EPEAT Conformity Assurance Implementation Manual

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

A companion document, *EPEAT Policy Manual (P65)*, defines the policies that govern all EPEAT programmatic activities and forms the basis for this Implementation Manual. Participating Manufacturers and GEC-approved CABs must operate in accordance with both Manuals as of their effective date to fulfill EPEAT Program requirements.

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

The latest revisions to this document were published on February 15, 2021 and become effective on July 1, 2021.

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

EPEAT Conformity Assurance Implementation Manual

Contents

EPEAT Conformity Assurance Implementation Manual

List of Tables

1.0 Introduction

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

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

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

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

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

2.0 EPEAT Conformity Assurance System

2.1 Overview

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

GEC establishes CAB Eligibility Requirements and approves and oversees CABs in their provision of conformity assurance services for the EPEAT Program. Organizations must undergo a robust approval and audit process prior to becoming GEC-approved CABs. On an ongoing basis, GEC-approved CABs must maintain third-party accreditations (to either ISO/IEC 17020 *Conformity assessment – Requirements for*

the operation of various types of bodies performing inspection or ISO/IEC 17065 *Conformity assessment – Requirements for bodies certifying products, processes and services*), implement EPEAT-specific elements in their quality management systems, maintain the proficiency and qualifications of their Auditors and successfully participate in an annual EPEAT audit process.

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

Participating Manufacturers may select one of two conformity assurance pathways to demonstrate initial and ongoing conformance with EPEAT Criteria – the Priority Verification Pathway and the Certification Pathway. Both Pathways require Participating Manufacturers to work with their GEC-approved CABs for Documentation Review and Continuous Monitoring. The key difference is the pace of the Initial Documentation Review process.

- In the Priority Verification Pathway, the Initial Documentation Review is staggered over several months for up to one year. Results of Initial Documentation Review are valid until the EPEAT Program implements the Criteria resulting from a Full Product Category Revision, after which Initial Documentation Review against the revised Criteria must be performed.
- In the Certification Pathway, the Initial Documentation Review is completed immediately and requires Participating Manufacturers to demonstrate conformance with all selected EPEAT Criteria at the outset. Results of Initial Documentation Review are valid for three years or until the EPEAT Program implements the Criteria resulting from a Full Product Category Revision, whichever is earlier, after which the Initial Documentation Review process must be performed again.

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

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

- A Participating Manufacturer executes *EPEAT License and Participating Manufacturer Agreement (P26)* with GEC and pays an annual EPEAT Participation Fee for each product category, which allows an unlimited number of products to be EPEAT-registered for a given product category.
- A Participating Manufacturer also establishes a contractual relationship with a GEC-approved CAB for the provision of conformity assurance services for the EPEAT Program, which requires that the Participating Manufacturer report relevant product or corporate changes to the CAB on an ongoing basis.
- Prior to the first products becoming EPEAT-registered for a product category, a Participating Manufacturer must complete Initial Documentation Review. During this process, the GEC-

approved CABs assesses documentation provided by the Participating Manufacturer to determine if the evidence supports conformance with EPEAT Criteria and if the Participating Manufacturer understands the obligations of the Criteria. Once Initial Documentation Review is complete, the Participating Manufacturer's products are EPEAT-registered.

- On an ongoing basis, a Participating Manufacturer may choose to select additional EPEAT Optional Criteria or have new products become EPEAT-registered. In these cases, the GEC-approved CAB performs Ongoing Documentation Review where required.
- To ensure the ongoing conformance of EPEAT-registered products, the EPEAT Program requires GEC-approved CABs to conduct Continuous Monitoring. These activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis. All EPEAT-registered products in all product categories are subject to Continuous Monitoring at any time, regardless of the conformity assurance pathway chosen.
- If any Continuous Monitoring activity results in a nonconformance, the Participating Manufacturer must make corrections to address the identified nonconformance and restore accuracy to the EPEAT Registry, as well as develop corrective action plans to address other similarly affected products. Should a Participating Manufacturer fail to make the necessary corrections, affected products will be removed from the Registry by either the Participating Manufacturer's CAB or the EPEAT Program.

