Arlington, VA, U.S.A., April 6, 2020

To:
Egyptian Organization for Standardization and Quality Control
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Re: Draft of Egyptian Standard ES 5149-2 for "Commercial Refrigerating Appliances Including Refrigerated Display Cabinets, Cold Rooms, etc"

Comments on WTO Notification G/TBT/N/EGY/242 issued on 06 February 2020

Dear Egyptian Organization for Standardization and Quality Control (EOS),

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI)1 is pleased to provide comments to the EOS regarding the draft revision Egyptian standard ES 5149-2 for "commercial refrigerating appliances including refrigerated display cabinets, cold rooms, etc." AHRI commends Egypt for its efforts to set Minimum Energy Performance Standards (MEPS), which AHRI supports in principle. If countries can verify energy efficiency performance, MEPS help governments achieve energy efficiency goals, while benefitting industry and the consumer by promoting a level playing field where purchasing decisions can be made on the basis of quality.

First, AHRI recommends that this standard make a reference to any applicable AHRI or ASHRAE2 standards. AHRI’s international standards can be found free of charge here. Referencing AHRI and ASHRAE standards will ensure a more accurate measure of energy efficiency. AHRI develops industry-recognized testing and rating performance standards for a variety of industry equipment categories, the referencing of which in energy efficiency regulations is the foundation for the second recommendation below. These standards are international standards per the six criteria3 identified by the World Trade Organization (WTO) Agreement4 on Technical Barriers to Trade.

Second, AHRI recommends the use of its voluntary equipment Certification Program as a verification system. This system is used by regulators globally for an accurate and unbiased

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1 AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. With more than 300 manufacturing members from virtually every continent, AHRI is an advocate for the industry and develops standards for and certifies the performance of many of the products manufactured by the global industry. The annual output of the heating, ventilation, air conditioning & refrigeration (HVACR) and water heating industry is worth more than $44 billion. In the United States alone, the HVACR and water heating industry supports 1.3 million jobs and $256 billion in economic activity annually, and accounts for more than 90 percent of residential and commercial HVACR and water heating equipment manufactured and sold in North America.

2 American Society of Heating, Refrigerating and Air-Conditioning Engineers


4 Agreement of Technical Barriers to Trade (TBT) and its relevant Decisions of the TBT Committee.
evaluation of the claimed energy efficiency of HVACR and water heating equipment. For example, to enforce its energy efficiency policies, Egyptian officials or customs officers can access test data in the AHRI Directory of Certified Product Performance to examine the performance of approximately four million equipment models.\(^5\)

**Detailed Comments**

**Commercial Refrigeration— Add Reference to AHRI Standard 1200/1201**

AHRI recommends that Egypt consider referencing AHRI standard 1200 (I-P/2013), *Performance Rating of Commercial Refrigerated Display Merchandisers and Storage Cabinets*, available here.\(^6\) This will allow Egyptian authorities to verify (using AHRI's Directory) a broader range of equipment (without building testing labs and administering a certification testing program) and make the Egyptian products more acceptable in markets outside of Egypt. This will lead to a more competitive market where consumers have a larger range of product choices based on certified energy efficiency performance.

AHRI understands ES 5149-2 is a direct adoption of ISO 53653-2:2015, *Refrigerated display cabinets — Part 2: Classification, requirements, and test conditions*. Referencing only ISO standards also severely limits the scope of Egypt’s energy efficiency efforts and will reduce the variety of energy efficient models available to the consumer. Referencing AHRI Standard 1200 provides Egyptian authorities with a more realistic market-oriented reference for its energy efficiency policies.

**Multipath Approach to Referencing Standards**

As explained above, referencing AHRI Standard 1200 instead of ISO 53653-2 will offer Egypt a stronger foundation to build and implement its energy efficiency policies. Nevertheless, we understand if Egypt has already decided to reference ISO 53653-2 in ES 5149-2. In this instance, AHRI advocates a “multipath approach” to compliance of Egypt’s energy efficiency policies.

