EPEAT™ Conformity Assurance Implementation Manual

Proposed Revisions to EPEAT Conformity Assurance Implementation 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.

Summary of Proposed Changes

Throughout this document, proposed revisions to *EPEAT Conformity Assurance Manual (P66)* 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 P66

Topic	Section	Summary
Overview	2.1	Change: Removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024.
Clarifications	2.2.1	Addition: Clarifications may also be released for 30-day Conformity Guidance Group review period.
Conformity Requirements and Guidance	2.2.2	Change: Section 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	2.2.5	Change: Section deleted as the conformity option no longer available (lack of uptake).
CAB Eligibility Requirements	3.1	Addition: Footnote to address Auditor training requirements for revised Criteria from Sustainability Impact Modules.
Qualifying Auditors	3.3.1	Addition: Footnote to address Auditor training requirements for revised Criteria from Sustainability Impact Modules.
CAB Mentored Work Phase	3.5	Addition: Footnote to clarify process for review of revised Criteria from Sustainability Impact Modules.
Initial EPEAT Training Requirements	4.1	Addition: Description of training and footnote to address training for revised Criteria from Sustainability Impact Modules.
Ongoing Training and Other requirements	4.2	Clarification: If an Auditor loses qualifications, existing work must be re-assigned.
Annual EPEAT Auditor Refresher Training	4.2.1	Clarification: Process for Auditors returning from leave and for new Auditors that qualify after annual training has occurred.
Annual EPEAT Auditor Proficiency Exam	4.2.2	Clarification: Process for Auditors returning from leave and for new Auditors that qualify after annual training has occurred.
Continuous Monitoring Training	4.2.3	Clarification: Auditors are only required to attend the training or review the recordings for specific Criteria they are investigating. For Level 2, at least one CAB representative must attend.
Accreditation (Table 1, Records)	5.1	Clarification: Records must be retained for a minimum of three years after the contract with a Participating Manufacturer ends.

Table A: Summary of Key Proposed Clarifications, Changes, and Additions in P66		
Topic	**Section**	**Summary**
Nonconformances and Corrective Actions	5.2.2	Change: Evidence of corrections must be provided during corrective action timeframe.
Nonconformances Related to Conformity Decisions	5.2.2.1	Clarification: Deletes "within three business days" to clarify that if CAB is unable to provide documentation demonstrating their original conformity decision is accurate, within 30 calendar days of receiving the audit report, they must notify the Participating Manufacturer and obtain necessary evidence.
CAB Performance Metrics – Metric 1	5.3	Change: Deleted requirement for CABs to have a policy in place that identifies customer service is measured and improved.
CAB Performance Metrics – Metric 3	5.3	Clarification: Auditors are only required to attend the training or review the recordings for specific Criteria they are investigating. For Level 2, at least one CAB representative must attend.
CAB Performance Metrics – Metric 4	5.3	Addition: CABs must notify EPEAT Program of any personnel changes impacting Annual Auditor Refresher Training attendance.
CAB Performance Metrics – Metric 11	5.3	Addition: Requires CABs to follow correct format for completing Investigation Reports.
CAB Performance Metrics – Metric 12	5.3	Change: Removes double counting in Metrics 10 and 12.
Priority Criteria	6.1.4.2	Change: Removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024.
Types of Evidence and Ensuring Integrity of Evidence	6.1.4.2	Addition: Adds requirement for declarations of conformity to further align with ISO 14024 (Section 7.4.4)
Assessing Competence	6.1.5	Clarification: Additional information and examples for when competence may or may not be demonstrated.
Assessing Conformance	6.2.2	Change: Removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024.
Activating products	6.2.4	Change: Removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024. Addition: Requirement for Participating Manufacturer to confirm in the EPEAT Registry that any new products registered are similar to an existing product (for further alignment with ISO 14024).
Initial Documentation Review of Non-Priority Optional Criteria	6.3.1 (previously)	Change: Section deleted to reflect removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024.
Adding New Products During 12-month Period	6.3.1.1 (previously)	Change: Section deleted to reflect removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024.
Selecting New Non-Priority Optional Criteria During 12-month Period	6.3.1.2 (previously)	Change: Section deleted to reflect removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024.

Table A: Summary of Key Proposed Clarifications, Changes, and Additions in P66		
Topic	**Section**	**Summary**
New Products	6.3.1	Change: Updated to reflect removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024. Addition: Requirement for Participating Manufacturer to confirm in the EPEAT Registry that any new products registered are similar to an existing product (for further alignment with ISO 14024). Clarification: Participating Manufacturer and/or CAB may develop an alternative way to demonstrate competence for Corporate Criteria with annual performance requirements.
Continuous Monitoring – Overview	7.1	Clarification: Products for Level 2 Investigations must be new and received by lab in original packaging.
Continuous Monitoring Rounds	7.2	Change: Adds actions EPEAT may take under force majeure circumstances.
Investigation Phase	7.2.2	Clarification: Products for Level 2 Investigations must be new and received by lab in original packaging.
Deliberation Phase	7.2.3	Clarification: EPEAT may provide CABs with five additional business days to address questions or revise the Investigation Report.
Investigated Products	7.2.4.1	Clarification: Timeframe for CABs to address questions or revise the Corrective Action Investigation Report.
Changing CABs	8.0	Change: Updated to reflect removal of Priority Criteria to further clarify that EPEAT aligns with ISO 14024.
Continuous Monitoring	9.2.1.2	Clarification: Additional details on process and timeframes for appeals raised to CABs during Continuous Monitoring.
Force Majeure Events	10.0	Addition: Updated to address impacts of force majeure events on ongoing conformity assurance activities.
Revisions and Effective Date	11.0	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	12.3	Change: Updated definitions – Certification Pathway, Conformity Requirements and Guidance Materials, Priority Criteria, and Priority Verification Pathway.

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EPEAT™ Conformity Assurance Implementation Manual

This document identifies the requirements of the EPEAT Conformity Assurance System and related activities. As such, it defines the obligations and expectations of all manufacturers or brands that have active EPEAT-registered products or are in the process of confirming that their products conform with EPEAT criteria (called Participating Manufacturers) and of all Conformity Assurance Bodies approved to provide EPEAT conformity assurance services (called GEC-approved CABs).

A companion document, *EPEAT Policy Manual (P65)*, defines the policies that govern all EPEAT programmatic activities and forms the basis for this Implementation Manual. 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, 2023~~2022~~. These revisions, unless otherwise noted, are effective as of July 1, 2023~~2022~~.

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

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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 tier of EPEAT Bronze, EPEAT Silver or EPEAT Gold.

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 requirements of the EPEAT Conformity Assurance System and related activities. As such, it defines the obligations and expectations of all manufacturers or brands that have active EPEAT-registered products or are in the process of confirming that their products conform with EPEAT criteria (called Participating Manufacturers), and of all CABs approved to provide EPEAT conformity assurance services (called GEC-approved CABs). A companion document, *EPEAT Policy Manual (P65)*, defines the policies that govern all EPEAT programmatic activities and forms the basis for *EPEAT Conformity Assurance Implementation Manual (P66)*. Participating Manufacturers and GEC-approved CABs must operate in accordance with both Manuals to fulfill EPEAT Program requirements. The EPEAT Program reviews both this *EPEAT Conformity Assurance Implementation Manual (P66)* and *EPEAT Policy Manual (P65)* on an annual basis to determine if revisions are required.

2.0 EPEAT Conformity Assurance System

2.1 Overview

The EPEAT Conformity Assurance System involves GEC oversight of both GEC-approved CABs and the EPEAT Program conformity assurance processes and requirements.

GEC establishes CAB Eligibility Requirements and approves and oversees CABs in their provision of conformity assurance services for the EPEAT Program. Organizations must undergo a robust approval and audit process prior to becoming GEC-approved CABs. On an ongoing basis, GEC-approved CABs must maintain third-party accreditations (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*), implement EPEAT-specific elements in their quality management systems, maintain the proficiency and qualifications of their Auditors and successfully participate in an annual EPEAT audit process.

Participating Manufacturers must engage a GEC-approved CAB for each product category prior to having EPEAT-registered products. Participating Manufacturers may select different GEC-approved CABs for different product categories but may only use a single CAB for each category. GEC-approved CABs are responsible for assessing Participating Manufacturers' initial and ongoing conformance with EPEAT Criteria (Documentation Review) and for implementing surveillance activities (Continuous Monitoring).

Participating Manufacturers may select one of two conformity assurance pathways to demonstrate initial and ongoing conformance with EPEAT Criteria – the Priority Verification Pathway and the Certification Pathway. Both Pathways require Participating Manufacturers to work with their GEC-approved CABs for Documentation Review and Continuous Monitoring. The key differences include product selection for review, process for adding additional products and/or selecting additional Optional Criteria and the length of validity of results from Initial Documentation Review. ~~is the pace of the Initial Documentation Review process.~~

- 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.~~ The Priority Verification Pathway relies on product sampling for selecting products for review, and the evaluation of a Participating Manufacturer's competence. Results of Initial Documentation Review are valid until the EPEAT Program implements the Criteria resulting from a Full Product Category Revision, after which Initial Documentation Review against the revised Criteria must be performed again. (Any Minor Criteria Revisions or Major Criteria Revisions must be addressed during Ongoing Documentation Review.)
- ~~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.~~ The Certification Pathway relies on product batching and does not require the evaluation of a Participating Manufacturer's competence. 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 against the revised Criteria~~process~~ must be performed again. (Any Minor Criteria Revisions or Major Criteria Revisions must be addressed during Ongoing Documentation Review.)

EPEAT-registered products are not identified in the EPEAT Registry as being assessed through the Certification Pathway or the Priority Verification Pathway as both Pathways are equally robust, credible, and valid.

For both Pathways, Participating Manufacturers follow the same process to participate in the EPEAT Program:

- A Participating Manufacturer executes *GEC EPEAT License and Participating Manufacturer Agreement (P26)* with GEC and pays an annual EPEAT Participation Fee for each product category, which allows an unlimited number of products to be EPEAT-registered for a given product category.
- A Participating Manufacturer also establishes a contractual relationship with a GEC-approved CAB for the provision of conformity assurance services for the EPEAT Program, which requires that the Participating Manufacturer report relevant product or corporate changes to the CAB on an ongoing basis.
- Prior to the first products becoming EPEAT-registered for a product category, a Participating Manufacturer must complete Initial Documentation Review. During this process, the GEC-approved CAB assesses documentation provided by the Participating Manufacturer to determine if the evidence supports conformance with EPEAT Criteria and if the Participating Manufacturer understands the obligations of the Criteria. Once Initial Documentation Review is complete, the Participating Manufacturer's products are EPEAT-registered.
- On an ongoing basis, a Participating Manufacturer may choose to select additional EPEAT Optional Criteria or have new products become EPEAT-registered. In these cases, the GEC-approved CAB performs Ongoing Documentation Review where required.
- 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.
- 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, as well as develop corrective action plans to address other similarly affected products. Should a Participating Manufacturer fail to make the necessary

corrections, affected products will be removed from the Registry by either the Participating Manufacturer's CAB or the EPEAT Program.

2.2 EPEAT Technical Guidance and Authority

2.2.1 Clarifications

The EPEAT Program may issue a formal Clarification if the wording in an EPEAT Criterion is ambiguous, or when requested to do so by a GEC-approved CAB or Participating Manufacturer. A request for Clarification must be submitted electronically to the EPEAT Program and clearly identify the ambiguous text. The request must also identify examples of how the ambiguity may result in different conformity decisions and/or propose language to address the ambiguity.

The EPEAT Program evaluates all requests and determines if a formal Clarification is needed. If the EPEAT Program determines that a Clarification is warranted, feedback may be sought from the Conformity Guidance Group and GEC's criteria development staff. The EPEAT Program then drafts the proposed Clarification and releases it for a 30-calendar day public comment period and/or 30-calendar day Conformity Guidance Group comment period, per Section 2.2.4.

The EPEAT Program approves and publishes the final Clarification with an effective date, which is typically 30 calendar days after publication but may be longer depending on the impact to conformity assurance activities. Clarifications must be used in conformity assurance activities after the effective date with one exception – if a Clarification is issued or becomes effective during a Continuous Monitoring Round (see Section 7), it does not apply to those specific Continuous Monitoring activities.

Clarifications provide additional information on interpreting the criteria and how they should be implemented and do not change the criterion text. Clarifications are made available to Participating Manufacturers and CABs in the EPEAT Registry and are available upon request.

2.2.2 Conformity Requirements and Guidance Materials[1]

~~Conformity Guidance Materials contain supplemental information developed by the EPEAT Program that may help Participating Manufacturers and GEC-approved CABs further understand EPEAT Criteria. Conformity Guidance Materials~~ Conformity Requirements and Guidance Materials are documents developed by the EPEAT Program to help Participating Manufacturers and GEC-approved CABs further understand EPEAT Criteria requirements, provide supplementary information and where necessary,

[1] Previously, these documents were identified as "Conformity Guidance Materials". "Conformity Guidance Materials" apply to existing EPEAT Criteria and are solely intended to provide guidance and assist stakeholders in understanding the conformity assurance requirements. "Conformity Requirements and Guidance Materials", while still providing guidance, also identify further details regarding demonstration of conformance with EPEAT Criteria and will solely apply to the revised Criteria resulting from the Sustainability Impact Module criteria development process. During the transition to the revised criteria from the Sustainability Impact Modules, "Conformity Guidance Materials" will apply to the existing EPEAT Criteria, while "Conformity Requirements and Guidance" will apply to the revised Criteria from the Sustainability Impact Modules. Once the revised Criteria have been fully implemented in the EPEAT Registry, the "Conformity Guidance Materials" will be retired and replaced by "Conformity Requirements and Guidance Materials" for those product categories adopting the revised Criteria.

provide further details regarding demonstration of conformance with EPEAT Criteria. Conformity Requirements and Guidance Materials are prepared for all EPEAT Criteria and, for each Criterion, provide an overview of the EPEAT Criteria requirements, examples of supporting evidence and answers to frequently asked questions.

The EPEAT Program publishes Conformity Requirements and Guidance Materials for Required~~Priority~~ Criteria two months before the launch of a new product category and take effect immediately unless otherwise stated. Within six months after a new category launch or revision, Conformity Requirements and Guidance Materials are available for all EPEAT Criteria. Necessary revisions are made as needed~~monthly~~ thereafter and become effective at the time of publication. If revisions and/or changes to the Materials are expected to significantly impact how Participating Manufacturers implement EPEAT Criteria, the EPEAT Program identifies a later effective date. GEC-approved CABs and Participating Manufacturers are notified when revisions and/or changes to Conformity Requirements and Guidance Materials are made.

Revisions to Conformity Requirements and Guidance Materials may be made for several reasons, including but not limited to:

- Providing links to recently published Outcomes Reports or updated reference materials.
- Clarifying what constitutes sufficient evidence.
- Adding information related to a Minor or Major Criteria Revision.
- Including details on common conformity issues that have arisen in Continuous Monitoring activities.
- Addressing requests for clarification from CABs, Participating Manufacturers, or other stakeholders.

GEC-approved CABs and Participating Manufacturers may submit suggestions or identify corrections or areas of improvement in the Conformity Requirements and Guidance Materials in writing, at any time, to the EPEAT Program.

~~Because Conformity Guidance Materials are guidance documents intended only to assist Participating Manufacturers and GEC-approved CABs further understand conformity assurance requirements, they become effective at the time of publication. If the guidance or changes to the guidance are expected to significantly impact how Participating Manufacturers implement EPEAT Criteria, the EPEAT Program identifies a later effective date.~~

The use of Conformity Requirements and Guidance Materials does not guarantee conformance to EPEAT Criteria. All evidence provided during Documentation Review and Continuous Monitoring activities must be evaluated by GEC-approved CABs. Where content in these Materials are specifically identified as "guidance", EPEAT Criteria take precedence over that content. ~~In the event of a discrepancy between the Conformity Requirements and Guidance Materials or Conformity Requirements and Guidance and the applicable EPEAT Criterion, the Criterion takes precedence.~~

2.2.3 Technical Questions

The EPEAT Program recommends that Participating Manufacturers and GEC-approved CABs consult the EPEAT Program for additional guidance in the following situations:

- A GEC-approved CAB is unable to obtain consensus amongst its Qualified Auditors on EPEAT Criteria and/or the associated conformity assurance requirements.
- There are differences between the language in EPEAT Criteria and the perceived intent.
- There is a disagreement between a GEC-approved CAB and its Participating Manufacturer client on EPEAT Criteria and/or the associated conformity assurance requirements that cannot be resolved during Documentation Review or Continuous Monitoring activities.
- A GEC-approved CAB is uncertain that a Participating Manufacturer's documentation will demonstrate conformance during Continuous Monitoring activities.
- A GEC-approved CAB seeks additional guidance or detail on why evidence may or may not be acceptable.

Due to ongoing interactions with Participating Manufacturer clients, GEC-approved CABs must inform the EPEAT Program of instances where there is conflicting or disparate understanding of EPEAT Criteria and/or the associated conformity assurance requirements. In these situations, the EPEAT Program makes the definitive technical interpretation and shares it through discussion at CAB Calibration Meetings, issuance of a formal Clarification, or updates to Conformity Guidance Materials.

Suppliers may be contracted by or supply multiple Participating Manufacturers who engage different GEC-approved CABs and may raise questions directly to the EPEAT Program to assist with documentation preparation. When this occurs, the EPEAT Program will notify all GEC-approved CABs of the question(s) raised by suppliers and the EPEAT Program's response during the next scheduled Calibration Meeting.

2.2.4 Conformity Guidance Group (CGG)

On an as-needed basis, the EPEAT Program seeks technical input and expertise from the Conformity Guidance Group (CGG) on EPEAT conformity assurance processes, technical requirements in EPEAT Criteria, and implementation of updated and amended EPEAT Criteria for all product categories. The Conformity Guidance Group is open to all stakeholders including Participating Manufacturers, GEC-approved CABs, and Purchasers. The CGG is not a standing committee and there are no standing members.

Stakeholders wishing to participate in one or more CGG meetings must inform the EPEAT Program by email, and they will be added to the CGG distribution list. Because participants must be prepared to discuss and provide feedback on technical issues, the EPEAT Program requests that participants be technical experts themselves or have access to relevant technical resources. Depending on the topic discussed at a meeting, the EPEAT Program may invite individuals with expert knowledge of that topic to participate.

The CGG meets on an as-needed schedule and the EPEAT Program strives to hold these meetings no more than once per month. The EPEAT Program communicates upcoming CGG meetings to stakeholders using various GEC communication vehicles (such as newsletters and special announcements). For each Conformity Guidance Group meeting, the EPEAT Program identifies agenda items, prepares discussion topic materials, and facilitates discussions. Meetings are not held in person to allow for the broadest number of participants. To the extent practical, the agenda and materials are provided in advance of each meeting to permit meaningful review.

All participants are encouraged to provide their expert advice, ask clarifying questions and be open and consultative. As such, CGG meetings are governed by Chatham House Rule[2]. Meeting participants are free to use information received but are not allowed to reveal the identity or affiliation of speakers. An anti-trust statement is read at the beginning of each meeting. All participants are expected to abide by Chatham House Rule and the anti-trust statement.

GEC-approved CABs and Participating Manufacturers may request that a topic be raised for discussion by the CGG. Requests must be submitted electronically using the *Conformity Guidance Group Issue Paper and Feedback Form (P88)*, which is available on the EPEAT Registry and upon request. Participating Manufacturers are strongly encouraged to bring topics forward through their GEC-approved CAB. If a request is received directly from a Participating Manufacturer, the EPEAT Program consults with the Participating Manufacturer's CAB to ensure consistency in the guidance given to both Participating Manufacturers and GEC-approved CABs.

The EPEAT Program brings the following topics to the CGG for discussion and feedback:

- Clarifications proposed for release by the EPEAT Program.
- Requests to examine equivalents to test methods, protocols or other methodologies specifically referenced in EPEAT Criteria.

For other topics, the EPEAT Program first takes steps to resolve the issue including but not limited to, outreach to technical experts, research into applicable conformity assurance protocols, review of existing guidance for other EPEAT product categories for applicability, and consultation with GEC's criteria development and maintenance personnel. If the EPEAT Program cannot reach an objective, reasonable and defensible solution without further technical input, the topic will then be brought to the Conformity Guidance Group for discussion and feedback. Possible topics include:

- Language in EPEAT Criteria is not descriptive enough for consistent conformity decisions and may lead to different decisions being made by different GEC-approved CABs.
- Test methods, protocols, or other references in EPEAT Criteria no longer exist.
- Uncertainty in the intention of EPEAT Criteria language.
- New technical guidance that may contradict guidance previously provided.

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

- Adjudication of disagreements in interpretation of EPEAT Criteria and associated conformity assurance requirements.
- Overarching questions or suggestions regarding the EPEAT Conformity Assurance System and requirements.
- Transition timeframe for implementation of revised EPEAT Criteria.

After receiving feedback from the CGG, the EPEAT Program may determine further consultation is needed, issue a formal Clarification, integrate further details into Conformity Guidance Materials, or send the topic to GEC's Continuous Maintenance Process. The EPEAT Program communicates the final decision to the CGG.

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.

~~2.2.5 Conformity Assurance Where Equivalent Regulatory Requirements Exist~~

~~If there are regulations in effect in a location of use (country) where a product is identified as being EPEAT-registered and those regulations address the requirements of an EPEAT Required Criterion, Participating Manufacturers may provide a signed attestation to their GEC-approved CAB as the supporting evidence for that Criterion in that specific location of use (country). This provision is only applicable to specific EPEAT Required Criteria and location of use (country) combinations, which will be identified by the EPEAT Program and made available to CABs and Participating Manufacturers on the EPEAT Registry (and upon request) after it has been developed.~~

~~Participating Manufacturers must use one of the Attestation Templates provided by the EPEAT Program, which will be available on the EPEAT Registry and upon request. The EPEAT Program will develop and maintain an Acceptable List of the Required Criteria and specific locations of use (countries) where this attestation may be used as evidence. An attestation may only be used for those locations of use (countries) identified by the EPEAT Program. If a product is EPEAT-registered in other countries that are not on the list of countries identified by the EPEAT Program, the Participating Manufacturer cannot use the attestation for the Required Criterion in those countries and must provide documentation to demonstrate conformance to the Criterion.~~

~~When finalized, additional information and obligations associated with the use of an attestation for both CABs and Participating Manufacturers will also be made available to CABs and Participating Manufacturers on the EPEAT Registry and available to other stakeholders upon request.~~

~~The EPEAT Program may update the Acceptable List of Required Criteria and specific countries on an as needed basis. Each Criterion is assessed on a country-by-country basis. Participating Manufacturers and CABs may request that specific Required Criteria and countries be added; however, the EPEAT Program makes the final determination as to which Required Criteria and countries are included, based on legal advice.~~

3.0 Approval of Conformity Assurance Bodies (CABs)

CABs play a key role in the EPEAT Program and are the gateway through which products are approved as being EPEAT-registered. GEC establishes CAB Eligibility Requirements and approves and oversees these organizations, which provide conformity assurance services for the EPEAT Program. To become a GEC-approved CAB, an organization progresses through a series of stages – applicant status, provisional status, approved status, and mentored work phase.

3.1 CAB Eligibility Requirements

The following CAB Eligibility Requirements must be met initially and fulfilled on an ongoing basis for an organization to maintain its status as a GEC-approved CAB, in addition to all requirements in *EPEAT Policy Manual (P65)* and ~~P66~~ *EPEAT Conformity Assurance Implementation Manual (P66)*.

- Operate EPEAT-related conformity assurance services under a valid accreditation to one of the following:
    - ISO/IEC 17020 *Conformity assessment – Requirements for the operation of various types of bodies performing inspection* from an accreditation body that is an ILAC Member and signatory to the ILAC Mutual Recognition Agreement (MRA).
    - ISO/IEC 17065 *Conformity assessment – Requirements for bodies certifying products, processes and services* from an accreditation body that is an IAF Member and signatory to the IAF Multilateral Recognition Arrangement (MLA). This accreditation is required for CABs offering EPEAT-related conformity assurance services under the Certification Pathway.
- Incorporate additional quality management system elements under the ISO/IEC 17020 or ISO/IEC 17065 accreditation, as per Section 5.1, including:
    - Execution of a legal agreement with Participating Manufacturer clients for the provision of conformity assurance services for the EPEAT Program, which requires adherence to applicable EPEAT Program policies and procedures.
    - Formal processes or procedures for performing Documentation Review, implementing Continuous Monitoring, and responding to Participating Manufacturer client and external stakeholder complaints.
- Maintain at least two Qualified Auditors for each product category in which they offer conformity assurance services for the EPEAT Program, as per Section 4[3].

