EPEAT Program
Stakeholder Comment Report

October 17, 2022 – December 31, 2022 Comment Period
Proposed Revisions to **EPEAT Policy Manual (P65)** and
EPEAT Conformity Assurance Implementation Manual (P66)

Introduction

The Global Electronics Council (GEC) released draft revised versions of the *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)* to seek public comment on these documents from October 17 through December 31, 2022. Stakeholder consultation in the form of a public comment period is a crucial element of Type 1 ecolabels, and an important component of the EPEAT Program. Stakeholders were invited to submit written feedback on both documents using the GEC provided stakeholder comment form. GEC also held a series of virtual information sessions for stakeholders to highlight and provide clarity on key proposed revisions.

GEC thanks all stakeholders for the constructive and thoughtful feedback provided during the public comment period, and appreciates the time and effort stakeholders took to review the documents and provide comments.

GEC believes that transparency strengthens the EPEAT Program in an important way. GEC received over 100 written comments from different stakeholder groups which have been compiled into this Stakeholder Comment Report. The comments are first listed alphabetically by the last name of the individual providing comments, and then grouped by document and listed numerically by section in the document.

GEC reviewed and considered all stakeholder comments when making final revisions to *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)*.

Overview of Comments Received

CAB Responsibilities in Continuous Monitoring

Stakeholders expressed a strong desire to ensure Participating Manufacturers are not unfairly maligned in Continuous Monitoring investigations where a GEC-approved Conformity Assurance Body (CAB) fails to submit an Investigation Report by the deadline. To this end, GEC created a new nonconformance category for situations where a CAB fails to submit an Investigation Report on time, called *"nonconformance due to CAB inaction or delay not attributable to Participating Manufacturer".* The EPEAT Program also revised *EPEAT Conformity Assurance Implementation Manual (P66)* to clarify that Participating Manufacturers will be notified directly if an Investigation Report is overdue. In the interest of full transparency, Outcomes Reports will identify products and Participating Manufacturers that receive nonconformances due to CAB inaction or delay. Note: this new nonconformance category will take effect on February 15, 2023.

Conformity Assurance Processes

Commenters sought clarification on the differences and similarities between the two conformity assurance pathways. Several of the questions raised in the comments are answered further in *EPEAT Conformity Assurance Implementation Manual (P66).* Section 6.2.1 includes requirements for CABs to have sampling and/or certification product grouping procedures. The removal of the Priority Criteria concept means that all selected Criteria are reviewed at the onset for both pathways. Section 6.2.4 outlines the process for Participating Manufacturers to add additional products during Initial Documentation Review for both pathways and Section 6.3 outlines the process for adding additional products, Criteria and/or locations of use for both pathways after Initial Documentation Review is complete.

Based on stakeholder comments, the EPEAT Program provided additional information in *EPEAT Conformity Assurance Implementation Manual (P66)* to further define what makes products "similar" when Participating Manufacturers wish to add additional products during both Initial Documentation Review and Ongoing Documentation Review and are required to confirm in the EPEAT Registry if the new product(s) is similar to an existing product.

The EPEAT Program also provided examples of how Participating Manufacturers can demonstrate competence of a Corporate Criterion with annual requirements when they are in between annual reporting cycles, in Section 6.3.1 of *EPEAT Conformity Assurance Implementation Manual (P66).*

Suggestions Requiring Additional Consideration by GEC

Some stakeholder suggestions received require further evaluation by GEC. For instance, commenters suggested that GEC should attempt to reduce the amount of overlapping text across the key policy documents, by removing similar text that appears in all of the documents and compiling it into one EPEAT Program reference document. Some of the topics cited include EPEAT Program Terms, Complaints and Appeals, and Technical Guidance.

Stakeholders also made a series of other suggestions including the recommendation that GEC publish CAB Performance Metrics and EPEAT Audit of CAB findings. Some stakeholders also expressed a desire for GEC to reconsider how it develops technical guidance and clarifications. Implementing any of these suggested changes could have a significant impact on the EPEAT Program and its stakeholders, and for this reason, GEC plans to evaluate the suggestions in 2023, and solicit stakeholder feedback where necessary before reaching a decision on these proposals.

Lastly, although the EPEAT Program is introducing a new nonconformance category to reflect CAB inaction or delay (based on stakeholder feedback), GEC plans to evaluate and refine existing Continuous Monitoring procedures in 2023 to account for this new nonconformance category.

Publication of Revised Documents

GEC published the revised versions of *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)* on February 15, 2023. These documents are available through either the EPEAT Registry, an EPEAT Registry account under "Resources" or upon request. New requirements take effect on July 1, 2023. Participating Manufacturers and GEC-approved Conformity Assurance Bodies must operate in accordance with both of these documents as of this effective date to fulfill EPEAT

Program requirements. The EPEAT Program will develop training resources to identify new requirements for CABs and Manufacturers.

Please direct any questions on this Stakeholder Comment Report to EPEAT@GEC.org.