2.2 EPEAT Technical Guidance and Authority

2.2.1 Clarifications

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

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

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

2.2.2 Conformity Guidance Materials

Conformity Guidance Materials contain supplemental information developed by the EPEAT Program that may help Participating Manufacturers and GEC-approved CABs further understand EPEAT Criteria.

Conformity Guidance Materials provide an overview of the EPEAT Criteria requirements, examples of supporting evidence and answers to frequently asked questions.

The EPEAT Program publishes Conformity Guidance Materials for Priority Criteria two months before the launch of a new product category. Within six months after a new category launch, Conformity Guidance Materials are available for all EPEAT Criteria. Necessary revisions are made monthly thereafter. GEC-approved CABs and Participating Manufacturers are notified when changes to Conformity Guidance Materials are made. Revisions to Conformity Guidance Materials may be made for several reasons, including but not limited to:

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

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

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

The use of Conformity Guidance Materials does not guarantee conformance to EPEAT criteria. All evidence provided during Documentation Review and Continuous Monitoring activities must be evaluated by GEC-approved CABs. In the event of a discrepancy between the Conformity Guidance Materials and the applicable EPEAT Criterion, the Criterion take precedence.

2.2.3 Technical Questions

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

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

- A GEC-approved CAB seeks additional guidance or detail on why evidence may or may not be acceptable.

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

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

2.2.4 Conformity Guidance Group (CGG)

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

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

The EPEAT Program establishes the monthly CGG meeting schedule at the beginning of each calendar year and communicates this to stakeholders using various GEC communication vehicles (such as newsletters and special announcements). For each Conformity Guidance Group meeting, the EPEAT Program identifies agenda items, prepares discussion topic materials, and facilitates discussions. Meetings are not held in person to allow for the broadest number of participants. To the extent practical, the agenda and materials are provided in advance of each meeting to permit meaningful review. If the EPEAT Program determines that there are no relevant topics to bring forward, CGG meetings may be canceled up to two days before the scheduled occurrence.

All participants are encouraged to provide their expert advice, ask clarifying questions and be open and consultative. As such, CGG meetings are governed by Chatham House Rule[1]. Meeting participants are free to use information received but are not allowed to reveal the identity or affiliation of speakers. An anti-trust statement is read at the beginning of each meeting. All participants are expected to abide by Chatham House Rule and the anti-trust statement.

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

GEC-approved CABs and Participating Manufacturers may request that a topic be raised for discussion by the CGG. Requests must be submitted electronically using the Conformity Guidance Group Topic Request Form[2]. Participating Manufacturers are strongly encouraged to bring topics forward through their GEC-approved CAB. If a request is received directly from a Participating Manufacturer, the EPEAT Program consults with the Participating Manufacturer's CAB to ensure consistency in the guidance given to both Participating Manufacturers and GEC-approved CABs.

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

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

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

- Language in EPEAT Criteria is not descriptive enough for consistent conformity decisions and may lead to different decisions being made by different GEC-approved CABs.
- Test methods, protocols, or other references in EPEAT Criteria no longer exist.
- Uncertainty in the intention of EPEAT Criteria language.
- New technical guidance that may contradict guidance previously provided.
- Adjudication of disagreements in interpretation of EPEAT Criteria and associated conformity assurance requirements.
- Overarching questions or suggestions regarding the EPEAT Conformity Assurance System and requirements.

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

The EPEAT Program is solely responsible for making technical interpretations of EPEAT Criteria, determining the necessary conformity assurance requirements for assessing conformance to EPEAT Criteria, and adjudicating disagreements in the interpretation of Criteria and the associated conformity assurance requirements. Careful consideration is given to the specific language used in EPEAT Criteria.

[2] The Conformity Guidance Group Topic Request Form will be made available to all interested parties in advance of the effective date (July 1, 2021) of this document, *EPEAT Conformity Assurance Implementation Manual (P66)*.