[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 in those product categories adopting the revised Criteria.

- Have in place a policy or procedure, which identifies that customer service for its Participating Manufacturer clients will be measured and improved. Section 5.3 provides further information on CAB customer service requirements.

To become a GEC-approved CAB, organizations must first submit an application and become an Applicant CAB. Once the application is reviewed and approved, the CAB is granted Provisional CAB status. A Provisional CAB must meet the CAB Eligibility Requirements, successfully complete an Initial EPEAT Audit, and have personnel pass Initial EPEAT Auditor training requirements before being granted status as a GEC-approved CAB.

3.2 Applicant Status

An organization that intends to become a CAB must electronically submit a *CAB Application Form (P40)* to GEC. An organization can only submit an application once every 12-month period. After the application and all supporting documentation have been received by GEC, the organization is considered an Applicant CAB.

GEC may ask clarifying questions and/or request an interview with the Applicant CAB as it evaluates the application. 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 and supporting documentation sufficiently demonstrates the organization's ability to perform conformity assurance activities, the organization may be granted Provisional CAB status.

GEC is solely responsible for the review and approval of all applications to become a GEC-approved CAB.

3.3 Provisional Status

A Provisional CAB must execute *GEC Conformity Assurance Body Agreement (P33)*. Once executed, Provisional CABs may begin soliciting business for EPEAT conformity assurance services but may not provide these services until becoming a GEC-approved CAB. A Provisional CAB has 12-months to prove it meets the CAB Eligibility Requirements and become a GEC-approved CAB. An organization must re-apply and submit a new application if it is unable to fulfill the requirements within this 12-month period, although GEC reserves the right not to accept an application from an organization that is re-applying. Reasons that GEC may not accept a second application may include failure to meet CAB Eligibility Requirements, unresponsiveness to EPEAT requests/inquiries, or because alternative CABs were approved in the interim to meet the needs of the CAB network (e.g., addressing specific technical requirements or number of existing GEC-approved CABs).

3.3.1 Qualifying Auditors

GEC-approved CABs must maintain at least two Qualified Auditors for each product category in which they offer conformity assurance services for the EPEAT Program. Therefore, Provisional CABs must

ensure that at least two individuals undergo Initial EPEAT Auditor Training and pass the associated exams (see Section 4.1). Provisional CABs must pursue qualifications for Auditors in at least one product category; qualifications for additional product categories may be added at a later date. Only Qualified Auditors can conduct EPEAT conformity assurance activities including performing Documentation Review, removing Documentation Review Requirements, and implementing Continuous Monitoring activities. Additionally, Qualified Auditors can only conduct EPEAT conformity assurance activities for those EPEAT product categories for which they have been qualified[4].

3.3.2 Supporting Documentation

Provisional CABs must submit to GEC all procedures, policies, and valid accreditation certificates related to the provision of conformity assurance services for the EPEAT Program. These documents must demonstrate that the additional quality management system elements outlined in Section 5.1 have been incorporated for the conformity assurance pathways the CAB will be using. GEC reviews the submitted documentation and may ask clarifying questions as needed prior to the Initial EPEAT Audit of the Provisional CAB.

3.3.3 Initial EPEAT Audit

During Initial EPEAT Audits of Provisional CABs, Provisional CABs are responsible for:

- Coordinating with GEC to plan the Initial EPEAT Audit.
- Making available the necessary personnel, documentation, and records.
- Providing a knowledgeable "audit guide" who is fluent in English to act as a liaison and help GEC staff obtain and interpret the necessary audit evidence.
- Responding to all questions and requests during the audit process.

During the audit process, GEC evaluates the documentation provided to determine if:

- CAB Eligibility Requirements are being met.
- The quality management system elements as per Section 5.1 are incorporated into the CAB's management system.
- Procedures adequately reflect the conformity assurance pathway(s) for which it is seeking approval as per requirements in Sections 6 and 7, including developing Initial Documentation Review plans and selecting products, collecting, and evaluating evidence, removing Documentation Review requirements, implementing Continuous Monitoring, and performing Annual Renewals.

[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 in those product categories adopting the revised Criteria.

GEC provides the Provisional CAB with an audit report summarizing the activities conducted and, where applicable, opportunities for improvement and nonconformances. Audit reports are provided electronically. Within 30 calendar days, Provisional CABs must make corrections for identified nonconformances and develop a corrective action plan to prevent reoccurrence[5]. Any corrective action plans must be fully implemented prior to GEC granting the organization GEC-approved CAB status.

3.4 Approved Status

Upon fulfillment of the requirements in Section 3.3, the organization is identified as a GEC-approved CAB for specific product categories and for one or more conformity assurance pathways. Once approved, the organization may provide conformity assurance services for Participating Manufacturer clients. CABs are also required to pay an annual CAB Participation Fee to GEC to maintain their status as an approved conformity assurance body for the EPEAT Program.

CABs may become approved to provide conformity assurance services for the EPEAT Program for one or more product categories, contingent upon the qualifications of the Auditors performing the conformity assurance activities. A GEC-approved CAB may expand the product categories it is able to provide conformity assurance services for by having at least two Qualified Auditors complete Product Category Modules and pass the associated exams for each new product category (see Section 4.1). GEC-approved CABs may also choose to become approved for an additional conformity assurance pathway and the audit for this addition shall occur during the next scheduled Annual EPEAT Audit for the CAB.

Information regarding which product categories each CAB is approved to provide EPEAT-related conformity assurance services for is made publicly available on the GEC website and/or the EPEAT Registry.

3.5 CAB Mentored Work Phase

GEC supports and oversees newly approved CABs as they perform Documentation Review of their initial Participating Manufacturer clients. This CAB Mentored Work Phase is designed to ensure that CABs:

- Understand the EPEAT Conformity Assurance System, nuances in the EPEAT Criteria, and conformity assurance requirements for the product categories in which they are approved.
- Seek appropriate evidence of conformity from their Participating Manufacturer clients.
- Appropriately evaluate that the evidence provided is consistent with EPEAT published guidance and the requirements in *EPEAT Conformity Assurance Implementation Manual (P66)*.
- Make appropriate judgments of conformity before products become EPEAT-registered.

[5] "Corrections" are the immediate actions that are taken by the CAB to correct nonconformances. Corrections must be completed within the 30-calendar day period. "Corrective action plans" are the actions and timelines that the CAB develops to address and eliminate the root cause(s) of a nonconformance so as to prevent reoccurrence. The Corrective action plan must be developed in the 30-calendar day period; however, implementation of the plan may take longer.

- Understand their responsibilities for approving products and selected EPEAT Criteria.
- Can support their Participating Manufacturer clients.

During the CAB Mentored Work Phase, GEC evaluates and approves the CAB's conformity decisions made in the Initial Documentation Review for its initial Participating Manufacturer clients, including the rationale for accepting or rejecting the evidence provided by the Participating Manufacturer. Where applicable, the EPEAT Program may also review the actions and results of a CAB's Continuous Monitoring activities (Continuous Monitoring Investigations and Annual Renewals) as part of CAB Mentored Work Phase. A CAB's decisions on all EPEAT Required Criteria and 50% of the EPEAT Optional Criteria in a product category are reviewed[6].

A GEC-approved CAB may remain in the CAB Mentored Work Phase for some EPEAT Criteria, while able to make conformity decisions independently for others because the CAB Mentored Work Phase is completed on a Criterion-by-Criterion basis.

If the CAB has Participating Manufacturers undergoing conformity assurance in more than one product category, GEC selects a cross section of EPEAT Criteria to review among the multiple product categories, as opposed to reviewing every Criteria in every product category. In these cases, GEC ensures the EPEAT Criteria selected for review across the product categories requires the CAB to demonstrate proficiency in all methods of conformity assurance.

CABs cannot approve a selected EPEAT Criterion or remove the Documentation Review requirement for the Criterion while still in the Mentored Work Phase for that Criterion. CABs are also unable to activate products while in the Mentored Work Phase. If the EPEAT Program agrees with a CAB's determination that a Participating Manufacturer has submitted sufficient evidence to demonstrate conformance and has completed the Initial Documentation Review process, the EPEAT Program will activate the products for the Participating Manufacturer, even if the CAB is still in the Mentored Work Phase. Products activated by the EPEAT Program during this Phase are subject to Continuous Monitoring activities (as outlined in Section 7).

If a CAB is unable to demonstrate an adequate understanding of specific EPEAT Criteria, it remains in Mentored Work Phase for those Criteria until able to do so and is still subject to evaluation of its decisions for the Criteria. This evaluation will involve reviewing documentation submitted by a subsequent Participating Manufacturer.

[6] When the revised Criteria from the Sustainability Impact Module criteria development process come into effect, 50% of EPEAT Optional Criteria across those product categories adopting the revised criteria will be reviewed. For those product categories not initially adopting the revised Criteria, 50% of the Optional Criteria for those product categories will need to be reviewed.

4.0 Qualified Auditor Proficiency and Training

4.1 Initial EPEAT Training Requirements

GEC-approved CABs must maintain at least two Qualified Auditors for each product category in which it provides conformity assurance services for the EPEAT Program. Auditors can only conduct EPEAT conformity assurance activities (including performing Documentation Review, removing Documentation Review Requirements, and implementing Continuous Monitoring activities) for those EPEAT product categories and/or Criteria for which they have been qualified[7].

To become qualified, Auditors must complete Initial EPEAT Auditor Training provided by the EPEAT Program and pass the associated exams with a score of 75% or greater. Individuals completing any EPEAT auditor exams may refer to EPEAT Criteria, Conformity Guidance Materials, and access information available on the Internet but cannot consult with or seek guidance from other individuals. The Initial EPEAT Auditor Training is comprised of an Overview Module and individual modules for each product category and/or individual modules for each Sustainability Impact Area. Each module has an associated exam. Auditors must complete and pass the Overview Module, at least one Product Category Module and/or, where applicable, all modules for the Sustainability Impact Areas. ~~and at least one Product Category Module~~

Overview Module	Product Category Specific Modules	Sustainability Impact Area Modules
The overview module provides an overview of the EPEAT Program, the product categories, requirements of GEC-approved CABs, the EPEAT Conformity Assurance System, and the Documentation Review and Continuous Monitoring processes. The exam for the overview module evaluates the Auditor's knowledge of the EPEAT Program, EPEAT's Conformity Assurance System and requirements of conformity assurance activities.	For product categories NOT adopting the revised Criteria from the Sustainability Impact Modules, e~~E~~ach product category specific module provides details on the EPEAT Criteria for that product category. For product categories that ARE adopting the revised Criteria from the Sustainability Impact Modules, each product category specific module also provides details on specific criteria, where applicable, such as product energy efficiency and consumables that are unique to that product category. In both cases, the training modules address conformity assurance requirements that may be specific to those Criteria, existing Clarifications, guidance for making appropriate conformity decisions, and expectations for details that must be provided in the rationale for these decisions. The exams for product category modules evaluate an Auditor's technical skills and applied knowledge of EPEAT Criteria in that category.	Each Sustainability Impact Module training reviews the Criteria specific to that impact area and provides information on the conformity assurance requirements that may be specific to those Criteria, existing Clarifications, guidance for making appropriate conformity decisions, and expectations for details that must be provided in the rationale for these decisions. The exams evaluate an Auditor's technical skills and applied knowledge of EPEAT Criteria in that Impact Module.

[7] 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 in those product categories adopting the revised Criteria.

When the EPEAT Program launches a new product category, already Qqualified Auditors must take the training for the Product Category Module and if applicable, the Sustainability Impact Area Modules, and pass the associated exam(s) with a score of 75% or greater for that new category to be able to perform the associated conformity assurance activities.

If an Auditor does not achieve a passing score for any exam, GEC provides feedback on aspects of the training and module that the Auditor should re-examine. The Auditor may revise the exam and resubmit it up to two times. Any Auditor that has retaken the same exam three times and not received a score of 75% or greater must retake the training module and a new exam will be administered.

Initial EPEAT Auditor Training is available online but can also be arranged to be held in person upon request from a Provisional CAB or GEC-approved CAB. Participating Manufacturers are not required to complete the Initial EPEAT Auditor Training but are welcome to view any training modules. All Initial EPEAT Auditor Training is subject to fees.

4.2 Ongoing Training and Other Requirements

To maintain their qualifications, Auditors must:

- Maintain employment on either a full-time, part-time, or contractual basis with a GEC-approved CAB.
- Attend training sessions on Minor Criteria Revisions to EPEAT Criteria for the product categories for which they have been qualified, when such training is identified as necessary by the EPEAT Program.
- Attend training sessions on Major Criteria or Product Category Revisions to EPEAT Criteria for the product categories for which they are qualified and pass the associated exam with a score of 75% or greater within the timeframe specified by the EPEAT Program.
- Attend the Annual EPEAT Auditor Refresher Training course.
- Pass the Annual EPEAT Auditor Proficiency Exam with a score of 75% or higher within the timeframe specified by the EPEAT Program.
- Attend all Continuous Monitoring training for the product categories for which they have been qualified or confirm that a recording of these training sessions and/or the presentations were viewed.

A Qualified Auditor may move from employment with one GEC-approved CAB to a different GEC-approved CAB. However, if more than 12 months have lapsed in the interim period, the Auditor must re-take the Initial Auditor Training, including the Overview Module and Product Category Modules, and pass the associated exams. GEC may make exceptions for Auditors that are absent due to illness, parental leave, sabbaticals, or other duties outside of EPEAT conformity assurance activities.

If an individual loses his/her EPEAT Auditor qualifications for any reason, GEC will notify the CAB. Upon this notification, the Auditor can no longer conduct any EPEAT-related conformity assurance activities and existing work must be re-assigned to a Qualified individual.

4.2.1 Annual EPEAT Auditor Refresher Training

Annual EPEAT Auditor Refresher Training includes interactive exercises to provide more immediate feedback and summarizes new information from the previous 12-month period. This includes but is not limited to:

- Technical questions, responses, interpretations, and rationale behind decisions.
- Conformity assurance related policy and procedural changes.
- Additional EPEAT Program policy and procedural changes.
- Common misunderstandings such as inappropriate selection of EPEAT Criteria, conformity assurance requirements for specific EPEAT Criteria, and underlying reasons for nonconformances.
- Investigation Report writing best practices and lessons learned.

If unable to attend the training at the time it is held, Auditors must watch the recording and confirm in writing to the EPEAT Program that this is complete. In advance of the training, GEC-approved CABs must notify the EPEAT Program of any Auditors that will be absent (e.g., due to illness, parental leave, sabbaticals, or other duties outside of EPEAT conformity assurance activities), obtain EPEAT Program approval for the absence and arrange for them to view the recording upon their return. Auditors returning from a leave are only required to review the most recent Annual EPEAT Auditor Refresher Training, even if they were on leave for more than Annual EPEAT Auditor Refresher Training session, as long as the leave was continuous (e.g., a two-year parental leave).

Newly Qualified Auditors that complete the Initial EPEAT Auditor Training after the last Annual EPEAT Auditor Refresher Training must attend the next scheduled annual training but are not required to complete any previous annual trainings that occurred prior to them becoming Qualified Auditors.

4.2.2 Annual EPEAT Auditor Proficiency Exam

Within three months of completing the Annual EPEAT Auditor Refresher Training, Qualified Auditors must take the Annual EPEAT Auditor Proficiency Exam and pass with a score of 75% or greater. The exam focuses on applied knowledge, looking at acceptability of evidence examples, conformity assurance related policies and processes (in particular, changes made over the previous 12 months), and technical responses to questions. The Annual EPEAT Auditor Proficiency Exam also includes a section on articulating the rationale for conformity decisions. The exam is designed to evaluate an auditor's technical skills and applied knowledge of the EPEAT Program. The Annual EPEAT Auditor Proficiency Exam is not administered in person to enable access by Auditors in all geographic locations.

If an Auditor does not achieve a passing score on the Annual EPEAT Auditor Proficiency Exam, the EPEAT Program provides feedback on aspects of the training that the Auditor should re-examine. The Auditor may revise the exam and resubmit it up to two times. Any Auditor that has retaken the Annual EPEAT Auditor Proficiency Exam three times and not received a score of 75% or greater must re-qualify as a Qualified Auditor by repeating and passing the Initial Auditor Training again. (On a case-by-case basis,

the EPEAT Program may determine that specialized and focused training is required in place of repeating the Initial Auditor Training.) Upon successful completion of Initial EPEAT Auditor Training, a new Annual EPEAT Auditor Proficiency Exam will be administered and a score of 75% or greater must be achieved. In these cases, Auditors are not permitted to conduct EPEAT conformity assurance activities until both the Initial Auditor Training and Annual EPEAT Auditor Proficiency exams are successfully passed.

In advance of the exam, GEC-approved CABs must notify the EPEAT Program of any Qualified Auditors that are unable to take the exam in the allotted timeframe (e.g., due to illness, parental leave, sabbaticals, or other duties outside of EPEAT conformity assurance activities), obtain EPEAT Program approval for taking the exam at a later date, and arrange for them take the exam upon their return.

Auditors returning from a leave are only required to successfully pass the most Annual EPEAT Auditor Proficiency Exam, even if they have missed more than one Annual EPEAT Auditor Proficiency Exam, as long as the leave was continuous (e.g., a two-year parental leave).

Newly Qualified Auditors that complete the Initial EPEAT Auditor Training and Exam(s) after the last Annual EPEAT Auditor Refresher Training must successfully pass the next scheduled annual exam but are not required to pass any exams that occurred prior to them becoming Qualified Auditors.

4.2.3 Continuous Monitoring Training

To ensure consistent and continued understanding of EPEAT Criteria and the associated conformity assurance requirements, GEC conducts Continuous Monitoring Training prior to the launch of all Continuous Monitoring Rounds for Level 0, Level 1 and Level 2 Investigations. These training sessions identify all aspects of the Criteria that must be addressed, explain what details must be documented in Investigation Reports, provide examples of acceptable and unacceptable evidence, and highlight common mistakes and misunderstandings pertaining to the Criteria being investigated. GEC expects that all Qualified Auditors prepare in advance for the training and come prepared with questions.

The Continuous Monitoring Training sessions are intended to be an opportunity for dialogue between the EPEAT Program and GEC-approved CABs and provide Qualified Auditors an opportunity to share specific examples of issues they are encountering with their Participating Manufacturer clients and receive feedback on any questions they have. To encourage more open discussion and maintain confidentiality, GEC conducts an individual session for each GEC-approved CAB. These individual sessions are recorded for additional viewing by the CAB's Qualified Auditors. At least one CAB representative must attend the training. If Auditors who are participating in the Continuous Monitoring Round are unable to attend the training at the time it is held, they must watch the recording and confirm in writing to the CAB that this is complete. The same materials are covered in all individual CAB training sessions. Auditors are only required to attend the training or review the recordings for the specific Criteria they are investigating in the Continuous Monitoring Round. For Level 2 Rounds, at least one CAB representative must attend the training.

The EPEAT Program may occasionally provide optional training for Participating Manufacturers to clarify EPEAT Criteria and outline evidence expectations to help Participating Manufacturers prepare for Continuous Monitoring. All Participating Manufacturers will be notified using various GEC

communication vehicles (such as newsletters and special announcements) and have the opportunity to attend these trainings.

4.2.4 Calibration Meetings

On a monthly basis, the EPEAT Program holds Calibration Meetings for Provisional and GEC-approved CABs using an online platform. When the EPEAT Program releases Major Criteria Revisions, Product Category Revisions and/or adds new product categories, the frequency of Calibration Meetings may increase. The goals of the meetings are to:

- Promote uniform understanding of EPEAT Criteria and consistent application of conformity assurance requirements.
- Disseminate and receive feedback on EPEAT Program policy and procedural changes.
- Encourage open discussion and sharing of conformity assurance questions and knowledge.

Calibration Meetings may be used to answer technical questions from GEC-approved CABs, highlight upcoming changes to EPEAT Program policies or procedures, and provide programmatic updates on Criteria development and continuous maintenance activities.

Calibration Meetings are governed by Chatham House Rule[8] and an anti-trust statement, both of which all participants are expected to abide by. Meeting participants are free to use information received but are not allowed to reveal the identity or affiliation of speakers.

Calibration Meeting materials and an index of the topics addressed at each meeting are made available to all Provisional and GEC-approved CABs. These materials may be used by CABs to inform their conformity assurance activities but may not be disseminated to Participating Manufacturers as official EPEAT Program guidance. Any resulting changes to conformity assurance processes, policies or interpretations are available to Participating Manufacturers in the Conformity Guidance Materials.

At least one representative from each GEC-approved CAB must attend each Calibration Meeting. Although not required to do so, Provisional CABs are strongly encouraged to attend all Calibration Meetings. The CAB representative who attends each meeting may change due to vacation and holiday schedules, illness, job description changes and CAB workloads. The EPEAT Program expects CAB representatives to actively participate in Calibration Meetings to the best of their ability, providing feedback and engaging in constructive dialogue where appropriate. Meeting attendees are also required to disseminate information presented and discussed during the meeting to the CAB's Qualified Auditors.

If the frequency of meetings increases, the EPEAT Program will reassess attendance requirements and may hold meetings in multiple time zones to better accommodate Provisional and GEC-approved CABs. Any changes will be communicated in writing to CABs.

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

5.0 Ongoing Requirements of CABs

5.1 Accreditation

As per the Eligibility Requirements, Provisional and GEC-approved CABs must maintain valid accreditations to ISO/IEC 17020 and/or ISO/IEC 17065. GEC requires that the quality management systems under these accreditations incorporate the elements identified in Table 1 below.

GEC does not expect that every detail in *EPEAT Conformity Assurance Implementation Manual (P66)* appears in a GEC-approved CAB's policies, procedures and/or other quality management system documentation. It may be appropriate for GEC-approved CABs to refer to *EPEAT Conformity Assurance Implementation Manual (P66)* for specific requirements, for example, when referring to timelines and deadlines of conformity assurance activities or definitions.

For example, instead of identifying the timeframes of Continuous Monitoring Rounds, a CAB's documentation may state "… as per the timeframes identified in *EPEAT Conformity Assurance Implementation Manual (P66)*." However, the CAB must have specific procedures in place that specifically identify how their personnel must conduct Continuous Monitoring activities.

CABs must have procedures in place for performing Documentation Review and implementing Continuous Monitoring, including at minimum, an overview of both processes. CAB's procedures must include CAB specific processes. Each CAB will determine their own processes, however, examples of CAB specific processes include, but are not limited to, responsibilities of team members, assigning Auditors, requirements for saving documentation (e.g., file locations), as well as identification of product family and/or sampling procedures.

Table 1: EPEAT Requirements for CAB Quality Management Systems

Management System and Accreditation Scope	If accredited to ISO/IEC 17020, the CAB must be either a Type A or Type C inspection body and meet the applicable requirements in Annex A (Independence requirements for inspection bodies) in ISO/IEC 17020. If Type C, the CAB shall not be part of a company that has EPEAT-registered products, and the CAB shall be or be part of the legal entity that signs the contractual agreement between the CAB and GEC. If accredited to ISO/IEC 17065, the CAB shall follow Option A as outlined in Section 8 in ISO/IEC 17065 (Management system requirements). ISO/IEC 17065 requires that certification documentation must be provided that conveys the term or expiry date of certification. For the EPEAT Program, this period of validity is three years. The EPEAT mark cannot be used on certification documentation, including certificates and certification reports. The EPEAT Program is not required to be included in the CAB's accreditation scope for either ISO/IEC 17020 or ISO/IEC 17065.

