EPEAT™ Policy Manual

Proposed Revisions to EPEAT Policy Manual
Public Comment Period
October 17, 2022 through December 31, 2022

The EPEAT Program makes policy and procedural updates on an annual basis and is proposing revisions to the *EPEAT Policy Manual* and the *EPEAT Conformity Assurance Implementation Manual*.

The *EPEAT Policy Manual* identifies policies that govern and support EPEAT programmatic activities. The companion document, *EPEAT Conformity Assurance Implementation Manual*, defines the specific requirements and expectations of manufacturers or brands that have active EPEAT-registered products or are in the process of confirming that their products conform with EPEAT criteria (Participating Manufacturers) and of EPEAT-approved Conformity Assurance Bodies (CABs).

Stakeholder feedback and insights are an essential part of the Global Electronics Council's (GEC) management of the EPEAT Program. As such, GEC is holding a 60-day comment period and welcomes stakeholder feedback on the October 2022 proposed revisions to the *EPEAT Policy Manual* and the *EPEAT Conformity Assurance Implementation Manual*. The comment period is open from October 17 through December 31, 2022. Comments must be provided in the EPEAT Public Comment Form and submitted electronically to EPEAT@GEC.org.

GEC reserves the right to not consider comments received after 11:59 pm North America Pacific Time on December 31, 2022.

All comments will be thoughtfully considered before either document is finalized and published. GEC intends to publish a stakeholder comment report summarizing comments received and attributing the comments to the submitting party.

GEC proposes to publish the revised documents on February 15, 2023. Unless otherwise identified in the document, new policy changes are proposed to become effective as of July 1, 2023. Participating Manufacturers and EPEAT-approved CABs will be responsible for conforming with the new requirements as of this date.

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Summary of Proposed Changes

Throughout this document, proposed revisions to *EPEAT Policy Manual (P65)* are identified using tracked changes, with the exception of correcting typos or grammatical errors, minor changes to sentence structure, and minor formatting changes. Table A below provides a summary of the key proposed clarifications (additional clarity on existing requirements), changes (changes to an existing requirement), and additions (new requirements).

Table A: Summary of Key Proposed Clarifications, Changes, and Additions in P65

Topic	Section	Summary
Introduction	1.0	Clarifications: • Section updated to further clarify that EPEAT aligns with ISO 14024 (Sections 5.1 and 5.13) - participation in the EPEAT Program is voluntary, and open to any manufacturer or brand owner of products in a product category for which EPEAT Criteria exist. • Participating Manufacturers and CABs are required to fulfill all applicable requirements in *EPEAT Policy Manual (P65)*.
EPEAT Criteria	4.0	Clarifications: • Updated to further clarify that EPEAT aligns with ISO 14024 (Sections 6.4.2.1 and 6.6) – additional considerations when developing criteria and criteria are designed to address impacts instead of processes/ production methods. • All EPEAT Criteria are published on the EPEAT Registry.
EPEAT Conformity Assurance System – Overview	4.1	Clarification: Included examples of EPEAT Criteria with country-specific benefits for purchasers.
Selection of Product Categories	4.2.1	Addition: Section added to reflect new document [*GEC Selection of Product Categories (P75)*] and further clarify that EPEAT aligns with ISO 14024 (Section 6.3).
Criteria Update and Revision	4.2.3	Clarification: Section updated to reflect updates to *GEC Criteria Development Process (P74)* - details and further description of reasons for revising criteria and revision process.
Documentation Review	5.2	Change: Section updated to reflect updates to *EPEAT Conformity Assurance Implementation Manual (P66)* – removal of Priority Criteria.
Conformity Requirements and Guidance	5.6.2	Change: Section updated to reflect updates to *EPEAT Conformity Assurance Implementation Manual (P66)* – renamed to "Conformity Requirements and Guidance Materials" and Materials will also provide further details regarding demonstration of conformance with EPEAT Criteria.
Conformity Assurance Where Equivalent Regulatory Requirements Exist	5.6.5	Change: Section deleted as the conformity option no longer available (lack of uptake).

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Table A: Summary of Key Proposed Clarifications, Changes, and Additions in P65		
Topic	**Section**	**Summary**
Requirements of Conformity Assurance Bodies – CAB Eligibility Requirements	6.1	Clarification: CABs are required to fulfill all applicable requirements in *EPEAT Policy Manual (P65)*.
Requirements of Conformity Assurance Bodies – Approval	6.2	Addition: Footnote to address Auditor training requirements for revised Criteria from Sustainability Impact Modules.
Requirements of Conformity Assurance Bodies – Qualified Auditor Proficiency and Training Requirements	6.3	Addition: Footnote to address Auditor training requirements for revised Criteria from Sustainability Impact Modules.
Requirements of Conformity Assurance Bodies – Suspension or Termination	6.5	Clarification: Updated grounds for suspension or termination to reflect existing language in *EPEAT Conformity Assurance Implementation Manual (P66)*.
Requirements of Participating Manufacturers – Initial Requirements	7.1	Clarification: Participating Manufacturers are required to fulfill all applicable requirements in *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)*.
Requirements of Participating Manufacturers – Ongoing Requirements	7.2	Clarification: Participating Manufacturers are required to fulfill all applicable requirements in *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)*.
Managing Impartiality and Conflicts of Interest	8.0	Clarification: Clarifies that GEC recognizes sources of funding as a potential risk to impartiality.
Recognized Potential Conflicts of Interest	8.1	Clarification: Clarifies that GEC recognizes potential conflicts of interests in the development and maintenance of criteria.
Force Majeure Events	11.0	Addition: Updated to address impacts of force majeure events on ongoing conformity assurance activities.
Revisions and Effective Date	12.0	Addition: Section added to identify annual review and revision schedule and indicate that revisions may become effective at an earlier or later date than annual schedule.
Definitions	13.3	Change: Updated definitions to reflect updates to *EPEAT Conformity Assurance Implementation Manual (P66)* – Certification Pathway, Conformity Requirements and Guidance Materials, Priority Criteria, and Priority Verification Pathway.

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EPEAT™ Policy Manual

This document identifies the policies that govern and support EPEAT programmatic activities. As such, it applies to all manufacturers or brands that have active EPEAT-registered products or are in the process of confirming that their products conform with EPEAT criteria (Participating Manufacturers) and to all Conformity Assurance Bodies approved to provide EPEAT conformity assurance services (GEC-approved CABs).

A companion document, *EPEAT Conformity Assurance Implementation Manual (P66)*, defines the specific requirements and expectations of Participating Manufacturers and GEC-approved CABs when implementing EPEAT policies. Participating Manufacturers and GEC-approved CABs must operate in accordance with both Manuals as of their effective date to fulfill EPEAT Program requirements.

The EPEAT Program reviews the *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)* on an annual basis to determine if revisions are required.

The latest revisions to this document were published on February 15, 2022. These revisions, unless otherwise noted, are effective as of July 1, 2023~~2~~.

Please direct any questions on this document to EPEAT@GEC.org~~GlobalElectronicsCouncil. org~~.

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Introduction

1.0 Introduction

EPEAT™® is a comprehensive voluntary sustainability Type 1 ecolabel that helps purchasers identify more sustainable technology products and services. Central to EPEAT are conformity assurance activities that meet the technical rigor and credibility needs of the institutional purchasers who rely upon it. The EPEAT Program is owned and operated by the Global Electronics Council (GEC), a mission driven non-profit working to create a world of only sustainable technology products and services.

EPEAT Criteria are developed in a multi-stakeholder, voluntary, consensus-based process and address environmental and social impacts across the entire product lifecycle, from extraction of resources and manufacturing, through to assembly, use, and end of life.

EPEAT Criteria are designed to address both attributes of the product and corporate activities of the Manufacturer and are identified as either Required or Optional. Required Criteria must be met for a product to become EPEAT-registered. Optional Criteria represent a Participating Manufacturer's commitment to innovation in environmental and social performance. Depending on the number of Optional Criteria met, a product may achieve an EPEAT rating of Bronze, Silver or Gold.

Participation in the EPEAT Program is voluntary, and open to any manufacturer or brand owner of products in a product category for which EPEAT Criteria exist. Products that meet EPEAT Criteria are identified in the public facing website called the EPEAT Registry. Before becoming EPEAT-registered, an independent GEC-approved Conformity Assurance Body (CAB) must confirm the product's conformance with EPEAT Criteria. To ensure consistent and objective assessment of products, the EPEAT Program maintains a Conformity Assurance System, which identifies the rules for conformity assurance activities and provides oversight and ongoing approval of all CABs.

This document identifies the policies that govern and support EPEAT programmatic activities. As such, ~~it applies to~~ all manufacturers or brands that have active EPEAT-registered products or are in the process of confirming that their products conform with EPEAT Criteria (Participating Manufacturers), and ~~to~~ all CABs approved to provide EPEAT conformity assurance services (GEC-approved CABs), are required to fulfill all applicable requirements in this document. A companion document, *EPEAT Conformity Assurance Implementation Manual (P66)*, defines the specific requirements and expectations of Participating Manufacturers and CABs when implementing EPEAT policies. The EPEAT Program reviews both this Policy Manual and the *EPEAT Conformity Assurance Implementation Manual (P66)* on an annual basis to determine if revisions are required.

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2.0 EPEAT Governance

2.1 Authority

The EPEAT Program was initially developed by a broad group of diverse stakeholders representing product manufacturers, component suppliers, environmental advocacy organizations, government representatives, large purchasers of electronics, retailers, electronic recyclers, academic researchers, and others. The EPEAT Program is owned, managed by, and operates under the authority of GEC. GEC serves the public interest by making the EPEAT Program available to the global public. GEC is overseen by a fiduciary board of directors. EPEAT Program staff are employees of GEC.

Because the activities of GEC impact the interests of many stakeholders, GEC maintains an Advisory Council that is comprised of a balanced representation of different stakeholder perspectives, to provide advice and guidance to both GEC and the EPEAT Program. The Advisory Council does not influence conformity assurance activities and has no fiduciary responsibility. As such, it does not influence EPEAT Participating Manufacturer or CAB participation fees.

2.2 Role of GEC

GEC is owner of the EPEAT Trademarks and managers of the EPEAT Program.