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Commenter	Organization	Date Submitted	Document	Section	Topic	Comment
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	N/A	Overarching	There is a lot of overlap between the documents P66, P74 and P65. To avoid confusion and the potential for conflicting policies, ITI suggests that sections of similar topics (such as technical guidance) be maintained in one document and referenced in the others.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	N/A	General	The EPEAT Program is planning to implement an Early Adopter status for the Climate Module. However, it is not clear how this is allowed under the EPEAT Policy Manual.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	1.0	Introduction	As noted in our comments to P74, ITI does not believe that EPEAT criteria are "developed in a multi-stakeholder, voluntary, consensus process." ITI is suggesting specific revisions to P74 to address both the spirit and letter of OMB Circular A-119 and ISO 14024. ITI would also welcome a return to an ANSI-accredited standards development process, as advocated by several stakeholders in the previous comments to P65 (See ITI and EPA comments on EPEAT Stakeholder Comment report dated February 15, 2021).
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	1.0	Participation	Participation is not voluntary for any manufacturer or brand owner who wishes to sell products to the U.S. Government (see 48 CFR §23.704). Suggested change: Participation in the EPEAT Program is voluntary, and open to any manufacturer or brand owner of products in a product category for which EPEAT Criteria exist. However, participation in the EPEAT program is required for sales to the U.S. Government per 48 CFR §23.704).

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	2.3	Program Transparency	This section needs to be more detailed. It should reflect a transparency commitment to specific areas of operation and stakeholder engagement, including: budget, finances, and spending; proactive engagement and feedback gathering via stakeholder email distribution lists, the AC, the CAC, and other relevant GEC/EPEAT committees. The GEC should also provide an annual (or other specified period) fiscal report. Suggested Changes: GEC, is committed to transparency in its administration of the EPEAT Program. As such, GEC will~~, is committed to~~ ensure ~~ing~~ that EPEAT Program documents are freely available to stakeholders. Information is made available to interested parties regarding the following aspects of the EPEAT Program: the selection of product categories; the selection, development, and revision of EPEAT Criteria; EPEAT Criteria including the identification of methods used for product evaluation; ~~and~~ conformity assurance requirements and processes; and records of stakeholder engagement (such as Advisory Council or other group minutes). Interested parties may obtain this information by...[process or contact]. The activities of the Global Electronics Council are funded through a mix of trademark fees from our ecolabels, fees from CABs to support their training and auditing, in-kind support from partner organizations and grants/research funding. GEC will provide a detailed financial report annually to include income, budget, cash flows and functional expenses. GEC will communicate changes to governance documents, announcements of criteria development processes and other information of interest to stakeholders via…[insert process here]

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	2.4	Confidentiality	GEC confidentiality protections have been reviewed by industry legal experts and found to not be robust or adequate for most CBI submissions. It is not clear who GEC is sharing data with (or not). Suggest adding a specific section to this governance document (P65) or specifically noting where the "internal policies and procedures" can be obtained and providing audits or other means to ensure the adequacy of these processes. Suggested Changes: As the owner of the EPEAT Trademarks and managers of the EPEAT Program, GEC has a robust framework of internal policies and procedures in place to prevent the disclosure of any confidential information in its possession. These polices and procedures may be obtained by…[process]. Participating Manufacturers provide the EPEAT Program with proprietary, commercially sensitive data. GEC ensures that all levels of the organization are in full compliance with applicable laws to safeguard the confidentiality of this information. Because of this, GEC will periodically review these policies and procedures with Participating Manufacturers and their representatives.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	2.5	Type 1 Ecolabel	The GEC Criteria Development Process (P74), the document which outlines how the EPEAT program conforms with ISO 14020 and ISO 14024, does not conform with all parts of these standards, especially in areas of openness and due process. ITI has provided specific recommendations to P74 to bring the GEC Criteria Development Process in conformity with the spirit and letter of ISO 14020 and ISO 14024. Below are areas where we have found the GEC process not in alignment with the Type 1 Ecolabel standards: - ISO 14020 Principle 4: Information concerning the procedure, methodology, and any criteria used to support environmental labels and declarations shall be available and provided upon request to all interested parties. o Several aspects, including the selection process for ad-hocs and the Technical Committee, the decision-making process of the ad-hocs, and the process for drafting and finalizing the criteria have not been described by the GEC o The documents provided, including P74 and the NSF International Criteria development and maintenance procedures, lack meaningful and necessary detail todetermine how the process is managed - ISO 14020 section 4.9.2: “The process for developing standards and criteria shall be open to all interested parties” - ISO 14024 section 5.9: “A process of formal open participation among interested parties shall be established at the outset for the purpose of selecting and reviewing product categories, product environmental criteria and product function characteristics.” and - ISO 14024 Section 5.12: “A Type I environmental labelling programme should be able to demonstrate transparency through all stages of its development and operation.” o The entire criteria development process is not open to all interested and affected parties, and the only time all stakeholders are engaged is at the SOSR and Final Draft Criteria public comment periods, which do not meet the spirit nor letter of “formal open participation” All stages of the process, including the selection and development of criteria, should be open to interested parties; this is currently by invitation-only to the ad-hocs and Technical Committee