2.2.5 Conformity Assurance Where Equivalent Regulatory Requirements Exist[3]

If there are regulations in effect in a country where a product is identified as being EPEAT-registered and those regulations address the requirements of an EPEAT Required Criterion, Participating Manufacturers may provide a signed attestation to their GEC-approved CAB as the supporting evidence for that Criterion in that specific country. Participating Manufacturers must use the Attestation Template[4] provided by the EPEAT Program.

The EPEAT Program maintains an Acceptable List[5] of the Required Criteria and specific countries where this attestation may be used as evidence. The attestation may only be used for those countries identified by the EPEAT Program. If a product is EPEAT-registered in other countries that are not on the list, the Participating Manufacturer cannot use the attestation for the Required Criterion in those countries and must provide documentation to demonstrate conformance to the Criterion.

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

The Attestation Template and Acceptable List of Required Criteria and specific countries are available to all interested parties.

3.0 Approval of Conformity Assurance Bodies (CABs)

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

3.1 CAB Eligibility Requirements

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

- Operate EPEAT-related conformity assurance services under a valid accreditation to one of the following:

[3] GEC will seek stakeholder input when further developing the implementation guidance for this Section in advance of the effective date (July 1, 2021) of this document, *EPEAT Conformity Assurance Implementation Manual (P66)*.

[4] The Attestation Template will be made available to all interested parties in advance of the effective date (July 1, 2021) of this document, *EPEAT Conformity Assurance Implementation Manual (P66)*. GEC will seek stakeholder input when developing this Template.

[5] The Acceptable List of Required Criteria and specific countries will be made available to all interested parties in advance of the effective date (July 1, 2021) of this document, *EPEAT Conformity Assurance Implementation Manual (P66)*. GEC will seek stakeholder input when developing this List.

  - ISO/IEC 17020 *Conformity assessment – Requirements for the operation of various types of bodies performing inspection* from an accreditation body that is an ILAC Member and signatory to the ILAC Mutual Recognition Agreement (MRA).
  - ISO/IEC 17065 *Conformity assessment – Requirements for bodies certifying products, processes and services* from an accreditation body that is an IAF Member and signatory to the IAF Multilateral Recognition Arrangement (MLA). This accreditation is required for CABs offering EPEAT-related conformity assurance services under the Certification Pathway.

- Incorporate additional quality management system elements under the ISO/IEC 17020 or ISO/IEC 17065 accreditation, as per Section 5.1, including:
  - Execution of a legal agreement with Participating Manufacturer clients for the provision of conformity assurance services for the EPEAT Program, which requires adherence to applicable EPEAT Program policies and procedures.
  - Formal processes or procedures for performing Documentation Review, implementing Continuous Monitoring, and responding to Participating Manufacturer client and external stakeholder complaints.

- Maintain at least two Qualified Auditors for each product category in which they offer conformity assurance services for the EPEAT Program, as per Section 4.

- Have in place a policy, which identifies how customer service for its Participating Manufacturer clients will be measured and improved.

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

3.2 Applicant Status

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

GEC may ask clarifying questions and/or request an interview with the Applicant CAB as it evaluates the application. If GEC finds that the required accreditations are in place and the documentation provided sufficiently demonstrates the organization's ability to perform conformity assurance activities, the organization is granted Provisional CAB status.

GEC is not obligated to grant Provisional CAB status to an organization. Decisions to allow organizations to proceed through the approval process are based on both the potential to meet specific technical requirements and the number of existing GEC-approved CABs. GEC seeks to maintain a network of approved CABs to meet Participating Manufacturer needs while also ensuring sufficient EPEAT Program capacity exists to support and oversee the entire CAB network.

3.3 Provisional Status

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

3.3.1 Qualifying Auditors

GEC-approved CABs must maintain at least two Qualified Auditors for each product category in which they offer conformity assurance services for the EPEAT Program. Therefore, Provisional CABs must ensure that at least two individuals undergo Initial EPEAT Auditor Training and pass the associated exams (see Section 4.1). Provisional CABs must pursue qualifications for Auditors in at least one product category; qualifications for additional product categories may be added after approval. Only Qualified Auditors can conduct Documentation Review, remove Documentation Review Requirements, and conduct Continuous Monitoring activities.