2.3 Program Transparency

GEC, in its administration of the EPEAT Program, is committed to ensuring that EPEAT Program documents are freely available to stakeholders. Information is made available to interested parties regarding the following aspects of the EPEAT Program: the selection of product categories; the selection, development, and revision of EPEAT Criteria; EPEAT Criteria including the identification of methods used for product evaluation; and conformity assurance requirements and processes.

The activities of the Global Electronics Council are funded through a mix of trademark fees from our ecolabels, fees from CABs to support their training and auditing, in-kind support from partner organizations and ~~increasingly,~~ grants/research funding.

2.4 Confidentiality

As the owner of the EPEAT Trademarks and managers of the EPEAT Program, GEC has a robust framework of internal policies and procedures in place to prevent the disclosure of any confidential information in its possession. Participating Manufacturers provide the EPEAT Program with proprietary, commercially sensitive data. GEC ensures that all levels of the organization are in full compliance with applicable laws to safeguard the confidentiality of this information.

All GEC personnel, including consultants and subcontractors, are contractually bound to keep all information they have access to during their support of GEC activities confidential. GEC has contractual requirements on confidentiality in place with Participating Manufacturers [*GEC EPEAT License and*

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Participating Manufacturer Agreement (P26)] and GEC-approved CABs [*GEC Conformity Assurance Body Agreement (P33*)].

2.5 Type 1 Ecolabel

The EPEAT Program is recognized by ANAB (ANSI National Accreditation Board) as a Type 1 ecolabel defined by ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures*. Key elements of Type 1 ecolabels include: development of criteria in a voluntary process that facilitates full participation of interested parties and makes reasonable efforts to achieve consensus throughout the process; inclusion of criteria that address impacts across the entire lifecycle of the product or service; and independent validation of conformance to the criteria. GEC follows both ISO 14020 *Environmental labels and declarations — General principles* and ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures* when managing all aspects of the EPEAT Program. GEC also goes beyond the requirements of ISO 14020 and ISO 14024 by using a balanced voluntary consensus process, including a consensus body (Technical Committee), for the development and revision of criteria.

GEC collaborates with a diverse range of stakeholders including technology product manufacturers and service providers, retailers, large purchasers of technology products and services, CABs, and criteria development organizations to ensure that the EPEAT Program remains a credible Type 1 ecolabel.

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3.0 EPEAT-Registered Products

EPEAT-registered products are identified by tier as EPEAT Bronze, EPEAT Silver, or EPEAT Gold. All products must meet all Required EPEAT Criteria, and the tiers differentiate products by the percentage of Optional EPEAT Criteria the products meet (see ~~s~~Section 4.1 for further details). GEC maintains the online EPEAT Registry as a free resource where EPEAT-registered products can be found (https://epeat.net/). A product is considered "EPEAT-registered" only after a GEC-approved CAB has confirmed conformance of all Required EPEAT Criteria and the Optional EPEAT Criteria selected for the product and performed a final data quality review.

An EPEAT-registered product is a specific marketing model and includes all possible configurations or variations that could be offered in that specific marketing model. This typically includes peripherals or external components integral to a product's operation; however, specific definitions of "product" are provided in EPEAT Criteria for each product category.

Where applicable, Participating Manufacturers must identify those exceptional configurations of an EPEAT-registered product that do not meet specific EPEAT Criteria. This information is provided to enable clear identification of which configurations qualify as EPEAT-registered.

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4.0 EPEAT Criteria

EPEAT Criteria address environmental and social impacts across the entire product lifecycle, from extraction of resources and manufacturing, through to assembly, use, and end of life. EPEAT Criteria are based on the best science available at the time of development and are revised as needed to maintain relevance. Relevant local, regional, and global environmental issues, available technologies, and best practices are taken into consideration during the development of criteria. Additionally, criteria are designed to address impacts instead of particular processes or production methods wherever possible, and the Criteria do not create obstacles to international trade. All EPEAT Criteria, whether new or revised, are publicly available at no cost and published on the EPEAT Registry after ~~any new or revised criteria have been~~ being adopted for use by the EPEAT Program.

GEC may collaborate with a criteria development organization to develop environmental and social criteria, which can then be adopted by the EPEAT Program. Products are only considered EPEAT-registered if they meet the criteria that have been adopted by the EPEAT Program.

4.1 Overview

EPEAT Criteria address attributes of the product and corporate activities of the Participating Manufacturer and are identified as either Required or Optional. Required Criteria must be met for a product to become EPEAT-registered. Optional Criteria represent a Participating Manufacturer's commitment to innovation in environmental and social performance.

The EPEAT Program recognizes three tiers of sustainability performance: EPEAT Bronze, EPEAT Silver, and EPEAT Gold. The tier is determined by the Optional Criteria for which a Participating Manufacturer has demonstrated conformance. Optional Criteria are designed to offer flexibility and allow Participating Manufacturers to select different Criteria to achieve the EPEAT Silver and EPEAT Gold tiers.

- EPEAT Bronze products meet all Required Criteria.
- EPEAT Silver products meet all Required Criteria and a minimum of 50% of the available points for Optional Criteria.
- EPEAT Gold products meet all Required Criteria and a minimum of 75% of the available points for Optional Criteria.

Participating Manufacturers choose to designate their EPEAT-registered products as available for use by purchasers in specific countries. As a result, some EPEAT Criteria may be selected differently for individual countries (also called individual locations of use). Participating Manufacturers must demonstrate their ability to meet EPEAT Criteria for those countries to ensure the country-specific benefits are realized for purchasers in those countries, such as in-country product take-back and recycling programs or the provision of spare parts in a particular market.

For some product categories, Innovation Points can be awarded if actions, programs, or policies exceed existing EPEAT Criteria or represent sustainability benefits not already addressed for the product category. GEC's Innovation Committee, an independent group of individuals with technology and

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sustainability expertise, reviews applications for Innovation Points and determines if Points should be awarded. Participating Manufacturers are not permitted to claim Innovation Points until awarded by the Innovation Committee.

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4.2 Criteria Development, Revision and Adoption

4.2.1 Selection of Product Categories

Prior to developing criteria for a new product category, GEC completes a Business Case (for internal use) and releases a summary of its findings and recommendations, referred to as a Product Category Proposal, for public comment. As a Type 1 ecolabel operating in accordance with the principles and requirements of ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures,* GEC ensures that the process which guides its selection of product categories is transparent, and that interested stakeholders are appropriately engaged and consulted. GEC's procedure to select new product categories is described in *GEC Selection of Product Categories (P75),* which is publicly available on the EPEAT Registry.

~~4.2.1~~4.2.2 Dynamic Criteria Development Process

GEC's criteria development and revision processes are referred to collectively as the Dynamic Criteria Development Process and are described in *GEC Criteria Development Process (P74)*, which is publicly available on the EPEAT Registry. The Dynamic Criteria Development Process has three key components which are described in further detail below: publication of State of Sustainability Research, criteria development through balanced voluntary consensus processes, and continuous maintenance of criteria.

~~4.2.1.1~~4.2.2.1 State of Sustainability Research

GEC publishes State of Sustainability Research as an important initial step in the development or revision of criteria. The research identifies science-based social and environmental impacts across the life cycle of technology products and services, and strategies to reduce the identified sustainability impacts. The research also identifies best practices, existing regulations, and existing voluntary leadership programs designed to reduce sustainability impacts. The data and analyses in State of Sustainability Research serves as the scientific basis for the development or revision of criteria, as well as identification of opportunities for harmonization. GEC releases State of Sustainability Research for public consultation for a minimum of 60 days.

~~4.2.1.2~~4.2.2.2 Balanced, Voluntary Consensus Process

EPEAT Criteria are developed in a balanced, voluntary consensus process that aligns with and draws from characteristics of voluntary consensus defined in ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures* and the US Federal Government's description of characteristics of a voluntary consensus process[1]. Key characteristics of the criteria development process, whether developed by GEC or in conjunction with a third-party criteria development organization, are:

- **Openness:** The process is open to participation by all interested parties. Such parties are provided meaningful opportunities to participate in criteria development on a non-

[1] U.S. Executive Office of the President, Office of Management and Budget (OMB), Circular No. A-119.

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discriminatory basis. The procedures or processes for participating in criteria development and for developing the criteria are transparent.

- **Balance of interests:** The process includes a balance of stakeholders including manufacturers; other industry; government policy representatives and sustainability advocates; and purchasers and ecolabel criteria users. Balance means that no single interest type shall comprise more than 25% of the consensus body or dominate the voting process. If balanced representation is not achieved, weighted voting may be used to achieve equal representation among the four stakeholder categories identified above.
- **Due process:** The process must include documented and publicly available policies and procedures, adequate notice of meetings and other activities, sufficient time to review drafts and prepare views and objections, access to views and objections of other participants, and a fair and impartial process for resolving conflicting views.
- **Appeals process:** A process must be available for the impartial handling of procedural appeals.
- **Consensus:** Consensus is defined as general agreement, but not necessarily unanimity, and includes a process for attempting to resolve objections by interested parties. All comments must be fairly considered, each objector must be advised of the disposition of his or her objection(s) and the reasons why, and the consensus body members must be given an opportunity to change their opinion after reviewing the comments.

~~4.2.1.3~~4.2.2.3 Collaboration with Criteria Development Organizations

GEC may partner with criteria development organizations (sometimes referred to as standards development organizations) to collaboratively develop and revise criteria. GEC only engages with an organization to do so if the following requirements are fulfilled:

- **Shared Intellectual Property Rights:** GEC must, at minimum, share the intellectual property rights for the output of every criteria development, revision, and maintenance process so that GEC can make the criteria and any accompanying resources freely available to stakeholders.
- **Balanced, Voluntary Consensus Criteria Development Process:** All criteria must be developed under a balanced, voluntary consensus process that is consistent with the elements described in Section 4.2.2.2~~4.2.3~~ and in accordance with *GEC Criteria Development Process (P74)*.
- **GEC Dynamic Criteria Development Process:** The process must adhere to GEC's Dynamic Criteria Development Process described in Section 4.2.2~~1~~ and further detailed in *GEC Dynamic Criteria Development Process (P74)*.
- **Fees:** GEC has a strong preference to partner with organizations that do not charge fees for criteria development or for stakeholders to participate in the criteria development process, including committees such as Expert Ad Hoc Groups or the consensus body (Technical Committee).