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\(^5\) AHRI’s standards and certification programs are credentialed as follows:
- AHRI is accredited to ISO 17065 as a Certification Body (CB) by COFRAC (the national accreditation body of France) and SCC (Standards Council of Canada);
- AHRI is an approved CB by the U.S. Environmental Protection Agency (EPA) for the ENERGY STAR® program;
- AHRI facilitates regulatory reporting compliance by submitting certification reports on behalf of its certification participants to the Department of Energy (DOE), California Energy Commission (CEC), Natural Resources Canada (NRCan); and
- Manufacturers in the AHRI certification programs can register AHRI certified products to comply with the Minimum Energy Performance standards (MEPS) set forth by the Saudi Standards, Metrology and Quality Organization (SASO) without additional testing.

\(^6\) An SI version is available here.
Various countries already accept equipment tested to either the applicable AHRI or ISO standard without duplicative testing and certification. Products that are AHRI Certified undergo a much more rigorous testing program compared to any other certification program in the world. Therefore, Egypt can with confidence allow AHRI Certified products (tested according to AHRI Standard 1200) into its market without costly and lengthy duplicative testing and certification within Egypt. Test results from both standards may be similar, but AHRI Certified equipment tested according to AHRI Standard 1200 will have a much more reliable energy efficiency rating. The rating of equipment tested according to ISO 53653-2 is much less reliable (with a large variance of uncertainty). Accommodating for a “multipath approach” to compliance will create a more competitive market and allow the Egyptian consumer more product choice and lower prices.

**Strengthening and Simplifying Energy Efficiency Performance Verification**

Referencing the above-mentioned standard is the foundation for Egypt to use the AHRI Certification Program to improve the implementation and verification of Egypt’s energy efficiency policies. To accomplish this, Egypt can use the energy efficiency test data on the AHRI Directory to verify the performance of equipment imported into or manufactured in Egypt. Equipment that has been certified by AHRI will have an AHRI certificate showing the equipment capacity, and energy efficiency rating, as determined using the relevant AHRI Standard. Authorized certification bodies in Egypt can verify, on AHRI’s publicly available Directory, the authenticity of this certificate to verify compliance to existing energy efficiency regulations.

AHRI believes that equipment performance needs to be documented through rigorous testing, such as through AHRI’s Certification Program. More specific details about the certification programs, including processes and testing requirements are listed in the Certification Operations Manual. Pages 1-4 contain an introduction to the AHRI certification program and explain the purpose of the program.

AHRI contracts independent third-party laboratories globally to test equipment, all of which undergo an onerous qualification process by AHRI staff. Further, all labs are accredited to ISO 17025: “General requirements for the competence of testing and calibration laboratories.” These laboratories are selected by AHRI through a competitive bidding process and then vetted extensively on testing competence to standards and practices far more detailed and rigorous than those found in ISO 17025. All AHRI tests are conducted or witnessed by qualified laboratory personnel. There is no equivalent certification method within the ISO system.

Therefore, we recommend that Egypt accept AHRI Certified equipment as compliant for its energy efficiency policies for a full range of equipment categories as outlined here. This would lead to large monetary and administrative savings on the part of government regulators and manufacturers, which could all be passed on to consumers in the form of lower prices and a wider choice of products whose energy efficiency has been verified.

AHRI appreciates this opportunity to provide information to the Egyptian Organization for Standardization and Quality Control regarding this draft and would be glad to discuss these

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7 The opportunity to use AHRI’s Certification Program is valid for a large variety of HVACR and water heating equipment.
matters in more detail. We look forward to new and challenging opportunities to support the work of EOS in the future.

If you have any questions or wish to discuss this further, please do not hesitate to call me at (1) (703) 303-2493.

Sincerely,

James Walters

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In an effort to help contain the spread of the COVID-19 virus, AHRI staff moved to a total telework policy beginning Tuesday, March 17. We all have the technological capability to carry out our responsibilities working remotely and our commitment to quality service to our members remains unchanged during this unprecedented period.

Under this policy, all interactions between AHRI staff and members will occur only in a virtual manner, i.e., via conference call, email, or telephone. Any currently scheduled in-person meetings, including at our office or at our members’ offices, will be transitioned to virtual meetings or postponed until a later date. This policy will remain in effect until further notice.

We appreciate your patience and urge you to contact us if you have questions or concerns.