Ongoing Requirements of CABs

Table 1: EPEAT Requirements for CAB Quality Management Systems

Organization	The CAB's quality management system must identify all personnel positions that: • Perform Documentation Review, evaluate and approve conformity decisions, and review and/or approve changes to Documentation Review status. • Implement, review and/or approve Continuous Monitoring activities and recommendations. • Manage conformity assurance services for the EPEAT Program and/or the personnel implementing these services.
Confidentiality	The CAB shall meet the confidentiality requirements in the contractual agreement between the CAB and GEC. These requirements allow the CAB to share with the EPEAT Program information collected from Participating Manufacturers during the provision of conformity assurance services for the EPEAT Program but prevent other disclosures.
Contractual Agreements	The CAB must execute a legal agreement with Participating Manufacturer clients for the provision of conformity assurance services for the EPEAT Program. This contract must include a clause that requires adherence to applicable EPEAT Program policies and procedures.
Management Review	The CAB's conformity assurance activities for the EPEAT Program must be included as part of the CAB's management review.
Internal Audits	The CAB's conformity assurance activities for the EPEAT Program must be included as part of the CAB's internal audit.
Complaints	The CAB must have a process for responding to complaints from Participating Manufacturer clients and external stakeholders, and to appeals from Participating Manufacturer clients on conformity decisions and recommendations. The CAB must also have a process for passing on complaints regarding EPEAT-registered products not meeting EPEAT Criteria to the EPEAT Program.
Process Requirements	The CAB must have specific procedures in place for performing Documentation Review and implementing Continuous Monitoring. These procedures must reflect the conformity assurance pathways for which it is approved as per requirements in Sections 6 and 7 of *EPEAT Conformity Assurance Implementation Manual (P66)*. If offering conformity assurance services via the Certification Pathway, the CAB must maintain an internal list of products and the EPEAT Criteria met by each product using this Pathway. The EPEAT Registry shall serve as the published directory of products assessed via this Pathway.
Records	The CAB must retain records related to conformity assurance for the EPEAT Program for a minimum of three years after the contract with a Participating Manufacturer ends, including records associated with the following: • Documentation Review including all evidence and the rationale supporting decisions. • Evaluation of a Participating Manufacturer's competence when demonstrating conformity. • Continuous Monitoring activities including all evidence, the review and approval processes, and for laboratory evaluation of products, the visual/photographic record of the evaluation. • Qualification of personnel involved in providing conformity assurance services for the EPEAT Program (records of completion EPEAT Auditor training requirements), which must be retained for at least three years after the end of employment. • Other business records (contracts or agreements with Participating Manufacturer clients) associated with provision of conformity assurance services for the EPEAT Program, which must be retained for three years after termination of the applicable contract.

Ongoing Requirements of CABs

Table 1: EPEAT Requirements for CAB Quality Management Systems

Personnel and Resource Requirements	All CAB personnel responsible for managing or implementing conformity assurance activities for the EPEAT Program must maintain Auditor qualifications as per Section 4 of *EPEAT Conformity Assurance Implementation Manual (P66)*. Due to the technical nature of EPEAT Criteria, the CAB must have personnel competence requirements for performing conformity assurance activities for the EPEAT Program that includes education, training, technical knowledge, skills, and experience. The CAB must ensure all personnel performing conformity assurance work for the EPEAT Program are provided with information discussed at Calibration Meetings and relevant Clarifications and Conformity Guidance Materials published by the EPEAT Program. Any laboratory evaluation of products for Continuous Monitoring must be performed by a laboratory with valid accreditation to ISO/IEC 17025 *General requirements for the competence of testing and calibration laboratories* from a body that is an ILAC Member and signatory to the ILAC Mutual Recognition Arrangement (ILAC MRA). • CABs must confirm that the evaluation methods are covered by the laboratory's accreditation scope or, for non-standard methods of evaluation, by other mechanisms or best practices to produce accurate and reliable results. • The laboratory must make best efforts to retain, appropriately identify and protect additional samples from a part or component to enable re-testing in the event the original samples are misplaced or there is a dispute or question about the evaluation results. • The laboratory must retain the disassembled product, including packaging, for at least six months following filing of the related Investigation Report(s). • The laboratory must retain the visual record of the disassembly process and results for at least three years following filing of the related Investigation Report(s).

5.2 Annual EPEAT Audit of CAB

5.2.1 Audit Methodology

On an annual basis, GEC audits each GEC-approved CAB. If possible and unless other mutually acceptable arrangements are made, the first Annual Audit shall be on-site at the CAB's primary location. Additional audits may be on-site or performed remotely at GEC's sole discretion. Annual EPEAT Audits of CABs may be subject to fees.

GEC-approved CABs are responsible for:

- Coordinating with GEC to plan the Annual EPEAT Audit.
- Making available the necessary personnel, documentation, and records.
- Providing a knowledgeable "audit guide" who is fluent in English to act as a liaison and help GEC staff obtain and interpret the necessary audit evidence.
- Responding to all questions and requests during the audit process.

On an annual basis, GEC evaluates the following during the audit process:

- Documentation Review decisions and where applicable, and Annual Renewal decisions for the conformity assurance pathway(s) and product category(ies) for which the CAB is approved.
    - Where applicable, assessment of Documentation Review will include rebranding of EPEAT-registered products (as per Section 6.4), and nonconformances identified outside of Continuous Monitoring (as per Section 6.5).
    - To ensure consistency of EPEAT Audits across all CABs, conformity decisions for four Criteria for each product category the CAB has Participating Manufacturer clients will be reviewed during each audit. The assessment may consist of a combination of Criteria reviewed by the CAB during the last year, or activities from prior years.
- Opportunities for improvement, nonconformances and implementation of corrections and corrective action plans from previous EPEAT Audits.
- Implementation of new EPEAT Program policies or requirements that became effective in the previous 12-month period.
- Review of annual Performance Metrics identified in Section 5.3.
- If applicable, documentation supporting the addition of a new conformity assurance pathway.
- If applicable, the CAB's follow-up on Participating Manufacturer clients' corrective action plans for similarly affected products, which were a result of nonconformances in Continuous Monitoring Investigations.
- If applicable, the CAB's follow-up on nonconformances from previous annual audits related to conformity decisions (as per Section 5.2.2.1).
- If applicable, activities conducted when accepting a new Participating Manufacturer client that has transitioned from a different GEC-approved CAB.

In addition to the items identified above, on a bi-annual basis the Annual EPEAT Audit of the CAB shall include GEC's evaluation of the CAB's implementation of and supporting records for quality management system elements as per Section 5.1.

Within 14 calendar days of completion of the audit, GEC provides the CAB with an audit report summarizing the activities conducted and, where applicable, opportunities for improvement and nonconformances. Audit reports are provided electronically. Results of the Annual EPEAT Audit of CABs are not made publicly available.

5.2.2 Nonconformances and Corrective Actions

Within 30 calendar days of receiving the audit report, GEC-approved CABs must make corrections for identified nonconformances, provide evidence of these corrections, and develop a corrective action plan to prevent re-occurrence, and submit this information to GEC[9]. Within 15 calendar days of receipt, the EPEAT Program communicates to the CAB the acceptability of the corrections and proposed corrective action plan. For nonconformances related to conformity decisions made during Documentation Review or Annual Renewal processes, see section 5.2.2.1 below for details on the requirements and timeframe to provide corrections and supporting evidence, and corrective action plans.

~~Depending on the nature of the nonconformance(s), CABs may be required to submit evidence of the correction, but the EPEAT Program typically evaluates evidence of correction at the next Annual EPEAT Audit. The exception is nonconformances related to conformity decisions made during Documentation Review processes, as identified below in Section 5.2.2.1.~~ CABs are responsible for implementation and completion of all approved corrective action plans and the EPEAT Program may follow up with CABs to track progress and ensure completion at the next annual audit.

If an Annual EPEAT Audit of CAB indicates that a CAB is not meeting multiple requirements in *EPEAT Policy Manual (P65)* and/or *EPEAT Conformity Assurance Manual (P66)*, the EPEAT Program may develop a Performance Improvement Assistance Plan (see Section 5.6.1).

5.2.2.1 Nonconformances Related to Conformity Decisions

GEC-approved CABs may receive nonconformances related to conformity decisions made during Documentation Review or Annual Renewals, which may subsequently result in a Participating Manufacturer client being found nonconformant with one or more EPEAT Criteria. CABs must take the following actions where nonconformances related to conformity decisions are identified for this:

(1) If applicable, provide additional documentation to demonstrate their original conformity decision is accurate. This may occur when the GEC-approved CAB already had the evidence but was not able to present it during the EPEAT Annual Audit.

Within 30 calendar days of receiving the audit report, the GEC-approved CAB may submit evidence to support the original conformity decision (which was not presented during the Annual EPEAT Audit). GEC will review this evidence to determine if it demonstrates the Participating Manufacturer is conformant with the Criteria.

(2) If unable to provide additional documentation as per item (1) above or if GEC determines the evidence does not support Participating Manufacturer conformance, collect and review additional evidence from the Participating Manufacturer to demonstrate conformance with the Criterion.

[9] "Corrections" are the immediate actions that must be taken by the CAB to correct nonconformances. Corrections must be completed within the 30-day period. "Corrective action plans" are the actions and timelines that the CAB must develop to address and eliminate the root cause(s) of a nonconformance so as to prevent reoccurrence. The Corrective action plan must be developed in the 30-day period; however, implementation of the plan may take longer.

Within 30 calendar days of receiving the audit report, the GEC-approved CAB must notify the Participating Manufacturer ~~within three business days~~ of GEC's decision and collect and review additional evidence from the additional Participating Manufacturers to demonstrate conformance with the Criterion. The Participating Manufacturer may be given up to three months from the date notified to make necessary corrections and provide the CAB with additional documentation. If unable to demonstrate conformance in the three-month period, the Participating Manufacturer must make appropriate changes [unselect EPEAT Criteria or remove/archive the impacted product(s)].

(3) If unable to provide additional documentation as per item (1) above, determine if additional Participating Manufacturer clients may also be impacted by the same original conformity decision (which was found nonconformant during the Annual EPEAT Audit), and collect and review additional evidence from those additional Participating Manufacturer clients to demonstrate conformance with the Criterion.

Within 30 calendar days of receiving the audit report, the CAB must also determine if the same original conformity decision was also made for additional Participating Manufacturers. The CAB must notify GEC of these findings.

Similar to (2) above, the CAB must then notify the additional Participating Manufacturers within three business days of notifying GEC and collect and review additional evidence from the additional Participating Manufacturers to demonstrate conformance with the Criterion. The additional Participating Manufacturers may be given up to three months from the date notified to make necessary changes and provide the CAB with additional documentation. If unable to demonstrate conformance in the three-month period, the additional Participating Manufacturers must make appropriate changes [unselect EPEAT Criteria or remove/archive the impacted product(s)]

5.3 CAB Performance Metrics

GEC evaluates the performance of all GEC-approved CABs against a series of customer service and conformity assurance metrics at least annually and shares the results with CABs during their Annual EPEAT Audit of CAB. Results of these reviews are not made publicly available.

GEC views these performance metrics as a mechanism for encouraging continuous improvement in the provision of conformity assurance services. Ultimately the goal is to support all GEC-approved CABs in the critical service they provide in the EPEAT Conformity Assurance System and help them improve where needed.

These performance metrics are also intended to promote consistent and objective conformity assurance decisions within and across all GEC-approved CABs, and nonconformances may be given for unsatisfactory performance. For CABs that are not meeting performance metrics, GEC may hold additional regularly scheduled meetings, provide further training on focused topics and work with CABs on improvement plans, where warranted.

Table 2: CAB Performance Metrics and Annual Expectations

Customer Service	
Metric 1	**Customer Service Provision Policy** ~~GEC-approved CABs must have a policy in place that identifies that customer service for Participating Manufacturer clients is measured and improved.~~ GEC-approved CABs must have a policy or procedure in place that addresses the following: • When assessing conformance to EPEAT Criteria, expectations for adequately articulating to Participating Manufacturer clients why document submissions meet Criteria requirements or not, without providing consulting services to the Participating Manufacturer. • High-level expectations for service delivery times for Participating Manufacturer clients. GEC-approved CABs may use existing policies or service level procedures in place for other non-EPEAT services as long as these meet the above requirements. The policy and/or procedures will be reviewed during the Annual EPEAT Audit of CAB.
Technical Proficiency and Training	
Metric 2	**Calibration Meetings** At least one representative from each GEC-approved CAB must attend each Calibration Meeting. One meeting annually may be missed due to extenuating circumstances without penalty. If the frequency of meetings increases, the EPEAT Program will reassess attendance requirements and may hold meetings in multiple time zones to better accommodate GEC-approved CABs.
Metric 3	**Continuous Monitoring Training** For Level 0 and 1 Rounds, At least one CAB representative must attend all regularly scheduled Continuous Monitoring training sessions for those product categories for which they are approved. Individual Qualified Auditors participating in the Round, if unable to attend the training at the time it is held, must watch the recording, and confirm in writing to the appropriate representative of their CAB that this is complete. Auditors are only required to attend the training or review the recordings for the specific Criteria they are investigating in the Round. For Level 2 Rounds, at least one CAB representative must attend the training.
Metric 4	**Annual Auditor Refresher Training** Qualified Auditors must attend the Annual Refresher Training. If unable to attend the training at the time it is held, Auditors must watch the recording and confirm in writing to the EPEAT Program that this is complete. In advance of the training, GEC-approved CABs must notify the EPEAT Program of any Auditors that will be absent or any personnel changes affecting Auditor presence for the annual training and exam.
Metric 5	**Annual Auditor Proficiency** Qualified Auditors must pass the Annual Auditor Proficiency Exam with a score of 75% or greater.
Nonconformance Findings in Annual EPEAT Audit of CABs	
Metric 6	**Integration of EPEAT Program Requirements into Quality Management System** GEC-approved CAB should receive no more than five nonconformances related to the incorporation of EPEAT Program requirements (as per Section 5.1) into its quality management system. During EPEAT Audits of CABs, nonconformances will only be issued based on the effective version of P66, and not proposed revisions or versions not yet in effect.

Ongoing Requirements of CABs

Metric 7	**Conformity Assurance Decisions** GEC-approved CAB should receive no more than two nonconformances per product category due to unacceptable conformity decisions made during Documentation Review or Annual Renewal activities or due to lack of acceptable documentation of the rationale for conformance or competence during Documentation Review activities.
Metric 8	**Corrections Beyond the Agreed Resolution Timeframe** All nonconformances should be corrected and corrective action plans implemented in the agreed timeframe. In recognition that a CAB may experience delays out of its control when implementing corrective action plans, a CAB may request an extension and notify the EPEAT Program of the reason for the delay.
Continuous Monitoring	
Metric 9	**Late Investigations Reports** No reports should be returned to the EPEAT Program after the specified deadline, unless the CAB notifies the EPEAT Program at least 24 hours before the deadline and obtains approval from the EPEAT Program to submit the Investigation Report past the deadline.
Metric 10	**Insufficient Rationale to Support Recommendations** No more than two reports per product category should be returned to a CAB due to an insufficient rationale to support the conformity recommendation. Insufficient rationale to support the conformity recommendation means either a failure to address all aspects of the criterion, including a description of the evidence provided for each aspect, or an insufficient level of detail being provided to support the CAB's recommendation. Before each Round, EPEAT conducts training with each CAB to identify expectations for Investigation Reports. While reviewing submitted Investigation Reports, the EPEAT Program may ask clarifying questions about the Investigation Report and evidence submitted by the Participating Manufacturer to further understand the evidence and/or CAB recommendation on conformity. In some cases, the EPEAT Program may ask the CAB to update the Investigation Report to include additional details. Only if the CAB does not make appropriate updates will the EPEAT Program consider there to be "insufficient rationale to support the conformity recommendation". At any time during the Investigation Phase, and until reports are due to the EPEAT Program, CABs may resubmit updated reports if they find an error, incomplete report, or report with insufficient rationale.
Metric 11	**Incomplete Investigation Reports** No more than four reports (across all product categories) should be submitted with missing required entries~~, or~~ containing the name of the Participating Manufacturer or product under investigation, or not following the correct format as specified in the Investigation Report template. At any time during the Investigation Phase, and until the date that reports are due to the EPEAT Program, CABs may resubmit updated reports if they find an error or determine the report is incomplete.
Metric 12	**Recommendations that Differ from EPEAT's Final Conformity Decision** No more than two CAB recommendations on conformity per product category, or no more than 20% of recommendations on conformity per product category, should differ from the EPEAT Program's final decisions due to the CAB's misunderstanding of EPEAT Criteria or the associated conformity assurance requirements. Because the number of investigations a CAB conducts annually is dependent on the number of Participating Manufacturer clients it has, both metrics will be evaluated by the EPEAT Program, but CABs can choose which metric will be used in their annual performance review. An exception is if a CAB

	has two or less investigations per product category annually. In such cases, only the second metric will be evaluated. While reviewing submitted Investigation Reports, the EPEAT Program may ask clarifying questions about the Investigation Report and evidence submitted by the Participating Manufacturer to further understand the evidence and/or CAB recommendation on conformity. In some cases, the EPEAT Program may ask the CAB to change its recommendation on conformity based on the responses to the questions. Only if the CAB does not change its recommendation will the EPEAT Program consider it a "recommendation that differs from EPEAT's final conformity decision". If an Investigation Report contains insufficient rationale to support the Auditor's recommendation, and the EPEAT Program overturns the recommendation, this will only be counted towards Metric 12, not Metric 10. The EPEAT Program recognizes that some differences in recommendations and final decisions may be due to unique Participating Manufacturer situations that are not fully addressed by EPEAT's conformity assurance requirements. Therefore, all differences are evaluated on a case-by-case basis.

5.4 CAB Summit

On an annual basis, GEC hosts a CAB Summit to further its goals of consistency, objectivity, and proficiency in the assessment of EPEAT-registered products. The CAB Summit is intended to strengthen GEC-approved CAB understanding of current EPEAT policies and conformity assurance requirements and allows the EPEAT Program to bring issues to CABs for further discussion. The Summit is also designed to stimulate collaboration and knowledge sharing between the EPEAT Program and CABs, and further empower GEC-approved CABs in their decision making with additional and focused training.

Conformity assurance guidelines and technical questions, policies, and EPEAT support for CAB outreach activities may be discussed during the Summit, and both GEC-approved CABs and the EPEAT Program can provide feedback on suggested changes.

GEC hosts the Summit through an online platform or in person, and one or more CAB representatives or Qualified Auditors are required to attend. Provisional CABs are also strongly encouraged, but not required, to attend the Annual CAB Summit.

GEC-approved CABs are encouraged to invite additional personnel to specific sessions, where relevant. GEC understands time commitments required for activities such as the CAB Summit and takes this into consideration when planning annual activities. When hosting in person meetings, GEC may also decide to offer an online session for GEC-approved CABs that are unable to travel.

5.5 Inappropriate Use of EPEAT Name and Marks

The *GEC Conformity Assurance Body Agreement (P33)* requires that GEC-approved CABs report to GEC any observed inappropriate use of the EPEAT name and Marks. CABs are not responsible for pursuing any misuse of the EPEAT name and Marks.

5.6 Performance Improvement, Suspension or Termination

Section 5.6 outlines the progressive actions that GEC may take when a GEC-approved CAB fails to meet the requirements identified in *EPEAT Policy Manual (P65)* and/or *EPEAT Conformity Assurance Implementation Manual (P66)*. In most situations when a CAB's performance is no longer satisfactory, GEC first develops a Performance Improvement Assistance Plan for the CAB before progressing to suspension and/or termination.

5.6.1 Performance Improvement Assistance Plans

When a GEC-approved CAB fails to meet one or more of the requirements identified in *EPEAT Policy Manual (P65)* and/or *EPEAT Conformity Assurance Implementation Manual (P66)*, GEC may develop a Performance Improvement Assistance Plan for the CAB. A Performance Improvement Assistance Plan is a tool that is intended to facilitate additional support and training for an individual CAB. Scenarios that may lead GEC to develop such a Plan include but are not limited to:

- Repeated or ongoing failure to meet one or more performance metrics identified in Section 5.3;
- Repeated or ongoing failure to meet one or more requirements identified in *EPEAT Policy Manual (P65)* and/or *EPEAT Conformity Assurance Implementation Manual (P66)*;
- Complaint(s) received by GEC regarding a CAB's performance.

A Performance Improvement Assistance Plan identifies goals, action items and deadlines that the GEC-approved CAB must meet to prevent progression to suspension and/or termination. The plan is based on requirements in *EPEAT Policy Manual (P65), EPEAT Conformity Assurance Implementation Manual (P66)* and the CAB's individual situation. CABs have an opportunity to review the proposed Performance Improvement Assistance Plan before implementation, and a representative from both entities will sign the document *CAB Performance Improvement Assistance Plan (P73)* to ensure commitment for execution.

Performance Improvement Assistance Plans may include, but are not limited to:

- Specific actions and deadlines for unresolved nonconformances resulting from an Annual EPEAT Audit.
- Regularly scheduled review of decisions made during Documentation Review and/or Annual Renewal, where the Performance Improvement Assistance Plan identifies the Criteria and frequency of review.
- More frequent EPEAT Audits of CABs, where the Performance Improvement Assistance Plan identifies the frequency of audits and the topics that will be reviewed.
- Regularly scheduled reviews of CAB performance metrics, where the Performance Improvement Assistance Plan identifies the frequency of reviews.

- Additional training sessions and/or one-on-one meetings between GEC and the CAB, where the Performance Improvement Assistance Plan identifies the frequency of training sessions and/or meetings.
- Requiring additional Qualified Auditors to attend Calibration meetings, where the Performance Improvement Assistance Plan identifies how many or which team members must attend.
- Reinstating CAB Mentored Work Phase (as per Section 3.5).
    - The Performance Improvement Assistance Plan will identify the Criteria for which the CAB's decisions in a product category must be reviewed by the EPEAT Program. This may include up to 100% of Required Criteria and/or 50% of Optional Criteria. All other requirements of CAB Mentored Work Phase, as per Section 3.5, shall apply.
    - The Performance Improvement Assistance Plan will identify how review of conformity decisions for new or existing Participating Manufacturers will occur. This could include review of decisions made during Initial Documentation Review and/or Ongoing Documentation Review and recommendations made during Continuous Monitoring activities.
    - If the CAB is not actively engaging with new Participating Manufacturers or completing Ongoing Documentation Review, the Performance Improvement Assistance Plan will include action items and deadlines that address this. This may result in an increased assessment of Documentation Review and Annual Renewal decisions during the EPEAT Audit of CAB.

GEC is not required to develop a Performance Improvement Assistance Plan for a CAB. There may be situations where a CAB is immediately suspended without completing a Performance Improvement Assistance Plan, including but not limited to~~:~~ providing consulting-like advice or services that impacts its ability to remain impartial in EPEAT-related activities; providing unfair advantage to one or more Participating Manufacturer clients; or undertaking other actions that put the integrity and credibility of the EPEAT Program at risk.

5.6.2 Suspension and Termination

As per the *EPEAT Policy Manual (P65)*, GEC, at its sole discretion, may suspend or terminate a GEC-approved CAB and any decision to do so shall be considered final. Grounds for suspension or termination as identified in *EPEAT Policy Manual (P65)* are as follows:

- Nonconformances 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.
- Failure to conform with the requirements identified in the *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. (See Section 7.2.1 for actions the EPEAT Program takes in such scenarios.)
- 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 Manufacturer clients.

5.6.2.1 Suspension

If a CAB meets one or more of the grounds for suspension or termination identified in Section 5.6.2, GEC may suspend the CAB. GEC notifies the CAB in writing of the reasons for suspension, the suspension period, and the actions that must be completed during the suspension period. The maximum period of suspension is six months. CABs that are suspended may continue to provide EPEAT-related conformity assurance services to their existing Participating Manufacturer clients during the suspension period~~,~~ but may not accept new Participating Manufacturer clients.

During the suspension period, a CAB must complete all actions identified by GEC and implement corrective action plans to prevent reoccurrence of the underlying issues in the future. Failure to complete the actions and/or implement corrective action plans will result in GEC terminating the CAB.

If a GEC-approved CAB's accreditation to ISO/IEC 17020 or ISO/IEC 17065 is suspended or withdrawn, or the CAB is unable to provide a valid accreditation certificate, GEC will automatically suspend the CAB. The CAB must present GEC with a plan and timeline describing how the ISO/IEC 17020 or ISO/IEC 17065 suspension will be lifted or how it will regain accreditation. If a CAB's ISO/IEC 17020 or ISO/IEC 17065 accreditation is withdrawn, it must become reaccredited within six months of the date of withdrawal. Failure to regain complete ISO/IEC 17020 or ISO/IEC 17065 accreditation within six months will result GEC terminating the CAB.

5.6.2.2 Termination

Termination is cancellation of the agreement between GEC and the CAB and bars the CAB from providing EPEAT conformity assurance services for a minimum of one year. GEC notifies the CAB of GEC's intent to terminate in writing and within the timeframe identified in *GEC Conformity Assurance Body Agreement (P33)*.

On the termination date, GEC informs the CAB's Participating Manufacturer clients of the termination. *GEC Conformity Assurance Body Agreement (P33)* requires that CABs transfer their Participating Manufacturer clients to a different GEC-approved CAB in the event of termination. GEC shall support this orderly transition.

Affected Participating Manufacturers are given 12 months from the time of notification to engage a new GEC-approved CAB and complete the necessary Initial Documentation Review requirements for changing CABs (see Section 8.0). During this 12-month period, the Participating Manufacturers' products will remain on the EPEAT Registry. If the Initial Documentation Review requirements for changing CABs are not completed in the 12-month period and in accordance with Section 8.0, the new CAB must archive the affected products until the Review process is completed. All other requirements for changing CABs (including review of Optional Criteria) must also be met.