3.3.2 Supporting Documentation

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

3.3.3 Initial EPEAT Audit

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

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

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

- CAB Eligibility Requirements are being met.
- The quality management system elements as per Section 5.1 are incorporated into the CAB’s management system.

- Procedures adequately reflect the conformity assurance pathway(s) for which it is seeking approval as per requirements in Sections 6 and 7 including developing Initial Documentation Review plans and selecting products, collecting, and evaluating evidence, removing Documentation Review requirements, implementing Continuous Monitoring, and performing Annual Renewals.

GEC provides the Provisional CAB with an audit report summarizing the activities conducted and, where applicable, opportunities for improvement and nonconformances. Provisional CABs must correct identified nonconformances within 30 days and develop a corrective action plan to prevent re-occurrence. Any corrective action plans must be fully implemented prior to GEC granting the organization GEC-approved CAB status.

3.4 Approved Status

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

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

3.5 CAB Mentored Work Phase

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

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

During the CAB Mentored Work Phase, GEC evaluates and approves the CAB's conformity decisions made in the Initial Documentation Review for its initial Participating Manufacturer clients, including the rationale for accepting or rejecting the evidence provided by the Participating Manufacturer. A CAB's decisions on all EPEAT Required Criteria and 50% of the EPEAT Optional Criteria in a product category are reviewed. A GEC-approved CAB may remain in the CAB Mentored Work Phase for some EPEAT

Criteria, while able to make conformity decisions independently for others because the CAB Mentored Work Phase is completed on a Criterion-by-Criterion basis.

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

CABs cannot approve a selected EPEAT Criterion or remove the Documentation Review requirement for the Criterion while still in the Mentored Work Phase for that Criterion. CABs are also unable to activate products while in the Mentored Work Phase. If the EPEAT Program agrees with a CAB's determination that a Participating Manufacturer has submitted sufficient evidence to demonstrate conformance and had completed the Initial Documentation Review process, the EPEAT Program will activate the products for the Participating Manufacturer, even if the CAB is still in the Mentored Work Phase

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

4.0 Qualified Auditor Proficiency and Training

4.1 Initial EPEAT Training Requirements

GEC-approved CABs must maintain at least two Qualified Auditors for each product category in which it provides conformity assurance services for the EPEAT Program. To become qualified, Auditors must complete Initial EPEAT Auditor Training provided by the EPEAT Program and pass the associated exams with a score of 75% or greater. Individuals completing any EPEAT auditor exams may refer to EPEAT Criteria, Conformity Guidance Materials, and access information available on the Internet but cannot consult with or seek guidance from other individuals. The Initial EPEAT Auditor Training is comprised of an Overview Module and individual modules for each product category. Each module has an associated exam. Auditors must complete and pass the Overview Module and at least one Product Category Module.

- **Overview Module:** The overview module provides an overview of the EPEAT Program, the product categories, requirements of GEC-approved CABs, the EPEAT Conformity Assurance System, and the Documentation Review and Continuous Monitoring processes. The exam for the overview module evaluates the Auditor's knowledge of the EPEAT Program, EPEAT's Conformity Assurance System and requirements of conformity assurance activities.
- **Product Category Modules:** Each product category specific module provides details on the EPEAT Criteria for that product category, conformity assurance requirements that may be specific to those Criteria, existing Clarifications, guidance for making appropriate conformity decisions, and expectations for details that must be provided in the rationale for these decisions. The exams for product category modules evaluate an Auditor's technical skills and applied knowledge of EPEAT Criteria in that category.

When the EPEAT Program launches a new product category, already qualified Auditors must take the Product Category Module and pass the associated exam with a score of 75% or greater for that new category to be able to perform the associated conformity assurance activities.

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

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

4.2 Ongoing Training and Other Requirements

To maintain their qualifications, Auditors must:

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

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

4.2.1 Annual EPEAT Auditor Refresher Training

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

- Technical questions, responses, interpretations, and rationale behind decisions.
- Conformity assurance related policy and procedural changes.
- Additional EPEAT Program policy and procedural changes.