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	3.0	EPEAT-Registered Products	The scope of each of the standards is defined in the standard or criteria document, including the models and configurations. The EPEAT Policy Manual should not define "product" or other EPEAT Program Terms. Suggest removing the second and third paragraphs of this section and creating an "EPEAT Program Terms" document that should be sent out for public comment.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	4.1	Innovation Points	The EPEAT Program has not implemented a process for innovation points despite their existence for several years. ITI requests that the EPEAT Program develop a process for these.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	4.2.1	Selection of Product Categories	ITI has concerns with the new Policy Document GEC Selectin of Product Categories (P75) and has submitted these comments to GEC.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	4.2.2.1	State of Sustainability Research	As mentioned in our comments to P74, the SOSR represents the input of a single stakeholder in the development process. As such, it may only be used as a resource for further discussion of criteria development. Suggested changes: GEC publishes State of Sustainability Research as ~~an important~~ the initial step in the development or revision of criteria. The research identifies science-based social and environmental impacts across the life cycle of technology products and services, and strategies to reduce the identified sustainability impacts. The research also identifies best practices, existing regulations, and existing voluntary leadership programs designed to reduce sustainability impacts. The data and analyses in State of Sustainability Research serves as ~~the scientific basis~~ a resource for the development or revision of criteria, as well as identification of opportunities for harmonization. GEC releases State of Sustainability Research for public consultation for a minimum of 60 days.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	4.2.2.2 and 4.2.2.3	Not provided	As we have noted in our comments to P74, GEC does not run a Voluntary Consensus Process as defined by OMB Circular A-119. We have provided specific suggestions to amend the process to ensure that it meets the key characteristics as defined by the Circular. If the GEC decides to keep its existing process, they cannot claim that it aligns with the characteristics of a voluntary consensus process and this section must be amended to reflect this.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	4.2.3	Criteria Update and Revision	Revising some criteria or substantive changes to criteria annually is too often considering the development cycle of registered products. The document should also reflect stakeholder concerns on impacts of product availability on the registry. Suggest full revisions to be done every 5 years.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	4.2.4	Adopting Criteria	The criteria requirements should also be analyzed to ensure that the incremental cost of obtaining the required documents properly balances against the benefit of the criteria objectives. Suggested change (add under first bullet on page 12): Ensure that the criteria are achievable in a reasonable amount of time without excessive costs
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	5.3	Continuous monitoring rounds	An additional category for final decision on conformity should be added to account for the situation when a CAB fails to implement the Continuous Monitoring activity with the participating manufacturer or fails to complete the round by not submitting documentation on investigations to the EPEAT program. Suggest adding a category like “CAB inaction or delay not attributable to manufacturer”. These outcomes should not be included in the outcomes report as they are not conclusive and could be misleading if reported in the Outcomes Report. Or if they are included in the Outcomes Report, the manufacturer’s name should not be displayed in instances when the manufacturer had nothing to do with the action or inaction that results in the Nonconformance.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	5.6	EPEAT Technical Guidance and Authority	The GEC does not have the necessary expertise to make technical interpretations of criteria, and there is no process in ISO 14024 for technical interpretations or guidance, so it is not clear how or why this section is referencing the Type 1 environmental labeling standard. In every standard or label that ITI works with, except for EPEAT, when conflicting or disparate understandings criteria or verification requirements arise, temporary guidance is provided by the criteria development Technical Committees, or if those have been sunset, via another expert consensus group. These guidance documents then sunset upon revision of the applicable criterion. ITI suggests that EPEAT adopt a similar approach to bring it in alignment with commonly accepted international approaches to technical guidance. Suggested changes: Remove first and second paragraphs of this section. During their ongoing interactions with Participating Manufacturer clients, GEC-approved CABs may identify that there is a conflicting or disparate understanding of EPEAT Criteria and/or the associated conformity assurance requirements, or ambiguity in the requirements or verification. In such situations and where they are unable to resolve the conflict with the Participating Manufacturer, CABs must inform the EPEAT Program. Stakeholders may also inform the EPEAT Program of a conflict in understanding or ambiguity. The EPEAT Program will then refer this issue to the appropriate expert committee (the Technical Committee of jurisdiction, or if that has been sunset, the EPEAT Advisory Committee, the EPEAT Conformity Guidance Group or another ad-hoc expert committee) to make a definitive technical interpretation and share it with all GEC-approved CABs and Participating Manufacturers.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	5.6	Technical Guidance	The terms and applications of “guidance,” “interpretations” and “clarifications” are all different however often used interchangeably in this section. Only the term “clarification" is defined in section 13 of this document. ITI suggests if P66 is going to use all three terms, it must provide commonly available definitions for each of the terms and separate out parts on “guidance” (informative) and “clarifications” and “interpretations” (normative).