If, at the time of notification, affected Participating Manufacturers are engaged in ongoing Continuous Monitoring Investigations, the EPEAT Program will cancel these Investigations. Once affected Participating Manufacturers have engaged a new CAB, the EPEAT Program may assign Investigations even during the required Initial Documentation Review process.

5.7 Administration of Participating Manufacturer Clients

GEC-approved CABs are required to inform the EPEAT Program when an existing Participating Manufacturer indicates that it will not be renewing its contract for EPEAT-related conformity assurance services. CABs are required to inform the EPEAT Program within five business days of receiving such a notice to enable the EPEAT Program to adjust any Continuous Monitoring Investigations currently underway or planned.

6.0 Documentation Review

6.1 General Requirements

6.1.1 Overview

Documentation Review is the process used by a GEC-approved CAB 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 it demonstrates conformance with the Criteria – see Section 6.1.4) and by assessing competence (i.e., assess if the Participating Manufacturer understands the requirements of the Criteria and can provide acceptable evidence – see Section 6.1.5). Documentation Review is the CAB's opportunity to ensure that they and their clients share a common understanding of the requirements, the Conformity Assurance process, and what evidence is needed to demonstrate conformance on an ongoing basis

Documentation Review activities fall into two categories:

- Initial Documentation Review: This is the review conducted 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.
- Ongoing Documentation Review: This includes all other Documentation Review activities that occur 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.

Documentation Review is required for both the Priority Verification Pathway and the Certification Pathway. Where applicable, differences between these pathways are identified throughout Section 6.

Only Qualified Auditors can conduct Documentation Review activities, assess Participating Manufacturer competence against Criteria, and remove Documentation Review Requirements for Criteria.

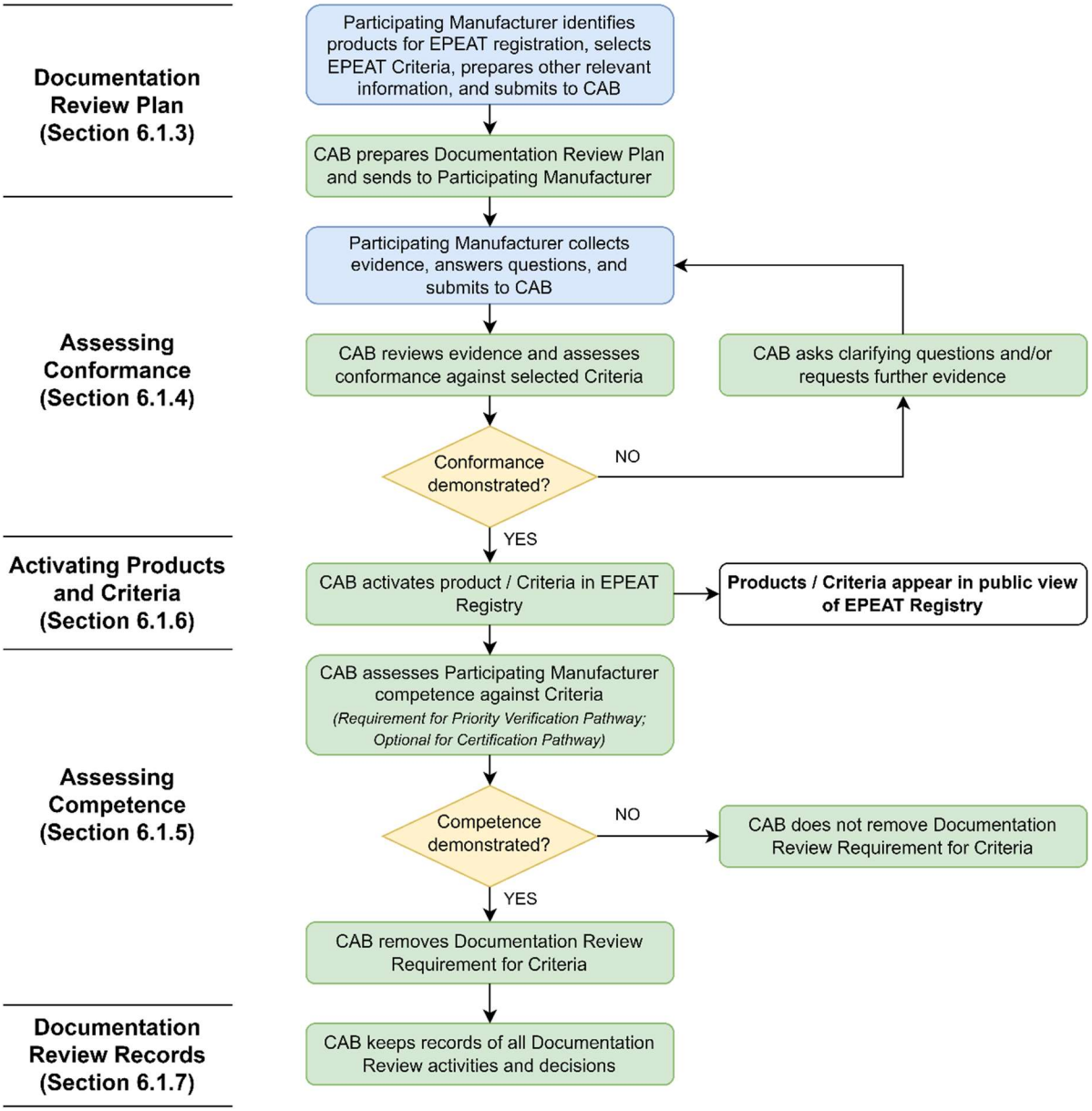
During the Documentation Review process, a Participating Manufacturer is expected to cooperate with its GEC-approved CAB and facilitate the Documentation Review process. This includes:

- Understanding EPEAT Criteria and any supplementary information as necessary (e.g., external materials referenced in the Criteria, Clarifications, and/or Conformity Guidance Materials).
- Compiling documentation and submitting it to the GEC-approved CAB in an organized and timely manner.
- Responding to questions raised by the GEC-approved CAB.
- Maintaining sufficient records to prepare for Continuous Monitoring activities.

Throughout the remainder of Section 6, the use of the term "CAB" shall imply a GEC-approved CAB.

6.1.2 Documentation Review Process

During both Initial Documentation Review and Ongoing Documentation Review, a series of steps are followed by Participating Manufacturers and CABs, as identified in the diagram below.



6.1.3 Documentation Review Plan

For both Initial Documentation Review and Ongoing Documentation Review, CABs must develop a Documentation Review Plan that identifies the products and EPEAT Criteria that will be reviewed and reflects the conformity assurance pathway selected by the Participating Manufacturer. CABs must share the Documentation Review plan with Participating Manufacturers at the beginning of the Documentation Review process.

To enable CABs to develop Documentation Review Plans and sample products or choose representative products, Participating Manufacturers must provide their CABs with a list of products they wish to register, the EPEAT Criteria selected for those products and where applicable, additional information to facilitate the product selection and sampling process (e.g., details regarding product configurations, components, bills of material, packaging, manufacturing processes and supply chains).

Section 6.2.1 provides additional guidance on product selection and sampling for Initial Documentation Review; however, this guidance may also be used for Ongoing Documentation Review.

6.1.4 Assessing Conformance

When assessing conformance, CABs must evaluate evidence submitted by Participating Manufacturers and make determinations of conformance with EPEAT Criteria using the guidance provided in this Section (6.1.4) and keep appropriate records as identified in Section 6.1.7. Typically, the evaluation process is iterative, and CABs may request additional evidence from Participating Manufacturers. Participating Manufacturers may also demonstrate nonconformance to a Criterion and need to make appropriate changes to come into conformance. CABs must maintain a record of how the nonconformance was communicated, what new evidence was provided and how the evidence demonstrated conformance. Some nonconformances may result in denying product registration for select or all products.

6.1.4.1 Criteria for Different Locations of Use (Countries)

Participating Manufacturers designate their EPEAT-registered products as available for use by purchasers in specific countries. Some EPEAT Criteria may be selected differently for individual locations of use (countries). Evidence provided for these Criteria must demonstrate that the Participating Manufacturer and their products are conformant in the identified locations of use (countries). Depending on the Pathway chosen, Participating Manufacturers must either demonstrate conformance for all identified locations of use (Certification Pathway) or for an appropriate sample of identified locations of use (Priority Verification Pathway).

Section 6.2.1 provides additional guidance on sampling for Initial Documentation Review; however, this guidance may also be used for Ongoing Documentation Review.

~~6.1.4.2 Priority Criteria~~

~~When a new product category is launched or revised, the EPEAT Program identifies "Priority Criteria". Priority Criteria are the minimum EPEAT Criteria selected by the Participating Manufacturer that must be reviewed by the CAB before allowing a Participating Manufacturer's first products in a product~~

~~category to become EPEAT-registered. For each product category, Priority Criteria are all Required Criteria in the category and those Optional Criteria in the category that the EPEAT Program has identified as being more difficult to demonstrate conformance with. The list of Priority Criteria for each product category is available to Participating Manufacturers and CABs on the EPEAT Registry and to other stakeholders upon request.~~

~~6.1.4.3~~6.1.4.2 Types of Evidence and Ensuring Integrity of Evidence

When assessing conformance to EPEAT Criteria, CABs must use the following normative requirements and guidance to inform their decisions:

- Specific language used in EPEAT Criteria (normative).
- Published Clarifications (normative).
- Published EPEAT Conformity Guidance Materials (guidance).

Participating Manufacturers may provide various forms of evidence to demonstrate conformance with EPEAT Criteria including but not limited to accreditation certificates, evaluation reports from laboratories, process or procedural documents, descriptions or lists of product components and materials, supplier letters, corporate reports, product manuals and other information produced internally. Acceptable forms of evidence may be stipulated in certain EPEAT Criteria.

When accepting evidence from a Participating Manufacturer as part of the Documentation Review process, CABs must first verify the integrity of the information before it can be relied upon to make conformity decisions. CABs are required to use their professional judgement in assessing the integrity of information and must specifically consider the following:

- Information supplied by other parties must meet the requirements stipulated in the relevant EPEAT Criterion.
- Information provided should be clearly dated and dates should be consistent with the Criteria requirements.
- If information supplied by other parties includes a determination or evaluation, the individual making the determination or evaluation must be clearly identified along with an indication of their authority for making the evaluation/determination.
- Information such as test data or reports produced by a laboratory accredited to ISO/IEC 17025 by an ILAC member accreditation body may be considered as accurate, on the basis of the laboratory's accreditation. Similarly, certificates or reports produced by bodies such as certification bodies or inspection bodies that are accredited to a relevant ISO conformity assessment standard by an ILAC or IAF member accreditation body may also be considered as accurate. Some EPEAT Criteria require certification bodies to be accredited by an ILAC or IAF member body.
- All laboratory reports, including those from internal laboratories and accredited third-party laboratories must contain the following information: laboratory name and location; date of

testing; identification of product, component or material evaluated; test method(s) used and if applicable, detection limits; evaluation results; sign off from an appropriate party at the laboratory; and if applicable, identification of relevant laboratory accreditations.

- Some EPEAT Criteria allow Participating Manufacturers to submit supplier letters or manufacturer declarations as evidence – these are called "declarations of conformity". *Participating Manufacturers must ensure any declaration of conformity is structured such that it aligns with the requirements of ISO/IEC 17050-1 Conformity assessment – Supplier's declaration of conformity- Part 1: General Requirements and that any supporting documentation from the issuer to substantiate a declaration of conformity aligns with the requirements described in ISO/IEC 17050-2 Conformity assessment – Supplier's declaration of conformity- Part 2: Supporting documentation* and CABs must ensure that all declarations of conformity contain the information identified below[10].
    - A unique identifier for the declaration of conformity (a specific way to uniquely identify the declaration itself).
    - The name and contact address of the organization issuing the declaration.
    - The identification of the object of the declaration of conformity (e.g., name, type, date of production or model number of a product, component, or material).
    - The statement of conformity (e.g., "As delivered, the object of the declaration described above is in conformity with X requirements or documents").
    - A complete and clear list of standards or other specified requirements, as well as the selected options, if any.
    - The date and place of issue of the declaration of conformity.
    - The signature (or equivalent sign of validation), name and function of authorized person(s) acting on behalf of the organization issuing the declaration.
    - Any limitation on the validity of the declaration of conformity.
- Some EPEAT Criteria specify acceptable test methods or standards that must be used to demonstrate conformance, while others state that an equivalent may be used.

[10] This requirement only applies to new declarations of conformity submitted to demonstrate conformance with the revised Criteria from the Sustainability Impact Module criteria development process. This requirement takes effect starting February 15, 2023. Participating Manufacturers are not required to revise existing declarations of conformity that are already in use for existing Criteria.

The EPEAT Program will provide declaration of conformity templates in the Registry for each revised Criterion that allows for such declarations. Participating Manufacturers are not required to use the templates, however if the provided template is not used, the content of the declaration must capture all the same details as those covered in the template

- If a Criterion does not allow the use of an equivalent, CABs must inform EPEAT of its or its Participating Manufacturer client's request to use an alternative and the EPEAT Program makes the final decision.
- If a Criterion allows for the use of an equivalent, CABs may use their expertise and professional judgment to accept alternative test methods or standards. The EPEAT Program requests that CABs inform EPEAT of the alternative so that EPEAT can update Conformity Guidance Materials.

6.1.5 Assessing Competence

When assessing competence, CABs also use professional judgement to evaluate Participating Manufacturers' understanding of EPEAT Criteria and their ability to demonstrate conformance on an ongoing basis (referred to as "competence"). Assessing Participating Manufacturer competence with EPEAT Criteria is required for the Priority Verification Pathway. Participating Manufacturers that select the Certification Pathway are not required to demonstrate competence with EPEAT Criteria; however, CABs may still track this information should the Participating Manufacturer want to switch to the Priority Verification Pathway.

When a Participating Manufacturer demonstrates competence for a Criterion, the CAB may remove the requirement for further Documentation Review for that Criterion. The decisions made by CABs for Participating Manufacturer conformance and Participating Manufacturer competence are separate and may be made at different points in time.

Competence is evaluated on a Criterion-by-Criterion basis. If a Participating Manufacturer demonstrates competence and an understanding of the Criterion and the required evidence to show conformance, the CAB may remove the requirement for further Documentation Review for that Criterion. CABs must keep appropriate records of the evaluation and decision, as per Section 6.1.7.

To demonstrate competence, Participating Manufacturers are expected to identify relevant sections of documentation submissions to their CAB and explain why or how the evidence meets individual Criterion requirements.

In addition to the guidance provided above, positive indicators of Participating Manufacturer competence include:

- Providing the correct form of accurate evidence with minimal guidance from the CAB.
- Clearly indicating how the evidence demonstrates conformance (e.g., by directing the CAB to specific pages in a manual or indicating within a test report where the relevant test results can be found).
- For EPEAT Criteria that include multiple elements, indicating how the evidence demonstrates conformance with each specific element.
- Applying the appropriate normative references.

Indicators that the competence threshold is not being met include:

- Showing a continued inability to provide relevant and adequate evidence and/or documentation.
- Needing to update evidence and documentation to address Criterion elements.
- Not providing evidence to support conformance to all elements of a Criterion.
- Providing large amounts of evidence without indicating how the evidence demonstrates conformance or providing evidence that clearly demonstrates non-conformance (e.g., test report that shows non-conformant levels).
- Providing the wrong type of evidence (e.g., CAB requests a test report for specific substances and Participating Manufacturer provides a test report that does not include the requested information).
- Consistently not applying appropriate normative references.

The length of time it takes to review a Criterion alone is not a sole indicator that competence has not been demonstrated. In these situations, the CAB may use professional judgment to assess whether the Participating Manufacturer understands the Criterion and whether the Participating Manufacturer will have difficulties demonstrating conformance for other products or demonstrating conformance for the Criterion in the future Continuous Monitoring activities.

It may be necessary for the CAB to review the same EPEAT Criterion for multiple products or across multiple locations of use (countries) before they are confident in the Participating Manufacturer's competence to provide evidence of conformance.

6.1.6 Activating Products and Criteria

CABs allow product(s) and the EPEAT Criteria selected for the product(s) to appear in the EPEAT Registry by using the Registry software to "activate" the product(s) and Criteria. GEC may perform a data quality review of Criteria selections to ensure they are appropriate for the product type before the activation is approved.

6.1.7 Documentation Review Records

CABs must keep all records related to Documentation Review including Documentation Review plans, evidence provided by the Participating Manufacturer, the rationale for accepting evidence and determining conformance, and the rationale for decision to remove the requirement for Documentation Review for one or more EPEAT Criteria because the Participating Manufacturer demonstrated competence against the Criteria.

In some cases, CABs may determine that Documentation Review is not necessary [such as in cases where the conformity assurance needs are similar for multiple locations of use (countries)]. In these instances, CABs must also maintain records documenting where and why Documentation Review was specifically not performed.

The CAB must maintain their own internal list of all products that used the Certification Pathway for Initial Documentation Review, in order to perform the required Continuous Monitoring activities (Annual Renewal).

6.2 Initial Documentation Review

6.2.1 Documentation Review Plan, Product Selection and Sampling

During Initial Documentation Review, CABs must develop a Documentation Review Plan as per Section 6.1.3 and share this Plan with the Participating Manufacturer.

Participating Manufacturers must first provide their CAB with an initial list of products they wish to register in the product category and the EPEAT Criteria selected for each product. Participating Manufacturers must also provide further details to facilitate the CAB's product selection and sampling process for Initial Documentation Review (e.g., details regarding product configurations, components, bills of material, packaging, manufacturing processes and supply chains).

A Participating Manufacturer may choose to add additional products to the initial list at a later stage in the Initial Documentation Review process. In such cases, there may be additional product activation and Documentation Review requirements (see Section 6.2.4).

The table below identifies the product selection and sampling processes CABs must use for the Priority Verification and Certification Pathways.

Product Selection and Sampling: Priority Verification Pathway	Product Selection and Sampling: Certification Pathway
Allows for the use of a product sampling technique to review all Criteria across all products. Sampling may also be applied across all selected locations of use (countries). Where a Participating Manufacturer submits more than one product during Initial Documentation Review, assessing conformance may be spread across several products. In these cases, the CAB should sample several products from the initial list of products, based on product types and characteristics, and review different EPEAT Criteria for each product. The CAB must identify the sampling process used in its Documentation Review Procedures. The CAB must document the product selection and sampling decisions made.	Allows for the use of product families or groups of products with similar characteristics, which do not affect how or if the products conform with all selected EPEAT Criteria. Allows information from one product to be used to represent other products from the same family or group, instead of evaluating each product individually. Where a Participating Manufacturer submits more than one product during Initial Documentation Review, assessing conformance may be spread across several representative products. The CAB must have a documented procedure for assessing a family or group of products, which identifies what information must be evaluated to determine similarity of product characteristics and outlines guidelines for selecting representative product(s). The CAB must document the product selection and sampling decisions made.

6.2.2 Assessing Conformance

During Initial Documentation Review, a Participating Manufacturer must demonstrate conformance with all selected Criteria for the sampled products (Priority Verification Pathway) or representative products (Certification Pathway) from the initial list of products included in the Initial Documentation Review Plan before any of the products on the list can become EPEAT-registered. For the Priority Verification Pathway, conformance must be demonstrated for a sampling of locations of use (countries), and for the Certification Pathway, conformance must be demonstrated for all locations of use (countries) included in the Initial Documentation Review Plan. CABs must follow the guidance provided in Section 6.1.4 when assessing conformance.

~~During Initial Documentation Review, a Participating Manufacturer must demonstrate conformance with, at minimum, all Priority Criteria (both Required and Optional Priority Criteria) selected for the initial list of products included in the Initial Documentation Review Plan before any of the products in the initial list can become EPEAT-registered. CABs must follow the guidance provided in Section 6.1.4 when assessing conformance.~~

~~For the Priority Verification Pathway, CABs may review Non-Priority Optional Criteria during Initial Documentation Review or as part of Ongoing Documentation Review as specified in Section 6.3.1. However, CABs and Participating Manufacturers may choose to review all selected Criteria (both Priority and Non-Priority) during Initial Documentation Review before any products become EPEAT-registered in a product category.~~

~~For the Certification Pathway, during Initial Documentation Review, the Participating Manufacturer must show conformance for all representative products, all selected Criteria (Priority and Non-Priority) and locations of use (countries) included in the Initial Documentation Review Plan before the representative products can become EPEAT-registered in the product category.~~

6.2.3 Assessing Competence

During Initial Documentation Review, CABs use professional judgement and follow the guidance provided in Section 6.1.5 to assess Participating Manufacturers' competence (Participating Manufacturers' understanding of EPEAT Criteria and their ability to demonstrate conformance on an ongoing basis). If a Participating Manufacturer demonstrates competence for a Criterion, the CAB may remove the requirement for further Documentation Review for that Criterion.

During Initial Documentation Review, assessing Participating Manufacturer competence with EPEAT Criteria is required for the Priority Verification Pathway. Participating Manufacturers that select the Certification Pathway are not required to demonstrate competence with EPEAT Criteria during Initial Documentation Review; however, CABs may still track this information should the Participating Manufacturer want to switch to the Priority Verification Pathway.

6.2.4 Activating Products

Activation of products after Initial Documentation Review should only occur for those products included in the initial list of products identified by the Participating Manufacturer and included in the Initial

Documentation Review Plan. The Participating Manufacturer must have demonstrated conformance with all Criteria selected and locations of use (countries) based on the pathway chosen. ~~At a minimum, the Participating Manufacturer must have demonstrated conformance with all Priority Criteria they have selected for the Priority Verification Pathway, or all Criteria and locations of use (countries) selected for the Certification Pathway.~~

For the Priority Verification Pathway:

- If a Participating Manufacturer chooses to add additional products to the initial list at a later stage in the Initial Documentation Review process, CABs may activate those products only if the Participating Manufacturer has also demonstrated competence for all ~~Priority~~ Criteria selected for the additional products. The Participating Manufacturer is required to confirm via electronic means (in the EPEAT Registry), that any new product they wish to add to the Registry is similar to and does not have substantive differences with another product (of the same product type) that is currently in the Initial Documentation Review process.

- If a Participating Manufacturer chooses to add additional products to the initial list at a late stage in the Initial Documentation Review process and ~~If~~ the Participating Manufacturer has not demonstrated competence for one or more ~~Priority~~ Criteria they have selected, CABs must sample the additional products as per the requirements in Section 6.2.1 and, at minimum, review at least one of the additional products to assess conformance for those Criteria.

- A Participating Manufacturer may choose to select additional Optional Criteria at a later stage in- the Initial Documentation Review process. The Participating manufacturer must demonstrate conformance with the additional Criteria before the initial list of products can be activated with the additional Criteria selected. If conformance has not been demonstrated, the Criteria must be unselected before the CAB can activate the initial list of products.

  - ~~If these are Priority Criteria, the Participating Manufacturer must demonstrate conformance with the additional Criteria before the initial list of products can be activated with the additional Criteria selected. If conformance has not been demonstrated, the Criteria must be unselected before the CAB can activate the initial list of products.~~

    ~~If these are Non-Priority Optional Criteria, the CAB may activate the initial list of products with the additional Criteria selected; however, the Participating Manufacturer must demonstrate conformance with the additional Criteria during Ongoing Documentation review as per the requirements in Section 6.3.1.~~

- For the Certification Pathway:

  - If a Participating Manufacturer chooses to add additional products or an additional product group/family to the initial list at a later stage in the Initial Documentation Review process, CABs may activate those products only if (1) the additional products are determined to be included in the family or group of products and covered by the representative model(s) chosen, or (2) if the Participating Manufacturer has demonstrated conformance with all selected Criteria and locations of use (countries) for the additional products or product group/family.

- A Participating Manufacturer may choose to select additional Optional Criteria at a later stage in the Initial Documentation Review process. The CAB may activate the initial list of products with the additional Criteria selected only if the Participating Manufacturer has demonstrated conformance with those Criteria. If conformance has not been demonstrated, the Criteria must be unselected before the CAB can activate the initial list of products.

The table below summarizes the process by which CABs perform initial product activation for both the Certification and Priority Verification Pathways.

