

EPEAT Program

Stakeholder Comment Report



October 17, 2022 – December 31, 2022 Comment Period
Proposed Revisions to **GEC Criteria Development Process (P74)** and First Issue of **GEC Selection of Product Categories (P75)**

Introduction

The Global Electronics Council (GEC) released a draft revised version of *GEC Criteria Development Process (P74)* and the first issue of *GEC Selection of Product Categories (P75)* 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 more than 70 written comments across both documents 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 listed numerically by section in the document.

GEC reviewed and considered all stakeholder comments when making final revisions to *GEC Criteria Development Process (P74)* and *GEC Selection of Product Categories (P75)*.

Overview of Received Comments: GEC Criteria Development Process (P74)

Editorial comments and requests for clarity

Stakeholders suggested text edits and additions for clarity on a variety of topics, including for instance, the role and composition of Expert Ad Hoc Groups, and details regarding the second stakeholder consultation period for draft criteria. GEC incorporated many of these requested revisions. Some requests were considered too specific for a policy document; for example, adding references to specific URLs.

Overview Graphic of Dynamic Criteria Development Process

Stakeholders requested changes to Figure 1 in Section 2.0, which provides an overview of GEC's Dynamic Criteria Development Process. GEC agreed with most of the comments and proposed changes, which presented an opportunity to reflect on whether the graphic aligns with current practice and future goals. As a result, Figure 1 was modified to highlight the goal of harmonization with best practices and existing standards in the State of Sustainability Research. For the Voluntary Consensus Process,

consideration of “security and data privacy implications” was removed. While EPEAT Criteria may address these issues (e.g., secure data deletion), inclusion in this graphic implied a greater emphasis on these issues over other sustainability topics addressed by EPEAT Criteria.

Alignment with ISO 14024 for Type 1 Ecolabels and elements of voluntary consensus process

Multiple comments expressed concerns that the GEC Criteria Development Process does not align with the principles of voluntary consensus outlined in the Office of Management and Budget (OMB) Circular A-119 and similar elements in ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures*, with a particular focus on openness and transparency.

GEC consulted with practitioners of voluntary consensus processes, and confirmed that the GEC Technical Committee process, and the resulting Criteria, meet the principles of voluntary consensus. NSF administers GEC Technical Committees using the same practices and principles of voluntary consensus it uses when developing ANSI standards. The EPEAT Program, including its Criteria Development Process, is also recognized as a Type 1 Ecolabel meeting the requirements of ISO 14024, by both ANAB and the Global Ecolabelling Network (GEN).

While GEC strives to apply the principles of voluntary consensus throughout the criteria development process, voluntary consensus is not required for all activities that feed into the Technical Committee, which is the consensus body. All activities are open and transparent to interested parties through public consultation (e.g., State of Sustainability Research, Full Criteria Document) or participation (e.g., Expert Ad Hoc Groups, Voting Member or Observer on Technical Committee).

State of Sustainability Research

GEC received comments about authorship, approval, and content of the State of Sustainability Research. The purpose of the State of Sustainability Research is to compile publicly available data on sustainability impacts, best practices to mitigate these impacts, and relevant standards, and based on this compilation, identify topics and potential direction for criteria development. State of Sustainability Research is a resource for use by Expert Ad Hoc Groups and the Technical Committee, and for this reason, its development does not take place as part of the voluntary consensus process.

As the owner of the EPEAT ecolabel, GEC is responsible for documenting data on life cycle impacts as justification for criteria and making this available for public comment. Where GEC has the technical expertise, it takes the lead in preparing the State of Sustainability Research. If GEC lacks expertise or determines that others are better suited to prepare the report, GEC may contract with experts in preparation of the research. The draft State of Sustainability Research is made available for a 60-day public comment period, affording all interested stakeholders with the opportunity to review, provide comments, and submit additional data or sources of information. Ultimately, the State of Sustainability Research is a resource, providing background and justification for criteria. It is the voluntary consensus process – the Technical Committee – that ultimately makes decisions on criteria.

Criteria Drafting

GEC received comments regarding aspects of Section 2.2, which addresses concepts related to criteria drafting, including verification requirements and the identification of Required and Optional Criteria. GEC provided additional clarity in response to several comments, including for instance, clarifying that

the Technical Committee develops and/or approves verification requirements and identifies evidence necessary to demonstrate conformance with the criterion requirements.

Commenters requested several additions to Section 2.2.3, Required and Optional Criteria, which GEC did not incorporate as the changes would circumvent important program elements. Some of these comments include:

- A request for GEC to add an option for the Technical Committee to designate specific optional criteria as “required” to obtain EPEAT Gold recognition. However, this approach would alter the purpose of Optional Criteria and the structure of EPEAT, which is to differentiate products based on the percentage of criteria met, incentivize innovation, and promote continuous improvement. An alternative approach is for the Technical Committee to consider a higher points value for criteria to provide manufacturers with an incentive to pursue conformance with the criterion.
- A suggestion for GEC to specify that any new topic or criteria should be designated as optional, when first introduced into EPEAT and remove criteria that are no longer value-added to ensure that the number of criteria do not become unwieldy. In Table 1, GEC provides guiding Principles for Criteria, outlining multiple factors that should be taken into account by the Technical Committee when developing and reviewing criteria, including new criteria or existing criteria, such as environmental impact, current best practices and ability of the market to meet the criterion

A comment suggested that GEC consider a process to review criteria under development across Technical Committees working on different sustainability issues to ensure appropriate emphasis on topics (e.g., number of criteria and optional points) and maximize efficiencies for manufacturers, while addressing all key hotspots of the product life cycle. GEC appreciates this sensitivity and is open to suggestions on how to accomplish this, while respecting and adopting the outcome of each voluntary consensus process.

