

## Summary of Draft Revisions to the WaterSense® Product Certification System

The U.S. Environmental Protection Agency's (EPA's) WaterSense program is pleased to announce the release of its *Draft Revised WaterSense Product Certification System* (draft revised product certification system). The purpose of this document is to summarize the revisions made to the product certification system, provide reasoning for the changes, and request feedback on this draft before it is finalized.

### 1.0 BACKGROUND

EPA requires all products bearing the WaterSense label to be independently certified for efficiency and performance. In March 2009, EPA released Version 1.0 of the *WaterSense Product Certification System* to guide this independent, third-party product certification process. Since that time more than 3,500 tank-type toilets, bathroom sink faucets, showerheads, and flushing urinals have been certified to meet EPA's criteria for efficiency and performance.

As the WaterSense program continues to grow and expand to cover new product categories, EPA has identified several changes that are necessary to improve the certification process and balance the cost and burden of certification with the rigor the program needs to maintain the WaterSense label's integrity. Additionally, since the initial release of the product certification system, EPA released its *Third-Party Certification Procedures* for the ENERGY STAR® program, which went into effect January 1, 2011. In order to facilitate future joint-labeling opportunities with ENERGY STAR, where appropriate, EPA has revised the WaterSense product certification system to complement the ENERGY STAR system. In addition, EPA is proposing to revise and streamline its current product notification process. With these changes, EPA's goal is to better focus WaterSense's resources and accommodate future growth of the program.

EPA is soliciting your feedback regarding the draft revised product certification system and the new product notification process (all materials including the new product templates are available on the WaterSense website). To facilitate public review of the draft revised product certification system, EPA has provided a version with the revisions included in track changes and a second version that is clean with all track changes accepted. EPA will accept written comments on its draft revised product certification system and new product notification templates from June 23 through July 25, 2011. EPA will also hold a public meeting via webinar on July 13, 2011, to discuss the revisions.

### 2.0 DISCUSSION OF DRAFT REVISIONS TO THE WATERSENSE PRODUCT CERTIFICATION SYSTEM

#### General

##### Organization

The product certification system incorporates requirements for accreditation bodies, licensed certifying bodies, and manufacturers and outlines the process for product certification and

authorization to use the WaterSense label. In order to reduce redundancies and more clearly indicate the roles and responsibilities of the various parties, EPA has reorganized some subsections within the draft revised product certification system. The draft revised product certification system is organized as indicated in Table 1.

**Table 1. Organization of the Draft Revised Product Certification System by Section**

Section	Subsection	Section Title
1.0		Introduction
2.0		Effective Date
3.0		Technical Requirements
	3.1	Scope
	3.2	References and Definitions
4.0		The Accreditation Body
	4.1	Requirements
	4.2	Application
5.0		The Product Certifying Body
	5.1	Requirements
	5.2	Accreditation
	5.3	Licensing
	5.4	Evaluation Resources
6.0		Product Certification
	6.1	Application
	6.2	Initial Production Inspection and Product Testing
	6.3	Authorization to Use the WaterSense Label
	6.4	Extending a Certification
	6.5	Reporting WaterSense Labeled Products to EPA
	6.6	Surveillance
	6.7	Misuse of the Certification or WaterSense Label
	6.8	Suspension of the Use of the WaterSense Label on Products
	6.9	Withdrawal of the WaterSense Label From Products
7.0		Amendments to These Rules and Procedures

The specific reorganizations and updates within each subsection are described below.

#### Guidelines for Using WaterSense Program Marks<sup>1</sup>

EPA is in the process of developing *Guidelines for Using WaterSense Program Marks*, which will provide overarching guidance on proper use of all of the WaterSense program marks, including the WaterSense label. The *Guidelines for Using WaterSense Program Marks* will incorporate what was previously the *WaterSense Label Use Guidelines*, so EPA has updated all references throughout the draft revised product certification system from the *WaterSense Label Use Guidelines* to the *Guidelines for Using WaterSense Program Marks*. In addition, where appropriate, EPA has referenced compliance with the *Guidelines for Using WaterSense Program Marks* and has removed the specificity related to proper use of the WaterSense label,

<sup>1</sup> The Guidelines for Using WaterSense Program Marks will be available on the website later this summer.

particularly if the requirements were repetitive with what is included in the *Guidelines for Using WaterSense Program Marks*.

## **Section 1.0 Introduction**

No significant changes were made to this section.