Initial Product Activation: Priority Verification Pathway	Initial Product Activation: Certification Pathway
The CAB may activate the initial list of products to appear in the EPEAT Registry after Initial Documentation Review of all ~~Priority~~ Criteria selected by the Participating Manufacturer is complete. The Initial Documentation Review must show conformance with all ~~Priority~~ Criteria selected. Additional products added to this list may only be activated if the Participating Manufacturer demonstrated competence for all ~~Priority~~ Criteria selected for the additional products. Results of the Initial Documentation Review are valid until the EPEAT Program implements the Criteria resulting from a Full Product Category Revision, after which time the Participating Manufacturer must undergo the Initial Documentation Review process again. (Any Minor Criteria Revisions or Major Criteria Revisions must be addressed during Ongoing Documentation Review.) ~~The initial products may appear in the EPEAT Registry while the Participating Manufacturer completes Ongoing Documentation Review for all non-Priority Criteria selected. The Participating Manufacturer has 12 months to complete this process as per Section 6.3.1. If not completed within this timeframe, the CAB archives all the Participating Manufacturer's products or unselects the non-Priority criteria.~~	The CAB may activate products to appear in the EPEAT Registry after Initial Documentation Review for all selected Criteria across all products (or product groups) and all identified locations of use (countries) is complete. The Initial Documentation Review must show conformance with all selected Criteria. Additional products can be added to this list if they are covered by the representative model(s) chosen or if all Criteria and locations of use (countries) are reviewed for additional product groups/families identified. Participating Manufacturers can modify their EPEAT Criteria selections only with approval from the CAB. Any addition of new Optional Criteria requires the CAB to perform Initial Documentation Review of the Criteria. Results of the Initial Documentation Review are valid for three years, after which time the Participating Manufacturer must undergo the Initial Documentation Review process again. (Any Minor Criteria Revisions or Major Criteria Revisions must be addressed during Ongoing Documentation Review.)

6.3 Ongoing Documentation Review

Whenever Participating Manufacturers are required to complete Ongoing Documentation Review, CABs and Participating Manufacturers must follow the guidance provided in Section 6.1. CABs should also use professional judgement and the sampling guidance provided in Section 6.2.1 when performing Ongoing Documentation Review.

Ongoing Documentation Review takes place in several instances, including, but not limited to the scenarios outlined below.

~~6.3.1 Initial Documentation Review Non-Priority Optional Criteria~~

~~A Participating Manufacturer must complete the review of all remaining non-Priority Criteria from Initial Documentation Review if they are using the Priority Verification Pathway.~~

~~After the initial list of products from Initial Documentation Review are activated in the EPEAT Registry for a product category, the Participating Manufacturer has 12 months from the date of this initial activation to complete Ongoing Documentation Review for all selected non-Priority Criteria that were not reviewed as part of Initial Documentation Review. CABs must track the 12-month deadline for all Participating Manufacturers completing this type of Ongoing Documentation Review.~~

~~If Ongoing Documentation Review of non-Priority Criteria is not completed within the 12-month period, the Participating Manufacturer must either unselect these Criteria or archive the products that have selected these Criteria. The CAB is responsible for performing these actions if they are not completed by the Participating Manufacturer. =~~

~~During this 12-month period, Participating Manufacturers may choose to select new Optional Criteria and/or add new products to the EPEAT Registry. Sections 6.3.1.1 and 6.3.1.2 below identify the required Ongoing Documentation Review requirements for these specific situations.~~

~~6.3.1.1 Adding New Products During 12-month Period~~

~~During the 12-month period from initial product activation in a product category (as identified above), the Participating Manufacturer may choose to add new products to the EPEAT Registry. CABs may immediately activate these products only if the Participating Manufacturer has demonstrated competence for all Priority Criteria selected for the new products. If competence has not been demonstrated for one or more Priority Criteria, the Participating Manufacturer must demonstrate conformance to these Criteria for the new products before they can be activated.~~

~~Additionally, if the Participating Manufacturer has also selected new Non-Priority Optional Criteria for the new products, the process in 6.3.1.2 must be followed.~~

~~6.3.1.2 Selecting New Non-Priority Optional Criteria During 12-month Period~~

~~During the 12-month period from initial product activation in a product category (as identified above), Participating Manufacturers may choose to select new non-Priority Optional Criteria. CABs may immediately activate these Criteria for EPEAT-registered products; however, Participating Manufacturers must demonstrate conformance with these Criteria and complete the Ongoing Documentation Review process before the 12-month deadline. If not completed in this timeframe, the Participating Manufacturer must either unselect these Criteria or archive the products that have selected these Criteria. The CAB is responsible for performing these actions if they are not completed by the Participating Manufacturer.~~

~~Additionally, if the Participating Manufacturer has also selected new Non-Priority Optional Criteria for the new products, the process in 6.3.1.1 must be followed.~~

Documentation Review

~~6.3.2~~6.3.1 New Products

A Participating Manufacturer wants a new product(s) to become EPEAT-registered.

- Under the Priority Verification Pathway ~~(and if not in the 12-month period from initial product activation in a product category as described in Section 6.3.1)~~:
    - If a Participating Manufacturer has not demonstrated competence for a Required Criterion, Ongoing Documentation Review of that Criterion must be completed before the new product(s) can become EPEAT-registered.
    - If a Participating Manufacturer has not demonstrated competence for an Optional Criterion selected for the new product(s), Ongoing Documentation Review of that Criterion must be completed before the new product(s) can become EPEAT-registered. The Participating Manufacturer can choose to unselect that Criterion in order to have the new product(s) activated.
    - If a Participating Manufacturer has demonstrated competence and completed Documentation Review for the selected criteria, they are required to confirm via electronic means (in the EPEAT Registry), that any new product added to the Registry is similar to and does not have substantive differences with another product (of the same product type) that is currently registered.
    - If a Participating Manufacturer has demonstrated conformance but not demonstrated competence for a Corporate Criterion (either Required or Optional), Ongoing Documentation Review of that Criterion must be completed before the new product(s) can become EPEAT-registered. If the Corporate Criterion has annual performance, reporting or other disclosure requirements, the Participating Manufacturer and/or CAB may develop an alternative way for the Participating Manufacturer to demonstrate they understand the Criterion before the next annual reporting cycle and must have this approved by the EPEAT Program. The CAB may also request that the EPEAT Program works with the CAB and Participating Manufacturer to find an acceptable method to demonstrate competence.
- Under the Certification Pathway: The CAB may conduct an assessment to determine if the new products have similar characteristics (which do not affect how or if the products conform with all selected EPEAT Criteria) to those assessed in the Initial Documentation Review process. If the assessment reveals the new products have similar characteristics, the Initial Documentation Review results may be used for the new products. If the new products cannot be grouped with existing EPEAT-registered products due to dissimilar characteristics, Ongoing Documentation Review must be conducted for the new products before they can be activated.

~~6.3.3~~6.3.2 New Optional Criterion

A Participating Manufacturer wants to select a new Optional Criterion for EPEAT-registered products.

- Under the Priority Verification Pathway ~~(and if not in the 12-month period described in Section 6.3.1)~~: A Participating Manufacturer must demonstrate conformance and complete Ongoing

Documentation Review of any new Optional Criterion before that Criterion can be added to EPEAT-registered products. During this process, the Participating Manufacturer may also demonstrate competence to the new Optional Criterion. When the Participating Manufacturer has demonstrated competence, the new Optional Criterion may be selected for any new products added in the future without further review. If the Participating Manufacturer did not demonstrate competence, then the Optional Criterion must be reviewed again for any new products added in the future that are selecting the Optional Criterion.

- Under the Certification Pathway: A Participating Manufacturer must complete Ongoing Documentation Review of any new Optional Criteria before those Criteria can be added to EPEAT-registered products.

~~6.3.4~~6.3.3 New Location of Use (Country)

A Participating Manufacturer wants to identify an additional location of use (country) for an EPEAT-registered product.

- Under the Priority Verification Pathway: If the Participating Manufacturer has not demonstrated competence for a Criterion that may be selected differently for different locations of use (countries), Ongoing Documentation Review must be completed for the new location of use (country) before the Criterion can be added to EPEAT-registered products in that new location of use (country).
- Under the Certification Pathway: The Participating Manufacturer must complete Ongoing Documentation Review for the new location of use (country) and associated EPEAT Criteria before the Criterion can be added to EPEAT-registered products.

~~6.3.5~~6.3.4 Loss of Confidence in Participating Manufacturer Competence

A CAB may lose confidence in a Participating Manufacturer's ability to demonstrate conformance with one or more EPEAT Criteria (typically because of a nonconformance finding from Continuous Monitoring activities or a nonconformance identified outside of Continuous Monitoring) and may reinstate the Documentation Review requirement for those Criteria. In these cases, Participating Manufacturers must complete Ongoing Documentation Review again for those Criteria for any new products.

~~6.3.6~~6.3.5 EPEAT Criteria Revisions

When the EPEAT Program releases revisions to EPEAT Criteria, Participating Manufacturers can continue to register their products to the pre-revision version of the EPEAT Criteria until the time the revised Criteria are implemented by the EPEAT Program. Table 3 below identifies Ongoing Documentation Review requirements for EPEAT Criteria revisions.

Table 3: Documentation Review Requirements for EPEAT Criteria Revisions

Type of Revision	Overview of Revision	Implementation and Documentation Review
Minor Criteria Revisions	• The scope of this revision is limited to corrections, changes, and updates to text to further clarify existing requirements. • The revisions are typically editorial changes with no obvious significant reduction of points for EPEAT-registered products. • The estimated timeframe for implementation is one to two months after publication of the revisions.	The EPEAT Program provides a timeline for implementation of the revisions and the deadline for when Participating Manufacturers must come into conformance with the revisions. Participating Manufacturers must complete any required Documentation Review activities before the identified deadline. If these activities are not completed by the deadline, Participating Manufacturers must unselect Criteria or archive products that are no longer conformant. If these actions are not taken by Participating Manufacturers, the CABs must then take these actions. This applies to both the Priority Verification and Certification Pathways. Participating Manufacturers are responsible for reviewing applicable changes to Criteria and ensuring continued conformance with selected Criteria and unselecting Criteria or archiving products that are no longer conformant. Participating Manufacturers may be required to submit documentation to CABs for review to demonstrate conformance to Criterion changes. Priority Verification Pathway: • CABs are responsible for completing Ongoing Documentation Review activities for Participating Manufacturer clients before the date specified by EPEAT. Certification Pathway: • As part of Continuous Monitoring and Annual Renewal activities (see Section 7.3), CABs are responsible for assessing the impacts of Minor and Major Criteria Revisions on Participating Manufacturer clients. If the Participating Manufacturer's Annual Renewal date occurs before the deadline to implement minor and major criteria revisions, the Annual Renewal process can be used to address the revisions. • Where applicable, CABs obtain and review new evidence from Participating Manufacturers to ensure ongoing conformance with the revisions.
Major Criteria Revisions	• In addition to the revisions categorized as Minor Criteria Revisions, the scope of this revision is limited to new Criteria identified to address gaps in sustainability impact areas, and revisions requested by stakeholders. • These revisions could result in a loss of points and/or a change in EPEAT tier (EPEAT Bronze, EPEAT Silver, EPEAT Gold) for EPEAT-registered products. • The estimated timeframe for implementation is four to six months after publication of the revisions.	

Table 3: Documentation Review Requirements for EPEAT Criteria Revisions

Type of Revision	Overview of Revision	Implementation and Documentation Review
Full Product Category Revisions	• All Criteria are open to modification and revision. • The revisions could result in potential and significant reduction of EPEAT-registered product availability. • The estimated timeframe for implementation is nine to eighteen months after publication of Criteria.	Priority Verification and Certification Pathways: • The EPEAT Program provides a timeline for when the revisions will be implemented, when Participating Manufacturers must come into conformance with the revisions and when Continuous Monitoring Activities will begin. • Participating Manufacturers must work with their CABs to complete Initial Documentation Review, as per Sections 6.1 and 6.2, for the revisions by the date specified by the EPEAT Program. • Previous Initial Documentation Review results will no longer be valid after this date. • All products that have not completed the Initial Documentation Review process for the Criteria revisions will be removed (archived).

6.4 Rebranding of EPEAT-Registered Products

Situations may arise where one Participating Manufacturer wants to rebrand another Participating Manufacturer's product that is already an active EPEAT-registered product and have it registered under its own brand, without changing from their current GEC-approved CAB. The Original Participating Manufacturer (the one that originally registered the product) has already demonstrated that the product meets EPEAT Criteria, and both Participating Manufacturers are demonstrating ongoing conformance with Criteria that address corporate activities.

The EPEAT Program allows for this to happen through an amended Documentation Review process described in Table 4 below. Each Participating Manufacturer is responsible for specific conformity assurance activities and may use their own CAB to implement them, which may result in a different CAB being used by each Participating Manufacturer. If during this process, the Rebranding Participating Manufacturer (the one that wants to rebrand an already EPEAT-registered product as its own brand) also wishes to change to a different CAB, it must instead follow the requirements in Section 8. Transfer of confidential information between GEC-approved CABs or Participating Manufacturers is not required and the EPEAT Program will not identify products as being "rebranded" on the EPEAT Registry.

Table 4: Responsibilities During Rebranding of EPEAT-Registered Products

Topic	Original Participating Manufacturer Responsibilities *(Manufactures the product and originally obtained EPEAT registration)*	Rebranding Participating Manufacturer Responsibilities *(Does not manufacture the product and is rebranding the EPEAT-registered product under its own brand)*
Rebranding agreement	The parties have a formal agreement in place that identifies the products that will be rebranded and stipulates fulfillment of the conformity assurance activities identified below. Specifically, this must include the Original Participating Manufacturer: • Taking responsibility for Continuous Monitoring Investigations assigned to the Rebranding Participating Manufacturer for product Criteria that do not have disclosure requirements and resolving any resulting nonconformances. • Notifying the Rebranding Participating Manufacturer of any changes in the rebranded product(s) registration status, EPEAT tier or EPEAT Criteria selected for product attributes.	
Initial Documentation Review for EPEAT Criteria that address product attributes	Must ensure that all products included in the rebranding agreement maintain EPEAT registration status and conform with all selected Criteria that address product attributes.	Must ensure that Initial Documentation Review is conducted for the products in the rebranding agreement for those Criteria that have product disclosure requirements including but not limited to criteria related to warranties, product servicing, spare parts, and public availability of LCAs. Is responsible for providing sufficient evidence to show conformance with these Criteria. Can only select Optional Criteria that are product-related if the Optional Criteria were selected by the Original Participating Manufacturer for the product. Must present the rebranding agreement as evidence during Initial Documentation Review. However, this agreement cannot be used to demonstrate competence with EPEAT Criteria or conformance for other products not included in the rebranding agreement. Note: • The EPEAT Program maintains a list of Criteria that have product disclosure requirements for each product category [*Rebranding of EPEAT-Registered Products: Product Criteria with Disclosure Requirements (P82)*], which is available on the EPEAT Registry and upon request. • CABs must evaluate and track whether competence is demonstrated for each of these Criteria as per the requirements in Section 6.1.5.

Table 4: Responsibilities During Rebranding of EPEAT-Registered Products

Topic	Original Participating Manufacturer Responsibilities *(Manufactures the product and originally obtained EPEAT registration)*	Rebranding Participating Manufacturer Responsibilities *(Does not manufacture the product and is rebranding the EPEAT-registered product under its own brand)*
Ongoing Documentation Review for EPEAT Criteria that address product attributes	Must meet all Ongoing Documentation Review requirements for all selected Criteria that address product attributes.	Must meet all Ongoing Documentation Review requirements for those Criteria that have product disclosure requirements and is responsible for providing sufficient evidence to show conformance with these Criteria. Can only select Optional Criteria that are product-related if the Optional Criteria were selected by the Original Participating Manufacturer for the product. If the Original Participating Manufacturer adds Optional Criteria, the Rebranding Manufacturer may also add these Criteria. If the Criteria have product disclosure requirements, then Ongoing Documentation Review is required. Must maintain a record that all products included in the rebranding agreement are actively EPEAT-registered at the effective date of the agreement and on an ongoing basis.
Initial and Ongoing Documentation Review for Criteria that address corporate activities	Must meet all Initial and Ongoing Documentation Review requirements for all selected Criteria that apply to its corporate activities.	Must meet all Initial and Ongoing Documentation Review requirements for all selected Criteria that apply to its corporate activities.
Removing (archiving) products	Must notify the Rebranding Participating Manufacturer if any products in the rebranding agreement are archived.	Must archive all products within two business days of receiving archival notification from the Original Participating Manufacturer.

Table 4: Responsibilities During Rebranding of EPEAT-Registered Products

Topic	Original Participating Manufacturer Responsibilities *(Manufactures the product and originally obtained EPEAT registration)*	Rebranding Participating Manufacturer Responsibilities *(Does not manufacture the product and is rebranding the EPEAT-registered product under its own brand)*
Continuous Monitoring	Must implement all Continuous Monitoring activities assigned to them for all EPEAT Criteria. Must take responsibility for Continuous Monitoring Investigations assigned to the Rebranding Participating Manufacturer for products in the rebranding agreement and for product Criteria that do not have disclosure requirements.	Must implement all Continuous Monitoring activities assigned to them for the rebranded products for all EPEAT Criteria except for those that do NOT have product disclosure requirements. These Investigations or Annual Renewal activities must be implemented by the Original Participating Manufacturer. Note: • If a Criterion that does NOT have product disclosure requirements is assigned to the Rebranding Participating Manufacturer, the CAB must inform the EPEAT Program within five business days of receiving investigation assignments. The EPEAT Program will then reassign the investigation(s) to the Original Participating Manufacturer.
Nonconformances Related to Continuous Monitoring	Responsible for correcting nonconformances found from Continuous Monitoring activities identified above.	Responsible for correcting nonconformances found from Continuous Monitoring activities identified above.

6.5 Nonconformances Outside Continuous Monitoring

6.5.1 Nonconformances Identified by a CAB

During ongoing interactions with a Participating Manufacturer client that are outside of Continuous Monitoring activities, a CAB may identify that an EPEAT-registered product is not in conformance with an EPEAT Criterion. The CAB must report this instance to the EPEAT Program.

The CAB must notify the Participating Manufacturer that it has 30 calendar days in which to correct the nonconformance and restore accuracy to the Registry by either submitting evidence demonstrating conformance or unselecting the nonconformant Criteria. The CAB must copy the EPEAT Program on the email to the Participating Manufacturer.

CABs are responsible for reviewing the documentation and determining if the actions demonstrate conformance as identified in Table 5 below. If the Participating Manufacturer does not respond to the request for additional evidence, the affected product(s) must be archived or impacted criteria unselected at the end of the 30-calendar day timeframe. For all nonconformances identified by a CAB outside of Continuous Monitoring activities, the EPEAT Program may assign a Level 1 Investigation for the impacted EPEAT Criterion(a) during a future Round.

6.5.2 Nonconformances Identified by EPEAT Program

During ongoing EPEAT conformity assurance activities outside of Continuous Monitoring activities or EPEAT Audits of CABs, the EPEAT Program may discover that a Participating Manufacturer is nonconformant with one or more EPEAT Criteria. The EPEAT Program will notify the Participating Manufacturer and their GEC-approved CAB of the nonconformance.

The Participating Manufacturer has 30 calendar days from the date of notification to correct the nonconformance and restore accuracy to the Registry by either submitting evidence demonstrating conformance or unselecting the nonconformant Criteria.

CABs are responsible for reviewing corrective actions and supporting evidence and determining if the actions demonstrate conformance as identified in Table 5 below. If the Participating Manufacturer does not respond to the request for additional evidence, the affected product(s) will be archived or impacted criteria unselected at the end of the 30-calendar day timeframe. For all nonconformances identified outside of Continuous Monitoring activities, the EPEAT Program may assign a Level 1 Investigation for the impacted EPEAT Criteria during the next applicable Round.

Table 5: Actions and Evaluation for Nonconformances Identified Outside Continuous Monitoring

Corrective Action Options for Participating Manufacturers	Required Evaluation and Record Keeping by CABs
Participating Manufacturer unselects the EPEAT Criterion.	The CAB confirms that the corrective action was taken and retains a record of the corrective action process and the final correction made. The CAB must reinstate the requirement for Documentation Review for the EPEAT Criterion.
Participating Manufacturer removes the nonconforming product ("archives" the product).	
Participating Manufacturer provides additional evidence that demonstrates conformance.	The CAB reviews the new evidence and assesses if conformance is established.

Participating Manufacturer makes appropriate changes to come into conformance and provides evidence of implementing these changes to the CAB.	• If conformance is established:
	  ○ The EPEAT Criterion may remain selected, and product may remain in as EPEAT-registered.
	  ○ The CAB may elect to not reinstate the requirement for Documentation Review for the EPEAT Criterion if the Participating Manufacturer has demonstrated competence (understanding of the Criterion's requirements) during the correction process. The CAB must maintain record of why this requirement was not reinstated.
	• If conformance is not established:
	  ○ The CAB notifies the Participating Manufacturer that further action must be taken (unselect Criterion or archive the product). If the Participating Manufacturer does not take action, the CAB is responsible for unselecting the criterion or archiving the product. If the CAB does not do this, the EPEAT Program archives the product.
	  ○ The CAB must reinstate the requirement for Documentation Review for the EPEAT Criterion.
	
	The CAB retains a record of the corrective action process, all activities conducted, and the final correction made.

7.0 Continuous Monitoring

7.1 Overview

The EPEAT Program ensures the ongoing conformance of EPEAT-registered products through an ongoing surveillance process known as Continuous Monitoring. Continuous Monitoring 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 and all Participating Manufacturers are subject to Continuous Monitoring, regardless of the conformity assurance pathway used during Initial Documentation Review.

Continuous Monitoring occurs in the form of Investigations planned by the EPEAT Program and implemented by GEC-approved CABs within discrete timeframes (Continuous Monitoring Rounds), or as part of annual Documentation Review activities conducted by GEC-approved CABs for the Certification Pathway (Annual Renewal). Only Qualified Auditors can conduct Continuous Monitoring activities. An overview of Continuous Monitoring Activities is provided in Table 6 below.

Table 6: Continuous Monitoring Activities

Name	Investigative Methods Implemented by GEC-approved CABS	Duration	Conformity Assurance Pathway	Addressing Nonconformances
Level 0 Investigation	Review of publicly available information without the Participating Manufacturer's involvement. Occurs during Rounds.	14-calendar day investigation period	Priority Verification and Certification	Nonconformances must be corrected in 30-calendar day corrective action period
Level 1 Investigation	Review of evidence provided by Participating Manufacturer. Must use practices as identified in Documentation Review (as per Sections 6.1 and 6.2). Occurs during Rounds.	60-calendar day investigation period	Priority Verification and Certification	
Level 2 Investigation	Laboratory evaluation of products. Products acquired without Participating Manufacturer's involvement, where possible. Products must be new (not refurbished or repaired) and received by the laboratory in the original packaging. Occurs during Rounds.	150-calendar day investigation period	Priority Verification and Certification	
Annual Renewal	Documentation Review of Corporate Criteria with annual reporting requirements. Review of product or corporate changes to assess if ongoing conformance is affected. Review of minor revisions to EPEAT Criteria, formal Clarifications, conformity guidance and program documents to assess if additional documentation is needed.	Duration varies based on changes but cannot exceed Annual Renewal deadline.	Certification	Nonconformances must be addressed during Annual Renewal period

During Continuous Monitoring activities, Participating Manufacturers are required to cooperate with their GEC-approved CAB and facilitate the review process. This includes:

- Reading applicable Criteria, verification requirements, and any supplementary information as necessary (e.g., external materials referenced in a Criterion, Clarifications, or Conformity Guidance Materials).
- Compiling documentation and submitting it to the GEC-approved CAB in an organized and timely manner by the deadlines provided. For Continuous Monitoring Rounds, evidence must be submitted before the end of the investigation phase. For Annual Renewals, evidence must be submitted before the Annual Renewal deadline.
- Responding to all questions from the GEC-approved CAB in a timely manner.

Throughout the remainder of Section 7, the use of the term "CAB" shall imply a GEC-approved CAB.

7.2 Continuous Monitoring Rounds

In September or October of each year, the EPEAT Program publishes an annual Continuous Monitoring Round Schedule for the following year to allow GEC-approved CABs and Participating Manufacturers time to prepare internal resources accordingly. The Schedule identifies the general timing of Rounds and the investigative methods that must be used by CABs in each Round.

In the same timeframe, the EPEAT Program provides GEC-approved CABs with an estimated range of how many Level 0 and Level 1 Investigations each of its Participating Manufacturer client will be assigned in the following year. CABs must pass this information onto each Participating Manufacturer client.

The EPEAT Program also provides GEC-approved CABs with additional details on Level 2 investigations for the following year (an estimated number of products and product types that will be examined). This information is only made available to facilitate CAB resource planning. GEC-approved CABs cannot share this information with Participating Manufacturer clients.