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~~4.2.2~~4.2.3 Criteria Update and Revision

As part of the Dynamic Criteria Development Process, GEC implements a Continuous Maintenance Process to update and revise EPEAT Criteria. Following initial release, EPEAT Criteria are subject to the Continuous Maintenance Process to retain impact and relevancy. Revisions are published no more frequently than on an annual basis. A revision may be considered upon request of stakeholders for several reasons, including the need for clarification or correction of criteria language, availability of new scientific evidence, and emerging best practices to reduce sustainability impacts.

GEC assesses the need for a full revision three years after the Criteria were initially adopted for use for a product category. ~~and initiates the revision process within six months of determining that a revision is required. If the assessment determines that a revision is not required,~~ If the assessment results in a recommendation for a revision, within six months of completing the assessment GEC initiates the revision process, beginning with State of Sustainability Research. If the assessment determines that a revision is not required, GEC evaluates the need for a full revision of the Criteria every 12 months thereafter.

When assessing the need for a full revision, GEC considers the following factors:

- Stakeholder feedback and/or requests.
- Age and impact of existing Criteria, including how many manufacturers are claiming optional criteria.
- Comparison of existing Criteria against the current State of Sustainability Research to ensure Criteria reflect existing knowledge and best practices.
- Potential impact on and current capability of Participating Manufacturers to meet updated Criteria including design implementation, product lifecycle, and testing timeline.
- Ability of existing Criteria to meet institutional purchaser needs.

GEC shares the outcome of the assessment with the Advisory Council and seeks their input on whether to proceed with a full revision.

GEC makes the final decision as to whether any revision to EPEAT Criteria is warranted. Any full revision to EPEAT Criteria is conducted in accordance with the principles and procedures of GEC's Dynamic Criteria Development Process.

When EPEAT Criteria are updated or revised, GEC establishes a transition period to allow Participating Manufacturers time to come into conformance with the updated or revised Criteria. GEC considers the number and complexity of new Criteria or proposed changes to existing Criteria when developing the timeframe of the transition period, and categorizes the revisions as identified below. Further details on implementation requirements are identified in *EPEAT Conformity Assurance Implementation Manual (P66)*.

- **Minor Criteria Revision:** The scope of this revision is limited to corrections, changes, and updates to text to further clarify existing requirements.

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- **Major Criteria Revision:** In addition to the revisions categorized as Minor Criteria Revisions, the scope is limited to new Criteria identified to address gaps in sustainability impact areas, and revisions requested by stakeholders.
- **Full Product Category Revision:** All Criteria are open to modification and revision, and the process begins with an update to State of Sustainability Research.

~~4.2.3~~4.2.4 Adopting Criteria for Use in the EPEAT Program

As a Type 1 ecolabel operating in accordance with the principles and requirements of ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures*, GEC evaluates criteria against the following requirements before they can be adopted for use as EPEAT Criteria:

- The criteria must only be attainable by leadership sustainability performance in the market and provide one or more of the following sustainability benefits:
    - Measurable environmental and/or social benefits.
    - Incremental steps towards a sustainability benefit, establishment of systems to provide benefit, or foundational elements of environmental or social management systems.
    - Reporting of data that will allow the comparison of key sustainability aspects of products or that will help fill critical information gaps to facilitate future development.
- The criteria must have been developed using a balanced voluntary consensus process.
- The criteria must be both lifecycle-based and science driven.
- The criteria must be clearly written and verifiable through use of objective metrics and commonly accepted tools, methodologies, and/or standards.
- Optional criteria must provide a continuing challenge for improvement of sustainability performance and be defined such that the technological or operational capability can reasonably be expected to be achieved before the next Full Product Category Revision.
- The criteria must be available to the public free of charge.

To the extent possible, criteria should also be harmonized with international environmental and social requirements and standards, including voluntary ecolabels and market requirements.

GEC solicits feedback from the Advisory Council regarding the adoption of criteria, however the final decision to adopt any criteria ultimately resides with GEC.

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5.0 EPEAT Conformity Assurance System

5.1 Overview

To ensure consistent and objective assessment of products and to maintain the credibility of the EPEAT Registry as a trusted resource for purchasers, the EPEAT Program operates a Conformity Assurance System, which identifies the rules for conformity assurance activities and provides oversight and ongoing approval of CABs. *EPEAT Conformity Assurance Implementation Manual (P66)* outlines the implementation requirements for the EPEAT Conformity Assurance System, which must be followed by all GEC-approved CABs and Participating Manufacturers.

To participate in the EPEAT Program, Participating Manufacturers must engage a GEC-approved CAB. CABs are impartial, independent conformity assurance experts responsible for assessing Participating Manufacturers' initial and ongoing conformance with EPEAT Criteria (Documentation Review) and for implementing surveillance activities (Continuous Monitoring).

The EPEAT Program offers Participating Manufacturers two conformity assurance pathways to choose from – the Certification Pathway and the Priority Verification Pathway. Both Pathways require Participating Manufacturers to work with a GEC-approved CAB for Documentation Review and Continuous Monitoring. EPEAT-registered products are not publicly identified in the EPEAT Registry as being assessed through Certification or Priority Verification as both pathways are equally robust, credible, and valid.

5.2 Documentation Review

Documentation Review is the process by which a GEC-approved CAB assesses documentation provided by a Participating Manufacturer to determine if the evidence supports conformance with EPEAT Criteria and if the Participating Manufacturer understands the obligations of the Criteria. Documentation Review for all selected~~Required~~ Criteria must be completed~~is required~~ prior to products initially becoming EPEAT-registered for a specific product category (called Initial Documentation Review) and on an ongoing basis (called Ongoing Documentation Review), for various scenarios including, but not limited to, selection of new Optional Criteria, addition of new products to the EPEAT Registry, and decisions of nonconformance resulting from Continuous Monitoring.

When the CAB is confident that evidence supports conformance with all Required Criteria and all ~~the~~ selected Optional Criteria, ~~EPEAT Criteria~~ and a data quality review process has been completed, the assessed products and selected Criteria may appear in the EPEAT Registry.

In both pathways, the Initial Documentation Review is completed immediately and requires Participating Manufacturers to demonstrate conformance with all selected EPEAT Criteria at the outset.

In the Priority Verification Pathway, the Initial Documentation Review ~~is staggered over several months for up to one year and the~~ results are valid until the EPEAT Program implements Criteria resulting from a Full Product Category Revision. At this point, Initial Documentation Review against the resulting revised Criteria must be performed again.

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~~In the Certification Pathway, the Initial Documentation Review is completed immediately and requires Participating Manufacturers to demonstrate conformance with all selected EPEAT Criteria at the outset. R~~r~~esults of Initial Documentation Review i~~I~~n the Certification Pathway, results of Initial Documentation review are valid for three years or until the EPEAT Program implements the Criteria resulting from a Full Product Category Revision, whichever is earlier, after which the Initial Documentation Review must be performed again.

Additional details on product registration and conformity assurance requirements for both Participating Manufacturers and GEC-approved CABs are identified in *EPEAT Conformity Assurance Implementation Manual (P66).*

5.3 Continuous Monitoring

To ensure the ongoing conformance of EPEAT-registered products, the EPEAT Program requires GEC-approved CABs to conduct Continuous Monitoring. These activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis. All EPEAT-registered products in all product categories are subject to Continuous Monitoring at any time, regardless of the conformity assurance pathway chosen. Specific Continuous Monitoring activities, requirements and associated definitions are described in *EPEAT Conformity Assurance Implementation Manual (P66)*.

Some Continuous Monitoring activities require that Investigations be conducted in discrete timeframes called Rounds. The EPEAT Program is responsible for developing timelines for the Rounds, selecting the EPEAT-registered products and EPEAT Criteria to be investigated, and identifying the method of investigation. Methods of investigation may include review of publicly available information or documentation provided by Participating Manufacturers, and independent laboratory evaluation of products without the Participating Manufacturers' involvement.

The EPEAT Program assigns the Investigations to GEC-approved CABs, which must fully participate in and are responsible for implementing Continuous Monitoring activities with their Participating Manufacturer clients in accordance with the Round Plan issued by GEC. GEC-approved CABs submit Investigation Reports to the EPEAT Program with their recommendation on conformity and the EPEAT Program makes the final decision on conformity (conformance, nonconformances and minor errors, or inconclusive) based on the Investigation Report and accompanying evidence. All nonconformances and minor errors must be corrected during the Corrective Action Phase of the Round, and corrective action plans developed to address other products that may be affected by the same issue underlying the nonconformance. For inconclusive findings, the EPEAT Program may require the CAB to investigate the same Criterion in a subsequent Round to definitively determine conformance.

To maintain the level of transparency relied on by purchasers, the EPEAT Program publishes an Outcomes Report at the conclusion of each Round to summarize the activities conducted and to identify the products and Participating Manufacturers that received nonconformances and the actions taken to restore accuracy of the EPEAT Registry. Minor errors are clerical in nature and do not materially affect the validity of products in the EPEAT Registry. As such, these are not identified in the Outcomes Report.

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Similarly, Outcomes Reports do not identify the products and Participating Manufacturers where the final decision on conformity is inconclusive.

Continuous Monitoring also includes Annual Renewal for Participating Manufacturers using the Certification Pathway. Annually, GEC-approved CABs must review evidence submitted by Participating Manufacturers to demonstrate ongoing compliance with EPEAT Criteria that have annual performance, reporting or other disclosure requirements at the corporate level. GEC-approved CABs must also determine if product and/or corporate changes made by Participating Manufacturers or revisions made to EPEAT Criteria have the potential to affect ongoing conformance with EPEAT Criteria and, where necessary, review additional evidence to support conformance.

If any Continuous Monitoring activity results in a nonconformance, the Participating Manufacturer must make corrections to address the identified nonconformance and restore accuracy to the EPEAT Registry. Should a Participating Manufacturer fail to make the necessary corrections, the products will be removed from the Registry by either the Participating Manufacturer's CAB or the EPEAT Program.