## **Section 2.0 Effective Date**

### Timeframe for Compliance

Upon the release of the final revised product certification system, EPA will establish an effective date. To ensure compliance with the new requirements within a reasonable timeframe, EPA is requiring its current licensed certifying bodies to transition to and begin implementing the revised product certification system within one year of the established effective date.

During this transition to revised product certification system, all existing licensing agreements between EPA and the licensed certifying bodies will remain in full force and effect. Licensed certifying bodies must submit proof of accreditation to the new requirements within one year of the effective date in order to remain licensed to certify products for WaterSense. Once final, all new product certifying bodies must obtain accreditation in accordance with the revised product certification system.

## **Section 3.0 Technical Requirements**

### Section 3.1 Scope

Since the release of its first specification for tank-type toilets in 2007, EPA has found it necessary to issue technical clarifications or revisions to its existing product specifications, as questions arise from stakeholders or as technological and/or market changes affect the specification's usefulness to consumers, industry, or the environment. As new or revised product specifications are released and additional technical clarifications are issued, EPA has identified a need to compile these documents into a single compendium on the WaterSense website. In the interest of transparency, this compendium will provide stakeholders with access to all of the documents that guide the certification of products for the WaterSense program and ensure that the specifications are interpreted in a manner consistent with EPA's intent. In this section of the draft revised product certification system EPA has clarified that, in addition to the product specifications and this product certification system, licensed certifying bodies are required to comply with any relevant technical clarifications and specification revisions as they become available through this compendium. When technical clarifications or revisions are made to existing specifications, EPA will provide a timeframe for compliance.

### Section 3.2 References and Definitions

EPA has made two important changes to this section. First, the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) is currently developing a standard, ISO/IEC 17065, for conformity assessment including requirements for bodies certifying products, processes, and services. This standard is intended to replace ISO/IEC

Guide 65, *General requirements for bodies operating product certification systems*. EPA has clarified that references to ISO/IEC Guide 65 in the revised product certification system will be superseded by ISO/IEC 17065 once it is published.

Second, EPA has added three new definitions to this section: Independent Testing Laboratory, Witnessed Manufacturer's Testing Laboratory, and Supervised Manufacturer's Testing Laboratory. EPA is defining these terms because it has restructured the allowable options for using external laboratories to conduct product testing, which now includes and allows testing by these three types of laboratories (see the discussion of Section 5.4 for more information). These specific definitions were adopted from the International Electrotechnical Commission's standard for Electrical Equipment (IECEE) Use of Manufacturer's Testing Laboratories: General Principals. The IECEE is an internationally recognized certification system for conformity testing and certification of electrotechnical equipment and components. Several of EPA's licensed certifying bodies are currently accredited to certify products in accordance with IECEE's certification system, and as such, operate in accordance with these definitions and have policies and procedures in place for recognizing and accepting data from these three types of laboratories.

## **Section 4.0 The Accreditation Body**

### Section 4.1 Requirements

Section 4.1 describes the requirements that all accreditation bodies must meet in order to offer accreditation services for WaterSense. These final accreditation body requirements have not changed from Version 1.0 of the product certification system. However, EPA is no longer offering transitional approval for accreditation bodies because the transitional time period specified in Version 1.0 of the product certification system has expired and because sufficient time has passed for current EPA-approved accreditation bodies to transition over to the final accreditation body requirements.

### Section 4.2 Application

EPA did not make any modifications to the application procedures for accreditation bodies. Any new accreditation body interested in participating in the WaterSense program must meet the general requirements and complete an application as described in this section.

## **Section 5.0 The Product Certifying Body**

EPA has restructured Section 5.0 The Product Certifying Body to consolidate the requirements for product certifying bodies into one section. EPA has also clarified some of the original requirements in this section and has added additional requirements, as necessary, to ensure the capabilities and competencies of product certifying bodies that are licensed to certify products for the WaterSense program. The specific revisions are explained below.

### Section 5.1 Requirements

EPA has added Section 5.1 Requirements to outline and provide a consolidated list of the general eligibility requirements for licensed certifying bodies. In addition to accreditation and

licensing requirements (previously included under Sections 5.0 The Product Certifying Body and 6.4.1 Licensing Agreement Between Product Certifying Body and EPA of Version 1.0 of the product certification system, respectively), EPA has added evaluation resource requirements (discussed in more detail below under Section 5.4 Evaluation Resources) and several requirements for licensed certifying body impartiality. Though impartiality is required by reference under ISO/IEC Guide 65, EPA is highlighting the specific requirements it has determined are necessary to ensure that the licensed certifying bodies are free from undue influence and that their certification decisions remain unbiased.