There was a request to add a new section for EPEAT Program Terms with an accompanying process for public review and approval by voluntary consensus. GEC agrees with providing an opportunity for public review and comment and added this topic to the agenda for the February 2023 Conformity Guidance Group meeting. It is worth noting that these terms were also subject to public comment during the first public comment periods for Climate Change Mitigation, Sustainable Use of Resources, and Chemicals of Concern. Comments received through these public comments were considered and the definitions modified. It is these modified definitions that were distributed for further review and comment through the Conformity Guidance Group.

Criteria Development Organization and Management of Voluntary Consensus Process

In response to comments, GEC included additional details in Section 2.5 on the selection of Criteria Development Organizations that GEC partners with for management of the Voluntary Consensus Process, to address conflicts of interest or undue influence of any one stakeholder group. Additionally, it was clarified that while GEC may provide technical support to the Criteria Development Organization, all final decisions regarding criteria are made by the Technical Committee, following the Criteria Development Organization’s procedures for voluntary consensus.

One commenter noted that the Criteria Development Organization may not be safeguarding against use of commercial terms. GEC requested that the Criteria Development Organization undertake a legal review of possible commercial terms and advise the Technical Committees if modifications are needed to any criteria in order to avoid commercial terms. GEC also requested that the Criteria Development Organization takes steps, as needed, to ensure quorum is met in the Technical Committee process.

A couple of comments questioned whether the Criteria Development Organization was adequately addressing all public comments and following procedures to notify public commenters of the disposition of their comments. GEC reviewed the actions of the Criteria Development Organization to date and note that procedures are being followed and meet the requirements of voluntary consensus. [It is possible that these comments were submitted before the Technical Committee process had progressed to this point in the process.] The Technical Committee is given the opportunity to discuss all comments and proposed resolutions. Responses to all public comments and Technical Committee ballot comments are provided to the commenter with notice of the right to appeal. In addition, the disposition of all Technical Committee ballot comments is provided to the Technical Committee for consideration and opportunity to change their ballot after considering comments.

Technical Committee

GEC received comments and suggestions regarding various aspects of Technical Committees, including a request to add a separate (fifth) category for suppliers to the list of stakeholder interests whose perspectives and representation are sought in the criteria development process. GEC recognizes that sustainability criteria can have a big impact on suppliers and, as such, suppliers are explicitly covered in the “Other Industry” stakeholder category, which is one of the four stakeholder categories. Adding a separate (fifth) category for suppliers would increase representation of industry on the consensus body (Technical Committee) from 50% to 60% of stakeholders, which would not adhere to the principle of voluntary consensus including a balance of interests.

Continuous Maintenance

GEC received multiple comments to clarify various aspects of the Continuous Maintenance process, outlined in Section 2.6. In 2023, GEC plans to further refine and develop the continuous maintenance process, and consult with stakeholders as necessary, before releasing proposed revisions in October 2023 as part of the annual revision process.

Conflict of Interest and Complaints and Appeals

In response to comments, additional details were added to Section 2.8 to delineate a specific funding threshold that triggers disclosure of funding sources throughout the criteria development process. Additional procedural details were also added to Section 2.7 to identify that the complainant or appellant is informed of the name and title of the individuals serving on the Committee and clarified that Complaints and Appeals Committee members may include individuals who are not GEC staff.

Overview of Received Comments: GEC Selection of Product Categories (P75)

Editorial comments and requests for clarity

Most of the stakeholder comments on P75 suggested text edits and additions for clarity. GEC incorporated most of these requested revisions. Additions to the text include, for example, that the business case considers life cycle sustainability impacts and manufacturers/providers ability to address sustainability impacts.

In response to comments, GEC also added further details on notification and feedback mechanisms. The document now states that if a stakeholder requests that GEC consider a new product category, the stakeholder will be informed of GEC's decision to pursue a product category, as well as not to pursue the category. GEC will also seek feedback from the Advisory Council.

Confidential Information

Section 4.1 describes the content of the publicly available Product Category Proposal, based on the key findings of the internal Business Case. At the request of a stakeholder, GEC added a statement that if confidential business information is omitted from the Product Category Proposal, a statement is included regarding the nature of the information withheld.

Publication of Revised Documents

GEC published the revised version of *GEC Criteria Development Process (P74)* on February 15, 2023, and new requirements take effect on July 1, 2023. GEC published the first edition of *GEC Selection of Product Categories (P75)* on February 15, 2023, and it takes effect on the same date. Both documents are available on the [EPEAT Registry](#), and through an EPEAT Registry account under "Resources", or [upon request](#).

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

EPEAT PROGRAM STAKEHOLDER COMMENT REPORT

Comments received during the October 17 through December 31, 2022 Stakeholder Comment Period on Proposed Revisions to GEC Criteria Development Process (P74) and the First Issue of GEC Selection of Product Categories (P75)