Continuous Monitoring Rounds include the following five phases:

Preparation Phase	The EPEAT Program develops Round materials, and CABs prepare for Round activities and receive Continuous Monitoring Training. Timeframe is 28 calendar days.
Investigation Phase	CABs actively conduct Investigations, make recommendations on conformity, and prepare draft Investigation Reports. Participating Manufacturers may or may not be actively involved in the Investigations. If draft Investigation Reports are submitted during this Phase, activities normally conducted in the Deliberation Phase may occur. Timeframe dependent on type of investigative methods used.
Deliberation Phase	A pre-established period in which the EPEAT Program reviews draft Investigation Reports and supporting evidence and makes final decisions of conformity. CABs may be asked to revise a draft Investigation Report or obtain additional information from their Participating Manufacturer and will be given five business days to do so. Timeframe is 45 calendar days.
Corrective Action Phase	Participating Manufacturers correct nonconformances found during Investigations and CABs review for acceptability. Timeframe for development of corrections and corrective action plans is 30 calendar days.
Reporting Phase	The EPEAT Program prepares and publishes an Outcomes Report summarizing the Round results. Timeframe is 14 calendar days.

All Continuous Monitoring timeframes identified in this document represent the minimum length of time for the specific Round activities to occur. The EPEAT Program may extend or adjust Continuous Monitoring Round schedules including when the Round is already underway. In such cases, the EPEAT Program will provide an updated Round schedule and deadlines to those CABs with assigned investigations.

Under exceptional force majeure circumstances, a Participating Manufacturer may request an extension to a Continuous Monitoring Round phase. The Participating Manufacturer must submit a request in writing to the EPEAT Program no later than 2 business days before the end of the phase, outlining the rationale for the request and the requested length of extension. The EPEAT Program is solely responsible for deciding whether to extend a Continuous Monitoring Round phase, and all decisions are considered final.

7.2.1 Preparation Phase

The EPEAT Program develops an individual plan (Round Plan) for each Continuous Monitoring Round, which specifies the EPEAT Criteria to be investigated, the method of investigation that CABs must use, and the specific dates when the Investigation activities must be completed. Round Plans identify specific dates that actions must occur, but do not specify a particular time zone. CABs are permitted to initiate the Investigation and Corrective Action Phases of a Round on the date indicated in the time zone where the CAB or its auditor(s) are located. In such cases, the end of the Investigation and Corrective Action Phases must also occur in this same time zone. Where a report is due to the EPEAT Program, it must be submitted by 11:59 pm North American Pacific Time on the given date. The EPEAT Program also selects the Participating Manufacturers and EPEAT-registered products for investigation and creates "assignments" for each CAB during the Preparation Phase.

Specific Continuous Monitoring Round details are only provided at the time when the Round occurs. Within three weeks of a Round launch, the EPEAT Program provides CABs with Investigation

assignments, the Round Plan, reporting templates, and other supporting materials and provides individual Continuous Monitoring Training for the CABs' Qualified Auditors (see Tables 6, 7 and 8 in Section 7.2.2 for timing). For Level 2 Investigations, the EPEAT Program provides CABs with a laboratory report template that identifies expectations for what types of visual inspection and/or testing are required.

Prior to the start of the Investigation Phase, CABs may discuss assigned Investigations internally with their Qualified Auditors but can only inform Participating Manufacturer clients on the date identified by the EPEAT Program (see Tables 6, 7 and 8 in Section 7.2.2 for timing). If a CAB informs or notifies a Participating Manufacturer about Continuous Monitoring Round details before the start of the Round, the CAB must immediately notify the EPEAT Program. The EPEAT Program will determine appropriate action, which may include cancelling the impacted Investigation, or assigning a different product or Criterion for investigation for that Participating Manufacturer.

After the Investigative Phase begins, the EPEAT Program publishes the Round Plan and informs stakeholders that the Round has officially launched.

7.2.2 Investigation Phase

Each CAB is responsible for conducting all assigned Investigations using the identified method of investigation and meeting all deadlines outlined in the Round Plan. For Level 0 Rounds, Participating Manufacturers are only notified of Level 0 Investigations after the EPEAT Program makes the final conformity decision. For Level 1 Rounds, CABs must notify affected Participating Manufacturer clients of the Investigations on the start date of the Round and are permitted to do so on that date in their local time zone. (In such cases, the end of the investigation period must also occur in this same time zone.) CABs are encouraged to ask the EPEAT Program questions about applicable Criteria or Round logistics and raise any issues or concerns at any time during the Round.

For Level 2 Rounds, CABs must obtain a ~~brand~~ new product, in the original packaging, and inform the EPEAT Program when the product(s) has been obtained for testing. Returned, repaired, or refurbished products and products not in the original packaging are not permitted for Level 2 testing. If the product(s) has not been obtained for testing within 30 calendar days of the launch of the Investigation Phase, CABs must inform the EPEAT Program. In this situation, the EPEAT Program may instruct~~s~~ the CAB to directly contact the Participating Manufacturer to obtain the product. The Participating Manufacturer then becomes responsible for ensuring the product is received by the laboratory chosen by the CAB for testing.

At the conclusion of the Investigations, CABs submit draft Investigation Reports (using the template provided by the EPEAT Program) and all supporting evidence collected during the Investigations (e.g., laboratory reports, certificates, procedural documents, etc.) to the EPEAT Program by 11:59 pm North American Pacific Time on the deadline date identified. Draft Investigation Reports must include a recommendation on conformity and a clear rationale to support the recommendation. CABs ensure that draft Investigation Reports do not contain references to the Participating Manufacturer or product that was investigated to facilitate impartial review of the reports by the EPEAT Program.

If unable to submit one or more draft Investigation Reports before the submission deadline, CABs must inform the EPEAT Program at least 24 hours before the deadline and request approval from the EPEAT Program to submit the Investigation Report(s) past the deadline. The EPEAT Program will evaluate the request and may extend the deadline. Where a CAB fails to submit a draft Investigation Report by the deadline without notifying and obtaining approval from the EPEAT Program in advance, or where the EPEAT Program denies a request for an extension, the EPEAT Program reserves the right to take any of the following actions: notify the Participating Manufacturer directly of the outstanding report(s), cancel the Investigation with possible reassignment in a future Round, and/or automatically assign a nonconformance.

As per Section 7.2.3, the EPEAT Program reviews draft Investigation Reports and evidence as soon as possible after received and may ask questions or seek clarity from CABs. Therefore, CABs are encouraged to submit draft Investigation Reports as soon as possible after collecting all appropriate evidence from the Participating Manufacturer and completing all investigative activities. A CAB may be required to seek additional evidence or rewrite sections of an Investigation Report. In these cases, the CAB has the remainder of the Investigation Phase to collect additional evidence from the Participating Manufacturer and resubmit the draft Investigation Report before the original deadline for Report submission.

If a CAB revises a draft Investigation Report for Level 1 and 2 investigations, the CAB must send the revised draft to the investigated Participating Manufacturer within five business days of submission to the EPEAT Program. Level 0 Investigation Reports are only provided to Participating Manufacturers after the EPEAT Program makes all final decisions of conformity for that Round.

For recommendations of nonconformance, CABs must identify the high-level reason for the nonconformance in the Investigation Report:

Demonstrated Nonconformance	Evidence definitively shows the EPEAT Criteria are not met.
Insufficient Evidence to Demonstrate Conformance	Evidence provided by a Participating Manufacturer in a Level 1 Investigation is incomplete and does not definitively show either conformance or nonconformance.
No Documentation Provided	Participating Manufacturer has not provided any supporting evidence or documentation during the investigation period for a Level 1 Investigation.
Product Not Obtained for Testing	The CAB was unable to obtain the selected product within the 150-calendar day investigation period of a Level 2 Investigation.

CABs must also identify in the Investigation Reports if nonconformances are due to a minor error (see the table below and Annex 1 for additional guidance).

Minor Error	The four cases where nonconformances can be categorized as a minor error are: • 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 the 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. • A 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	All nonconformances that do not meet the definition of minor error must be categorized as a nonconformance. This specifically includes, but is not limited to, the following: • No response to a request for documentation or no documentation provided during the investigation period of a Level 1 Investigation (except for when the Participating Manufacturer indicated the product is end-of-life and no longer available on the market). • All nonconformances found in Level 2 Investigations (except for when the CAB was unable to obtain the product for evaluation by a laboratory and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market).

For some Level 1 and 2 Investigations, CABs must also provide the draft Investigation Reports with their recommendations on conformity to the Participating Manufacturers (see Tables 7, 8 and 9).

Tables 7, 8 and 9 below provide further details and requirements for implementing Continuous Monitoring Investigations.

Continuous Monitoring

Table 7: Level 0 Investigation Activities

(also see flowchart in Annex 2)

Topic	Requirements and Additional Details
Applicable conformity assurance pathway(s)	Priority Verification and Certification
Investigative methods used by CABs during investigation period	Qualified Auditors evaluate publicly available information for conformance to assigned EPEAT Criteria or aspects of EPEAT Criteria (the EPEAT Program may elect not to have all requirements in the Criteria investigated). CABs are prohibited from requesting information or clarification from Participating Manufacturers. If the product was assessed during Initial Documentation Review through the Certification Pathway, CABs may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria. If a Participating Manufacturer switches to the Certification Pathway and completes the Initial Documentation Review for the product during the Round's investigation period, the CAB may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria.
CABs notify Participating Manufacturers of Investigations	Prohibited. Participating Manufacturers are only notified of Level 0 Investigations after the EPEAT Program makes the final conformity decision.
Recommendations by CABs	May be Conformance, Nonconformance, or Inconclusive. CABs recommend Inconclusive if publicly available information could not be found or did not provide enough details to determine conformance.
Nonconformance categories	CABs must choose either minor error or nonconformance as per the guidance in Section 7.2.2 and Annex 1.
Assignments and Round documents to CABs	21 calendar days before the Round Launch Date
Continuous Monitoring Training by EPEAT	7 calendar days before the Round Launch Date
Length of investigation period	14 calendar days
Draft Investigation Reports (with recommendation on conformity) and evidence due from CABs to EPEAT	14 calendar days after the end of the investigation period, but CABs are encouraged to submit investigation reports as they are completed. Reports must be submitted no later than 11:59 pm North American Pacific Time on the deadline date. If a CAB does not submit a draft Investigation Report by the deadline without notifying the EPEAT Program of a delay at least 24 hours before the reports are due, the EPEAT Program reserves the right to take further action [notify the Participating Manufacturer directly of the outstanding report(s), cancel the Investigation with possible reassignment in a future Round, and/or automatically assign a nonconformance for the investigation]. The EPEAT Program tracks the submission of late Investigation Reports for CAB performance metric 9.
Draft Investigation Reports (same as submitted to EPEAT) sent to Participating Manufacturers by CABs	Prohibited. Investigation Reports can only be sent to Participating Manufacturers after the EPEAT Program makes the final decision on conformity.

Continuous Monitoring

Table 8: Level 1 Investigation Activities

(also see flowchart in Annex 3)

Topic	Requirements and Additional Details
Applicable conformity assurance pathway(s)	Priority Verification and Certification
Investigative methods used by CABs during investigation period	Qualified Auditors request evidence from Participating Manufacturers and evaluate it for conformance to assigned EPEAT Criteria. If the product was assessed during Initial Documentation Review through the Certification Pathway, CABs may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria. If a Participating Manufacturer switches to the Certification Pathway and completes the Initial Documentation Review for the product during the Round's investigation period, the CAB may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria.
CABs notify Participating Manufacturers of Investigations	CABs must notify Manufacturers in writing (e.g., by e-mail) on the Round Launch Date identified by the EPEAT Program. CABs are permitted to notify Manufacturers on the Round Launch Date in their own local time zone.
Recommendations by CABs	May be Conformance, Nonconformance or Inconclusive
Nonconformance categories	CABs must choose either minor error or nonconformance as per the guidance in Section 7.2.2 and Annex 1. CABs must assign a nonconformance if there was no response or no documentation received from the Participating Manufacturer during the Investigation Period. CABs must categorize a nonconformance as a minor error if the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.
Assignments and Round documents to CABs	21 calendar days before the Round Launch Date
Continuous Monitoring Training by EPEAT	7 calendar days before the Round Launch Date
Length of investigation period	60 calendar days
Draft Investigation Reports (with recommendation on conformity) and evidence due from CABs to EPEAT	14 calendar days after the end of the investigation period, but CABs are encouraged to submit investigation reports as they are completed. Reports must be submitted no later than 11:59 pm North American Pacific Time on the deadline date. If a CAB does not submit a draft Investigation Report by the deadline without notifying the EPEAT Program of a delay at least 24 hours before the reports are due, the EPEAT Program reserves the right to take further action [notify the Participating Manufacturer directly of the outstanding report(s), cancel the Investigation with possible reassignment in a future Round, and/or automatically assign a nonconformance for the investigation]. The EPEAT Program tracks the submission of late Investigation Reports for CAB performance metric 9.
Draft Investigation Reports (same as submitted to EPEAT) sent to Participating Manufacturers by CABs	Within 5 business days of submission to the EPEAT Program

Continuous Monitoring

Table 9: Level 2 Investigation Activities

(also see flowchart in Annex 4)

Topic	Requirements and Additional Details
Applicable conformity assurance pathway(s)	Priority Verification and Certification
Investigative methods used by CABs during investigation period	CABs obtain products from the marketplace without Participating Manufacturer involvement. CABs may research where products are available on the open market before the Round launch date but products cannot be purchased before the Round launch date. If unable to do obtain the product in the marketplace within 30 calendar days (e.g., products are not commercially available or only sold through contracts), CABs notify the EPEAT Program and must then obtain the product directly from the Participating Manufacturer, where the Participating Manufacturer becomes responsible for ensuring the product is received by the laboratory. Products are then evaluated by independent laboratories for conformance to assigned EPEAT Criteria or aspects of EPEAT Criteria (the EPEAT Program may elect not to have all requirements in the Criteria investigated). CABs are not permitted to obtain information or documentation from the Participating Manufacturer unless specified by the EPEAT Program in the laboratory report template or with written approval from the EPEAT Program to do so.
When products cost US $10,000 or more	CABs may work with the EPEAT Program and the Participating Manufacturer to find an alternate way to verify conformance to the identified Criteria. The approach will depend on the Criteria, and the EPEAT Program may offer suggestions on alternate ways to verify conformance (e.g., provision of high-risk components or materials for testing, onsite inspection of the product).
Laboratory requirements	Laboratories must have valid accreditation to ISO/IEC 17025 from a body that is an ILAC Member and signatory to the ILAC Mutual Recognition Arrangement (ILAC MRA). CABs must confirm that the evaluation methods are covered by the laboratory's accreditation scope or, for non-standard methods of evaluation, by other mechanisms or best practices to produce accurate and reliable results.
CABs notify Participating Manufacturers of Investigations	After the product has been received by the laboratory OR when CABs must reach out to Participating Manufacturers because the products could not be found in the market.
Recommendations by CABs	May be Conformance, Nonconformance or Inconclusive. If unable to obtain the product within the 150-calendar day investigation period, CABs automatically recommend nonconformances for all EPEAT Criteria investigated. This will be identified in the Outcomes Report. CABs may recommend Inconclusive when Conformance or Nonconformance cannot be determined due to limitations in the evaluation technique(s).

Table 9: Level 2 Investigation Activities

(also see flowchart in Annex 4)

Nonconformance categories	CABs must identify all nonconformances as nonconformances. Exception: if the CAB is unable to obtain the product and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market, the CAB must identify the nonconformance as a minor error.
Assignments and Round documents to CABs	14 calendar days before the Round Launch Date
Continuous Monitoring Training by EPEAT	7 calendar days before the Round Launch Date
Length of investigation period	150 calendar days
Draft Investigation Reports (with recommendation on conformity) and evidence due from CABs to EPEAT	14 calendar days after the end of the investigation period. CABs must also send the laboratory reports at the same time. CABs are encouraged to submit investigation reports as they are completed. Reports must be submitted no later than 11:59 pm North American Pacific Time on the deadline date. If a CAB does not submit a draft Investigation Report by the deadline without notifying the EPEAT Program of a delay at least 24 hours before the reports are due, the EPEAT Program reserves the right to take further action [notify the Participating Manufacturer directly of the outstanding report(s), cancel the Investigation with possible reassignment in a future Round, and/or automatically assign a nonconformance for the investigation]. The EPEAT Program tracks the submission of late Investigation Reports for CAB performance metric 9.
Draft Investigation Reports (same as submitted to EPEAT) sent to Participating Manufacturers by CABs	Within 5 business days of submission to the EPEAT Program. CABs must also send the laboratory reports at the same time.

7.2.3 Deliberation Phase

During the 45-calendar day Deliberation Phase, the EPEAT Program reviews the Draft Investigation Reports and supporting evidence submitted by CABs for completeness and the rationale to support recommendations of conformity and makes the final decisions on conformity.

The EPEAT Program reviews draft Investigation Reports and evidence as soon as possible after received. The EPEAT Program first reviews draft Investigation Reports, and where applicable, laboratory reports, which do not identify the Participating Manufacturer or product investigated, to ensure that all Criterion elements have been reviewed during the Investigation Phase and a recommendation has been made by the CAB. Only after reviewing the Investigation Report does the EPEAT Program review the submitted evidence to make the final conformity decision. This process is implemented to facilitate impartial review of the reports by the EPEAT Program.

The EPEAT Program may ask questions or seek clarity from CABs.

- A CAB may be required to seek additional evidence or rewrite sections of a draft Investigation Report. In these cases, the CAB has five business days to update the draft Investigation Report

and resubmit it and allowable additional evidence to the EPEAT Program. Failure to make appropriate updates will be reflected in the CAB's performance metrics (see Section 5.3). For Level 1 and Level 2 Investigations, the CAB must provide the Participating Manufacturer a copy of the revised draft Investigation Report within five business days of submitting it to the EPEAT Program. Level 0 Investigation Reports are only provided to Participating Manufacturers after the EPEAT Program makes all final decisions of conformity for that Round.

- If the EPEAT Program has follow-up questions, an additional five business days may be provided for the CAB to address questions or revise the Investigation Report.
- If a CAB is unable to complete the update within the five business days, it must inform the EPEAT Program and propose an alternative timeline and the EPEAT Program may grant an extension. Where a CAB fails to submit a revised draft Investigation Report by the deadline provided, the EPEAT Program reserves the right to take any of the following actions: notify the Participating Manufacturer directly of the outstanding report(s), cancel the Investigation with possible reassignment in a future Round, make a final decision based on the information that was originally provided, and/or automatically assign a nonconformance.

EPEAT final decisions on conformity may be Conformance, Nonconformance or Inconclusive. For inconclusive findings in Level 0 and Level 2 Investigations, the EPEAT Program may require the CAB to investigate the same Criterion in a subsequent Level 1 Round to definitively determine conformance.

7.2.4 Corrective Action Phase

At the start of the Corrective Action Phase, the EPEAT Program sends the Investigation Reports with the final conformity decisions to the CABs. If the final decision is Conformance, the Investigation Report is considered final, and the Investigation is closed. If the final decision is nonconformance, the Investigation moves into the Corrective Action Phase.

CABs must distribute the Investigation Reports with the final decision on conformity to Participating Manufacturer clients on the date identified by the EPEAT Program (and may do so based on the date in their own local time zone). CABs are prohibited from distributing these reports earlier than the date identified by EPEAT in their local time zone.

7.2.4.1 Investigated Products

For both minor errors and nonconformances, Participating Manufacturers have 30 calendar days to make corrections[11] for investigated products and restore accuracy to the EPEAT Criteria selected (see Tables 9 and 10 for applicable options). CABs are responsible for reviewing corrections and supporting evidence and determining if the corrections demonstrate conformance.

CABs update the Investigation Reports with a description of the corrections taken, the recommendation on acceptability, and a clear rationale to support the recommendation. The EPEAT Program makes the final decision on the acceptability of corrections made by Participating Manufacturers for investigated

[11] "Corrections" are the immediate actions that must be taken by the Participating Manufacturer to correct nonconformances. Corrections must be completed within the 30-calendar day period.

products. If the EPEAT Program requires further clarification on the correction, CABs have until the end of the Corrective Action Phase, or if the Corrective Action Phase is completed, five business days to seek additional evidence from the Participating Manufacturer, respond to questions and if necessary, submit a revised Corrective Action Investigation Report.

When a Corrective Action Investigation Report (or revisions to the Report in response to EPEAT Program questions) has not been received by the EPEAT Program by 11:59 pm North American Pacific Time on the deadline provided, the EPEAT Program reserves the right to inform the affected Participating Manufacturer that the Corrective Action Investigation Report is outstanding. The EPEAT Program also reserves the right to make the final decision based on the information that was originally provided or archive the investigated product.

7.2.4.2 Similarly Affected Products

In this same 30-calendar day Corrective Action Phase, Participating Manufacturers must also develop corrective action plans[12] for other EPEAT-registered products that may be affected by the same underlying issue causing the minor error or nonconformance but were not the subject of investigation (called "similarly affected products"). Participating Manufacturers must provide their CABs with a list of the similarly affected products, if applicable, and the corrective action plans, which must identify the steps that will be taken to address the underlying issue and the timeframe for implementation. The maximum allowable timeframe for implementation of corrective action plans is six months.

The EPEAT Program does not provide final approval of Participating Manufacturers' corrective action plans for similarly affected products. CABs are responsible for reviewing and approving these plans and updating the Investigation Reports with a summary of the plans (actions and timeframes) and an indication of approval. CABs are expected to follow-up with Participating Manufacturer clients to ensure the plans are fully implemented in the identified timeframe. If the Participating Manufacturer does not implement the corrective action plan to address similarly affected products, the CAB may archive the affected products. The EPEAT Program may require CABs to submit evidence of effective implementation of corrective action plans and/or review corrective action plans for similarly affected products during the Annual EPEAT Audit of CABs.

7.2.4.3 Reinstatement of Requirement for Documentation Review:

For nonconformances, CABs may be required to reinstate the requirement for Documentation Review for the investigated EPEAT Criterion (see Tables 10 and 11 for requirements on reinstatement). The relevant steps for Documentation Review (see Section 6.1) must then be followed to remove the Documentation Review Requirement for that EPEAT Criterion.

[12] "Corrective action plans" are the actions and timelines that the Participating Manufacturer must develop to address and eliminate the root cause(s) of a nonconformance so as to prevent reoccurrence for other products that are also affected by the nonconformance assigned to the investigated product. The corrective action plan must be developed in the 30-calendar day period; however, implementation of the plan may take longer.

Table 10: Corrections for Nonconformances (Level 0, 1 and 2 Investigations)

Correction Options for Participating Manufacturers	Required Evaluation by CABs
Participating Manufacturer unselects the EPEAT Criterion.	The CAB confirms the correction was made by the Participating Manufacturer and updates the Investigation Report to identify the correction made, the recommendation on acceptability and the rationale for the recommendation. The CAB must reinstate the requirement for Documentation Review for the EPEAT Criterion. Exception: The Participating Manufacturer also corrects the underlying issue for similarly affected products during the 30-calendar day Corrective Action Phase and this correction shows the Participating Manufacturer has demonstrated competence (understanding of the Criterion's requirements). In such cases, the CAB must maintain a record of why this requirement was not reinstated.
Participating Manufacturer removes the nonconforming product ("archives" the product). When archiving a product on the EPEAT Registry, the user must enter the reason for archival as "product found nonconformant in continuous monitoring activities (Round)".	

Participating Manufacturer provides additional evidence that demonstrates conformance. This can only include new evidence that was not provided during the investigation period.	The CAB reviews the new evidence and assesses if conformance is established.
	
	• If conformance is established:
	  ○ The EPEAT Criterion may remain selected, and product may remain EPEAT-registered.
	  ○ The CAB may elect to not reinstate the requirement for Documentation Review for the EPEAT Criterion if the Participating Manufacturer has demonstrated competence (understanding of the Criterion's requirements) during the correction process. The CAB must maintain a record of why this requirement was not reinstated.
	• If conformance is not established:
	  ○ The CAB notifies the Participating Manufacturer that further action must be taken (unselect Criterion or archive the product). If the Participating Manufacturer does not take action, the CAB is responsible for archiving the product. If the CAB does not do this, the EPEAT Program archives the product.
	  ○ The CAB must reinstate the requirement for Documentation Review for the EPEAT Criterion.
	
	The CAB updates the Investigation Report with details on the correction made and evidence submitted, the recommendation on acceptability and the rationale for the recommendation.