### Section 5.2 Accreditation

EPA has made only one modification to the accreditation requirements, clarifying that licensed certifying bodies only need to update their scopes of accreditation related to a specific product category when major changes are made to the test methods identified in the relevant WaterSense product specification. EPA will notify its licensed certifying bodies and accreditation bodies when it makes major changes to a specification that would necessitate the need for an updated scope of accreditation.

### Section 5.3 Licensing

EPA has moved the licensing requirements from under Section 6.4.1 Licensing Agreement Between Product Certifying Body and EPA in Version 1.0 of the product certification system to Section 5.3 Licensing of the draft revised product certification system because the requirements apply to the product certifying body and not the product certification process. In addition, EPA has included, as a new subsection (Section 5.3.1 Transitional Approval), requirements for transitional approval and licensing of certifying bodies. These transitional approval and licensing requirements were previously contained in Appendix A of Version 1.0 of the product certification system.

EPA has also clarified the licensed certifying body's responsibilities for providing ongoing support to the WaterSense program. Specifically, EPA has removed from this section the requirements for the licensed certifying body to provide an annual report and to notify EPA of any WaterSense label suspensions or withdrawals. The annual report is no longer necessary because EPA meets with its licensed certifying bodies and accreditation bodies on a regular basis to discuss issues as they relate to the WaterSense product certification process. EPA has removed the requirement for notification of WaterSense label suspensions or withdrawals because it is duplicative of requirements specified in Section 6.7 Misuse of the Certification or WaterSense label.

EPA has retained in this section the right to accompany the accreditation body on any routine or follow-up assessment of licensed certifying bodies. In addition, EPA has clarified that it reserves the right to terminate the licensing agreement if it has determined that the licensed certifying body is not meeting or maintaining the requirements for accreditation in accordance with the product certification system.

## Section 5.4 Evaluation Resources

In Version 1.0 of the product certification system the requirements for generating or accepting test data were included under Section 6.0 Product Certification, which describes the product certification process. Since the generation/acceptance of test data is a responsibility of the licensed certifying body, EPA recognized that these requirements would fit better under Section 5.0 The Product Certifying Body, which describes the requirements that product certifying bodies must meet to certify products for the WaterSense program.

In addition, EPA has significantly restructured the original requirements for generating and accepting test data. Under Version 1.0 of the product certification system, EPA required that all test facilities used by the licensed certifying body be able to demonstrate compliance with ISO/IEC 17025. Further EPA allowed the licensed certifying body to determine the means it would use to conduct the initial testing, providing three options: in-house testing, subcontract testing, and onsite (witness) testing.

Through dialogue with manufacturers, licensed certifying bodies, and accreditation bodies EPA discovered that limiting the means for conducting the initial testing to these three options in some cases significantly increases certification costs and the amount of time it takes to certify products. Recognizing the limit of these options and the need to ensure sufficient certification resources are available to accommodate future WaterSense labeled products and product categories, EPA carefully evaluated its testing options alternatives, including:

- Continue to allow only in-house testing, subcontract testing, and onsite (witness testing).
- Expand the allowable testing options to also include supervised manufacturer testing.
- Require ISO/IEC 17025 accreditation for all laboratories.

As proposed in the draft revised product certification system, EPA chose to expand the allowable testing options to also include supervised manufacturer testing. Several stakeholders had encouraged WaterSense to consider this option under the development of Version 1.0 of the product certification system. At that time, as noted in the *Response to Public Comments Received on the Draft WaterSense Certification Scheme*, WaterSense indicated that it could revisit this option, once it had sufficient experience with the implementation of the final product certification system and provided that specific procedures could be established, with appropriate input from a variety of stakeholders, to provide adequate oversight. EPA believes it has now gained sufficient experience with the program to allow supervised manufacturer testing with the additional procedures identified to ensure the integrity of the process.

It is important to distinguish supervised manufacturer testing from a supplier's declaration of conformity, which is not a form of independent third-party certification. Under supplier's declaration of conformity, the test data is generated by the manufacturer without oversight from an independent third party. For supervised manufacturer testing, all testing is done under the ongoing supervision of a licensed certifying body and the licensed certifying body maintains ultimate responsibility for the integrity of the test data. Supervised manufacturer testing is currently recognized as an allowable testing option under ISO/IEC Guide 65, is practiced by many sectors including ENERGY STAR, OSHA, and IECEE and other health and safety certification programs, and if proper controls are in place, can be a cost-effective and reliable testing option. EPA is choosing to include this option because it will build more flexibility into the product certification process, reduce testing costs and the time it takes for products to obtain

certification, free up certification resources for future WaterSense labeled products and product categories, and align the WaterSense product certification system with ENERGY STAR's *Third-Party Certification Procedures* to facilitate future joint-labeling opportunities between the two programs.