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Commenter	Organization	Date Submitted	Document	Section	Topic	Comment
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	N/A	General	The concept of EPEAT Program terms (such as “product”) has been discussed in several Technical Committees but not done in the TCs. ITI suggests that the Criteria Development Process add a section on EPEAT program terms, with a process for public review and comment and a committee to provide a vote on these.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	1.0	Consistency with OMB Circular A-119	<p>ITI has significant concerns that the Dynamic Criteria Development Process is not consistent with the requirements of OMB Circular A-119. In particular the process is lacking in areas of openness and due process. Examples of these concerns are outlined in comments below and in multiple discussions with GEC and NSF. Section 1 either needs to remove the references OMB Circular A-119 or GEC needs to modify its processes to actually meet the requirements of the Circular.</p> <p>Specifically, ITI has concerns about these sections of the Circular:</p> <p>OMB Circular A-119 Section 2e(i) Openness: The procedures or processes used are open to interested parties. Such parties are provided meaningful opportunities to participate in standards development on a non-discriminatory basis. The procedures or processes for participating in standards development and for developing the standard are transparent.</p> <p>A-119 Section 2e(iii) Due process: Due process shall include documented and publicly available policies and procedures, adequate notice of meetings and standards development, sufficient time to review drafts and prepare views and objections, access to views and objections of other participants, and a fair and impartial process for resolving conflicting views.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.0	Key Goals	The document notes that criteria are “developed with and adhering to the principles of transparency and voluntary consensus, including a process that is open without discrimination to interested parties and representing a balance of stakeholder interests.” However, in no meaningful way is the process open to all interested parties. A single public consultation on the draft criteria before they enter the “consensus” process cannot be construed as “open participation.” Membership in all criteria development groups: the Expert Ad-Hoc Groups and the Technical Committee, is closed only to members invited by the GEC. This is not the spirit or letter of “open without discrimination.”

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.0	Restart Process	<p>As we note below, the State of Sustainability Research is the output of a single stakeholder in the process and must be treated as such. Further, the quality of the research and writing in the SOSRs has been to date severely lacking. The SOSRs published to date have shown little to no understanding of existing criteria or draft criteria or regulations, and in most cases, the recommendations of the SOSR have reflected neither the current best practices of manufacturers nor an understanding of regulations or criteria in development. We further suggest that the SOSR reflect both purchaser and manufacturer priorities as the manufacturer is the only entity that is actually required to do anything to conform to EPEAT criteria.</p> <p>Suggested changes for first box:</p> <ul style="list-style-type: none"> - Reflect purchaser <u>and manufacturer</u> priorities - Identify existing criteria <u>(both published and draft)</u> for harmonization - <u>Understand the underlying regulatory landscape and look to harmonize with leading regulations</u>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.0	Restart Process	<p>VCS Development Process box: it is not clear how security and data privacy are an sustainability issue, other than as a potential limit to repair and recycling of devices. Security and data are not part of any of the UN Sustainability Development Goals and no authoritative sources place it there. There are several NGOs and standards that are better placed than GEC and EPEAT to address data security and privacy, and it is not clear what value GEC would bring to addressing these issues. Additionally, privacy and data security require different expertise than existing ESG criteria, which neither the GEC nor current stakeholders have.</p> <p>Suggested change (for last bullet in middle square):</p> <ul style="list-style-type: none"> - Consider security and data privacy implications <u>as they relate to repair and circularity of devices</u>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.0	2nd stakeholder comment period	<p>The document notes that a “second stakeholder comment period may also occur...”. A second stakeholder comment period should be the default option and GEC can note conditions under which a second stakeholder comment period may be shorter if no substantive changes are made.</p> <p>Suggested change (for bottom of page 3):</p> <p>“A second <u>30-day</u> stakeholder comment period may also <u>will</u> occur to solicit feedback on changes made to the Full Draft Criteria Document. <u>The Technical Committee may determine that a shorter second comment period is warranted if it determines that changes made to the Full Draft Criteria editorial or unsubstantial enough to not need a full second review.</u>”</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.1	State of Sustainability Research	<p>The SOSR is the input of a single stakeholder in the process – the GEC. The SOSRs published to date have not been well developed nor robust documents. As such, they should not be “the foundation for the development and revision of criteria.” At best, the SOSR should serve as a resource for the Ad-Hocs and Technical Committee discussions.</p> <p>Suggested change:</p> <p>The data and analysis of the State of Sustainability Research serves as the foundation for the development and revision of criteria <u>a resource for further discussion in the Expert Ad-Hoc Groups and Technical Committee.</u></p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.1	State of Sustainability Report	<p>This first step in the criteria development process is not based on a consensus decision-making process that is open to all interested stakeholders. Lack of openness in this stage prevents all interested stakeholders from participating equally in the criteria development process. It also risks creating criteria favored by one stakeholder or stakeholder category to the exclusion of others. While public consultation is a critical part of this development stage, it is not a substitute for a voluntary consensus process. GEC should allow all interested stakeholders to participate in the development of the SOSR and utilize consensus-based processes to finalize this report.</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.1	State of Sustainability Research	The document notes that “the GEC may contract with third parties for research and data analysis assistance during this step.” However, the GEC has gone well beyond this allowance and contracted the drafting of the SOSR to third parties. The parties that GEC has contracted with for the development of SOSRs have been clearly partisan and do not present a well-balanced picture of the state of sustainability in an area. The GEC should follow their own processes, restricting the contracting to research and data analysis (i.e., not drafting) or either disallow the use of third parties or provide a set of criteria for how third parties should approach the development of the SOSR.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.2	Criteria Drafting	As noted above, the SOSR is the input of a single stakeholder and should only serve as a resource for further discussion by the Ad-Hocs and TCs. Suggest change for Table 1 line 1: Criteria address priority sustainability impacts, as identified in the State of Sustainability Research, and throughout the life cycle of products and services, inclusive of the supply chain.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.2	Criteria Drafting	This section is not clear in indicating how discussions are managed and decisions are made; and who is drafting the criteria, compiling inputs from different sources, resolving overlaps or conflicts in the inputs received, and deciding when to form the Expert Ad Hoc Groups and what they will work on. The ISO 14020 standard at Section 4.9.1 states: “The process of developing environmental labels and declarations should include an open, participatory consultation with interested parties. Reasonable efforts should be made to achieve a consensus throughout the process. ” (emphasis added). The lack of consensus and the limitations on participating in the decision-making at all stages of the process contravenes ISO requirements and voluntary consensus principles. GEC should use consensus-based processes—open to all interested stakeholders—for all stages of the development and progression of criteria.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.2.1	Criteria Drafting Principles	New concepts, especially product criteria, should start as optional criteria. For example, the concept of using recycled plastics started as optional and then moved to required. Suggest that this concept be added in Principle 3 or as a stand-alone concept.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.2.1	Criteria Drafting Principles	A principle of removing criteria that are no longer value-added should be placed here to ensure that the criteria modules do not become unwieldy.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.2.1	Draft Criteria	<p>The GEC is a single stakeholder in the criteria development process and as such should not be specifically called out.</p> <p>Suggest combining the second and third bullets at the end of the section to:</p> <p>Submissions from stakeholders, including GEC staff or partner organizations.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.2.2	Selection of Verification Requirements	<p>This section should make it clear that verification requirements cannot add new requirements to a criterion. For example, if the criterion does not call for testing, the verification cannot call for test reports. The criterion, not the verification requirements, should list standards (for example, ENERGY STAR or ISO 14001) or required tests (such as material testing) that allow for meeting the criterion, and verification is limited to the evidence necessary to show conformity to that criterion.</p> <p>Suggested change:</p> <p>Verification requirements cannot add new requirements to a criterion and align with all required elements of the criterion, and to the extent applicable, specify published test methods, international standards (e.g., ISO, IEC) and certifications, regional and national standards (e.g., EU-CEN, US ENERGY STAR), and recognized voluntary programs.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.2.2	Selection of Verification Requirements	<p>Uncertainty exists for all measurements and testing. Verification requirements should note that there is uncertainty in any quantitative measurement.</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.3	Expert Ad Hoc Groups	According to this section, GEC is not bound by the voluntary consensus principles of ensuring balance and openness in the Expert Ad Hoc Groups. While this document mentions that “GEC seeks balanced representation from the following stakeholder categories,” balance is required if GEC is to align with voluntary consensus characteristics articulated in Table 3 of the GEC Criteria Development Process document and OMB Circular A-119. There is no indication of how balance is achieved nor discussion of consensus-based processes for this critical stage of development. Expert views should be sought, discussed, and refined based on real world practices, using these principles, in order to improve the ultimate quality of the resulting deliverables. There is no voting or other procedure set forth for how to arrive at consensus or resolve objections in the absence of unanimity. (that this exists in the NSF doc is insufficient for the entirety of the process prior to the TC where in the ‘final draft criteria’ are developed). Sending summaries of Expert Ad Hoc Group discussions to the Technical Committee (as Section 2.3 contemplates) is an inadequate substitute for real-time debate, deliberation and iterative drafting amongst all interested experts. As with Section 2.2, GEC should use consensus-based processes—open to all interested stakeholders—to develop and progress criteria developed by the Expert Ad Hoc Groups.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.3	Expert Ad Hoc Groups	The Ad Hoc Groups make the decisions to which options and criteria are sent to the Technical Committee. The middle paragraph on page 7 should be changed to reflect this: Suggested change: <u>The Expert Ad Hoc Group</u> GEC may choose to forward 2 or more criteria options...

