products: On product packaging, labels, or, at the manufacturer’s discretion, directly imprinted on or adhered to the product, in direct association with the certified product(s), as long as the product maintains its certification to the WaterSense criteria for efficiency and performance. (Upon notification of a disqualification, manufacturers must immediately cease using the label on a product.)
- Manufacturer, distributor, or retailer brochures, advertisements, trade show displays, or point-of purchase materials, where clearly associated with a specific certified product or professional program to indicate that the product or professional program meets the WaterSense criteria for efficiency and performance.
- Manufacturer, distributor, or retailer Web sites, to clearly distinguish products that meet WaterSense criteria for efficiency and performance, and in direct association with those products.

How is the WaterSense label to be used?

DO use the label for product on product packaging, labels, or, at the manufacturer’s discretion, directly imprinted on or adhered to the product, as long as the product continues to meet the WaterSense certification criteria for efficiency and performance.

DO use the label on manufacturer, distributor, or retailer brochures, advertisements, trade show displays, or point-of-purchase materials, where clearly associated with a specific qualified product or service to indicate that the product or service meets the WaterSense criteria for efficiency and performance.

DO use the label for professional certification programs in program materials, brochures, or Web sites promoting certification program(s) that meet EPA’s WaterSense criteria, in direct association with the relevant program(s).

DO use the label for manufacturer, distributor, or retailer Web sites, to clearly distinguish products that meet WaterSense criteria for efficiency and performance, but only in direct association with those products.

DO be sure that the name of the certifying body as text appears under the label with the words “Certified by” when EPA specifications require third party certification for a product to earn the label, exactly as it is provided by the certifying body.

DO label all relevant components, in the event that separately packaged and sold components make up the WaterSense labeled product. Manufacturers must clearly indicate on the packaging, user manual, and specification sheets which products combine to achieve the label.

DO note which components combine to make a WaterSense labeled product by using language such as “When combined with [name or model #].” In the case of toilets, for example, tanks should include the words “When used in combination with [bowl model number/name]” in close proximity to the label, and vice versa with bowl labeling.

DO include the separate labeling clarifications on other promotional materials for WaterSense labeled products that are sold separately, including (but not limited to) Web site, point-of-purchase materials, displays, showroom models, and advertising.

DO NOT use the label with any product or program that has been disqualified from the WaterSense program by EPA. If the label is withdrawn for any reason, you must immediately cease to use the label with that product, and the label must be eliminated from product packaging/promotional materials within six months.

DO NOT use the label in any way to imply that other products produced by the manufacturer that have not met WaterSense certification criteria are labeled.

DO NOT use the label in any way to imply that EPA endorses the labeled product(s), manufacturer, or, in the case of certification programs, the program itself or any certified professional.

DO NOT use the label in conjunction with training courses, including those that might support WaterSense labeled certification programs. The WaterSense label is only for certification programs, not training.

DO NOT use the label on promotional materials that promote water efficiency in general. The label should only be used in association with and directly adjacent to a specific WaterSense labeled product or certification program. For general water efficiency promotional materials, the WaterSense partner logo may be appropriate.

DO NOT use the label to promote WaterSense labeled products or programs in general (e.g., on a Web page that features several products or programs, not all of which are labeled). Use one of the promotional labels instead.

- D. **Selection of Samples:** IAPMO R&T shall select samples of products for testing that are representative of the model to be certified and made using components and subassemblies identical to those used in production. The samples selected shall be made from production tools and assembled using methods established for the production run. Such samples may be submitted directly by the supplier (applicant).
- E. **Conduct of Initial Testing:** The initial testing shall be carried out in accordance with the specification outlined in the scope. IAPMO R&T shall conduct an annual surveillance. IAPMO R&T shall also, at a minimum, every fifth year, retest each model of each product it has certified, if the manufacturer wishes to maintain certification. Retesting for conformance with the relevant WaterSense specification shall be conducted following the same procedures as the Initial Product Testing

IAPMO R&T allows for the following means for conducting testing:

- In-House testing
- Subcontract testing
- On-Site testing (witness testing)

F. **Licensing:**

F1. **IAPMO R&T shall:**

- Maintain a listing of all WaterSense labeled products on the Web site. IAPMO R&T's website shall be updated daily to provide EPA with current listing status of suppliers.
 - If separate listings are necessary for the manufacturer and the additional company that is private labeling or rebranding the manufacturer's products, IAPMO R&T shall keep a record of the linkage between the two files and provide the cross-referenced list of brand names and model numbers to EPA upon request. Such records are available in the laserfiche.
- Provide EPA with an annual report: The report shall be made on a form provided by EPA and shall contain information regarding numbers of products certified, de-listed, or reinstated. In addition, the annual report shall contain a summary of common label misuse or dispute actions. EPA may utilize this information to generally track the certifications of specific products and evaluate the effectiveness and continued applicability of its WaterSense specifications.
- Notify EPA of any WaterSense label suspensions, withdrawals, or reinstatement. Accordingly, IAPMO R&T shall provide EPA with notification of any WaterSense label suspensions, withdrawals, or reinstatement, within 30 days of occurrence.
 - Certification staff is to notify EPA via e-mail (watersense@epa.gov and cc Kim.Wagoner@erg.com) upon any delisting/withdrawal/reinstatement of Watersense listing. The certification staff is to copy the Director of Product Certification on the e-mail. A copy of the e-mail notification is to be filed in the laserfiche in the "EPA Watersense" folder under the "Listee Withdrawal" sub folder.
- Allow EPA to accompany accreditation organization on routine assessments: EPA reserves the right, for EPA staff or agents acting on behalf of EPA, to accompany the accreditation organization on any routine or follow-up assessments of IAPMO R&T accreditation as it relates to the WaterSense Program.
- Put all efforts to notify current listee of any revisions to the applicable WaterSense product specifications. Please refer to R-024 for details.

Figure 1