5.4 Nonconformances Identified Outside of Continuous Monitoring

GEC-approved CABs may identify nonconformances outside of planned Continuous Monitoring activities. In such cases, the GEC-approved CAB must notify the EPEAT Program and work with the Participating Manufacturer to resolve the nonconformance within 30 calendar days, as per the requirements identified in *EPEAT Conformity Assurance Implementation Manual (P66)*.

The EPEAT Program may also identify nonconformances outside of planned Continuous Monitoring activities. In such cases, the EPEAT Program will notify the Participating Manufacturer and their GEC-approved CAB of the finding and require the Participating Manufacturer to resolve the nonconformance within 30 calendar days, as per the requirements identified in *EPEAT Conformity Assurance Implementation Manual (P66).* The EPEAT Program may also initiate~~institute~~ a formal Continuous Monitoring investigation.

5.5 Rebranding of EPEAT-Registered Products

The EPEAT Program allows for a Participating Manufacturer to rebrand another Participating Manufacturer's active EPEAT-registered product and register it under its own brand, through an amended Documentation Review process. Both Participating Manufacturers are demonstrating ongoing conformance with EPEAT Criteria that address corporate activities and the Participating Manufacturer that originally registered the product has already demonstrated that the product meets EPEAT Criteria. This amended process does not require either Participating Manufacturer to change from their existing GEC-approved CAB. Details and requirements of the amended Documentation Review process are described in *EPEAT Conformity Assurance Implementation Manual (P66).*

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5.6 EPEAT Technical Guidance and Authority

As a Type 1 ecolabel operating in accordance with the principles and requirements of ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures*, the EPEAT Program is solely responsible for making technical interpretations of EPEAT Criteria, determining the necessary conformity assurance requirements for assessing conformance to EPEAT Criteria, and adjudicating disagreements in the interpretation of Criteria and the associated conformity assurance requirements. Careful consideration is given to the specific language used in EPEAT Criteria.

To further the understanding of EPEAT Criteria and ensure consistent and objective conformity assurance activities, the EPEAT Program issues formal Clarifications, publishes informative guidance materials and further details regarding conformity requirements, convenes Calibration Meetings with all GEC-approved CABs, and seeks technical feedback from a group of experts.

During their ongoing interactions with Participating Manufacturer clients, GEC-approved CABs may identify that there is a conflicting or disparate understanding of EPEAT Criteria and/or the associated conformity assurance requirements. In such situations and where they are unable to resolve the conflict with the Participating Manufacturer, CABs must inform the EPEAT Program. The EPEAT Program will then make a definitive technical interpretation and share it with all GEC-approved CABs and Participating Manufacturers.

5.6.1 Clarifications

The EPEAT Program may issue a formal Clarification when EPEAT Criteria are ambiguous. Stakeholders may also submit a request for a Clarification to the EPEAT Program. Clarifications provide additional information on interpreting the Criteria and how they should be implemented and do not change the Criterion text. The EPEAT Program seeks feedback from stakeholders on proposed Clarifications during a 30-calendar day public comment period, and carefully considers any feedback received before formally publishing a Clarification. Clarifications are accessible by all GEC-approved CABs and Participating Manufacturers and available to stakeholders upon request.

5.6.2 Conformity Requirements and Guidance Materials

~~The EPEAT Program publishes Conformity Guidance Materials to enhance Participating Manufacturer and GEC-approved CAB understanding of EPEAT Criteria. Conformity Guidance Materials are made available to all GEC-approved CABs and Participating Manufacturers. Conformity Guidance Materials are intended to provide practical and supplementary guidance. As such, EPEAT Criteria take precedence over any guidance provided in Conformity Guidance Materials.~~

The EPEAT Program publishes Conformity Requirements and Guidance Materials to help Participating Manufacturers and GEC-approved CABs further understand EPEAT Criteria requirements, provide supplementary information and where necessary, provide further details regarding demonstration of conformance with EPEAT Criteria. Where content in these Materials is specifically identified as "guidance", EPEAT Criteria take precedence over that content. Conformity Requirements and Guidance Materials are prepared for all Criteria and are made available to all GEC-approved CABs and Participating Manufacturers.

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5.6.3 Calibration Meetings

The EPEAT Program convenes regularly scheduled Calibration Meetings with all GEC-approved CABs to promote a uniform understanding of EPEAT Criteria and a consistent and objective application of conformity assurance requirements among all CABs. Calibration Meeting materials are made available to all GEC-approved CABs. At least one representative from each GEC-approved CAB must attend each Calibration Meeting. The frequency of Calibration Meetings may increase when deemed necessary by the EPEAT Program. Calibration Meetings are not held in person to enable broader participation and all meeting participants are expected to abide by Chatham House Rule[2] and an anti-trust statement.

5.6.4 Conformity Guidance Group

On an as-needed basis, the EPEAT Program may seek feedback and guidance from the Conformity Guidance Group. The Conformity Guidance Group may be asked to provide technical input and expertise on EPEAT conformity assurance processes, technical requirements in EPEAT Criteria, and implementation of updated and amended EPEAT Criteria. The EPEAT Program may also seek Conformity Guidance Group input when adjudicating disagreements in the interpretation of a Criterion and the associated conformity assurance requirements. Conformity Guidance Group feedback does not replace GEC's criteria development and continuous maintenance processes.

The Conformity Guidance Group is open to all stakeholders including, but not limited to, Participating Manufacturers, GEC-approved CABs, and Purchasers. There are no standing members and participants are asked to be technical experts themselves or individuals with access to relevant technical resources. To ensure appropriate expertise is available for a given topic, the EPEAT Program may invite individuals with expert knowledge of that topic to participate. *EPEAT Conformity Assurance Implementation Manual (P66)* provides additional details on the Conformity Guidance Group, including how to participate.

~~5.6.5 Conformity Assurance Where Equivalent Regulatory Requirements Exist~~

~~During Documentation Review and Continuous Monitoring activities, Participating Manufacturers must provide evidence demonstrating conformance with EPEAT Criteria to their GEC-approved CAB. If there are regulations in effect in a country where a product is identified as being EPEAT registered and those regulations address an EPEAT Required Criterion's requirements, Participating Manufacturers may provide a signed attestation to their GEC-approved CAB as the supporting evidence for that Criterion in that specific country. This provision is only applicable to select Required Criteria in specific jurisdictions identified by the EPEAT Program.~~

~~The EPEAT Program is developing a list of the Required Criteria and specific countries of use for which this attestation may be used as evidence, which will be available to stakeholders. Participating Manufacturers and GEC-approved CABs may request that specific Required Criteria and countries of use be added to this list. The EPEAT Program makes the final determination as to which countries are included, based on legal advice.~~

[2] https://www.chathamhouse.org/about-us/chatham-house-rule

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~~Further details regarding the use of such attestations and implementation guidance are identified in *EPEAT Conformity Assurance Implementation Manual (P66)*.~~

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6.0 Requirements of Conformity Assurance Bodies

6.1 CAB Eligibility Requirements

The EPEAT Program maintains formal Eligibility Requirements that must be fulfilled for an organization to become a GEC-approved CAB and provide conformity assurance services for Participating Manufacturers in specific product categories. These requirements must also be met on an ongoing basis for an organization to maintain its status as a GEC-approved CAB. GEC-approved CABs must fulfill all applicable requirements in this document [*EPEAT Policy Manual (P65)*] and operate EPEAT conformity assurance services under a valid accreditation to either ISO/IEC 17020 *Conformity assessment—Requirements for the operation of various types of bodies performing inspection* or ISO/IEC 17065 *Conformity assessment—Requirements for bodies certifying products, processes, and services*. Full details on CAB Eligibility Requirements are identified in *EPEAT Conformity Assurance Implementation Manual (P66)*.

6.2 Approval

GEC accepts applications from all organizations interested in becoming a GEC-approved CAB and is solely responsible for the review and approval of CABs. GEC to seeks to maintain a network of approved CABs to meet Participating Manufacturer needs globally while also ensuring sufficient EPEAT Program capacity exists to support and oversee the entire CAB network. When reviewing CAB applications, GEC considers a variety of factors including technical capabilities of the organization, as well as the diverse needs of Participating Manufacturers regarding linguistic capabilities and the ability to provide conformity assurance services in regions of the world required by Participating Manufacturers.

If GEC determines that the applicant meets these needs and the application supports an organization's capabilities to perform conformity assurance activities for the EPEAT Program, the organization may be identified as a Provisional CAB.

Provisional CABs must fully execute *GEC Conformity Assurance Body Agreement (P33)*. They may then begin soliciting business for EPEAT conformity assurance services but may not provide these services until formally approved by GEC.

Within 12 months of becoming a Provisional CAB, an organization must:

- Provide to GEC all procedures, policies and accreditation documents related to the provision of conformity assurance services for the EPEAT Program.
- Ensure personnel undergo Initial EPEAT Auditor Training and pass the Initial EPEAT Auditor Exam for each product category[3] in which the CAB wishes to provide EPEAT conformity assurance services.

[3] When the revised Criteria from the Sustainability Impact Module criteria development process come into effect, all impact area training modules, along with product-specific modules, where applicable, must be passed for an Auditor to be considered qualified.

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- Successfully complete the Initial EPEAT Audit of CABs to determine if the CAB Eligibility Requirements are met.

Upon completion of the above in accordance with the requirements outlined in *EPEAT Conformity Assurance Implementation Manual (P66)*, the organization is identified as a GEC-approved CAB and may provide conformity assurance services for Participating Manufacturers for product categories in which they have completed training.

GEC-approved CABs are also required to pay an annual CAB Participation Fee to GEC to maintain their status as an approved CAB for the EPEAT Program.

GEC seeks to maintain a network of approved CABs to meet Participating Manufacturer needs and may solicit an organization to apply to become a GEC-approved CAB. GEC does not control the pricing of CAB services and Participating Manufacturers are free to choose any GEC-approved CAB to support their conformity assurance requirements.

6.3 Qualified Auditor Proficiency and Training Requirements

To ensure consistency, objectivity and technical competency, GEC-approved CABs must use Qualified Auditors to perform conformity assurance activities for the EPEAT Program. Auditors become qualified to perform conformity assurance for one or more product categories[4] by attending Initial EPEAT Auditor Training and passing the Initial EPEAT Auditor Exam for each product category. Separate training and exams are required for each product category.