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.3	Expert Ad Hoc Groups	<p>ITI and other stakeholders in the Ad Hoc Groups have seen decisions made on criteria outside the Group. While it is in good faith to have offline discussions of criteria and how to resolve issues, these discussions must be taken to the Ad Hoc for final discussion and consensus prior to moving on with a proposal. Section 2.3 or 2.4 needs to identify a process by which all participants in an Ad Hoc Group are involved in any final recommendations, especially if there is no consensus among the group.</p> <p>Suggested change: Add to the second to last paragraph in section 2.3:</p> <p><u>Members of an Expert Ad Hoc Group are allowed to hold discussions among small groups of stakeholders and/or GEC staff, but all proposals for recommendations to the Technical Committee must be discussed at a meeting of the Expert Ad Hoc Group.</u></p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.3.1	Expert Ad Hoc Group Membership	<p>Since suppliers are the entities that must (by definition) supply the parts and requested information to conform with EPEAT, suppliers should be considered to be their own stakeholder category instead of “other industry”. Suggest creating another Stakeholder Category for Suppliers to Manufacturers and their trade associations.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.4	Full Draft Criteria Document	<p>“Recommendations” seems too weak of a word for what the Ad-Hocs are designed to do. Further, the GEC should not have the authority to unilaterally change outcomes from the Ad-Hocs.</p> <p>Suggested changes:</p> <p>GEC compiles a comprehensive Full Draft Criteria Document based on the recommendations <u>proposals</u> of the Expert Ad Hoc Groups</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.4	Full Draft Criteria Document	<p>If the output of the Ad Hoc Group does not reflect the State of Sustainability Research the GEC cannot unilaterally add this to the plan for the Technical Committee.</p> <p>Suggested changes:</p> <p>GEC confirms that reviews the Full Draft Criteria Document to addresses the environmental and social impacts identified in the State of Sustainability Research. If gaps are identified in the Full Draft Criteria Document, GEC prepares a plan for addressing the gaps and provides it to the <u>may note this for consideration by the</u> Technical Committee.</p> <p>(and in next paragraph)</p> <p>This summary <u>may also identify</u> identifies whether an Expert Ad Hoc was unable <u>or chose not to</u> develop a recommendation proposal to address an impact identified in the State of Sustainability Research, and why.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.4	Full Draft Criteria Document	<p>As we note in our comments to Section 2.3, the Full Draft Criteria Document should also be developed through an open voluntary consensus process. However, the process is that GEC alone compiles the Full Draft Criteria Document based on the recommendations of the Expert Ad Hoc Groups and submits it to the Technical Committee as the starting point for the TC’s deliberation. GEC’s dominance over this significant stage of criteria development means that other interested parties are denied any meaningful opportunity to participate in the drafting, gap analysis, identification of key discussion points and areas of disagreement, and conclusions about why some impacts could not be addressed. Further, as we note below, all interested stakeholders should be allowed to contribute and participate in the Technical Committee, including voting or other processes that are designated for resolving objections.</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5	Criteria Development Org	<p>This section describes the voluntary consensus process that should apply to all stages of GEC criteria development, not just one late stage. It is in GEC’s interest in advancing “credible and objective criteria” to itself reflect the virtues it describes in its own processes, including: managing a voluntary consensus processes of diverse stakeholders; maintaining impartiality; documented procedures that address and adhere to the five characteristics of voluntary consensus; procedures in place to objectively select participants; safeguards against anti-competitive behaviors; rules to avoid the use of commercial terms and other requirements that may restrict trade and competition; and a requirement that minutes be taken, approved and made publicly available.</p> <p>There is no articulated process for how proposals or counter-proposals are made, how decisions are made, when votes or straw polls might be appropriate, or even how matters are put onto a meeting agenda.</p> <p>Even within this section that focuses on consensus, there are processes that don't achieve consensus. For example, in Section 2.5.1.1, the Technical Committee should address public comments through Technical Committee consensus and should reach consensus on final criteria. Similarly the end of Section 2.5.2 should make clear that the Criteria Development Organization prepares a comment resolution report and notifies public commenters of the resolution of their comments based on consensus of the Technical Committee. Further, it is unclear why GEC is consulted on processing of Technical Committee membership applications if the Criteria Development Organization (CDO) ordinarily would process membership applications independently. GEC interference, or even a perception of interference, could impact the CDO’s satisfaction of voluntary consensus principles. GEC should make clear, in the GEC Criteria Development Process document, that CDOs must operate independently from GEC and that GEC shall not interfere in CDO processes. Rather than prohibit Observers from speaking, the CDO should merely prohibit stakeholders who have selected to be an Observer (over a participatory role) from voting.</p>