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	5.6.1	Not provided	As with technical interpretations for criteria, GEC does not have the expertise or the authority (via ISO 14024) to unilaterally provide clarifications if a criterion is found to be ambiguous. ITI suggests removing section 5.6.1 and combining it with the suggested text from section 5.6
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	5.6.1	Clarifications	When the EPEAT Program provides clarifications, the clarifications should be published in the documentation resources of the EPEAT website for future references. It's not clear in this section how these clarifications are communicated.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	5.6.2	Conformity Requirements and Guidance	Guidance materials cannot place additional requirements not in the criteria on the Participating Manufacturers. This includes testing types and timelines. In most cases, the acceptable evidence is listed in the verification requirements of the criterion. Suggested change: The EPEAT Program publishes Conformity Requirements and Guidance Materials to help Participating Manufacturers and GEC-approved CABs further understand EPEAT Criteria requirements~~, provide supplementary information and where necessary, provide further details regarding demonstration of conformance with EPEAT Criteria~~. Where content in these Materials is specifically identified as "guidance", EPEAT Criteria take precedence over that content. Further, guidance cannot impose further requirements not found in the EPEAT Criteria.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	5.6.3	Calibration meetings	Outcomes, decisions, and clarifications that result from calibration meetings should be shared with participating manufacturers to ensure common understanding of criteria and verification requirements. Suggested change: Calibration Meeting materials are made available to all GEC-approved CABs and Participating Manufacturers.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	6.1	CAB Eligibility	In all other standards and labels that ITI and our members participate in, the Standards org or label owner does not have any requirements for participation in the program other than accreditation to applicable programs. It is not clear what benefit Sections 6.2 and 6.4 provide.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	6.4.3	Performance Metrics	CABs performance metrics should be shared with the manufacturers who rely on that particular CAB to ensure that their CAB is in good standing. Suggested change: The EPEAT Program evaluates the performance of all GEC-approved CABs against a series of conformity assurance and service provision metrics at least annually and shares the results with CABs and that CAB's Participating Manufacturers during their annual EPEAT Audit.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	6.5	Suspension or Termination	Once terminated, the time for a CAB to work with existing manufacturing clients for only 6 months may not provide enough time for manufacturing clients to finish criteria in process and find a new CAB. Suggest reverting this to 12 months.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	7.2	Ongoing Requirements	Participating Manufacturers may need time to conform with criteria based on changes to the EPEAT policy manuals. Suggest providing a time to conform to potential changes. Suggested change: Participating Manufacturers must ~~also unselect~~ inform the GEC if they are unable to meet EPEAT Criteria ~~immediately if they are no longer able to meet the Criteria~~ due to a change in EPEAT Policy. Manufacturers must inform GEC of which criteria they are unable to meet and the time necessary to come back into conformity with the criteria. If the time to conform to the criteria is longer than six months, the Participating Manufacturer will unselect those optional criteria and remove the device from the registry if there are required criteria.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	7.4	Termination	If the specific grounds and provisions for Participating Manufacturer termination are in the GEC EPEAT License and Participating Manufacturer Agreement (P26) then a summary in bullet form does not need to be listed here. Suggest removing the bullets. Additionally, inclusion of P26 in the Policy Manual suggests that this document should also be open for public review and comment.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	7.4	Termination	There should be a provision that Participating Manufacturers may appeal the CAB recommendation or GEC decision to terminate. Suggested change: GEC may terminate a Participating Manufacturer according to the provisions in *GEC EPEAT License and Participating Manufacturer Agreement (P26)*. Participating Manufacturers may appeal a decision to terminate using the process in Section 9.0
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	8.0	Managing Impartiality and Conflicts of Interest	This section is vague and does not explain the safeguards in place to avoid a conflict of interest. It also does not explain how GEC being a CAB competing with and managing independent CABs is not a conflict of interest, although it is recognized in Section 8.2 that this is a potential conflict of interest. ITI refers GEC to our comments on Section 2.3 for suggestions of actions that will increase transparency and manage potential conflicts of interest.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	8.2	GEC CAB and Independence	ITI continues to wonder how the GEC can maintain a CAB that competes with other CABs and maintain that it does not have a conflict of interest. No other standards organization globally operates in this way. Ultimately, as long as GEC maintains its own CAB, appearances of conflict of interest will exist.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	9.0	Complaints and Appeals	Similar to our comments on Complaints and Appeals in P74, ITI recommends a process by which an appeal is reviewed by an external, volunteer group. This removes the conflict of interest of GEC staff ruling on an appeal of a GEC action or inaction. ITI suggests that GEC add a section here either about an external Complaints Appeals Committee, which is comprised of individuals outside of GEC, or a two-tier process where there is a "GEC appeal" and then an "external appeal." The decisions of the external appeal would be final.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	13.3	Definition of "Conformity Requirements and Guidance Materials"	Per our comments on Section 5.6, suggest removing this new definition and providing comments for the three terms as used in the Policy Manual