To maintain their qualifications, Qualified Auditors must abide by the requirements in *EPEAT Conformity Assurance Implementation Manual (P66)* and attend required training sessions, pass corresponding exams (where applicable) and pass an Annual EPEAT Auditor Proficiency Exam, which is intended to establish the ongoing technical competency of the Qualified Auditor.

Auditors who fail to maintain their qualification for a given product category must retake the Initial EPEAT Auditor Training and pass the Initial Auditor Exam. At the EPEAT Program's discretion, Auditors with ongoing absences due to illness, parental leave, sabbaticals, or other duties outside of EPEAT conformity assurance activities may be allowed to attend training and pass exams upon their return.

To be qualified for a new EPEAT product category, Auditors must attend EPEAT training for the new category and pass the accompanying exam.

6.4 Additional Oversight and Support

6.4.1 CAB Mentored Work Phase

The EPEAT Program supports and oversees newly approved CABs as they perform Documentation Review for their first Participating Manufacturer clients. This CAB oversight process is called CAB

[4] When the revised Criteria from the Sustainability Impact Module criteria development process come into effect, all impact area training modules, along with product-specific modules, where applicable, must be passed for an Auditor to be considered qualified.

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Mentored Work Phase and is intended to confirm and support CABs in understanding the conformity assurance requirements of EPEAT Criteria, seeking appropriate documentary evidence from Participating Manufacturers, and appropriately evaluating evidence and assessing conformance in a manner consistent with published guidance and *EPEAT Conformity Assurance Implementation Manual (P66)*.

During the Mentored Work Phase, a CAB cannot approve products and selected Criteria to appear in the EPEAT Registry, or independently evaluate a Participating Manufacturer's conformance to EPEAT Criteria. To move out of the Mentored Work Phase, a CAB must obtain the EPEAT Program's review and approval of conformity decisions made in the Initial Documentation Review process for the CAB's initial Participating Manufacturer clients.

6.4.2 Annual EPEAT Audit of CAB

The EPEAT Program conducts an annual EPEAT Audit of all approved CABs to ensure the CABs' ongoing conformance with CAB Eligibility Requirements and all provisions in *EPEAT Conformity Assurance Implementation Manual (P66)*. Audit results are confidential and not disclosed to the public. As a result of the audit, the EPEAT Program may identify opportunities for improvement, present nonconformances, and/or develop a Performance Improvement Assistance Plan. GEC-approved CABs must implement the requirements in Performance Improvement Assistance Plans.

Within 30 calendar days of receiving the audit results, GEC-approved CABs must correct identified nonconformances and develop corrective action plans to prevent reoccurrence. A nonconformance may be related to a CAB's conformity decision in Documentation Review or Annual Renewal and may subsequently result in a Participating Manufacturer client being found nonconformant with one or more EPEAT Criteria. In such cases, the CAB must identify similar conformity decisions made across all Participating Manufacturer clients and inform the EPEAT Program of these cases. All affected Participating Manufacturers are then provided three months to submit additional documentation to demonstrate conformance to the CAB or to make appropriate corrections to the EPEAT Registry.

6.4.3 Performance Metrics

The EPEAT Program evaluates the performance of all GEC-approved CABs against a series of conformity assurance and service provision metrics at least annually and shares the results with CABs during their annual EPEAT Audit. These performance metrics are designed to encourage continuous improvement in the provision of conformity assurance services, maintain a high level of competency across all GEC-approved CABs, and ensure consistent and objective conformity assurance decisions within and across CABs.

If warranted, the EPEAT Program may assign corrective actions to GEC-approved CABs with unsatisfactory performance. Results of performance evaluations are confidential and not disclosed to the public.

The performance metrics are identified in *EPEAT Conformity Assurance Implementation Manual (P66)* and are reviewed on an annual basis by the EPEAT Program, to ensure they remain relevant.

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6.4.4 Annual CAB Summit

On an annual basis, the EPEAT Program hosts a CAB Summit to further its goals of consistency, objectivity, and proficiency in the assessment of products in the EPEAT Registry. The CAB Summit is intended to:

- Strengthen GEC-approved CAB understanding of current EPEAT policies and conformity assurance requirements.
- Ensure the EPEAT Program benefits from GEC-approved CABs' experience, expertise, and tacit knowledge on proposed changes to EPEAT policies and conformity assurance requirements.
- Stimulate collaboration by providing a venue to discuss high-level conformity assurance issues and share information.
- Further empower GEC-approved CABs in their decision making with additional and focused training.

Depending on the topics addressed, one or more GEC-approved CAB representatives or Qualified Auditors are required to attend the Annual EPEAT CAB Summit. CABs are encouraged to invite additional personnel to specific sessions, where relevant. Provisional CABs are also encouraged, but not required, to attend the Annual CAB Summit.

6.5 Suspension or Termination

GEC, at its sole discretion, may suspend or terminate a GEC-approved CAB and any decision to do so shall be considered final. CABs that are suspended may continue to provide EPEAT-related conformity assurance services to their existing Participating Manufacturer clients, for no longer than six months as they undertake corrective action but may not accept new Participating Manufacturer clients. Termination is cancellation of the agreement between GEC and the CAB and bars the CAB from providing conformity assurance services for the EPEAT Program for a fixed period. *EPEAT Conformity Assurance Implementation Manual (P66)* provides additional details regarding both suspension and termination of CABs.

Grounds for suspension or termination include any of the following:

- Non-conformances identified during the Annual EPEAT Audit, or an audit performed by an accreditation body that remain uncorrected beyond the agreed time.
- Failure to implement and complete all requirements of a Performance Improvement Assistance Plan within the designated timeframe.
- Non-payment of annual EPEAT CAB Participation Fees to GEC.
- Any breach of *GEC Conformity Assurance Body Agreement (P33)* that goes uncorrected beyond the agreed upon time.
- Failure to meet the same Performance Metric for three consecutive years.

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- Failure to conform with the requirements identified in *EPEAT Conformity Assurance Implementation Manual (P66)* that remain uncorrected beyond the agreed time.
- Loss of accreditation to ISO/IEC 17020 *Conformity assessment – Requirements for the operation of various types of bodies performing inspection* or ISO/IEC 17065 *Conformity assessment – Requirements for bodies certifying products, processes and services*, or failure to provide a valid certificate.
- Intentionally sharing upcoming Continuous Monitoring Round details with Participating Manufacturers before the date specified by the EPEAT Program with the intention of providing the Participating Manufacturer an unfair advantage. ~~This includes obtaining a product directly from a Participating Manufacturer for laboratory evaluation without first obtaining approval from the EPEAT Program.~~
- Obtaining a product directly from a Participating Manufacturer for laboratory evaluation without first obtaining approval from the EPEAT Program.
- Undertaking actions that put the integrity and credibility of the EPEAT Program at risk, such as providing consulting-like advice or services that impacts the CAB's ability to remain impartial in EPEAT-related activities or providing unfair advantage to one or more Participating Manufacture clients.

In the case of CAB termination, GEC informs the CAB's EPEAT clients of the pending termination and supports an orderly transition of these clients to other GEC-approved CABs.

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7.0 Requirements of Participating Manufacturers

7.1 Initial Requirements

Participating Manufacturers must fulfill all applicable requirements in this document [*EPEAT Policy Manual (P65)*] as well as *EPEAT Conformity Assurance Implementation Manual* (P66), execute *GEC EPEAT License and Participating Manufacturer Agreement (P26)* with GEC, and pay an annual EPEAT Participation Fee for each product category, which allows an unlimited number of EPEAT-registered products for a given product category. Participating Manufacturers are granted access to the EPEAT Registry only after a fully executed *GEC EPEAT License and Participating Manufacturer Agreement (P26)* is in place and GEC has received payment for the applicable EPEAT Participation Fees.

To participate in the EPEAT Program, Participating Manufacturers must also establish a contractual relationship with a GEC-approved CAB for the provision of conformity assurance services. A Participating Manufacturer may engage different CABs for different product categories but can only use a single CAB for each product category.

Prior to products becoming EPEAT-registered for any given product category, Participating Manufacturers must successfully complete the Initial Documentation Review conducted by their GEC-approved CAB. During this process, Participating Manufacturers are responsible for providing sufficient evidence and responding to all questions raised by the CAB. The requirements for Initial Documentation Review are identified in *EPEAT Conformity Assurance Implementation Manual (P66)*.

Participating Manufacturers acknowledge that selecting EPEAT Criteria is an indication that they are conforming to the Criteria as written, unless exceptional configurations are identified, subject to any guidance and Clarifications published by GEC. Participating Manufacturers must identify exceptional configurations where the configurations or variations of a product means that the product does not meet EPEAT Criteria.

7.2 Ongoing Requirements

Participating Manufacturers must fulfill all applicable requirements in this document [*EPEAT Policy Manual (P65)*] and *EPEAT Conformity Assurance Implementation Manual* (P66) on an ongoing basis. Participating Manufacturers are also required to update their EPEAT Criteria selections in the EPEAT Registry as needed to reflect changes (including, but not limited to, changes in product materials, components, contract services or corporate activities) if any of the changes impact how they are conforming with the Criteria and/or their ability to successfully meet the Criteria. Participating Manufacturers must also unselect EPEAT Criteria immediately if they are no longer able to meet the Criteria.

Participating Manufacturers are only able to achieve and maintain EPEAT-registration for products that are available on the market. Participating Manufacturers must remove/archive products when the products are no longer offered for sale or if the products no longer meet all Required Criteria.

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Participating Manufacturers must be prepared at any time to provide evidence to demonstrate conformance with EPEAT Criteria in response to a request from their CAB. As such, Participating Manufacturers are required to fully participate in Documentation Review (both Initial and Ongoing) and Continuous Monitoring activities.

Participating Manufacturers must abide by the requirements in *GEC EPEAT License and Participating Manufacturer Agreement (P26)* and *EPEAT Conformity Assurance Implementation Manual (P66)* on an ongoing basis.