- Common misunderstandings such as inappropriate selection of EPEAT Criteria, conformity assurance requirements for specific EPEAT Criteria, and underlying reasons for nonconformances.
- Investigation Report writing best practices and lessons learned.

If unable to attend the training at the time it is held, Auditors must watch the recording and confirm in writing to the EPEAT Program that this is complete. In advance of the training, GEC-approved CABs must notify the EPEAT Program of any Auditors that will be absent (e.g., due to illness, parental leave, sabbaticals, or other duties outside of EPEAT conformity assurance activities), obtain EPEAT Program approval for the absence and arrange for them to view the recording upon their return.

4.2.2 Annual EPEAT Auditor Proficiency Exam

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

If an Auditor does not achieve a passing score on the Annual EPEAT Auditor Proficiency Exam, the EPEAT Program provides feedback on aspects of the training that the Auditor should re-examine. The Auditor may revise the exam and resubmit it up to two times. Any Auditor that has retaken the Annual EPEAT Auditor Proficiency Exam three times and not received a score of 75% or greater must undergo and pass Initial Auditor Training again. Upon successfully repeating and passing Initial EPEAT Auditor Training, a new Annual EPEAT Auditor Proficiency Exam will be administered and a score of 75% or greater must be achieved.

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

4.2.3 Continuous Monitoring Training

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

The Continuous Monitoring Training sessions are intended to be an opportunity for dialogue between the EPEAT Program and GEC-approved CABs and provide Qualified Auditors an opportunity to share specific examples of issues they are encountering with their Participating Manufacturer clients and

receive feedback on any questions they have. To encourage more open discussion and maintain confidentiality, GEC conducts an individual session for each GEC-approved CAB. These individual sessions are recorded for additional viewing by the CAB's Qualified Auditors. At least one CAB representative must attend the training, and if Auditors are unable to attend the training at the time it is held, they must watch the recording and confirm in writing to the CAB that this is complete. The same materials are covered in all individual CAB training sessions.

The EPEAT Program may occasionally provide optional training for Participating Manufacturers to clarify EPEAT Criteria and outline evidence expectations to help Participating Manufacturers prepare for Continuous Monitoring. All Participating Manufacturers will be notified using various GEC communication vehicles (such as newsletters and special announcements) and have the opportunity to attend these trainings.

4.2.4 Calibration Meetings

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

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

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

Calibration Meetings are governed by Chatham House Rule[6] and an anti-trust statement, both of which all participants are expected to abide by. Meeting participants are free to use information received but are not allowed to reveal the identity or affiliation of speakers.

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

At least one representative from each GEC-approved CAB must attend each Calibration Meeting. Although not required to do so, Provisional CABs are strongly encouraged to attend all Calibration Meetings. The CAB representative who attends each meeting may change due to vacation and holiday schedules, illness, job description changes and CAB workloads. The EPEAT Program expects CAB representatives to actively participate in Calibration Meetings to the best of their ability, providing

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

feedback and engaging in constructive dialogue where appropriate. Meeting attendees are also required to disseminate information presented and discussed during the meeting to the CAB's Qualified Auditors.