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P65	11.0	Force Majeure Events	Several criteria in the existing standards have built-in force majeure events provisions, but it seems that the EPEAT Program is no longer allowing for this. Absent specific provisions in the criteria, the EPEAT Policy Manual should note that temporary exemptions to conformity of criteria may be granted. Additional specificity on this would help. Suggested change: The EPEAT Program may also issue temporary exemptions to conformity to criteria during Documentation Review and Continuous Monitoring activities due to force majeure events.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	N/A	Overarching	There is a lot of overlap between the documents P66, P74 and P65. To avoid confusion and the potential for conflicting policies, ITI suggests that sections of similar topics (such as technical guidance) be maintained in one document and referenced in the others.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.1	Adding additional products or criteria	it is not clear why or how these pathways have different lengths of validity. What is the length of validity based on? This should be specified.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.1	Ongoing documentation review	It is not clear the difference between major and minor revisions. This needs to be clarified with examples
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.1	Ongoing documentation review	What other kinds of "Ongoing Documentation Review" are there and why would another review need to be done if no significant product/program changes have occurred to warrant it? Any criteria revision happening outside of a full revision should be taken through the Conformance Guidance Group for vetting and mfr awareness and/or weighing in.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.1	Continuous monitoring non conformance	If in the continuous monitoring activity, the CAB fails to provide the investigation report, then the CAB's performance metric should reflect this, and the participating manufacturer will not be penalized with a non conformance due to this. Instead, a corrective action report will need to be submitted by the CAB along with the investigation report within 30 calendar days.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.1	Clarifications	Any change to the requirement should also warrant a Conformity Guidance Group review with manufactures. This is critical for mfrs to have awareness and time to respond. Suggested change: 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.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.1	Clarifications	ITI has provided comments on the EPEAT Policy Manual Section 5.6 on Technical Guidance. All Clarifications must go through this process Suggested Change: 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.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.1	Clarification	The text should be "and" as the proposed clarification should be routed for comment to both the public AND the conformity guidance group to obtain the most feedback.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.1	Clarifications	Effective dates for clarifications should be 60 calendar days as depending on the time of the year, 30 might be too tight. Plus depending on the clarification, additional time is needed to compile the information and ensure CAB review if necessary.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.2	Guidance Materials	Guidance materials must not override the criteria. This is stated in other EPEAT Policy Documents and should be stated here. Suggested change: The EPEAT Program publishes Conformity Requirements and Guidance Materials for Required Criteria two months before the launch of a new product category and take effect immediately unless otherwise stated. Content in these Materials is specifically identified as "guidance." EPEAT criteria take precedence over that content. (See Page 16 of P65)
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.2	Footnote 1	This footnote is overly long and complex. Recommend an attempt to simplify or put into some form of table or graphic to understand better.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.2 (pg 8 2nd paragraph)	Conformity Requirements & Guidance materials	Any change in these documents should be brought thru the CGG for mfr awareness and weighing in. This should be stated for confirmation.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.2 (pg 8 para 3)	Revisions to Conf requirements & Guidance materials	In addition to listing why guidance materials may be revised, the document should list a clear timeline of when are these revisions be done and the justification for each revision. Additionally, adequate time should be allowed to implement any new changes. This process should be defined for manufacturer awareness with adequate time beforehand to respond.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.3	Technical Questions	The EPEAT Policy Manual Section 5.6 contains policies on technical guidance, clarifications and conformity requirements. ITI suggests that GEC determine that one of these documents contain the policies for technical questions, clarifications and guidance and refer all stakeholders to that single source. ITI also refers GEC to our comments on technical guidance in the EPEAT Policy Manual.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.3	Technical Questions	The consensus body (in this case, the CGG) should make the determination of interpretation or if further consultation, clarification or guidance is needed. Suggested changes: ~~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.~~
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.3	Technical Questions	On page 11, the document notes the "EPEAT Program is solely responsible for making technical interpretations." However, this does not note which parts of the EPEAT Program do this. ITI suggests deleting the last paragraph of this section as it does not add any clarity to which parts of the program are performing which actions when.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.3	Technical questions	Please correct for new terminology and to include AND. Suggested changes: "The EPEAT Program makes the definitive technical interpretation and shares it through discussion at CAB Calibration Meetings, issuance of a formal Clarification, ~~or~~ and updates to Conformity Requirements and Guidance Materials."
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	2.2.4	Conformity Guidance Group	The GEC/EPEAT Program should not independently or unilaterally resolve any technical issue or need for clarity in the EPEAT Criteria. The CGG may serve as the expert group to perform these functions. The last paragraph on page 10 (starting with "For other topics" should be deleted and the bullet points moved up topics brought to the GCC for discussion and feedback.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	4.0	Qualified Auditor Proficiency and Training	In this section about auditors, there is no mention of being evaluated for good communications skills. Lots of mentioning of technical knowledge etc, but nothing about good organizational skills to clearly outline their feedback or define what is required for compliance vs. opinions, etc.. This causes serious misalignments in audits and has led to appeals that waste a lot of mfr and GEC's time. This should be a new requirement/training implemented in 2023.