At the same time, through dialog with stakeholders, licensed certifying bodies, and accreditation bodies, EPA also determined that its current testing option requirements were vague, subject to misinterpretation and provided insufficient guidance for ensuring the qualifications, capability and competence of the testing laboratory. As a result, and because EPA was proposing to expand the allowable testing options to include supervised manufacturer testing, EPA decided that it needed to require specific controls to ensure that supervised testing is implemented consistently among manufacturers and licensed certification bodies and to maintain the validity and integrity of the test results, regardless of the source of the test data. EPA first considered requiring all testing laboratories to be accredited by an International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement (MRA) Signatory to ISO/IEC 17025 with a scope of accreditation to include the relevant WaterSense product specification. Ultimately, however, in an effort to harmonize the WaterSense product certification system with ENERGY STAR's *Third-Party Certification Procedures*, EPA decided to require ISO/IEC 17025 accreditation only for the licensed certifying body's internal test facilities and any independent laboratories used. For any external resources used by the licensed certifying body, such as testing done at manufacturers' laboratories (whether witnessed or supervised) EPA has outlined a specific set of requirements designed to ensure the licensed certifying body's responsibility for the test data. Requirements are also included to ensure that testing is done in compliance with ISO/IEC 17025, the relevant WaterSense product specification, and this product certification system.

To further discourage tampering with or falsification of test data, EPA is also proposing to require all test reports to include the statement, "*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.*"

## **Section 6.0 Product Certification**

EPA has reorganized Section 6.0 Product Certification to streamline the product certification process and to eliminate redundancies. To that end, some sections have been moved within or from this section, while other sections have been removed entirely. A description of where subsections were moved within Section 6.0 is given below. Sections 6.5 Appeals to the Licensed Certifying Body and 6.6 Confidentiality in Version 1.0 of the product certification system were removed completely, as requirements for both are already included by reference in ISO/IEC 65 and must be met in order for a certifying body to become accredited.

### Section 6.1 Application

In coordination with the revision of the product certification system, EPA is also revising the product notification form process to streamline the flow of information and improve data quality. As part of the new process, EPA has developed product-specific notification templates, which will be available on the WaterSense website. These templates will guide the information that the licensed certifying body collects from the manufacturer at the time of application and as part of

the certification process. This information will be directly reflected on the licensed certifying body's WaterSense labeled product listing (see discussion of Section 6.2.5 Licensed Certifying Body's WaterSense Labeled Product Listing), and the licensed certifying body will then complete and submit the product-specific templates to EPA for all the products they certify (see discussion of Section 6.5 Reporting WaterSense Labeled Products to EPA).

To facilitate this notification process, EPA is proposing to require the licensed certifying body to collect from the manufacturer as part of the application all of the information contained in the relevant product-specific notification template. Because EPA intends to use the product information supplied on the template to update the WaterSense labeled product Web registry, , EPA is requiring the information to match how the products are advertised and sold to the consumer, to the extent possible.

If at any time a manufacturer intends to have its products private labeled or rebranded under a separate organization/brand, it would need to notify the licensed certifying body. This notification is not a new requirement; however, EPA is clarifying that the licensed certifying body would also need to collect the information contained in the relevant product-specific notification template for all private labeled or rebranded products and that the information shall also match how the products are advertised and sold to the consumer.

## 6.2 Initial Product Inspection and Product Testing

Revisions were made to Sections 6.2.3.2 Conduct of Initial Testing and 6.2.5 Licensed Certifying Body's WaterSense Labeled Product Listing. No significant changes were made to other subsections within Section 6.2 Initial Product Inspection and Product Testing.

### *6.2.3.2 Conduct of Initial Testing*

As described under the discussion of changes made to Section 5.4 Acceptance of Test Data, EPA has removed the requirements for generating or accepting test data from Section 6.2.3.2. In its place, EPA has referenced that the licensed certifying body would only use evaluation resources that comply with the requirements outlined in Section 5.4.