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

Commenter	Organization	Date Submitted	Document	Section	Topic	Comment
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5	Voluntary Consensus Process and Technical Committee Participation	In accordance with ISO 14024 section 6.2, the ecolabeling body shall implement a consultation mechanism that facilitates full participation of interested parties. As such, full membership in the Technical Committee must be made available to all interested stakeholders. The Technical Committee may implement measures to ensure balanced stakeholder participation after ensuring full participation of interested stakeholders. Several specific changes to the Criteria Development Process are proposed below.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5	Page 9	To allow for all interested members to participate: Suggested Changes: The Criteria Development Organization must also have procedures in place to objectively select <u>allow interested stakeholders to become</u> Technical Committee members, safeguard against anti-competitive behaviors, and avoid the use of commercial terms and other requirements that may restrict trade and competition. <u>If necessary, the Criteria Development Organization may implement measures to ensure balanced representation of Stakeholder Categories.</u>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5	Voluntary Consensus Process	While there is a definition of “Criteria Development Organization” in Section 5.2, there is no description in this document of how this organization is identified, who chooses the CDO and what the CDO does or how it manages its processes. ITI suggests that sections be added to this document to address this.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5	Criteria Development Org	Currently NSF is not safeguarding against commercial terms. Criteria related to warranties, manufacturer spend on suppliers and wages are being developed, most of which need at least a cursory commercial term review. ITI suggests that GEC work with NSF to review their commercial terms guidance.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5.1.1		<p>To allow for all interested members to participate:</p> <p>Suggested changes:</p> <p>GEC seeks individuals with expertise on the topics under consideration by the <u>allows all parties interested in a particular</u> Technical Committee to participate on the consensus body.</p> <p>The Criteria Development Organization processes applications for Technical Committee membership, in consultation with GEC. The Criteria Development Organization is responsible for ensuring that interested parties are able to participate in the final selection of Technical Committee Members.</p> <p>Delete the paragraph on page 10 beginning with “Technical Committee Members are selected...”</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5.1	TC Participation	<p>TCs are having issues with achieving quorum at TC meetings. This is because invited voting members are not attending meetings. Most standards processes have attendance and participation requirements that members must follow to remain voting members of the committee. ITI suggests adding typical for SDOs attendance (such as must attend 3 of 4 meetings) and voting (must vote in all virtual ballots) requirements and replace members who fall off of the TC.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5.1	TC Participation	<p>There are many examples in the current TC process in which none of the TC members are experts on the topic being discussed, and in some cases are making incorrect statements. Observers, despite having expertise on the topic at hand, are not allowed to speak up even when the TC members are saying they are not knowledgeable about the topic being discussed, or TC members are making incorrect statements, and/or comments are being misinterpreted. A more open process would lead to better outcomes in developing the criteria.</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5.1.2	TC Observers	<p>There are benefits to allowing multiple observers including transparency of the process and allowing stakeholders to bring in subject matter experts. It is not clear what benefits limiting observers gives. The TC process should not limit observer participation.</p> <p>Suggested changes:</p> <p>Technical Committee Observers are limited to one representative from an organization. Organizations that have a representative with Technical Committee Member status are not eligible to have a Technical Committee Observer. All Observers must sign an Observer Agreement before receiving Technical Committee documents or attending meetings. The names and affiliations of all Technical Committee Observers are publicly available.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5.2	Public Consultation	<p>The default process should be to provide a second public consultation, unless the TC decides that they did not make substantive changes and a second consultation is not necessary.</p> <p>Suggested changes:</p> <p>If the Technical Committee makes substantive modifications to the Full Draft Criteria Document, the Criteria Development Organization may shall provide stakeholders with a second opportunity to provide comments, unless the Technical Committee decides that it had not made substantive modifications to the Full Draft Criteria Document and a second comment period is not necessary.The second public consultation is limited to changes to the document and must be open for no less than 30 days. GEC notifies stakeholders of the public consultation periods <u>or an explanation of why the Technical Committee believes there is no need for a second public consultation</u> through GEC newsletters and announcements.</p>