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	4.2.2	Annual EPEAT Auditor Proficiency Exam	Most professional qualifications or accreditation programs make the development of exams a public process similar to criteria development. ITI suggests that these exams should be made available for review and comment, and that GEC should solicit questions from multiple EPEAT stakeholders. ITI suggests a new section prior to the Annual EPEAT Auditor Proficiency Exam be added to address development of the EPEAT Auditor Proficiency Exam.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	4.2.4	Calibration Meetings	Update language: "Any resulting changes to conformity assurance processes, policies or interpretations are available to Participating Manufacturers in the Conformity Guidance Materials and in the Conformity Requirements and Guidance Materials.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	5.2.1	Annual CAB Audits	Manufacturers pay considerable fees for adequate services rendered by CABs. Additionally, Manufacturer performances to criteria are made publicly available. The CAB audit report or a summary should be made publicly available. Suggested change (at end of page 25) 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~~ or a summary of results, including nonconformities, will be posted on the GEC website.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	5.2.2.1	Nonconformances Related to Conformity Decisions	Parts 2 and 3 note that a manufacturer whose conformity status may be changed due to nonconformance by the CAB "may be given up to three months" to make corrections. How is this time determined? For simplicity and ease of implementation, ITI suggests that Participating Manufacturers be given three months from the date notified to make corrections or provide the CAB with additional documentation. Suggested change: The Participating Manufacturer must provide ~~may be given up to three months from the date notified to make~~ necessary corrections and provide the CAB with additional documentation within three months of notification from the CAB.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	5.2.2.1	Non Conformances and corrective action	A section needs to be included to address what is the process when a CAB does not submit an investigation report for a participating manufacturer and the participating manufacturer has submitted all the requested information.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	5.3	CAB Performance Metrics	Participating Manufacturers' compliance results are made public and the CABs play a significant role in that outcome. There is no reason to why CAB's aren't held to the same level of expectation for the program's accuracy. Suggest deletion of the
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	Metric 11	Incomplete investigation report	It is not clear why CABs are allowed to submit any reports with missing required entries. In particular, CABs should be prohibited from prematurely submitting reports to GEC - especially if mfrs state that more evidence is forthcoming.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.1.4.2	Types of Evidence	As noted in our comments on P65, the CAB and the EPEAT Program cannot place additional requirements not in the criteria on the Participating Manufacturers. This includes testing types and timelines. In most cases, the acceptable evidence is listed in the verification requirements of the criterion.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.1.4.2	Types of Evidence	Guidance is not (as noted) normative and cannot be listed in a set of normative requirements CABs are using. Suggest removing the third bullet on the top of page 38.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.1.4.2	Types of Evidence and Ensuring Integrity of Evidence	Most suppliers send supplier declarations of conformity by email. In the emails, addresses of the organization are rarely included and so shouldn't be required in the declaration. In addition, the place of issue is not included. Signatures are also not included and as such a digital signature such as that included by an email address such suffice as evidence.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.1.5	Assessing Competence	It is not clear why EPEAT created a new term, "competence" to show conformity to EPEAT criteria when the term "competence" is simply defined as "demonstrating conformance" in this section and not defined in Section 12. Further, if a Participating Manufacturer is showing conformity to a criterion, it can be assumed that the manufacturer understands that criterion, or a manufacturer may be highly competent, yet a CAB may disagree with how the manufacturer is showing conformity. A separate, novel term is not necessary. No other standards conformity process uses this term. ITI suggests that this section be deleted and any relevant information be moved into Section 6.1.4 Assessing Conformity, as this is the ultimate goal of the program.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.1.5	Assessing Competence	Assuming the intent of this section (per our previous comment) is to show how a CAB will verify that a Participating Manufacturer is conforming to the criteria in the EPEAT Program, this whole section is very subjective and poorly defined. The need to update evidence and documentation is not an indicator of nonconformity. While ITI agrees that the length of time to review evidence is not an indicator of anything, we still struggle with the need for this concept in the EPEAT Program.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.2.1	Initial Doc Review	Some of this section sounds new and overly extensive. almost sounds like the DR itself - A list of products and their basic description should be enough for the plan. This should be distilled down to make the process efficient.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.2.2 and 6.2.3	Assessing Conformance and Competence	These sections are redundant to Section 6.1.4 and 6.1.5. We suggest removal of these sections and the relevant parts moved to 6.2.1. Section 6.2.1 can refer back to the relevant sections in 6.1.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.2.4 (1st bullet)	Activating Products	The term "electronic means" is not defined. This should be clarified.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.2.4	Activating Products	There is a new requirement in this manual for participating manufacturers to conform if a new product is “similar” to another one in the registry but there is no clear definition as to what EPEAT considers to be a “similar” product. The EPEAT Program needs to provide a clear definition on how to measure “similarity” between products. In addition, it’s not clear what happens if a product being added to the registry via the priority verification method is not similar to any other product in the registry.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.3.1	New Products	3rd bullet in on page 47: As above, it is not clear what is meant by “electronic means.” There needs to be a defined process or action here. Further as we note above, the term “competence” is merely defined as “showing conformity” and should be removed.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.3.1 (4th bullet)	Not provided	As we mention, there is no clear differentiation between “conformance” and “competence.” As written, this puts a Participating Manufacturer in a potentially never-ending cycle of review by the CAB. It is not clear how a manufacturer can verify compliance to a criterion without demonstrating "understanding." It is also not clear how a CAB can subjectively determine that a manufacturer “understands” a criterion; they only have the evidence of conformity. This bullet should be reworked or deleted.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.3.1	New Products	The EPEAT Program needs to provide a clear definition on how to measure “similarity” between products