### *6.2.5 Licensed Certifying Body's WaterSense Labeled Product Listing*

The licensed certifying body's WaterSense label product listing will also be affected by the changes to the product notification process. EPA is proposing to require the licensed certifying body's WaterSense labeled product listing to include all information collected as part of the application and included in the relevant product-specific notification template. Therefore, EPA has removed from this section the specific requirements for the licensed certifying body's WaterSense labeled product listing and has instead referenced the product-specific notification template for the required information. This new template will not only ensure that the information on the certification files matches what is included on the WaterSense labeled product Web registry, but it will provide EPA with more flexibility to modify the type of information it collects as part of the product notification process, as necessary.

In addition to the information specified in the product-specific notification template, EPA is proposing to require the licensed certifying body to include in its WaterSense labeled product

listing for each manufacturer a key or legend defining any prefixes or suffixes that can be added to a base model number to denote different variations in color, finish, or other non-performance related attributes. This information is particularly important because EPA does not list every possible WaterSense labeled product model iteration on its WaterSense labeled product Web registry. Instead it relies on the presence of placeholders (reported on the product-specific notification templates) to denote that a particular base model number may have a prefix or suffix. Therefore, if questions about a specific product model arise, EPA would have a mechanism to trace the product's certification.

### Section 6.3 Authorization to Use the WaterSense Label

As a result of labeling issues that have come to EPA's attention in the past, EPA is clarifying that it is the licensed certifying body's responsibility to evaluate how manufacturers and their private labelers intend to use the WaterSense label prior to its use on products in the marketplace. With this change, EPA strives to reduce the instances of incorrect use of the WaterSense label.

More recently, EPA has also become aware that as some manufacturers switch their inventory from a standard model to a WaterSense labeled model, they may not change the model number. As a result, products have appeared on the market with the same model number but with different efficiencies. To reduce confusion associated with this practice and allow consumers to more easily identify WaterSense labeled products, EPA is requiring manufacturers to use the WaterSense label on all products certified to a WaterSense product specification.

Lastly, in an effort to consolidate requirements and eliminate redundancies within the product certification system, EPA has also integrated into this section the requirements from Section 6.8 Publicity About a WaterSense Labeled Product from Version 1.0 of the product certification system.

### Section 6.5 Reporting WaterSense Labeled Products to EPA

As part of the new product notification process, EPA is proposing that licensed certifying bodies (as opposed to the manufacturers) report all certified and labeled products to EPA on a regular basis using the product-specific notification templates, which will be available on the WaterSense website. Specific details on the product notification process and the reporting period will be specified in the template. Regular reporting of WaterSense labeled products will help EPA maintain an accurate list of WaterSense labeled products on its WaterSense labeled product Web registry.

### Section 6.6 Surveillance

In an effort to ensure that products continue to conform to the relevant WaterSense product specifications on an ongoing basis, EPA has removed the allowance for licensed certifying bodies to reduce the number of samples required for product retesting to just one. Instead, as reflected in Section 6.6.2.1 Product Retesting of the draft revised product certification system, EPA is specifying that products be retested in accordance with the relevant WaterSense product specification and this product certification system.

### *Section 6.6.1 Periodic Production Inspection*

In Version 1.0 of the product certification system, licensed certifying bodies were required to retest each model of each certified product every five years. Licensed certifying bodies have indicated to EPA that this requirement is typically only used for products subject to health and safety testing. Because of the added cost and burden associated with recertification, EPA has removed this requirement. In place of five year recertification, EPA has added additional requirements to Section 6.6.2 Market Surveillance of Products to ensure that annual market surveillance is sufficient to evaluate whether products continue to conform to the relevant WaterSense product specifications.

### *Section 6.6.2 Market Surveillance of Products*

EPA has replaced the sections for annual retesting of products and regular surveillance of WaterSense label use (Sections 6.11.2 Market Surveillance of Products and 6.11.3 Surveillance of Label Use in the Marketplace under Version 1.0 of the product certification system) with Section 6.6.2 Market Surveillance. This new section encompasses and integrates both product retesting and surveillance of label use. Under these new requirements, EPA is proposing that the licensed certifying body conduct both product retesting and label use surveillance annually using the same sampling procedures and on the same set of products.

The sampling procedures for market surveillance have been revised to provide more flexibility to the licensed certifying body when selecting samples. The licensed certifying body would now conduct market surveillance for 15 percent of the products it has certified, rather than on one unit of one model of each certified product per manufacturer. This revision allows the licensed certifying body to better choose products that are representative of what is available on the market. For instance, the licensed certifying body may now focus more of its market surveillance activities on manufacturers with large numbers of certified products rather than evenly distributing the market surveillance among all of its manufacturers. EPA is also now proposing to require the licensed certifying body to ensure that the sampling includes a representation of both the original equipment manufacturer and private labeled products.