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				2.5.2	Public Consultation	<p>We suggest not to limit the scope of 2nd public consultation only to the change to the document through TC. The criteria structure is very complicated and change in the description in certain portion would affect to the interpretation of other portion which are not changed.</p> <p>Here is the proposed revision;</p> <p>If the Technical Committee makes substantive modifications to the Full Draft Criteria Document, the Criteria Development Organization may provide stakeholders with a second opportunity to provide comments. The second public consultation is limited to changes to the document and must be open for no less than 30 days.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5.2	Public Consultation	The Technical Committee should either consider all comments submitted through the public consultation process or be informed at the beginning of the TC process if the GEC and CDO have not decided to address certain public comments in the TC. As currently written, the process requires that the TC consider ALL comments submitted. This is not what is happening at the TCs. If the GEC wishes to continue not addressing all comments submitted, the final paragraph of this section will need revision.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.5.2	Public Consultation	Simply publishing a comment resolution document as noted in the last sentence of this section is insufficient to adequately address comments. For example, ANSI Essential Requirements at Section 2.6 require that SDOs respond in writing to all objections made as part of public comments or votes with “the disposition of the objection and the reasons therefor,” plus notice that an appeals process exists. ITI suggests developing a process to explicitly address and provide per-comment disposition.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.6	Continuous Maintenance	A full revision of the criteria should be done longer than every 3 years. Establishing criteria takes a lengthy amount of time and implementing programs can take up 24 months to 48 months depending on the product. Thus, this can create undue burden in manufacturers given the timelines for product development. If updated every 3 years, manufacturers would constantly be pursuing new criteria, especially as it relates to optional criteria when manufactures want to pursue EPEAT silver and gold levels. Full revisions should be done every 5 years.

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.6	Continuous Maintenance	<p>This section should also include considerations for how and why an update to a criterion would be delayed and/or not updated upon request. Examples may be:</p> <ul style="list-style-type: none"> - The proposed criterion is new and would require significant discussion - Whether a criterion is no longer adding value and should be removed <p>Suggest adding these bullets to section 2.6</p> <p>Suggested change:</p> <p>Adding to the end of the 1st paragraph on an 'ad hoc revision': GEC puts forward the reasoning for a revision to the Advisory Council and seeks their input on whether to proceed with the revision.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.6	Continuous Maintenance	<p>The development of an assessment on Continuous Maintenance should be a consensus process including the Advisory Council.</p> <p>Suggested change:</p> <p>GEC shares the outcome of the assessment with <u>puts forward the reasoning for a revision</u> the Advisory Council and seeks their input on whether to proceed with a full revision.</p> <p>GEC makes the final decision as to whether any revision to EPEAT Criteria is warranted. Any full revision to EPEAT Criteria is conducted in accordance with the principles and procedures of GEC's Dynamic Criteria Development Process</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.7	Complaints and Appeals	<p>It is not clear what has GEC done to establish an appeal process that is unbiased. GEC has control over appeals related to its own process and implementation: “GEC retains full authority to make the final determination in the case of all complaints and appeals pertaining to GEC’s Dynamic Criteria Development Process.”</p> <p>All SDOs that ITI works with have 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. For the viability of the process, it is critical for GEC to involve parties outside of GEC and unrelated to EPEAT and the GEC criteria development, to process and manage appeals and to set up an appeal panel made up of a balanced group of stakeholders.</p> <p>Also, GEC should make clear that its appeals process allows for, among other things, appeals based on: a) inaction, not solely based on actions; b) exclusion from membership in Expert Ad Hoc Groups (currently explicitly prohibited), Technical Committees, or other activities; c) whether a technical issue was afforded due process (for example, see ANSI Essential Requirements at Section 1.8); d) failure to adequately address public or member comments and objections; and e) GEC’s failure to follow voluntary consensus processes.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.7	Complaints and Appeals	<p>The participating manufacturer should be informed as to who is part of the Complaints/Appeals Committee. The make-up of this committee should be made available to the appellant given that confidential business information may be included in the complaint/appeal process, the participating manufacturer should have the ability to not approve if there are potential conflicts or CBI concerns.</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P74	2.8	Conflict of Interest	<p>Following voluntary consensus principles requires GEC to abide by due process. According to GEC Criteria Development Process at Table 3 and OMB Circular A-119: “Due process shall include documented and publicly available policies and procedures, adequate notice of meetings and standards development, sufficient time to review drafts and prepare views and objections, access to views and objections of other participants, and a fair and impartial process for resolving conflicting views.” The GEC Criteria Development Process document lacks critical elements.</p> <p>Aside from other examples in comments for prior sections, there is no clear delineation of roles and responsibilities between GEC, CDOs, TC, and Expert Ad Hoc Groups to ensure that these bodies can operate without undue interference from each other, but also with an appropriate degree of cooperation as may be needed.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P75	1.0	Introduction	<p>As noted in our comments to P74, ITI does not believe that EPEAT criteria are “developed in a balanced, voluntary, consensus process” nor does it “align with” the characteristics of voluntary consensus in OMB Circular A-119 and ISO 14024. ITI is suggesting specific revisions to P74 to address both the spirit and letter of the documents referenced.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P75	2.0	Identification of Product Categories	<p>What happens if GEC decides to not act on a written request? ITI suggests providing the provider of a written request a notice of whether a product category selection has initiated, if the GEC has declined (for now) to initiate a product category, or if no decision has been made and/or if additional information could potentially sway the decision.</p> <p>Suggested Change:</p> <p>If GEC progresses with the product category selection process, GEC informs the stakeholder of the availability of the Product Category Proposal and the opportunity to provide feedback through the public consultation process, as summarized in Section 5.0. <u>The stakeholder will also be informed if GEC chooses to not pursue a new product category or if GEC would like additional information to make a decision.</u> Since initiation and decisions regarding potential product categories are carefully evaluated, there may be a considerable time lapse before a decision is reached. Further, GEC may choose not to pursue a new product category at all.</p>