7.3 Changing CABs

Participating Manufacturers may transition from one GEC-approved CAB to a different GEC-approved CAB for any given product category. Participating Manufacturers must transfer the conformity assurance activities for all EPEAT-registered products in the product category to the new CAB but may engage different CABs for different product categories. Participating Manufacturers must maintain a contractual relationship with a GEC-approved CAB for all product categories in which they are active during the transition process. Details and requirements for the process of changing CABs are identified in *EPEAT Conformity Assurance Implementation Manual (P66)*.

7.4 Termination

GEC may terminate a Participating Manufacturer according to the provisions in *GEC EPEAT License and Participating Manufacturer Agreement (P26)*. Grounds for termination include:

- Nonconformances identified during any investigation undertaken by a CAB or the EPEAT Program that remain uncorrected beyond the agreed upon time.
- Non-payment of annual EPEAT Participating Manufacturer Fee to GEC.
- Any breach of *GEC EPEAT License and Participating Manufacturer Agreement (P26)* that goes uncorrected beyond the agreed upon time.
- Failure to conform with the requirements identified in *EPEAT Conformity Assurance Implementation Manual (P66)* that remain uncorrected beyond the agreed time.
- A CAB recommendation to terminate a Participating Manufacturer.

If a Participating Manufacturer is terminated, their GEC-approved CAB or the EPEAT Program removes/archives all of the Participating Manufacturer's products.

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8.0 Managing Impartiality and Conflicts of Interest

GEC recognizes that impartiality and managing conflicts of interest are fundamental to maintaining the integrity of the EPEAT Program. Impartiality is defined as the presence of objectivity, where objectivity means that conflicts of interest do not exist or are resolved so as not to adversely influence subsequent activities. Any situation where the EPEAT Program may be influenced by pressure from commercial, financial, organizational, or other obligations is considered a potential conflict of interest and risk to impartiality.

To this end, GEC does not allow commercial, financial, or other pressures to compromise impartiality in the EPEAT Program and eliminates or mitigates conflicts of interest that may influence development and maintenance of EPEAT Criteria, management of the EPEAT Conformity Assurance System, and oversight of programmatic activities.

The GEC leadership team ensures that the EPEAT Program is operated in a manner to safeguard objectivity and impartiality. GEC evaluates risks to impartiality on an ongoing basis, including those that arise from its activities, its relationships, or from the relationships of its personnel, and its sources of funding.

In instances where a risk to impartiality is identified and presents a serious threat to the credibility of the EPEAT Program, the conflict is eliminated. In other cases, GEC mitigates the risks in such a way to ensure impartiality is not compromised. This is accomplished through organizational and personnel control measures, checks and oversight within criteria development and maintenance processes, and the rigorous requirements in the EPEAT Conformity Assurance System. GEC also accepts and investigates stakeholder complaints regarding potential conflicts of interest.

All GEC personnel are contractually obligated to comply with the rules defined by GEC relating to confidentiality and independence from commercial and other interests, to disclose any actual or perceived conflicts that may arise in the course of their work for GEC, and to act objectively and free from any pressures that could compromise their objectivity. GEC maintains signed statements to this effect for all personnel.

GEC's policy on impartiality and conflicts of interest and administration of this policy are non-discriminatory and are not used to impede or inhibit access to the EPEAT Program by Participating Manufacturers or CABs. GEC monitors conformance to this policy through implementation of the EPEAT Program's quality management system.

8.1 Recognized Potential Conflicts of Interest

Although conflicts may arise in any facet of GEC's operations or the EPEAT Program, GEC recognizes the following as key sources of possible conflicts of interest:

- **Sources of income and commercial pressures:** The need to be fiscally solvent is an inherent conflict of interest. GEC generates revenues through collecting trademark fees to allow the use of the EPEAT Mark by Participating Manufacturers and through collecting EPEAT CAB Participation Fees from CABs. ~~Both s~~Sources of income present financial pressures that have

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the potential to influence the outcomes of conformity assurance activities, and the development and maintenance of EPEAT Criteria.

- **Technical assistance and conformity assurance:** GEC provides technical assistance and training to Participating Manufacturers, GEC-approved CABs and Qualified Auditors, while also operating and overseeing the Conformity Assurance System.
- **Individual stakeholder pressure and conformity assurance:** Stakeholders may pressure GEC to change the requirements of the EPEAT Program or a Criterion so that it is easier or more difficult to achieve compliance, or they may pressure GEC to make the conformity assurance process more or less rigorous.
- **GEC CAB and independence:** GEC recognizes that as EPEAT Program owner and operator of a Conformity Assurance Body, GEC is responsible for conformity assurance activities at the EPEAT Program level and GEC CAB level. GEC CAB is subject to the same level of scrutiny and performance requirements as all other GEC-approved CABs.
- **Using competent personnel while avoiding conflicts of interest:** Given the highly specialized nature of the EPEAT Program, there are a limited number of individuals who possess the qualifications and specific knowledge needed to work within these operations. It is likely that some GEC personnel may be involved in multiple aspects of the EPEAT Program activities.

8.2 GEC CAB and Independence

GEC recognizes that as the owner of both the EPEAT Program and a Conformity Assurance Body (GEC CAB), there is an inherent risk to impartiality and a potential for conflicts of interest to arise, simply because the EPEAT Program is responsible for overseeing all CABs. To eliminate this risk, GEC maintains an organizational structure that effectively creates a firewall between EPEAT Program personnel and GEC CAB personnel. GEC CAB receives no preferential treatment, is held to the same requirements as all other CABs, is not made aware of any EPEAT Program announcements or decisions earlier than other CABs, and does not have any ability to influence the EPEAT Program more than any other CAB.

GEC CAB also is subject to the same oversight as all other GEC-approved CABs, including required conformance with *EPEAT Conformity Assurance Implementation Manual (P66)* and participation in Annual EPEAT Audits of CABs. GEC ensures that GEC CAB operates under independent accreditation that evaluates its management of conflicts of interest. GEC CAB's relationship to GEC does not compromise the impartiality of GEC CAB's conformity assurance activities or the integrity of the EPEAT Program.

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9.0 Complaints and Appeals

The EPEAT Program has a documented process to receive, evaluate and make decisions on complaints and appeals and requires GEC-approved CABs to have a complaints and appeals process in place. GEC organizational activities continue without limitation during an investigation into a complaint or appeal of any nature. Complaints and appeals must be submitted in writing.

Complaints and appeals shall be handled swiftly and as transparently as possible, while still respecting the confidentiality of all parties involved. Any GEC personnel who is the subject of the complaint or appeal will not be involved in the investigation of that complaint or appeal.

The EPEAT Program ensures that complaints and appeals do not result in discriminatory actions. No complainant, appellant or other individual shall be negatively treated for bringing forward a complaint or appeal, providing information related to a complaint or appeal, or helping to resolve a complaint or appeal.

The EPEAT Program is responsible for managing investigations into complaints and appeals and GEC retains full authority to make the final determinations in the case of all complaints and appeals under its purview.

9.1 Complaints

Complaints may be raised, in writing, by any person or organization and may address EPEAT-registered products, misuse of the EPEAT mark or misleading claims about EPEAT product registration, conformity recommendations or decisions, GEC's Dynamic Criteria Development Process, and/or GEC's management of the EPEAT Program.

GEC-approved CABs may receive complaints that are not related to its Participating Manufacturer clients (e.g., complaints about non-client's EPEAT-registered products, conformity decisions made by other CABs, other conformity assurance activities, potential misuse of the EPEAT mark, or misleading claims). CABs must forward all such complaints to the EPEAT Program and should not initiate an investigation regarding these issues unless explicitly instructed by the EPEAT Program to do so.

Complaints regarding dissatisfaction with a GEC-approved CAB must first be directed to that CAB. If the complainant is not satisfied with the resolution of the complaint, then the complainant may raise the issue directly with the EPEAT Program. The EPEAT Program strives to resolve such issues jointly with the GEC-approved CAB.

Complaints pertaining to the Voluntary Consensus Process must first be directed to, and investigated by, the criteria development organization managing the Voluntary Consensus Process. If the complainant is not satisfied with the resolution of the complaint, then the complainant may raise the issue, in writing, directly with GEC. Complaints regarding other aspects of GEC's Dynamic Criteria Development Process are received and managed by GEC. Details regarding the management of such complaints are identified in *GEC Dynamic Criteria Development Process (P74)*.

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9.2 Appeals

Appeals regarding conformity assurance recommendations and decisions may be raised, in writing, by Participating Manufacturers and GEC-approved CABs. Such appeals may be made on technical or procedural grounds. Details regarding the management of such complaints and appeals are identified in *EPEAT Conformity Assurance Manual (P66)*.

Provisional CABs and GEC-approved CABs may appeal decisions made by the EPEAT Program during the Initial EPEAT Audit or Annual EPEAT Audit. Such appeals may be made on technical or procedural grounds. Details regarding the management of such appeals are identified in *EPEAT Conformity Assurance Implementation Manual (P66).*

Procedural appeals pertaining to the Voluntary Consensus Process must first be directed to, and investigated by, the criteria development organization managing the Voluntary Consensus Process. If the appellant is not satisfied with the resolution of the appeal, then the appellant may raise the procedural issue in writing directly with GEC. Procedural appeals regarding other aspects of GEC's Dynamic Criteria Development Process are received and managed by GEC. Technical appeals related to any aspect of GEC's Dynamic Criteria Development Process are not permitted. Details regarding the management of such procedural appeals are identified in *GEC Dynamic Criteria Development Process (P74)*.

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10.0 Use of the EPEAT Name and Mark

The EPEAT name and marks are trademarked in the United States, the European Union and several other countries worldwide by the Global Electronics Council. GEC licenses the use of the EPEAT name and marks only through formal license agreements. Inappropriate use of the EPEAT name and marks will be prosecuted to protect the credibility of the EPEAT brand.

Many countries around the world have requirements that govern how organizations may communicate the sustainability characteristics of their products. Participating Manufacturers are responsible for ensuring compliance with local laws and regulations when using the EPEAT mark.

To enable coordination and consistent messaging about the EPEAT Program, GEC-approved CABs may be required to obtain GEC's approval of any communications related to the EPEAT Program and their role as a CAB. As independent, impartial conformity assurance experts, GEC-approved CABs are prohibited from claiming or inferring that they receive any preferential treatment from the EPEAT Program.