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

5.0 Ongoing Requirements of CABs

5.1 Accreditation

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

Table 1: EPEAT Requirements for CAB Quality Management Systems

Management System and Accreditation Scope	If accredited to ISO/IEC 17020, the CAB must be either a Type A or Type C inspection body and meet the applicable requirements in Annex A (Independence requirements for inspection bodies) in ISO/IEC 17020. If Type C, the CAB shall not be part of a company that has EPEAT-registered products, and the CAB shall be or be part of the legal entity that signs the contractual agreement between the CAB and GEC. If accredited to ISO/IEC 17065, the CAB shall follow Option A as outlined in Section 8 (Management system requirements) in ISO/IEC 17065. ISO/IEC 17065 requires that certification documentation must be provided that conveys the term or expiry date of certification. For the EPEAT Program, this period of validity is three years. The EPEAT mark cannot be used on certification documentation, including certificates and certification reports. The EPEAT Program is not required to be included in the CAB's accreditation scope for either ISO/IEC 17020 or ISO/IEC 17065.
Organization	The CAB's quality management system must identify all personnel positions that: • Perform Documentation Review, evaluate and approve conformity decisions, and review and/or approve changes to Documentation Review status. • Implement, review and/or approve Continuous Monitoring activities and recommendations. • Manage conformity assurance services for the EPEAT Program and/or the personnel implementing these services.
Confidentiality	The CAB shall meet the confidentiality requirements in the contractual agreement between the CAB and GEC. These requirements allow the CAB to share with the EPEAT Program information collected from Participating Manufacturers during the provision of conformity assurance services for the EPEAT Program but prevent other disclosures.
Contractual Agreements	The CAB must execute a legal agreement with Participating Manufacturer clients for the provision of conformity assurance services for the EPEAT Program. This contract must include a clause that requires adherence to applicable EPEAT Program policies and procedures.
Management Review	The CAB's conformity assurance activities for the EPEAT Program must be included as part of the CAB's management review.
Internal Audits	The CAB's conformity assurance activities for the EPEAT Program must be included as part of the CAB's internal audit.

Table 1: EPEAT Requirements for CAB Quality Management Systems

Complaints	The CAB must have a process for responding to complaints from Participating Manufacturer clients and external stakeholders and to appeals from Participating Manufacturer clients on conformity decisions and recommendations. The CAB must also have a process for passing on complaints regarding EPEAT-registered products not meeting EPEAT Criteria to the EPEAT Program.
Process Requirements	The CAB must have specific procedures in place for performing Documentation Review and implementing Continuous Monitoring. These procedures must reflect the conformity assurance pathways for which it is approved as per requirements in Sections 6 and 7 of P66 *EPEAT Conformity Assurance Implementation Manual*. If offering conformity assurance services via the Certification Pathway, the CAB must maintain an internal list of products and the EPEAT Criteria met by each product using this Pathway. The EPEAT Registry shall serve as the published directory of products assessed via this Pathway.
Records	The CAB must retain records related to conformity assurance for the EPEAT Program for a minimum of three years, including records associated with the following: • Documentation Review including all evidence and the rationale supporting decisions. • Evaluation of a Participating Manufacturer's competence when demonstrating conformity. • Continuous Monitoring activities including all evidence, the review and approval processes, and for laboratory evaluation of products, the visual/photographic record of the evaluation. • Qualification of personnel involved in providing conformity assurance services for the EPEAT Program (records of completion EPEAT Auditor training requirements), which must be retained for at least three years after the end of employment. • Other business records (contracts or agreements with Participating Manufacturer clients) associated with provision of conformity assurance services for the EPEAT Program, which must be retained for three years after termination of the applicable contract.
Personnel and Resource Requirements	All CAB personnel responsible for managing or implementing conformity assurance activities for the EPEAT Program must maintain Auditor qualifications as per Section 4 of P66 *EPEAT Conformity Assurance Implementation Manual*. Due to the technical nature of EPEAT Criteria, the CAB must have personnel competence requirements for performing conformity assurance activities for the EPEAT Program that includes education, training, technical knowledge, skills, and experience. The CAB must ensure all personnel performing conformity assurance work for the EPEAT Program are provided with information discussed at Calibration Meetings and relevant Clarifications and Conformity Guidance Materials published by the EPEAT Program. Any laboratory evaluation of products for Continuous Monitoring must be performed by a laboratory with valid accreditation to ISO/IEC 17025 *General requirements for the competence of testing and calibration laboratories* from a body that is an ILAC Member and signatory to the ILAC Mutual Recognition Arrangement (ILAC MRA). • CABs must confirm that the evaluation methods are covered by the laboratory's accreditation scope or, for non-standard methods of evaluation, by other mechanisms or best practices to produce accurate and reliable results. • The laboratory must make best efforts to retain, appropriately identify and protect additional samples from a part or component to enable re-testing in the event the original samples are misplaced or there is a dispute or question about the evaluation results. • The laboratory must retain the disassembled product, including packaging, for at least six months following filing of the related Investigation Report(s). • The laboratory must retain the visual record of the disassembly process and results for at least three years following filing of the related Investigation Report(s).