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Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P75	3.1/3.2.3	Business Case	<p>Purchasers and manufacturers should be equally and specifically identified as more than simply “stakeholders” in the process.</p> <p>Suggested changes:</p> <p>3.1:</p> <p>The Business Case identifies the landscape of relevant technology providers, <u>manufacturer and</u> large-scale purchaser demand, and where criteria have the potential to reduce sustainability impacts.</p> <p>3.2.3:</p> <p>The Business Case evaluates demand for products and services in the category by large-scale institutional purchasers in the private and public sectors <u>and the desire and ability of manufacturers to meet EPEAT criteria for that product category.</u> GEC also gathers viewpoints from a variety of interested stakeholders, including but not limited to policy makers, environmental non-government organizations, manufacturers, and suppliers.</p>
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P75	3.2	Development of the Business Case	CAB capacity should be considered in this process. Analysis should be given to whether there is CAB capacity to take on given technical expertise and current capacity to engage in this.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P75	4.1	Product Category Proposal	There needs to be a balance of CBI and transparency in the Product Category Proposal. Without a clear definition of the CBI excluded, it may appear that the GEC is leaving out key information.
Cleet, Chris	Information Technology Industry Council (ITI)	December 31, 2022	P75	6.0	Complaints and appeals	The appellant should be informed as to who is part of the Complaints/Appeals Committee. 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.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.0	Figure 1 - Continuous Maintenance box	Suggest revising “ <i>Analysis of product performance against criteria</i> ” to “ <i>analysis of market uptake of criteria</i> ” – seems to more accurately reflect what is analyzed in this process.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.0	Where public comment is included in the process	For clarity, suggest revising to: “ <i>Public consultation is actively sought and open to all stakeholders at two critical points in the Dynamic Criteria Development Process: 1) on the issuance of the Draft State of Sustainability Research...”;</i>

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Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.0	How public notified of comment opportunities	Suggest revising to: <i>“GEC notifies stakeholders of public consultation through the website epeat.net/announcements, GEC newsletters and specific announcements.”</i> Make this change throughout the document. For example, also in this sentence under 2.1: <i>“GEC notifies stakeholders of the availability of State of Sustainability Research for public consultation through the website epeat.net/announcements, GEC newsletters and announcements”</i>
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.2.2	Selection of Verification Requirements	Suggest adding the following example to have examples for each item referenced: <i>“Verification requirements align with all required elements of the criterion, and to the extent applicable, specify published test methods, international standards (e.g., ISO, IEC) and certifications, regional and national standards (e.g., EU CEN, US ENERGY STAR), and recognized voluntary programs (e.g. USEPA Smartway Transport Partnership Program)”</i> .
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.2.2	Selection of Verification Requirements	Suggest adding: <i>“Verification requirements are built to rely heavily on these existing tools. Requirements are avoided which direct GEC to select additional standards/criteria/test methods/etc. outside of the criteria development process. In rare instances when the Technical Committee takes this approach, the selection criteria that GEC shall use and an open and transparent process for sharing the outcome of the selection process is included in the verification requirements”</i> .
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.2.2	Selection of Verification Requirements	Please specify that all verification requirements will be developed and approved by Technical Committees and not outside of the voluntary consensus based process in order to ensure maximum transparency and stakeholder input.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.2.3	Required and Optional Criteria	Consider adding in a sentence like this: <i>“In some instances, a Technical Committee may elect to require a product to meet a specific optional criterion in order to be eligible to be EPEAT Gold Registered in order to address specific high priority sustainability impacts more swiftly in the market”</i> .
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.2.3	Required and Optional Criteria	Consider if/how to address the need to review all criteria sets in the final draft stage to ensure appropriate emphasis/i.e. number of points placed on each criterion, and to try to maximize efficiencies for manufacturers and minimize the number of criteria products must meet while still addressing all key hotspots of the product life cycle.

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Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.3	Expert Ad Hoc Groups	Suggest replacing this sentence: <i>“The delivery of fully drafted criteria to the Technical Committee streamlines the voluntary consensus process in order to broaden multistakeholder participation”</i> with the following: <i>“The review and refinement of draft criteria by the Expert Ad Hoc Groups prior to review by the Technical Committees streamlines the criteria development process and broadens multistakeholder participation”</i> .
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.3	Expert Ad Hoc Groups	<i>“A list of organizations participating in Expert Ad Hoc Groups is made available to the Technical Committee and is publicly available”</i> . Please specify where the list(s) are publicly available.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.3	Expert Ad Hoc Groups	It is noted that the size limitation is being proposed to be eliminated for Expert Ad Hoc Groups. We’d propose retaining a minimum size for these groups to ensure some engagement with stakeholders external to GEC prior to submitting to the Technical Committees. Four seems like an appropriate minimum number.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.5	Voluntary Consensus Process	For clarity, and to ensure partner organizations have solid proven success in developing product sustainability standards, suggest the following edit: <i>“Since credible and objective criteria development is important to GEC’s mission, GEC selects partner criteria development organizations with experience in managing voluntary consensus processes involving participation of diverse stakeholders, which have documented funding sources, the lack of any conflicts of interest or undue influence by any one stakeholder group on their activities, and which have resulted in a final voluntary consensus standard successfully implemented in the marketplace”</i> .
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.5	Voluntary Consensus Process – Table 3 – Balance of Interests	State source for Table 3. Suggest the following edits: <i>“The Criteria Development Organization must also have procedures in place to objectively select Technical Committee members, ensure balance in the Technical Committee, safeguard against anti-competitive behaviors, and avoid the use of commercial terms and other requirements that may restrict trade and competition. Approved minutes of Technical Committee meetings must be publicly available”</i> . It is important that the Criteria Development Organization ensures balance to align with the requirements in OMB Circular A119.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.5.1.1	Technical Committee Member	Suggest the following edits: <i>“Participation on the Technical Committee does not constitute an endorsement of the EPEAT Program, nor the criteria set or standard developed by the Technical Committee by the individual or their affiliated organization”</i> .
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.5.2	Public Consultation	<i>Suggest the following edits: “GEC notifies stakeholders of the public consultation period through the website epeat.net/announcements, GEC newsletters and announcement”</i> .