Participating Manufacturers are granted a license to use the EPEAT name and relevant marks to promote their active EPEAT-registered products. Participating Manufacturers must abide by the requirements in *GEC EPEAT License and Participating Manufacturer Agreement (P26)* regarding EPEAT-related advertising, promotional, marketing, and related uses of the marks. The marks must be used in a manner consistent with the EPEAT designation of Bronze, Silver or Gold achieved by the product. Participating Manufacturers shall not imply that they as an organization have been endorsed, approved, or rated by the EPEAT Program or GEC.

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11.0 Force Majeure Events

The EPEAT Program may issue temporary policy addenda to this document, *EPEAT Policy Manual (P65)*, to address unforeseeable and extraordinary circumstances that are beyond the control of Participating Manufacturers or GEC-approved CABs. Such circumstances include but are not limited to natural disasters, acts of war or terrorism, significant labor strikes, devastating accidents to a supplier facility, epidemics, or pandemics.

The EPEAT Program may also issue temporary exemptions during Documentation Review and Continuous Monitoring activities due to force majeure events.

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12.0 Revisions and Effective Date

The EPEAT Program reviews *EPEAT Policy Manual* (P65) on an annual basis to determine if revisions are required. Revisions to this document are generally published on February 15 and take effect on July 1 of any given year; however, GEC may, at its sole discretion, identify specific revisions which take effect on another date before or after July 1.

GEC considers programmatic needs when determining the effective date for all revisions and is committed to ensuring its decision is transparent and fair for all stakeholders, including Participating Manufacturers, GEC-approved CABs, and purchasers.

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~~12.0~~13.0 Supplementary Information

~~12.1~~13.1 Acronyms

The following acronyms are used in this document.

ANAB: ANSI National Accreditation Board

ANSI: American National Standards Institute

CAB: Conformity Assurance Body

CGG: Conformity Guidance Group

~~12.2~~13.2 References

The following documents are referenced in this document, *EPEAT Policy Manual (P65)*, and are indispensable for its application. Undated references indicate that the latest edition of the referenced document applies.

- *EPEAT Conformity Assurance Implementation Manual (P66)*
- *GEC Conformity Assurance Body Agreement (P33)*
- *GEC EPEAT License and Participating Manufacturer Agreement (P26)*
- ISO 9000 *Quality management systems – Fundamentals and vocabulary*
- ISO 14020 *Environmental labels and declarations — General principles*
- ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures*
- ISO/IEC 17020 *Conformity assessment—Requirements for the operation of various types of bodies performing inspection*
- ISO/IEC 17065 *Conformity assessment—Requirements for bodies certifying products, processes, and services*

~~12.3~~13.3 Definitions

The following definitions are referenced throughout this document, *EPEAT Policy Manual (P65)*, and are indispensable for its application.

Active / Activate: Term that refers to the status of a product that is currently identified in the EPEAT Registry as meeting EPEAT Criteria (“active”) or the process of using the EPEAT Registry software to make a product appear in the EPEAT Registry (“activate”).

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Annual Renewal: Continuous Monitoring activities conducted by a GEC-approved CAB for a Participating Manufacturer's products that have used the Certification Pathway.

Antitrust Statement: GEC assigns the highest priority to full compliance with both the letter and the spirit of antitrust laws and therefore a statement is read at the beginning of meetings that are facilitated by GEC and include industry members to remind participants not to engage in anti-trust behaviors and that care should be taken to avoid discussions that may suggest or tend to reflect agreements among competitors as to: price; terms of sale that could impact price; allocation of customers, markets or territories; bid-rigging; and boycotts or joint refusals to do business with others. Participants must abide by the antitrust statement and avoid any conduct that might violate, or would create the appearance of a violation of, antitrust laws.

Appeal: For the purposes of this document, *EPEAT Policy Manual (P65)*, an appeal is a written request for reconsideration of (1) a conformity recommendation or decision based on either procedural or technical grounds, or (2) a procedural decision in the development of GEC Criteria that is considered by the appellant to be inconsistent with the policies and procedures. Based on definition of appeal in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*.

Applicant Conformity Assurance Body (Applicant CAB): Conformity Assurance Body whose *CAB Application Form (P40)* and all supporting documentation have been received by GEC but has not yet been granted status as a Provisional Conformity Assurance Body.

Archived / Archive: Term that refers to the status of a product that once appeared in the EPEAT Registry but no longer meets EPEAT Criteria ("archived").

Certification Pathway: One of two ways to complete Initial Documentation Review, where results of Initial Documentation Review are valid for three years or until the EPEAT Program implements the Criteria resulting from a Full Product Category Revision, whichever is earlier. Any Minor Criteria Revisions or Major Criteria Revisions must be addressed during Ongoing Documentation Review.~~Documentation Review is completed immediately and requires a Participating Manufacturer to demonstrate conformance with all selected EPEAT Criteria at the outset~~

Clarification: Formal guidance issued by the EPEAT Program to clarify ambiguous wording in EPEAT Criteria or in associated conformity assurance requirements. Typically issued to mitigate the potential for different conformity decisions being made because of the ambiguous language.

Complaint: For the purposes of this document, *EPEAT Policy Manual (P65)*, a complaint is a written expression of dissatisfaction, other than an appeal, regarding EPEAT-registered products, misuse of the EPEAT mark or misleading claims about EPEAT product registration, conformity recommendations or decisions, GEC's Dynamic Criteria Development process, and/or GEC's management of the EPEAT Program. Based on definition of complaint in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*.

Conformance: Conclusion, based on the results of conformity assurance activities, in which the party being assessed has demonstrated the fulfillment of specified requirements. Based on definition of "decision" in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*.

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Conformity Assurance Body (CAB): A body that performs conformity assessment activities, excluding accreditation. Based on definition of conformity assessment body in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*.

Conformity Assurance Body Mentored Work Phase (CAB Mentored Work Phase): Period of time where GEC provides additional support to a newly approved Conformity Assurance Body to increase its proficiency in EPEAT Program required methods of conformity assurance. During this Phase, GEC evaluates and approves the Conformity Assurance Body's conformity decisions made in the Initial Documentation Review for its initial Participating Manufacturer clients. Because Conformity Assurance Bodies in this Phase cannot activate products or newly selected Criteria or remove a Documentation Review requirement for a Criterion, GEC facilitates these activities for them.

Conformity Guidance Group (CGG): A group of stakeholders with technical expertise, or with access to such expertise, that is convened by the EPEAT Program to obtain technical input and feedback on EPEAT conformity assurance processes, technical requirements in EPEAT Criteria and implementation of updated and amended EPEAT Criteria. The Conformity Guidance Group is open to all stakeholders but is not a standing committee and does not hold any decision-making authority.

~~**Conformity Guidance Materials**: Informative and supplemental guidance published by the EPEAT Program to enhance Participating Manufacturer and Conformity Assurance Body understanding of EPEAT Criteria and associated conformity assurance requiremen~~

Conformity Requirements and Guidance Materials: Documents developed by the EPEAT Program designed to help Participating Manufacturers and GEC-approved CABs further understand EPEAT Criteria requirements, provide supplementary information and where necessary, provide further details regarding demonstration of conformance with EPEAT Criteria.

Continuous Monitoring: Ongoing surveillance process for confirming the accuracy of information identified by Participating Manufacturers in the EPEAT Registry. Continuous Monitoring includes conformity assurance activities conducted in Continuous Monitoring Rounds and in Annual Renewals.

Continuous Monitoring Round: Discrete period of time where GEC-approved Conformity Assurance Bodies conduct Investigations that have been selected and assigned to them by the EPEAT Program. The EPEAT Program identifies which products and EPEAT Criteria must be evaluated, specifies the method of investigation, and assigns Investigations to Conformity Assurance Bodies.

Correction: Action(s) taken to immediately correct a nonconformance within a specified timeframe.

Corrective Action Plan: Plan, with actions and timelines, developed to eliminate the root cause(s) of a nonconformance so as to prevent reoccurrence. Based on definition of corrective action in ISO 9000 *Quality management systems – Fundamentals and vocabulary*.

Documentation Review: Iterative process used by a GEC-approved Conformity Assurance Body to evaluate a Participating Manufacturer's Criteria selections by assessing conformance (i.e., assess the integrity of documentation provided by a Participating Manufacturer and determine if demonstrates conformance with the Criteria) and by assessing competence (i.e., assess if the Participating Manufacturer understands the requirements of the Criteria and can provide acceptable evidence)..

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EPEAT Audit of Conformity Assurance Body (EPEAT Audit of CAB): Audit conducted by the EPEAT Program to evaluate a Conformity Assurance Body's ability to meet EPEAT Program requirements as identified in *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)*.

EPEAT Criteria: Environmental and social requirements developed through a balanced, voluntary consensus process and adopted by the EPEAT Program. Sometimes referred to as "Criteria" or "Criterion".

EPEAT Program: A comprehensive voluntary sustainability Type 1 ecolabel that helps purchasers identify more sustainable technology products and services, which is owned and managed by the Global Electronics Council (GEC). EPEAT Program staff are employees of GEC. All activities and responsibilities associated with "EPEAT" or the "EPEAT Program" identified in this document are undertaken by GEC employees.

EPEAT-registered Product: Product appearing on the EPEAT Registry with active status. Sometimes referred to as "registered product".

EPEAT Registry: Online repository that identifies more sustainable technology products and services in a variety of different product and service categories that currently meet EPEAT Criteria (referred to as "active") and that previously met EPEAT Criteria (referred to as "archived").

EPEAT Trademark: Visual representations of the name EPEAT and stylized marks EPEAT Bronze, EPEAT Silver, EPEAT Gold, and the EPEAT logo, which Participating Manufacturers are licensed to use contingent on meeting the terms in *GEC License and Participating Manufacturer Agreement (P26)*. Active products appearing in the EPEAT Registry have been verified as meeting specific EPEAT environmental and social criteria associated with the Marks. By appearing in the EPEAT Registry, Products are considered to be using the Marks and Participating Manufacturers are not required to use the Marks on their physical Products. Also known as EPEAT Marks.