Participating Manufacturer makes appropriate changes to come into conformance and provides evidence of implementing these changes to the CAB. These changes may be to the investigated product or to corporate practices.	
Corrective Action Phase Activity	**Timeframe**
Corrective action period (timeframe in which correction must be made and reviewed)	30 calendar days
Investigation Reports (with recommendations on correction acceptability) and evidence due from CABs to EPEAT	14 calendar days after the end of the corrective action period. CABs are not required to send these Reports to Participating Manufacturers but may do so if they wish.
Final Investigation Reports (with final decisions on corrections) sent to CABs by EPEAT	28 calendar days after the end of the corrective action period

Table 10: Corrections for Nonconformances (Level 0, 1 and 2 Investigations)

Correction Options for Participating Manufacturers	Required Evaluation by CABs
Final Investigation Reports (with final decisions on corrections) sent to Participating Manufacturer by CABs	Within 5 business days of receiving Final Investigation Reports from the EPEAT Program

Table 11: Corrections for Minor Errors (Level 0, 1 and 2 Investigations)

Correction Options for Participating Manufacturers	Required Evaluation by CABs
If the product is end-of-life and no longer available in the market, Participating Manufacturer must remove ("archive") the product. When archiving a product on the EPEAT Registry, the user must enter the reason for archival as "product found nonconformant in Continuous Monitoring activities (Round)".	The CAB confirms that the correction was made by the Participating Manufacturer (the end-of-life product was archived, or the evidence indicates the minor error was corrected and conformity re-established). In these cases, the CAB is not required to reinstate the Documentation Review requirement but may elect to do so. If the Participating Manufacturer does not take the appropriate action, the CAB is responsible for archiving the product. If the CAB does not do this, the EPEAT Program archives the product. In these cases, the CAB must reinstate the requirement for Documentation Review for the EPEAT Criterion. The CAB updates the Investigation Report with details on the corrective actions taken, the recommendation on acceptability and the rationale for the recommendation.
Participating Manufacturer corrects the minor human or administrative error and provides evidence of the correction to the CAB. Examples of corrections include but are not limited to: • Updating a value that was insignificantly above/below the actual value. • Fixing a broken URL. • Providing updated certificates or reports.	
Corrective Action Phase Activity	**Timeframe**
Corrective action period (timeframe in which correction must be made and reviewed)	30 calendar days
Investigation Reports (with recommendations on correction acceptability) and evidence due from CABs to EPEAT	14 calendar days after the end of the corrective action period. CABs are not required to send these Reports to Participating Manufacturers but may do so if they wish.
Final Investigation Reports (with final decisions on corrections) sent to CABs by EPEAT	28 calendar days after the end of the corrective action period
Final Investigation Reports (with final decisions on corrections) sent to Participating Manufacturer by CABs	Within 5 business days of receiving Final Investigation Reports from the EPEAT Program

7.2.5 Reporting Phase

Investigation Reports are not made public. Fourteen calendar days after completion of the Corrective Action Phase and the close of all Investigations, the EPEAT Program publishes an Outcomes Report. For each Continuous Monitoring Round, the Outcomes Report summarizes Round activities, identifies the EPEAT Criteria investigated and the method of investigation, and highlights overall conformity results and trends.

Outcomes Reports also identify the names of products and Participating Manufacturers that received nonconformances and how corrections were made to restore accuracy to the EPEAT Registry. Because minor errors are generally clerical in nature and do not materially affect the validity of products in the EPEAT Registry, minor errors are not disclosed in the Outcomes Report. Outcomes Reports do not identify the names of products and Participating Manufacturers that received Inconclusive findings.

7.3 Annual Renewal

Annual Renewal is a form of Continuous Monitoring performed by CABs on products that used the Certification Pathway for Initial Documentation Review. In the Certification Pathway, results from Initial Documentation Review are valid for a three-year period with the proviso that CABs perform Annual Renewal activities to confirm ongoing conformance. During the second and third years of this period, CABs must work with Participating Manufacturer clients to:

- Ensure Participating Manufacturer ongoing conformance with selected EPEAT Criteria, which have annual reporting requirements at the corporate level.
- Ensure Participating Manufacturer conformance with Minor Criteria Revisions and Major Criteria Revisions that have been released in the previous 12-month period.
- Assess the impact of Participating Manufacturer changes to the product or corporate activities on conformance with EPEAT Criteria and where necessary, evaluate if new evidence supports conformance.
- Assess the impact of updated EPEAT Program requirements and guidance on conformance with EPEAT Criteria and where necessary, evaluate if new evidence supports conformance.

The timing of Annual Renewal activities is determined by the date each product first completed Initial Documentation Review for all selected criteria using the Certification Pathway. For the second and third years, Annual Renewal activities must be completed prior to that year's anniversary of completion of the Initial Documentation Review activities.

7.3.1 Criteria with Corporate Level Annual Reporting Requirements

Participating Manufacturers must provide evidence demonstrating continued conformance with EPEAT Criteria that were selected as part of Initial Documentation Review and have annual performance, reporting or other disclosure requirements at the corporate level. A list of the applicable EPEAT Criteria for each product category is maintained by the EPEAT Program and available to CABs and Participating Manufacturers. CABs review the evidence in accordance with Documentation Review practices identified in Sections 6.1 and 6.2.

7.3.2 Minor and Major Criteria Revisions

In the 12-month period preceding Annual Renewal activities, the EPEAT Program may release Minor or Major Revisions to EPEAT Criteria (see Table 3 for a description of these revisions). CABs must determine if additional evidence is needed from Participating Manufacturer clients to demonstrate conformance with the changes to EPEAT Criteria. CABs must keep records of how this determination was made.

Where necessary, CABs obtain and review the additional evidence in accordance with Documentation Review practices identified in Sections 6.1 and 6.2.

7.3.3 Product and Corporate Changes

CABs must work with Participating Manufacturer clients to identify any changes that occurred in the previous 12-month period, which may affect conformance with selected EPEAT Criteria (including those that address attributes of the product and those that address corporate activities of the Participating Manufacturer). Changes may include but are not limited to:

- Product design or packaging.
- Materials and components.
- Manufacturing and assembly processes.
- Suppliers and supply chain performance.
- Environmental management systems.
- Third-party certifications.
- Participating Manufacturer operating procedures and/or conformance assurance processes.
- Services or support programs offered by the Participating Manufacturer to purchasers.
- Information on the product that is made publicly available by the Participating Manufacturer.

If one or more changes have the potential to affect conformance with EPEAT Criteria, CABs obtain and review new evidence from the Participating Manufacturers in accordance with Documentation Review practices identified in Sections 6.1 and 6.2.

7.3.4 Updates to EPEAT Program Requirements and Guidance

Over the previous 12-month period, the EPEAT Program may release new Clarifications, make updates to Conformity Guidance Materials and/or update requirements in P66 *EPEAT Conformity Assurance Implementation Manual*. The updated guidance and requirements may include changes to acceptable forms of evidence, new details in the evidence that must be assessed, and/or additional requirements for conformity assurance-related processes.

CABs are responsible for determining if any of the guidance or programmatic updates have the potential to impact Participating Manufacturer conformance with EPEAT Criteria or how conformance was first determined for Participating Manufacturer clients. CABs must keep records of how this determination was made.

Where necessary, CABs obtain and review the additional evidence in accordance with Documentation Review practices identified in Sections 6.1 and 6.2.

7.3.5 Nonconformances and Corrections

If Annual Renewal activities confirm the Initial Documentation Review results and the EPEAT Criteria selected by Participating Manufacturers, the EPEAT Criteria may remain selected, and the product may remain EPEAT-registered.

If Annual Renewal activities do not confirm the Initial Documentation Review results, CABs are responsible for communicating the nonconformance to its Participating Manufacturer. Nonconformances may arise from Participating Manufacturers:

- No longer meeting the requirements of EPEAT Criteria that have annual reporting requirements at the corporate level.
- Not meeting Minor or Major Criteria Revisions released in the previous 12 months.
- No longer meeting one or more EPEAT Criteria due to changes made to the product and/or corporate activities or due to revised EPEAT Program guidance or requirements.

All nonconformances found in Annual Renewal must be corrected by Participating Manufacturers prior to that year's anniversary of the product registration date. CABs are responsible for reviewing and approving these corrections.

If appropriate corrections are not made by the Participating Manufacturer, the CAB notifies the Participating Manufacturer that action must be taken (unselecting the applicable EPEAT Criteria or archiving the product). If the Participating Manufacturer does not take action, the CAB is responsible for archiving the product and must notify the EPEAT Program. If the CAB does not archive the product, the EPEAT Program takes this action.

8.0 Changing CABs

At any time, Participating Manufacturers may change from using one GEC-approved CAB to a different CAB for any given product category. Participating Manufacturers may change CABs for one or more product categories but must transfer all products in the product category to the new CAB. Participating Manufacturers must maintain a contractual relationship with at least one GEC-approved CAB during the transition process to address ongoing conformity assurance activities such as Continuous Monitoring.

A Participating Manufacturer must notify the EPEAT Program of their intention to change to a new GEC-approved CAB a minimum of 60 calendar days prior to the change. The new GEC-approved CAB must provide the EPEAT Program with written acceptance of the Participating Manufacturer as a new client.

Participating Manufacturers must undergo Initial Documentation Review for all active products in each product category being moved to the new CAB. The new CAB is responsible for conducting these activities in accordance with Section 6 to evaluate the Participating Manufacturer's conformance with and competence against EPEAT Criteria. This includes collecting and evaluating evidence of conformance for selected EPEAT Criteria. The new CAB must inform the EPEAT Program when Initial Documentation Review begins and provide a status update every 30 calendar days thereafter until Initial Documentation Review activities are completed.

For each conformity assurance pathway, the new GEC-approved CAB must use the appropriate product sampling processes for Initial Documentation Review and is required to review specific EPEAT Criteria as per the following:

Priority Verification Pathway	Certification Pathway
The new CAB must complete Initial Documentation Review of all ~~Priority~~ Required Criteria before the Participating Manufacturer's products can appear as EPEAT-registered under the new CAB's conformity assurance services. As per Section 6, any product sampling technique must be applied across all active EPEAT-registered products if choosing representative products for evaluation. Within 12 months of the products appearing under the new CAB, Documentation Review of all selected Optional Criteria ~~(both Priority and non-Priority)~~ must be completed, or the Criteria must be unselected, or the products archived until this Review is completed. Any new Optional Criteria previously not selected by the Participating Manufacturer must be successfully reviewed before appearing in the EPEAT Registry.	The new CAB must complete Initial Documentation Review for all EPEAT Criteria and locations of use (countries) selected by the Participating Manufacturer before the products can appear as EPEAT-registered under the new CAB's conformity assurance services.

The new CAB must notify the EPEAT Program when the Initial Documentation Review is complete, at which point the EPEAT Program will change the Participating Manufacturer's CAB of record in the EPEAT Registry to the new CAB. Once products appear as EPEAT-registered under the new CAB's conformity assurance services, the transition process is considered complete, and the new CAB takes full responsibility for all required conformity assurance activities including Ongoing Documentation Review and any new Continuous Monitoring activities.

Until the transition process is complete, the existing CAB is still considered the CAB of record and is responsible for fulfilling all conformity assurance activities for the Participating Manufacturer. If the

transition process is completed during an active Continuous Monitoring Round, the EPEAT Program will work with the Participating Manufacturer and both old and new CABs to determine how best to transition the investigative activities to the new CAB.

9.0 Complaints and Appeals

For the purposes of this document (*EPEAT Conformity Assurance Implementation Manual P66*), complaints and appeals referenced in Section 9 are only related to conformity assurance activities, recommendations, and decisions for the EPEAT Conformity Assurance System. GEC organizational activities continue without limitation during an investigation into a complaint or appeal, unless otherwise identified in Section 9.

A complaint is a written expression of dissatisfaction related to conformity assurance activities, recommendations, or decisions, other than an appeal, submitted to a GEC-approved Conformity Assurance Body or the EPEAT Program by any person or organization.

An appeal is a written request for reconsideration of a conformity recommendation or decision based on either procedural or technical grounds. Appeals can be made to GEC-approved Conformity Assurance Bodies or the EPEAT Program. Appeals may only be lodged by Participating Manufacturers or GEC-approved CABs.

GEC-approved CABs must have procedures in place that identify how all complaints and appeals will be managed. Upon receiving a complaint or appeal, a GEC-approved CAB must acknowledge receipt, conduct a fair investigation to resolve the issue, and ensure impartiality is maintained in the investigative process. All complaints and appeals must be addressed swiftly and transparently, tracked internally, and not result in discriminatory actions.

Participating Manufacturers and GEC-approved CABs are strongly encouraged to raise conformity assurance related questions and issues to the EPEAT Program as part of the ongoing conformity assurance process. The EPEAT Program strives to resolve these through other processes and seeks to avoid their escalation to formal complaints and appeals, wherever possible.

9.1 Complaints

9.1.1 Complaints Raised to CABs

A Participating Manufacturer may raise a complaint with its GEC-approved CAB if there is disagreement regarding the CAB's conformity decision made during Documentation Review, Continuous Monitoring activities, or discoveries of nonconformances found outside of Continuous Monitoring. Complaints regarding conformity decisions made during Documentation Review can only be raised after the final CAB decision on conformity of the Criterion is made, not during the iterative Documentation Review process that occurs between Participating Manufacturers and CABs.

The complaint must be submitted in writing to the CAB within 30 calendar days of receiving the conformity decision from the CAB or within the timeframe specified in the CAB's complaints process, whichever is less. The CAB then shall follow its complaints process and keep appropriate records of the investigation conducted and how the complaint was resolved. The CAB's complaints process shall be concluded within 30 calendar days. GEC reserves the right to review such records during the Annual EPEAT Audit of CABs. Complaints related to conformity decisions must be raised and resolved within

these timeframes because they can impact the status of products on the EPEAT Registry as well as the credibility 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). 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. The EPEAT Program will determine the appropriate next steps and only involve the CAB if warranted.

9.1.2 Complaints Raised to EPEAT Program

The EPEAT Program may receive a complaint from a Participating Manufacturer about its GEC-approved CAB's conformity decision made during Documentation Review or Continuous Monitoring activities. In such cases, the EPEAT Program will require that the Participating Manufacturer first try to resolve the complaint directly with its CAB. If a Participating Manufacturer is not satisfied with the resolution of the complaint, then it may raise the issue directly to the EPEAT Program for further consideration. The EPEAT Program strives to resolve such issues jointly with the Participating Manufacturer and CAB.

The EPEAT Program may receive a complaint from any stakeholder regarding the status of an EPEAT-registered product, conformity decisions or recommendations, or other conformity assurance activities. In such cases, the EPEAT Program may notify the applicable GEC-approved CAB and instruct the CAB to initiate an investigation where appropriate. Within 30 calendar days of notification by the EPEAT Program, the CAB must conduct the investigation following its complaints process, document the steps taken, and communicate the outcome of the investigation to the EPEAT Program. If the investigation results in a Participating Manufacturer being found nonconformant with one or more EPEAT Criteria, the steps identified in Section 6.5 shall be followed.

9.2 Appeals

Appeals may be made on either procedural or technical grounds. Procedural appeals are made on the grounds that a conformity recommendation or decision should be reconsidered because a required internal or external process was not followed. Technical appeals are made on the grounds that a conformity recommendation or decision should be reconsidered because a specified requirement was not interpreted correctly. During technical appeals, the appellant cannot provide additional evidence beyond what was supplied during the original conformity assurance activities.

9.2.1 Appeals Raised to CABs

9.2.1.1 Documentation Review

A Participating Manufacturer may appeal a GEC-approved CAB's conformity decision made during Documentation Review activities. The appeal must be submitted in writing to the CAB within 30 calendar days of receiving the conformity decision from the CAB or within the timeframe specified in the CAB's appeals process, whichever is less. Within five business days of receiving the appeal, the CAB must determine if enough information has been provided to proceed with the appeal. The CAB then shall

follow its appeal process and keep appropriate records of the investigation conducted and the final decision on the appeal. The CAB's appeals process shall be concluded within 30 calendar days. GEC reserves the right to review records regarding the above appeals made to CABs during the Annual EPEAT Audit of CABs.

9.2.1.2 Continuous Monitoring

A Participating Manufacturer may appeal a GEC-approved CAB's recommendation of nonconformance or unacceptable corrections for an Investigation in a Continuous Monitoring Round. The appeal must be submitted in writing to the CAB, within 10 days of receiving the relevant draft Investigation Report from the CAB or within the timeframe specified in the CAB's appeals process, whichever is less. Within five business days of receiving the appeal, the CAB must determine if enough information has been provided to proceed with the appeal and inform the EPEAT Program of this decision.

- If the appeal is proceeding, the EPEAT Program will postpone review of the relevant draft Investigation Report until the CAB has concluded its appeals process. The CAB's appeals process shall be concluded within 30 calendar days.
- Depending on the outcome of the appeal, the CAB may need to submit a revised Investigation Report to the EPEAT Program. If required, the CAB must submit the revised Investigation Report within 14 days of the conclusion of the appeals process.
- Where corrective action is required following a CAB investigation into an appeal, the EPEAT Program provides the CAB with new Corrective Action Phase deadlines if necessary. In this case, the appellant is still provided a 30-day Corrective Action period. Dissemination of EPEAT corrective action decisions for all other investigations in the affected Round, as well as publication of the Outcomes Report, may be delayed.

A Participating Manufacturer may appeal a GEC-approved CAB's conformity decision made during Annual Renewal activities conducted for the Certification Pathway. The appeal must be submitted in writing to the CAB within 30 calendar days of receiving the conformity decision from the CAB or within the timeframe specified in the CAB's appeals process, whichever is less. Within five business days of receiving the appeal, the CAB must determine if enough information has been provided to proceed with the appeal. The CAB then shall follow its appeal process and keep appropriate records of the investigation conducted and the final decision on the appeal. The CAB's appeals process shall be concluded within 30 calendar days.

GEC reserves the right to review records regarding the above appeals made to CABs during the Annual EPEAT Audit of CABs.

9.2.2 Appeals Raised to EPEAT Program

9.2.2.1 EPEAT Audits of CABs

A Provisional CAB may appeal one or more nonconformance findings in their Initial EPEAT Audit. Similarly, a GEC-approved CAB may appeal one or more nonconformance findings in their Annual EPEAT Audit. The appeal must be submitted in writing to GEC within 30 business days of the date that GEC sent

the audit report to the CAB. GEC evaluates if the appellant has provided enough documentation to warrant proceeding with the appeal before proceeding with an investigation into the appeal. During GEC's appeals process, the CAB will continue to address any other nonconformance findings found during the Initial or Annual EPEAT Audit.

9.2.2.2 Continuous Monitoring

Participating Manufacturers and GEC-approved CABs may appeal final decisions on conformity and final decisions of unacceptable corrections made by the EPEAT Program during Continuous Monitoring Round Investigations. Appeals must be submitted in writing within 10 calendar days of the date that the EPEAT Program specified Investigation Reports with the final decisions on conformity or corrections were to be distributed by CABs to Participating Manufacturers. The appellant must indicate whether the appeal is based on procedural or technical grounds.

If a Participating Manufacturer or GEC-approved CAB appeals a final decision on conformity made for a Level 2 Investigation, the appellant must be prepared to provide another, identical product for re-evaluation by the laboratory, at their own cost, if necessary. The written appeal must establish the reason for the appeal and if applicable, the reason for possible re-evaluation of the investigated product.

9.3 EPEAT Program Complaints and Appeals Process

As described in Section 9.1.2 and 9.2.2, specific complaints and appeals regarding conformity assurance activities may be raised to the EPEAT Program. This section describes the process used to address such complaints/appeals and does not apply to complaints/appeals raised directly to GEC-approved CABs.

Complaints and appeals regarding conformity assurance activities must be made in writing to the EPEAT Program within the timeframes specified in Sections 9.1.2 and 9.2.2, and must include the following information to be considered complete:

1. Identification of the issue:
    - For procedural complaints/appeals, identification of the relevant clause(s) of this document, *EPEAT Conformity Assurance Implementation Manual (P66)* against which the complaint or appeal is based.
    - For all appeals related to Continuous Monitoring Round investigations, identification of the Investigation number originally assigned by the EPEAT Program;
2. Rationale or reason for the complaint/appeal; and
3. Evidence substantiating the basis for the complaint/appeal.
    - For technical appeals of final conformity decisions or final decisions of unacceptable corrections: Because Continuous Monitoring Investigations are time-bound activities, the appellant cannot provide additional evidence beyond what was originally submitted during the Continuous Monitoring Investigation.

Within five business days of receipt of a complaint or appeal, the EPEAT Program evaluates the complaint or appeal for completeness and notifies the complainant/appellant of the outcome of the evaluation. If determined to be complete, the EPEAT Program assigns a Complaint/Appeal Manager and conducts an investigation. During the investigation, the complainant/appellant may be asked to respond to questions or provide additional information.

Depending on the nature of the complaint, the EPEAT Program may convene a Complaints Committee. For all appeals, the EPEAT Program convenes an Appeals Committee. The Complaint/Appeal Manager may also serve as a member of such Committees.

The Complaints/Appeals Committee (or, where applicable and appropriate for complaints, the Complaint Manager) reviews the complaint/appeal, all submitted documentation, and results of the investigation and makes a final decision on the complaint/appeal.

Complaints and appeals are 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 is not permitted to be involved in the investigation of that complaint or appeal, is not permitted to serve as Complaints/Appeals Manager for that complaint/appeal and is not permitted to serve on the Complaints/Appeals Committee for that complaint/appeal.

GEC 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.

GEC notifies the complainant/appellant in writing of its decision on the complaint/appeal within 30 calendar days of the start of the investigation. The EPEAT Program is responsible for managing investigations into complaints and appeals and GEC retains full authority to make the final determination in the case of all complaints and appeals pertaining to conformity assurance related activities.

9.4 Non-Conformity Assurance Related Complaints

GEC-approved CABs may receive complaints regarding GEC's management of the EPEAT Program, 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. The EPEAT Program will determine the appropriate next steps and only involve the CAB if warranted.

10.0 Force Majeure Events

The EPEAT Program may issue temporary addenda to this document, *EPEAT Conformity Assurance Implementation Manual (P66)*, 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.

11.0 Revisions and Effective Date

The EPEAT Program reviews *EPEAT Conformity Assurance Implementation Manual* (P66) 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.

~~11.0~~12.0 Supplementary Information

~~11.1~~12.1 Acronyms

The following acronyms are used in this document.

CAB: Conformity Assurance Body

CGG: Conformity Guidance Group

IAF: International Accreditation Forum

ILAC: International Laboratory Accreditation Cooperation

~~11.2~~12.2 References

The following documents are referenced in this document, *EPEAT Conformity Assurance Implementation Manual (P66)*, and are indispensable for its application. Undated references indicate that the latest edition of the referenced document applies.

- *CAB Application Form (P40)*
- *CAB Performance Improvement Assistance Plan (P73)*
- *Conformity Guidance Group Issue Paper and Feedback Form (P88)*
- *EPEAT Policy Manual (P65)*
- *GEC Conformity Assurance Body Agreement (P33)*
- *GEC EPEAT License and Participating Manufacturer Agreement (P26)*
- ISO 9000 *Quality management systems – Fundamentals and vocabulary*
- ISO/IEC 17000 *Conformity assessment – Vocabulary and general principles*
- ISO/IEC 17020 *Conformity assessment – Requirements for the operation of various types of bodies performing inspection*
- ISO/IEC 17025 *General requirements for the competence of testing and calibration laboratories*
- ISO/IEC 17050-1 *Conformity assessment – Supplier's declaration of conformity – Part 1: General Requirements*
- ISO/IEC 17050-2 *Conformity assessment – Supplier's declaration of conformity – Part 2: Supporting documentation*
- ISO/IEC 17065 *Conformity assessment – Requirements for bodies certifying products, processes, and services*
- *Level 0 Investigation Report Template (P70)*
- *Level 1 Investigation Report Template (P35)*

- *Level 2 Investigation Report Template (P36)*
- *Outcomes Report Template (P63)*
- *Rebranding of EPEAT-Registered Products: Product Criteria with Disclosure Requirements (P82)*

~~11.3~~12.3 Definitions

The following definitions are referenced throughout this document, *EPEAT Conformity Assurance Implementation Manual (P66)*, 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).

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 Conformity Assurance Implementation Manual (P66*), an appeal is a written request for reconsideration of a conformity recommendation or decision based on either procedural or technical grounds. Appeals can be made to GEC-approved Conformity Assurance Bodies or the EPEAT Program. 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.~~

Supplementary Information

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.

Competence: Ability of a Participating Manufacturer to demonstrate an understanding of an EPEAT Criterion's requirements and their ability to demonstrate conformance to that Criterion on an ongoing basis. A participating Manufacturer's competence for a Criterion is evaluated by its GEC-approved Conformity Assurance Body.

Complaint: For the purposes of this document, *EPEAT Conformity Assurance Implementation Manual (P66*), a complaint is a written expression of dissatisfaction related to conformity assurance activities, recommendations, or decisions, other than an appeal, submitted to a GEC-approved Conformity Assurance Body or the EPEAT Program by any person or organization. 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*.

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 requirements~~.

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.

Supplementary Information

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 (Level 0, Level 1 or Level 2), and assigns Investigations to Conformity Assurance Bodies.