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Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.6	Continuous Maintenance	Please clarify this is about FULL revisions throughout this section. <i>“GEC assesses the need for a full criteria revision three years after Criteria were initially adopted for use for a product category”.</i>
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.6	Continuous Maintenance	Please add as <i>“factors considered when evaluating whether criteria require revisions”</i> : <i>“Whether new sustainability impacts related to the manufacture, use, and/or disposal of this product have been identified since the development of this standard requiring criteria to be developed to sufficiently address them”.</i>
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.6	Continuous Maintenance	Please add discussion of when/how minor revisions are made to the criteria. And mirror with text in the EPEAT Policy Manual.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P74	2.8	Conflicts of Interest	Please clarify how GEC ensures there is no conflict of interest or undue influence for Criteria Development Organizations being funded to manage the criteria development process by a particular stakeholder group.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	1.0	Conformity assurance: <i>“Before becoming EPEAT-registered, an independent GEC-approved Conformity Assurance Body must confirm the product’s conformance with EPEAT Criteria.”</i>	We understood that under the Priority Verification Pathway, manufacturers go through desk review of their submissions for one product to ensure they are submitting responses in the ballpark of what is needed to respond accurately while not confirming accuracy of any specific claims made. If the responses seem reasonable, then GEC allows OEMs to put as many products on the registry as they would like, which are then subject to post market verification via the verification rounds. Under this path, a CAB is not confirming the products conformance with EPEAT criteria prior to posting on the EPEAT Product Registry. If this process is still used, then this sentence should be revised for accuracy.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	1.0	Transparency of category selection process.	Since this is a new process, recommend for accuracy revising this sentence to say: <i>“The process outlined in this document is intended to guide all future selection of product categories and ensure that the selection process is transparent, and interested stakeholders are appropriately engaged and consulted per As a Type 1 ecolabel operating in accordance with the principles and requirements of ISO 14024 Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures. , GEC ensures that the process which guides its selection of product categories is transparent, and that interested stakeholders are appropriately engaged and consulted.”</i>

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Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	3.1	Business Case	Suggest the following edits if in line with GEC approach: <i>“The Business Case identifies the landscape of relevant technology providers, large-scale purchaser demand, and whether there are opportunities in this product category to where criteria have the potential to reduce sustainability impacts”</i> . Criteria may or may not reduce sustainability impacts based on how they are crafted. The Business Case is focused on whether there is an opportunity to reduce sustainability impacts to justify the work to create a hopefully effective criterion/criteria.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	3.1	Topics covered in the business case	Recommend the following revision: <i>“The Business Case may be developed by GEC or by a third-party on behalf of GEC, and addresses at a minimum, the following topics: market research and policy drivers, sustainability impacts related to the manufacture, use, and disposal of the product, stakeholder interest, purchaser demand, and GEC capacity”</i> . The document puts purchaser demand into the stakeholder interest category, but it may be worth calling out separately due to the amount of importance of this piece.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	3.1	Decision the business case impacts	Recommend the following revisions: <i>“The Business Case provides a data driven analysis and makes an overall recommendation regarding the potential of successful impact resulting from whether GEC and its stakeholders developing criteria for the product category and adding it to the EPEAT Product Registry would be successful and impactful”</i> .
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	3.1	Public visibility of the product categories GEC develops business cases on	In the past, GEC determined which product categories to address based on a multi-stakeholder input seeking process (called “the Roadmap”), and the product categories under consideration were shared for public input. It would be helpful to stakeholders to view the possible product categories under consideration to allow them to provide key info to GEC to include in their Business Cases and to prepare for engagement in potential upcoming criteria development efforts, and related procurement activities. Suggest adding this process step in some way to the document. Notices could also be placed in the ANSI Standards Notice for all potential product categories simultaneous to a possible list of future product categories being made public.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	4.2	Feedback	Recommend that GEC also shares the Product Category Proposal with the EPEAT Advisory Council and seeks their input as well. Suggest adding this to this section. It would be helpful to clarify the Advisory Council’s role in this process throughout the document where appropriate.
Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	5.0	Decision	Recommend revising to state: <i>“The findings of the Business Case in conjunction with stakeholder and EPEAT Advisory Council feedback on the Product Category Proposal serve as the basis from which GEC makes its final decision regarding whether to develop criteria for a new product category”</i>

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Elwood, Holly	Environmental Protection Agency	December 12, 2022	P75	Throughout	Sharing public comment period information with stakeholders	Suggest noting that GEC will be posting these public comment periods on epeat.net/announcements as well, as stakeholders are now going there to see opportunities to engage.