To further ensure that market surveillance covers a diverse range of products and that products identified as potentially non-compliant are retested, EPA has indicated it reserves the right to require the licensed certifying body to select up to 50 percent of the models subject to annual market surveillance based on several key selection criteria. These criteria include previous product failures, referrals from concerned stakeholders, models that are most widely available on the market, or the location from which the products are sampled (e.g., to increase the percent of models sampled from retail outlets or distribution centers).

All products that are sampled as part of the market surveillance now would also be retested for compliance to the relevant WaterSense product specification. The licensed certifying body would also verify that the label is present on product packaging and that it is used in accordance with the *Guidelines for Using WaterSense Program Marks*. Finally, all surveillance testing must be done at an independent testing laboratory, regardless of where it was tested initially.

### Section 6.7 Misuse of the Certification or WaterSense Label

In order to consolidate the conditions and requirements for identifying and handling misuse of the WaterSense label, EPA has moved what was previously Section 6.9 Misuse of the Certification or WaterSense Label under Version 1.0 of the product certification system to Section 6.7 Misuse of the Certification or WaterSense Label. EPA has also added a diagram outlining the mechanisms for identifying label misuse and the party responsible for handling corrective actions under various scenarios (either EPA or the licensed certifying body).

In addition, EPA has integrated within this section the requirements for WaterSense label suspension and withdrawal.

### **Section 7.0 Amendments to These Rules of Procedure**

No significant changes were made to this section.

### **3.0 DISCUSSION OF REVISIONS TO THE PRODUCT NOTIFICATION PROCESS**

EPA has decided to revise its product notification process based on conversations with manufacturers and its licensed certifying bodies. Under the new process, EPA will collect WaterSense labeled product information directly from its licensed certifying bodies. To facilitate this reporting process, EPA has developed product-specific notification templates, available on the WaterSense website, which outline the information that EPA intends to collect for each product category. These product-specific notification templates will replace the current new certified product notification forms that manufacturers are required to complete. Table 2 describes the current and proposed product notification processes.

**Table 2. Current and Proposed Product Notification Process**

Current Product Notification Process	Proposed Product Notification Process
<ul style="list-style-type: none"> <li>• Manufacturer submits products to licensed certifying body for testing and certification.</li> <li>• Once products are certified, product information is listed on the licensed certifying body's WaterSense labeled product listing.</li> <li>• Each manufacturer completes new certified product notification form for each new certified product and submits to EPA.</li> <li>• EPA verifies that information on form matches the licensed certifying body's WaterSense labeled product listing and the manufacturer's website.</li> <li>• If discrepancies are found EPA discontinues processing the form until the manufacturer makes corrections</li> </ul>	<ul style="list-style-type: none"> <li>• Upon application manufacturer provides licensed certifying body with information required by product notification template.</li> <li>• Licensed certifying body verifies product information as part of certification process.</li> <li>• Once products are certified, the required product information is listed on the licensed certifying body's WaterSense labeled product listing.</li> <li>• Licensed certifying body compiles information for all certified products into product notification template and submits to EPA twice per month.</li> <li>• EPA performs final QA/QC check and uploads information to its WaterSense labeled product Web registry.</li> </ul>

<p>and/or updates their WaterSense labeled product listing with the licensed certifying body.</p> <ul style="list-style-type: none"><li>• Upon completion of the form, EPA updates its WaterSense labeled product Web registry.</li></ul>	
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With thousands of products by hundreds of manufacturers, the WaterSense program has simply outgrown the existing process. The current product notification process places a significant and unnecessary burden on both the EPA and the manufacturers. Manufacturers were required to report information to EPA that had already been reported to their licensed certifying body and EPA needed to verify and correct information with manufacturers located around the world. In addition, the manual nature of the process made it subject to numerous reporting errors. Correcting these errors was costly to the manufacturers if changes to the certification files were required, and would significantly delay the listing process with WaterSense. The proposed product notification process will allow EPA to more accurately verify a product's certification because the information included on the licensed certifying body's WaterSense labeled product listing will match the information reported to EPA. It will also significantly reduce reporting errors and the amount of time it takes to update products on the WaterSense labeled product Web registry as product information will be provided directly by the licensed certifying body with minimal coordination with manufacturers required to verify that the information is correct. Finally, the new process will facilitate joint labeling of products between the WaterSense and ENERGY STAR programs as the listing processes are now very similar for both programs.