Expert Ad Hoc Group: A multi-stakeholder group convened by GEC and serving in an advisory capacity to review and draft criteria that address sustainability impacts for a technology or service.

Full Product Category Revision: One of the three possible categories assigned by the EPEAT Program to Criteria revisions resulting from Continuous Maintenance in GEC's Dynamic Criteria Development Process. In this type of revision, all EPEAT Criteria are open to modification and revision, and the process begins with an update to State of Sustainability Research. The other two categories are Minor Criteria Revision and Major Criteria Revision.

GEC-approved Conformity Assurance Body (GEC-approved CAB): Status of a Conformity Assurance Body assigned by GEC after successful completion of the Initial EPEAT Audit, including correction of all nonconformances and implementation of all corrective action plans, and successful qualification of at least two individuals to be Qualified Auditors for each product category in which the Conformity Assurance Body offers conformity assurance services for the EPEAT Program. GEC-approved CABs may provide EPEAT conformity assurance services for Participating Manufacturer clients.

Impartiality / Impartial: Presence of objectivity, where objectivity is understood to mean that conflicts of interest do not exist or are resolved so as not to adversely influence conformity assurance and

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programmatic activities. Based on the definition of impartiality in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles* and ISO/IEC 17065 *Conformity assessment—Requirements for bodies certifying products, processes, and services*.

Inconclusive: Result of an Investigation where sufficient and objective evidence has been evaluated but a conclusion of conformance or nonconformance cannot be determined due to limitations in the evaluation technique(s). Typically, only Investigations using laboratory evaluation result in a finding of Inconclusive.

Initial Documentation Review: Documentation Review activities conducted by a GEC-approved Conformity Assurance Body when a Participating Manufacturer initially registers its first products in the EPEAT Registry or registers products in a new product category. Initial Documentation Review must be completed before a Participating Manufacturer's products can become EPEAT-registered for a product category.

Investigation: Activities conducted in a Continuous Monitoring Round where a Participating Manufacturer's conformance to EPEAT Criteria is evaluated by a GEC-approved Conformity Assurance Body.

Major Criteria Revision: One of the three possible categories assigned by the EPEAT Program to Criteria revisions resulting from Continuous Maintenance in GEC's Dynamic Criteria Development Process. In this type of revision, in addition to the revisions categorized as Minor Criteria Revisions, the scope is limited to new criteria identified to address gaps in sustainability impact areas, and revisions requested by stakeholders. The other two categories are Minor Criteria Revision and Full Product Category Revision.

Minor Criteria Revision: One of the three possible categories assigned by the EPEAT Program to Criteria revisions resulting from Continuous Maintenance in GEC's Dynamic Criteria Development Process. In this type of revision, the scope is limited to corrections, changes, and updates to text to further clarify existing requirements. The other two categories are Major Criteria Revision and Full Product Category Revision.

Minor Error: Category assigned to a nonconformance for the following four scenarios:

- Minor human error in data entry (e.g., value cited for EPEAT-product registration is insignificantly above or below the actual value),
- Minor administrative errors (e.g., broken URLs, reports/certificates marginally outdated),
- No documentation provided by a Participating Manufacturer during a Level 1 Investigation where the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market, and
- A GEC-approved CAB is unable to obtain a product from the market during a Level 2 Investigation where the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.

Nonconformance: Conclusion, based on the results of conformity assurance activities in which the party being assessed has not demonstrated the fulfillment of specified requirements. Based on definition of "decision" in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*.

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Ongoing Documentation Review: Documentation Review activities conducted by a GEC-approved Conformity Assurance Body after a Participating Manufacturer's initial products first appear in the EPEAT Registry for a product category. Ongoing Documentation Review can occur for a variety of reasons, such as the addition of new products, changes to the EPEAT Criteria selected for EPEAT-registered products and addressing nonconformances arising from Continuous Monitoring activities.

Optional Criterion / Criteria: EPEAT Criteria that represent a Participating Manufacturer's commitment to innovation in environmental and social performance. Participating Manufacturers have the option to select one or more Optional Criteria for each EPEAT-registered product. If selected, the Participating Manufacturers must demonstrate conformance with the Optional Criterion. EPEAT-registered products are identified by tier as EPEAT Bronze, EPEAT Silver or EPEAT Gold. All products must meet all Required EPEAT Criteria, and the tiers differentiate products by the percentage of Optional EPEAT Criteria the products meet.

Outcomes Report: Report published by the EPEAT Program at the conclusion of each Continuous Monitoring Round to summarize the activities conducted, identify EPEAT Criteria investigated and the method of investigation, highlight overall conformity results and trends, and identify the products and Participating Manufacturers that received nonconformances and the corrections made to restore accuracy of the EPEAT Registry.

Participating Manufacturer: Brand owner that registers products in the EPEAT Program and is responsible for ensuring ongoing conformance of the products against the EPEAT Criteria selected for those products. A Participating Manufacturer must retain the services of a Provisional Conformity Assurance Body or a GEC-approved Conformity Assurance Body to participate in the EPEAT Program. Sometimes referred to as Manufacturer.

~~**Priority Criteria**: Criteria identified by the EPEAT Program for each product category, which are the minimum to which a Participating Manufacturer must demonstrate conformance to a GEC-approved Conformity Assurance Body before allowing the Participating Manufacturer's products to appear in the EPEAT Registry for each product category. Priority Criteria include all Required Criteria for any given EPEAT product category.~~

Priority Verification Pathway: One of two ways to complete Initial Documentation Review, where results of Initial Documentation review are valid until the EPEAT Program implements the Criteria resulting from a Full Product Category Revision. Any Minor Criteria Revisions or Major Criteria Revisions must be addressed during Ongoing Documentation Review. ~~Documentation Review is staggered over several months for up to one year.~~

Procedural Appeal: Appeal made on the grounds that a decision should be reconsidered because a required internal or external process was not followed.

Provisional Conformity Assurance Body (Provisional CAB): Status of a Conformity Assurance Body assigned by GEC after successful evaluation of the submitted *CAB Application Form* (P40), review of accreditations, and full execution of *Agreement Between Conformity Assurance Body* (P33). Provisional CABs may solicit business for EPEAT conformity assurance services but may not provide these services until granted status as a GEC-approved CAB.

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Qualified Auditor: CAB personnel who has met and maintained the necessary qualifications and been approved by the EPEAT Program to provide conformity assurance services for the EPEAT Program. Sometimes referred to as "Auditor".

Required Criterion / Criteria: EPEAT Criteria against which a Participating Manufacturer must demonstrate conformance before a product can become EPEAT-registered and appear in the EPEAT Registry.

Technical Appeal: Appeal made on the grounds that a conformity assurance recommendation or decision should be reconsidered because a specified requirement was not interpreted correctly.

Technical Committee: The multi-stakeholder committee serving as the voluntary consensus body for GEC Criteria and administered by a third-party Criteria Development Organization.

Voluntary Consensus Process: The process used to develop GEC Criteria that aligns with and draws from similar principles for the characteristics of voluntary consensus as defined in ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures* and in the U.S. Executive Office of the President, Office of Management and Budget (OMB) Circular A-119: *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities.*

~~12.4~~13.4 Document Change History

Issue	Revision	Author	Description of Change	Approver	Approval Date	Effective Date
1	0	Director EPEAT Program	Initial release	Director EPEAT Program	2020 Jan 17	2020 Jan 17
2	0	Senior Manager, Ecolabels and Resources	Reformatting of document. Restructuring of document and further clarifying existing policies. Addition or changes to policies for: Rebranding of EPEAT-registered products; Use of attestations for Required Criteria in countries where regulations address the criteria; CAB reporting of discrepancies or conflicts in the understanding of EPEAT Criteria; Conformity Guidance Group; CAB Calibration Meetings; EPEAT audits of provisional and existing CABs; auditor qualifications; CAB performance metrics; annual CAB Summit; grounds for termination; additional definitions and references; acronyms; Force Majeure Events.	Senior Director, Ecolabels and Manufacturer Resources	2021 Feb 15	2021 July 01

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Issue	Revision	Author	Description of Change	Approver	Approval Date	Effective Date
2	1	Senior Manager, Ecolabels and Resources	**Additional Clarity**: Updates to identify why GEC performs specific actions (4.2.3, 5.6) and to further clarify policies (4.1, 5.6.1, 5.6.5, 6.2, 6.4.2); Consensus body is Technical Committee (2.5); Additional details from P74 (4.2.1.1, 4.2.1.2, 4.2.1.3); Performance assistance improvement plan (6.4.2, 6.5); Complaint and appeals (9.0, 9.1, 9.2); Re-ordering to reflect the key components of GEC's Dynamic Criteria Development Process (4.2); Update to reflect that EPEAT categorizes criteria revisions and why (4.2.2); Addition of definitions used in other EPEAT documents (12.3). **Additions**: P74 publicly available (4.2.1); Use of attestations is only applicable to select Required Criteria in specific jurisdictions (5.6.5); Nonconformances outside of Continuous Monitoring to reflect P66 (5.3).	Senior Director, Ecolabels and Manufacturer Resources	2022 Feb 15	2022 July 01
2	*2*	*Senior Manager, Ecolabels and Resources*	***Additional Clarity**: Participation in EPEAT Program is voluntary (1.0); CABs and Participating Manufacturers are required to fulfill all applicable requirements in P65 (1.0, 6.1, 7.1, 7.2); Considerations when developing criteria (4.0); Criteria revision details (4.2.3); Grounds for suspension or termination to align with P66 (6.5); Sources of funding and impartiality (8.0); Potential for conflicts of interest in criteria development (8.1). **Additions**: Section on selection of product categories (4.2.1); Footnote to address auditor training requirements for new criteria from Sustainability Impact Modules (6.2, 6.3); Address impacts of force majeure events on ongoing conformity assurance activities (11.0); Section on revisions and effective date (12.0). **Changes**: Reference to priority criteria removed (5.2, 13.3); Name and intent of conformity guidance materials (5.6.2); Removed section on conformity assurance where equivalent regulatory requirements exist (5.6.5); Updated definitions (13.3).*	*VP, Ecolabels and Manufacturer Resources*	*Proposed 2023 Feb 15*	*Proposed 2023 July 01*

Supplementary Information

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