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.3.2	Demonstrating Compliance/Competence	Demonstrating conformity should accepted to add new optional criteria. It is not clear (as mentioned above) what the value add for showing "competence" is. With this approach, manufacturers may be required to continue to provide the same evidence in whatever approach possible and still be able to register.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.3.3	Location of Use	As above, it is not clear what value "competence" adds. If a Participating Manufacturer shows conformity to a criterion, it should be able to list the product in the desired country.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	6.3.4	Loss of confidence	Loss of confidence should be defined with clear examples. However, the term "competence" (as noted above) should be deleted. ITI suggests that the EPEAT Program develop a "high and low risk" (as noted in several EPEAT corporate criteria) Participating Manufacturer program. Manufacturers that for reasons listed are determined by the CABs to be "high risk" will face additional review and inspections. Lower risk manufacturers may be subject to less stringent review.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.1	Annual Reviews	In some cases, the production of evidence may be out of the manufacturer's control. It should be noted there is a process for limited allowances for evidence after the deadline. Suggested change (page 57 2nd bullet): 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. <u>For instances out of the Participating Manufacturers' control, an extension may be requested as noted in sections 7.2 and 7.3.</u> (note: our comment on section 7.3 below notes that a force majeure clause similar to 7.2 should be added to 7.3)

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.2 Table 7 Table 8 Table 9	Investigation Rounds	If the CAB is 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 they should inform the participating manufacturer. The EPEAT program actions should be notifying the participating manufacturer, providing the CAB and extension if applicable, and if no extension is granted, then include in the outcomes report a category for “CAB inaction or delay not attributable to manufacturer”. A non conformance is not justifiable when the participating manufacturer is at no fault in this situation. A high-level reason for the result of the investigation must include the option of “CAB inaction or delay not attributable to manufacturer”.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.2	Obtaining products	It is possible (or probable) that the person contacted by the CAB to obtain a new product may have no authority to obtain a product for EPEAT. The EPEAT Program should develop a process by which they can obtain products for testing. It is also not clear who would pay for the product in this case. Manufacturers typically do not budget for this situation.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.2	Test sample for Level 2 investigation	Disagree with adding the change in 7.2.2 regarding the prohibition on the use of "returned, repaired, or refurbished products and products not in the original packaging" in the Level 2 investigation. Especially for the high-priced models, it is quite difficult for a manufacturer to pay the full cost of obtaining test model in terms of budgeting since the testing models are randomly selected. EPEAT should allow CABs manufacturer flexible ways for sampling including the use of "returned, repaired, or refurbished products and products not in the original packaging", as long as CABs can verify the conformance with selected criteria
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.2 (3rd para)	CAB submittals	It is not clear who (top of page 60) automatically receives a nonconformance in the case where the CAB is unable to submit one or more Investigation Reports before the submission deadline. The Participating Manufacturer should not receive a nonconformance for failed submission by the CAB.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.2 and 7.2.3	CAB submittals	Language states that CABs are encouraged to submit IRs as soon as possible after they are received. This should be reworded to include a stipulation that closing the IR should only be completed after the manufacturer has had an opportunity to use the entire allotted time of the investigation. If the manufacturer indicates additional information will be made, the CAB must allow additional evidence to be provided. Premature report closures of this type have occurred and creates significant confusion. This also may encourage wrong behavior by auditors and CABs. Premature conclusions can and have occurred and could lead to appeals.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.2 (pg 61 – top of page)	Minor errors	Another instance where a minor error should be identified is when a CAB cannot find public information but a Particpating Manufactuer can show it exists. Suggested change (to Minor Error table on top of page 61) add bullet: Where a complaint or a CAB or EPEAT cannot find public disclosures for a criterion but the manufacturer can prove it was there.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.2	Test sample for Level 2 investigation	Disagree with adding the change in 7.2.2 regarding the prohibition on the use of "returned, repaired, or refurbished products and products not in the original packaging" in the Level 2 investigation. Especially for the high price model, it is quite difficult for manufacturer to pay full cost of obtaining test model in terms of budgeting since the testing models are randomly selected. EPEAT should allow CABs manufacturer the flexible ways for sampling including the use of "returned, repaired, or refurbished products and products not in the original packaging" as far as CABs can verify the conformance with selected criteria.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	Not provided	Investigation Phase – Minor Error – last bullet	Language should be added that stipulates “when product cannot be shipped from country of registration due to manufacturer sales/trade compliance policies” – there should be no NC in this case.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.3	Deliberations Phase	If a CAB contacts a manufacturer during this time for additional information, there should be additional time granted to respond that is not part of the 5 day requirement of the CAB. The CAB's limits should not be imposed on the manufacturer.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.3	Deliberations Phase	It is not clear who (third bullet of page 66) automatically receives a nonconformance in the case where the CAB is unable to submit one or more Investigation Reports before the submission deadline. The Participating Manufacturer should not receive a nonconformance for failed submission by the CAB.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.3	Deliberations Phase	If a CAB is unable to complete the update within the five business days, CABs must inform the EPEAT Program and they should inform the participating manufacturer. The EPEAT program actions should be notifying the participating manufacturer, providing the CAB and extension if applicable, and if no extension is granted, then include in the outcomes report a category for "CAB inaction or delay not attributable to manufacturer".
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.4.1	Investigated Products	In a global business, deadlines are tracked via business days rather than calendar days. Further, all short term timelines should be in business Days and should not span Major holidays . This impacts all parts of the program (CABs, EPEAT and Mfrs). Suggested change: For both minor errors and nonconformances, Participating Manufacturers have 30 ~~calendar~~ business days to make corrections.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.4.1 (pg 67 – top of page)	Further clarifications	Manufacturers should be given an equal amount of time as the CAB to respond; an additional 5 business days should be inserted (10 business days total)
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	7.2.5	Reporting Phase	Since outcomes of "CAB inaction or delay not attributable to manufacturer" do not materially affect the validity of products in the EPEAT Registry, these should not be disclosed in the Outcomes Report. Purchasers will be confused if this is included in the report.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	Pg 68	Corrective action phase	Suggest (as above) that this should be 30 Business days.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	Pg 69	Table 11	As above, all small-term timelines should be in Business days
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	Not provided	Table 11	This list should include other online documentation like service manuals that can be updated with no significant loss to compliance. Please add.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	9.1.1	Complaints	There is no legitimate benefit to limiting the time for filing a complaint. It may take time for the critical aspects to be proven out and/or constructed over very complex periods of information submittals, review, etc.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	9.2.1.1	Appeals	As with complaints, there is no benefit to set a time limit on filing an appeal. If a legitimate reason is determined, it should be justifiably applicable.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	9.3	EPEAT Program Complaints and Appeals process	The make up of the Complaints/Appeals Committee should be defined in the manual. The titles of who is to be included should be disclosed and made transparent in these procedures.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	12.3	Definitions – Competence	It is not clear what benefit the term "competence" provides. As noted in our comments to Section 6, this term should be deleted.
Cleet, Chris	Information Technology Industry Council (ITI)	December 30, 2022	P66	12.3	Definitions – Conformity Requirements and Guidance Materials	Per our comments on the EPEAT Policy Manual, the terms "guidance" and "conformity requirements" (and "clarifications") are not interchangeable, nor should they be combined. Suggest reverting to the original definition of "Guidance Materials" and provide additional definitions.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P65	4.0	EPEAT Criteria	Much of the content of this section is repetitive to what is in the EPEAT Criteria Development Process document. Suggest considering whether to retain this information in this document. If a separate stand alone document covering this topic is helpful for sharing with stakeholders, then suggest mirroring the exact text in both places to ensure full alignment. At a minimum, a reference to the EPEAT Criteria Development process document should be added to the beginning of this section so stakeholders can read it for further details.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P65	4.0	EPEAT Criteria – Innovation Point	The document references the continued use of innovation points for some product categories. Criteria for innovation only exist in the mobile phones UL110 standard. Once the new Sustainability Impact Modules are adopted, our understanding was that the standards currently used under the EPEAT system for mobile phones, computers, servers, imaging equipment, and TVs would no longer be used, meaning that all criteria in these standards would no longer be used. If that is the case, please make a note to remove this paragraph as soon as the new criteria are completed and in use in the EPEAT Product Registry – in the FY25 update to this document.