Corrective Action Phase: Period of a Continuous Monitoring Round during which Participating Manufacturers must correct the issues underlying final decisions of nonconformance identified in Investigations. During this period, Participating Manufacturers must also develop a corrective action plan to address other similarly affected products.

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*.

Deliberation Phase: Period of a Continuous Monitoring Round where the EPEAT Program reviews Investigation Reports and supporting evidence submitted by GEC-approved Conformity Assurance Bodies and makes final decisions of conformity on the Investigations.

Demonstrated Nonconformance: High-level reason for a nonconformance in an Investigation where evidence provided by a Participating Manufacturer definitively shows EPEAT Criteria are not met.

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).

Documentation Review Requirement: EPEAT Program conformity assurance requirement where a Participating Manufacturer must show competence for an EPEAT Criterion and cannot activate the Criterion without Documentation Review being performed by a GEC-approved CAB. When the Documentation Review Requirement is instated or reinstated for a Criterion, a Participating Manufacturer must provide evidence and demonstrate conformance to that criterion.

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".

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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.

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. Estimated timeframe for implementation is nine to eighteen months after publication. 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 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 Level 2 Investigations 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

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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.

Insufficient Evidence to Demonstrate Conformance: High-level reason for a nonconformance in an Investigation where evidence provided by a Participating Manufacturer is incomplete and does not definitively show either conformance or nonconformance.

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.

Investigation Phase: Period of a Continuous Monitoring Round where GEC-approved Conformity Assurance Bodies are actively conducting Investigations.

Investigation Report: Report prepared by a GEC-approved Conformity Assurance Body summarizing the continuous monitoring activities conducted during an Investigation, identifying the Conformity Assurance Body's recommendation on conformity, and submitted to the EPEAT Program at the conclusion of an Investigation. Investigation Reports are considered to be in draft form until the EPEAT Program makes the final decision on conformity or the final decision on a correction for findings of nonconformance.

Level 0 Investigation: Type of Investigation where a GEC-approved Conformity Assurance Body reviews publicly available information without the Participating Manufacturer's involvement or submission of evidence.

Level 1 Investigation: Type of Investigation where a GEC-approved Conformity Assurance Body reviews evidence submitted by a Participating Manufacturer.

Level 2 Investigation: Type of Investigation where a GEC-approved Conformity Assurance Body acquires a Participating Manufacturer's product from the marketplace, without the Participating Manufacturer's involvement where possible, and has the product evaluated by a laboratory.

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. Estimated timeframe for implementation is four to six months after publication. 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. Estimated timeframe for implementation is one to two months after publication of the revisions. 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*. This specifically includes the following:

- No response to a request for documentation or no documentation provided during the investigation period of a Level 1 Investigation, except for when the Participating Manufacturer indicated the product is end-of-life and no longer available on the market, and
- All nonconformances found in Level 2 Investigations, except for when the CAB was unable to obtain the product for evaluation by a laboratory and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.

No Documentation Provided: High-level reason for a nonconformance in an Investigation where the Participating Manufacturer has not provided any supporting evidence or documentation during the Investigation Phase.

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.

Preparation Phase: Period of a Continuous Monitoring Round where the EPEAT Program selects products, EPEAT Criteria and the method of investigation (Level 0, Level 1, or Level 2), assigns investigations to GEC-approved Conformity Assurance Bodies, and conducts training for GEC-approved Conformity Assurance Bodies

~~**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 conformity recommendation or 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 *GEC Conformity Assurance Body Agreement (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.

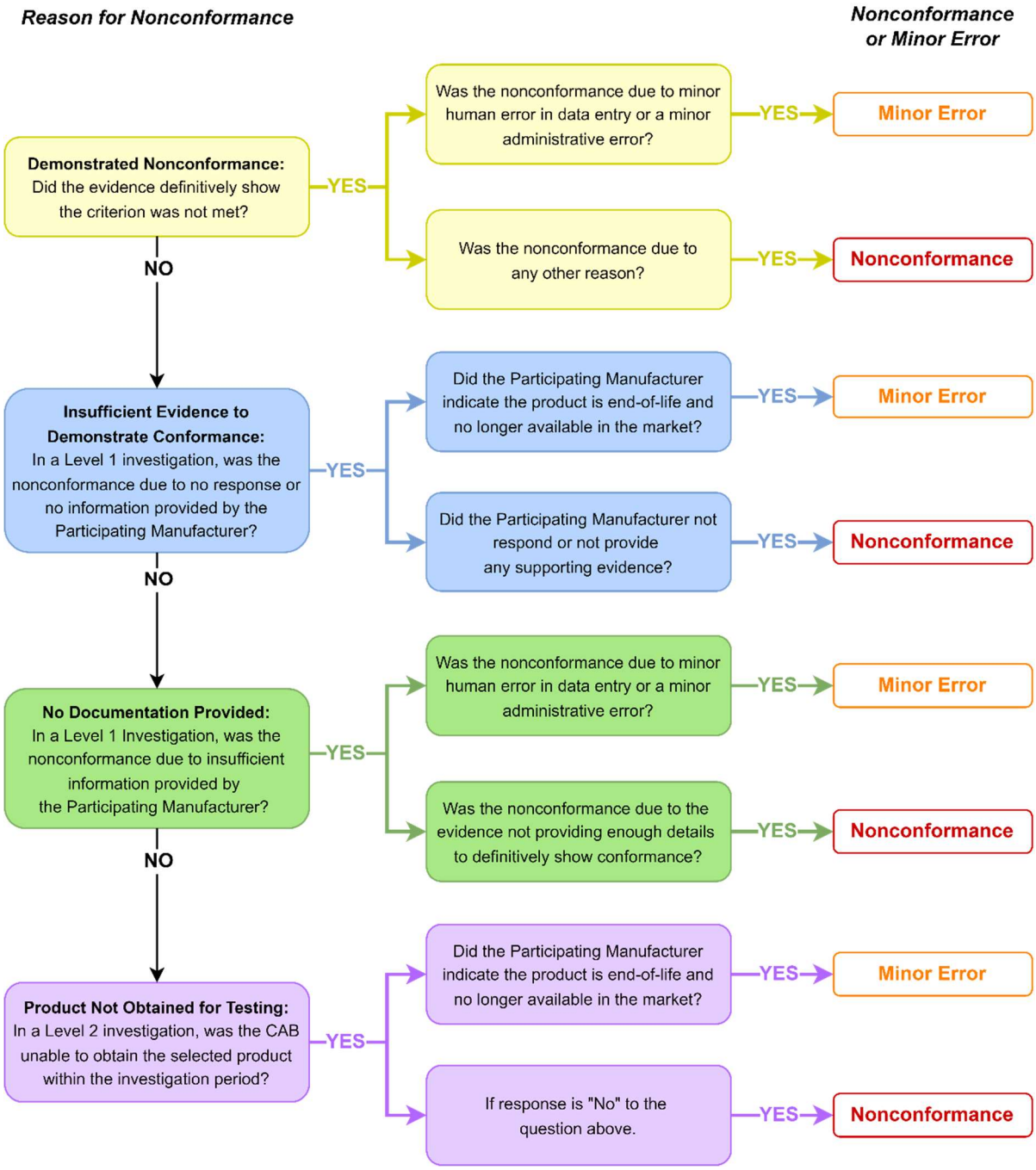
Qualified Auditor: CAB personnel who has met and maintained the necessary qualifications and been approved by the EPEAT Program to provide conformity assurance services for the EPEAT Program. Sometimes referred to as "Auditor".

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.

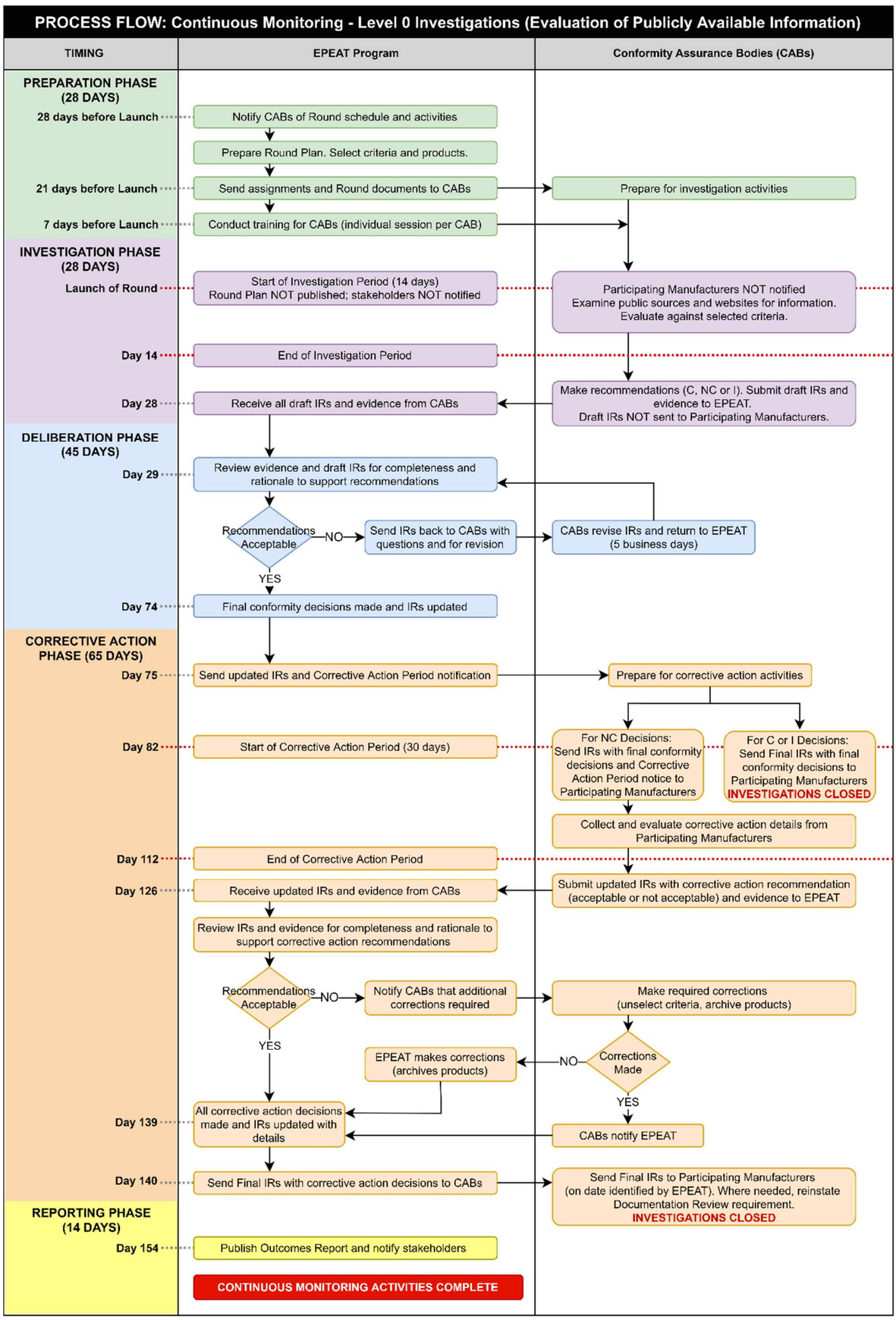
Technical Appeal: Appeal made on the grounds that a conformity assurance recommendation or decision should be reconsidered because a specified requirement was not interpreted correctly.

~~11.4~~12.4 Annex 1: Nonconformances and Minor Errors

The flowchart below provides additional guidance to GEC-approved CABs for identifying if nonconformances resulting from Continuous Monitoring Investigations are “minor errors”.



~~11.5~~12.5 Annex 2: Level 0 Investigations



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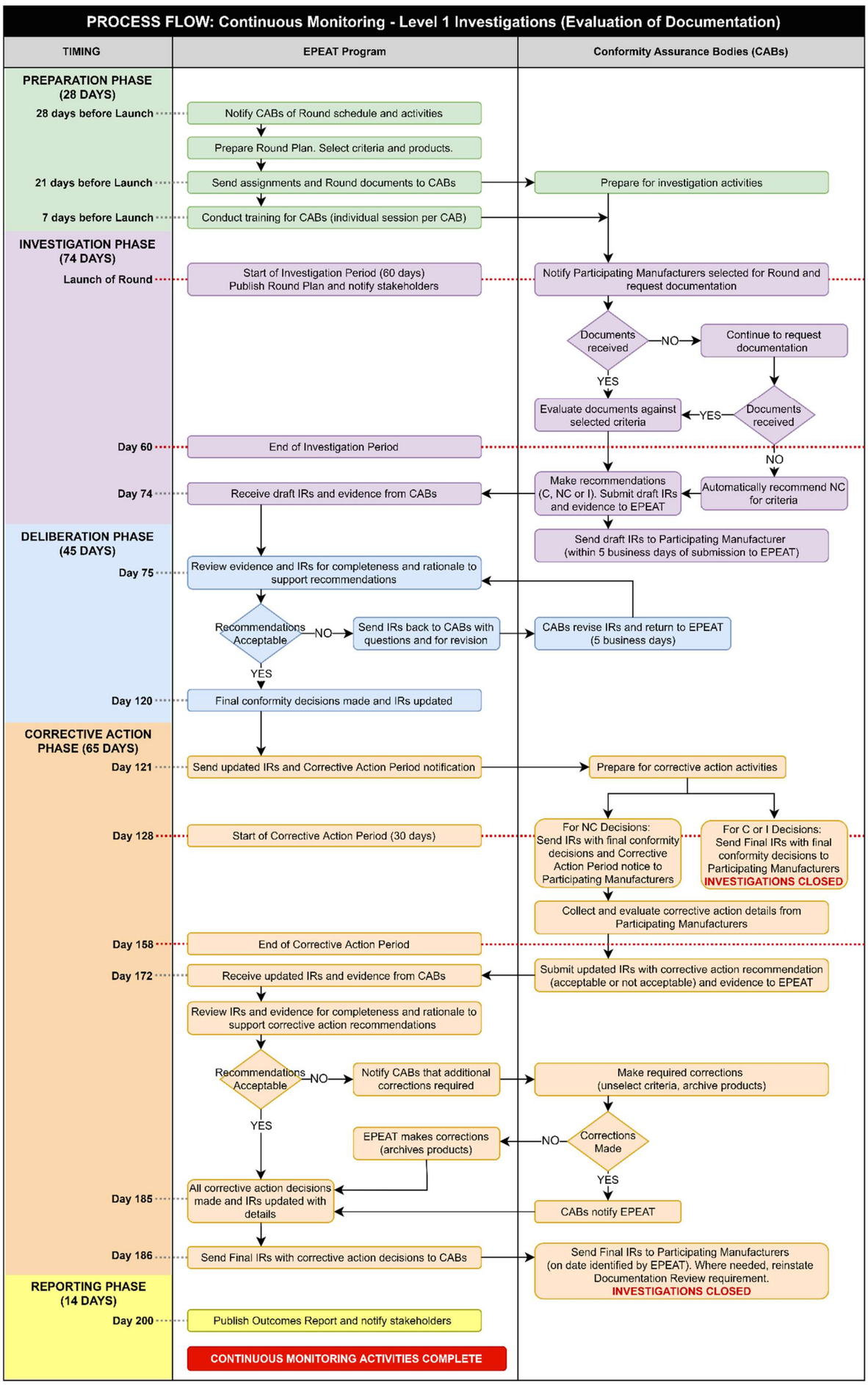
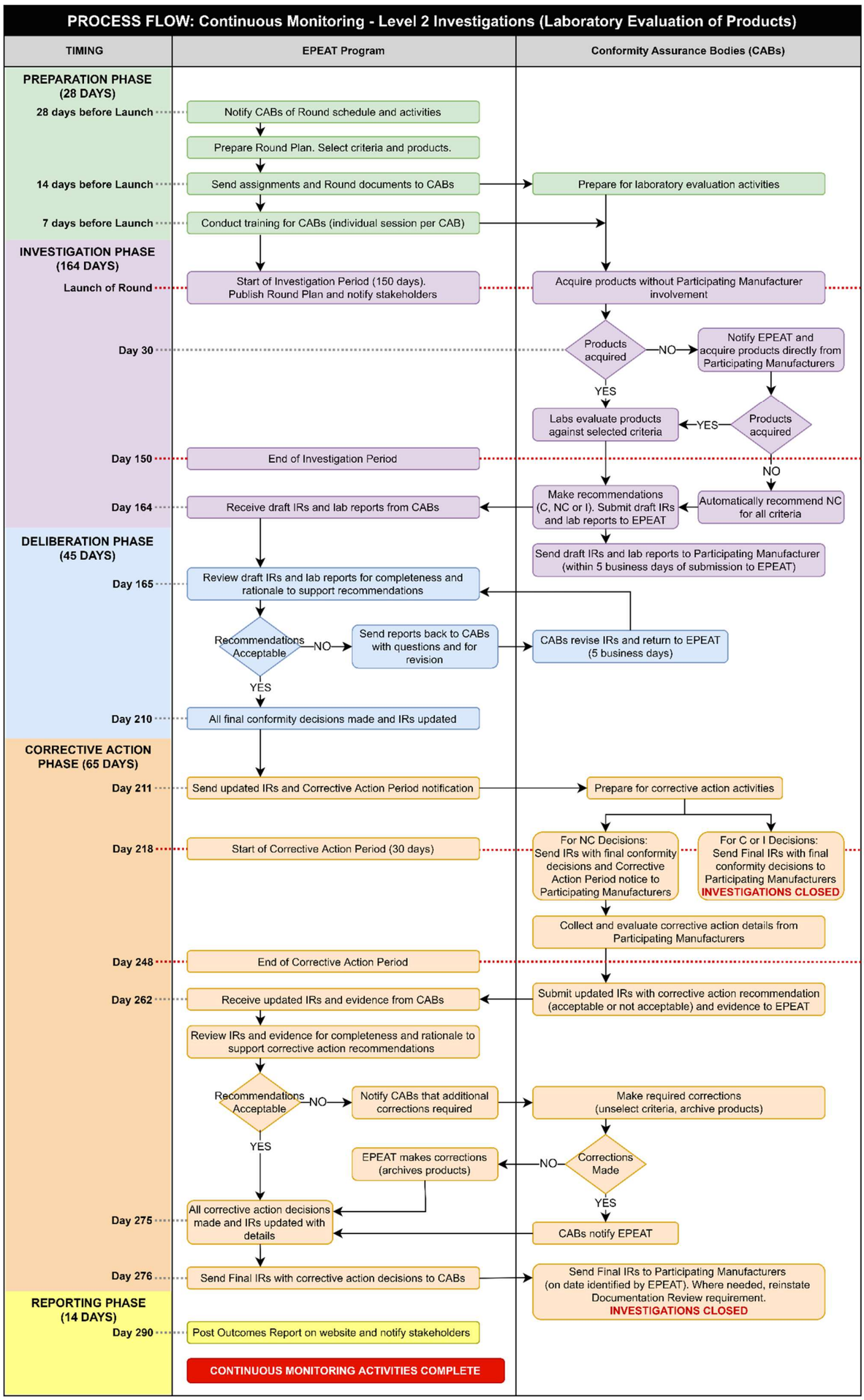
~~11.6~~12.6 Annex 3: Level 1 Investigations



~~11.7~~12.7 Annex 4: Level 2 Investigations



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~~11.8~~12.8 Document Change History

Issue	Revision	Author	Description of Change	Approver	Approval Date	Effective Date
1	0	L. Hoppe	Initial release	L. Fernandez-Salvador	2020 Jan 17	2020 Jan 17
2	0	Senior Manager, Ecolabels and Resources	Restructuring of document and further clarifying existing policies. Addition or changes to: Guidance for raising questions with EPEAT; Organizations can only apply once each 12 months to be a CAB; Initial audit required for Provisional CABs; New minimum criteria for review in CAB Mentored Work Phase; Topics for annual and bi-annual audits of CABs; Process if Auditor fail exams; Annual Auditor proficiency training and exam; CAB must attend Calibration mtgs and mtgs governed by Chatham House Rule and anti-trust statement; Updated CAB metrics including new customer service metric; New reasons for CAB suspension or termination; annual CAB Summit; No visual inspection requirement for Certification Pathway but products may be included in Level 2; Details needed in test reports; New process for rebranding products already EPEAT-registered; Minor NCs must be corrected in 30 days; 6 months max for corrective action plan for similarly affected products; List of criteria for Annual renewals; Guidance for when CABs identify NCs outside of Continuous Monitoring; Updated criteria for review when changing CABs; additional definitions and references; acronyms; Force Majeure Events.	Senior Director, Ecolabels and Manufacturer Resources	2021 Feb 15	2021 July 01

Issue	Revision	Author	Description of Change	Approver	Approval Date	Effective Date
2	1	Senior Manager, Ecolabels and Resources	**Throughout**: Formatting and fixing typos; Defining timeframes (calendar vs business days); Additional documents available; Defining correction versus corrective action plan. **Additional clarity**: Clarifications (2.2.1); CGG meets on as needed basis, topics may include transition timeframe for revised criteria (2.2.4); Reviewing CAB applications (3.2); Only qualified auditors can perform work, must be qualified for each product category (3.3.1, 4.1); Mentored work can include Continuous Monitoring (3.5); Reordering for clarity (5.6, 6.0, 9.0); Further details on PIAP, suspension and termination (5.6.1, 5.6.2, 5.6.2.1, 5.6.2.2); Change in terms to Nonconformance and Minor Error (throughout 7.2); CABs encouraged to provide Reports early to address questions (7.2.2); EPEAT may follow-up on Inconclusive findings (7.2.3); Inconclusive findings not identified in Outcomes Reports (7.2.5); Timing for Annual Renewal activities (7.3); Further details on complaints and appeals (9.1.1, 9.1.2, 9.2.1, 9.2.2, 9.3). **New**: Scenarios where attestations may be used, docs will be available when finalized (2.2.5); Public availability of which categories CABs are approved (3.4); Specialized training may be used for auditors (4.4.2); Ability to reference P66 in CAB's QMS but substantive activities must be in procedures (5.1); Annual audit of CABs include review of Mfr CAPs and previous NCs related to conformity decisions (5.2.1); Requirements to address Mfrs that may be affected by NCs (5.2.2.1); Must gain EPEAT approval for late submission of Reports (5.3, throughout 7); If CA~~S~~B terminated, Mfr clients given 12 months to complete Documentation Review with new CAB (5.6.2.2); CABs must notify GEC is Mfr no longer a client (5.7); Diagram to explain Documentation review (6.1.2); No confidential info transferred in rebranding, products not identified as rebranded, requirements for Continuous Monitoring (6.4); NCs identified by EPEAT outside Continuous Monitoring (6.5.2); Using local time zone and implications for late Reports (throughout 7.2); references and definitions (11.2, 11.3).	Senior Director, Ecolabels and Manufacturer Resources	2022 Feb 15	2022 July 01

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Issue	Revision	Author	Description of Change	Approver	Approval Date	Effective Date
2	2	Senior Manager, Ecolabels and Resources	***Additional clarity**: Process for auditors on leave (4.2.1, 4.2.2); Continuous monitoring training (4.2.3); Retention of records for 3 years after contract with Mfr ends (5.1); Nonconformances related to conformity decisions and notifying Mfr (5.2.2.1); Metric 3 and training attendance (5.3); Examples for demonstrating competence (6.1.5); CABs and Mfrs may develop alternate methods to demonstrate competence for specific criteria (6.3.1); Products for testing must be new and in original packaging (7.1, 7.2.2); Time to revise IRs (7.2.3, 7.2.4.1); Appeals during Continuous Monitoring (9.2.1.2). **Additions**: Clarification may be released for CGG review period (2.2.1); Auditor training for revised Criteria from Sustainability Impact Modules (3.1, 3.3.1, 4.1, 4.2); CAB mentored work phase with revised Criteria from Sustainability Impact Modules (3.5); Metrics 4 and 11 (5.3); Declarations of conformity (6.1.4.2); Conforming new products similar to existing products (6.2.4, 6.3.1); Impacts of force majeure events on ongoing conformity assurance activities (10.0); Section on revisions and effective date (11.0). **Changes**: Reference to priority criteria removed (2.1, 6.1.4.2, 6.2.2, 6.2.4, old 6.3.1, old 6.3.1.1, old 6.3.1.2, 6.3.1, 8.0); Name and intent of conformity guidance materials (2.2.2); Removed section on conformity assurance where equivalent regulatory requirements exist (2.2.5); Timeframe for providing evidence of corrections during Annual EPEAT Audit of CAB (5.2.2); Changes to metrics 1 and 12 (5.3); Actions in Continuous Monitoring for force majeure circumstances (7.2); Updated definitions (12.3).*	VP, Ecolabels and Manufacturer Resources	Proposed 2023 Feb 15	Proposed 2023 Jul 01