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Elwood, Holly	Environmental Protection Agency	December 12, 2022	P65	4.2.1 and throughout the document	Selection of Product Categories	Recommend including direct links to other reference GEC documents in this and all EPEAT policy documents to further simplify the reader's efforts.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P65	5.2	Documentation Review	Similar comment to one made on EPEAT Conformity Assessment Implementation Manual regarding this sentence: "*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*." Not clear on whether both the Certification Pathway and the Priority Verification Pathway require conformance with every criterion in the set which apply to a product prior to posting on the EPEAT Product Registry. Understood that the Priority Verification Pathway allowed manufacturers to have their initial products go through desk review, and then once they pass, the OEM can post as many other products as they would like on the EPEAT Registry.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P65	5.2	Documentation Review	This section seems to be saying that both the Priority Verification Pathway and the Certification Pathway verifications are valid for three years ("*In the Priority Verification Pathway, the Initial Documentation Review is staggered over several months for up to one year and the results are valid until the EPEAT Program implements Criteria resulting from a Full Product Category Revision*.". Does this mean that GEC is no longer conducting snapshots of the Registry and doing spotchecks of subsets of criteria for the Priority Verification Pathway products via verification rounds? If both pathways allow certification to be good for three years, what is the real difference between the two?
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P65	8.1	Recognized Potential Conflicts of Interest	For sources of income for GEC, please add the others cited at the beginning of this document – grants for research, etc.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P65	8.1	GEC CAB and Independence	To reduce conflicts of interest, it has been noted several times previously that it may make sense for GEC to cease their work as a CAB, due to their work as a manager of all CABs.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P66	6.3.1	New Products	Not supportive of clarification that participating manufacturer and/or CAB may develop an alternative way to demonstrate competence for Corporate Criteria with annual performance requirements. All verification requirements should be developed by Technical Committees to ensure voluntary consensus-based processes are used and there is transparency and multi-stakeholder input into the crafting process.

EPEAT PROGRAM STAKEHOLDER COMMENT REPORT

Comments received during the October 17 through December 31, 2022 Stakeholder Comment Period
on Proposed Revisions to EPEAT Policy Manual (P65) and EPEAT Conformity Assurance Implementation Manual (P66)

Comments are first listed alphabetically by the last name of the individual providing comments, and then grouped by document and listed numerically by section in the document.

Commenter	Organization	Date Submitted	Document	Section	Topic	Comment
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P66	2.1	Overview – Priority Verification Pathway	The following statement is confusing: "*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*". My understanding was that there is a full review and determination of conformance against all the criteria for each product prior to being posted on the EPEAT Registry under ONLY the Certification Pathway. Please clarify. Also, what is the difference between "product sampling", stated as used under the Priority Verification Pathway, and "product batching" stated as used under the Certification Pathway?
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P66	2.1	Overview	The document states: "*For both Pathways, Participating Manufacturers follow the same process to participate in the EPEAT Program…..*: "*Prior to the first products becoming EPEAT-registered for a product category, a Participating Manufacturer must complete Initial Documentation Review. During this process, the GECapproved 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*". So under either pathway a manufacturer can add as many products as they want following completion of desk review? I thought that under the Certification Pathway a product had to be tested and proven to meet every single criterion before it is allowed to be added to the EPEAT Registry?
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P66	2.2.1	Clarifications	Suggest adding the following: "*All clarifications are shared with the GEC criteria development team to be addressed in the continuous maintenance process for the relevant criteria".*
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P66	4.2.1	Annual Auditor Refresher Training	Some text is missing from this sentence – please correct: *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).* Ditto with this sentence: *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).*