5.2 Annual EPEAT Audit of CAB

5.2.1 Audit Methodology

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

GEC-approved CABs are responsible for:

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

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

- Assessment of Documentation Review and Annual Renewal decisions, for the conformity assurance pathway(s) and product category(ies) for which the CAB is approved, to assess compliance with Sections 6 and 7. To ensure consistency of EPEAT Audits across all CABs, conformity decisions for four criteria for each product category the CAB has Participating Manufacturer clients will be reviewed during each audit. The review may consist of a combination of criteria reviewed by the CAB during the last year, or activities from prior years.
- If applicable, assessment of activities conducted when accepting a new Participating Manufacturer client that has transitioned from a different GEC-approved CAB.
- Previous nonconformances and implementation of corrections and corrective action plans.
- Implementation of new EPEAT Program policies or requirements that became effective in the previous 12-month period.
- Review of annual Performance Metrics identified in Section 5.3.
- If applicable, documentation supporting the addition of a new conformity assurance pathway.

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

Within 14 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. Results of the Annual EPEAT Audit of CABs are not made publicly available.

5.2.2 Nonconformances and Corrective Actions

Within 30 days of receiving the audit report, GEC-approved CABs must correct identified nonconformances, develop a corrective action plan and timeframe to prevent re-occurrence, and submit this information to GEC. Within 15 days of receipt, the EPEAT Program communicates to the CAB the acceptability of the correction and proposed corrective action plan.

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

GEC-approved CABs may receive nonconformances related to conformity decisions made during Documentation Review or Annual Renewals for Participating Manufacturer clients. Within 30 days of receiving the audit report, the CAB must submit evidence to support the conformity decision (which was not presented during the Annual EPEAT Audit) or correct the nonconformance by obtaining necessary documentation from the Participating Manufacturer. The CAB must also ensure that the Participating manufacturer addresses any other active EPEAT-registered products that may be similarly affected by the nonconformance.

If after reviewing the evidence of implementation GEC finds that the Participating Manufacturer is still not in conformance with EPEAT Criteria, the GEC-approved CAB must notify the Participating Manufacturer within three business days. The Participating Manufacturer may be given up to three months to make necessary changes and provide the CAB with additional documentation. If unable to show conformance in the three-month period, the Participating Manufacturer must make appropriate changes [unselect EPEAT Criteria or remove/archive the impacted product(s)].

5.3 CAB Performance Metrics

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

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

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

Table 2: CAB Performance Metrics and Annual Expectations

Customer Service	
Metric 1	**Customer Service Provision Policy** GEC-approved CABs must have a policy in place that identifies how customer service for Participating Manufacturer clients is measured and improved. The policy must address the following: • When assessing conformance to EPEAT Criteria, expectations for adequately articulating to Participating Manufacturer clients why document submissions meet Criteria requirements or not, without providing consulting services to the Participating Manufacturer. • High-level expectations for service delivery times for Participating Manufacturer clients. • Expectations for maintaining professional conduct. GEC-approved CABs may use existing policies or service level requirements in place for other non-EPEAT services as long as these meet the above requirements. The policy will be reviewed during the Annual EPEAT Audit of CAB.
Technical Proficiency and Training	
Metric 2	**Calibration Meetings** At least one representative from each GEC-approved CAB must attend each Calibration Meeting. One meeting annually may be missed due to extenuating circumstances without penalty. If the frequency of meetings increases, the EPEAT Program will reassess attendance requirements expectations and may hold meetings in multiple time zones to better accommodate GEC-approved CABs.
Metric 3	**Continuous Monitoring Training** At least one CAB representative must attend all regularly scheduled Continuous Monitoring training sessions for those product categories for which they are approved. Individual Qualified Auditors, if unable to attend the training at the time it is held, must watch the recording, and confirm in writing to the CAB that this is complete.
Metric 4	**Annual Auditor Refresher Training** Qualified Auditors must attend the Annual Refresher Training. If unable to attend the training at the time it is held, Auditors must watch the recording and confirm in writing to the EPEAT Program that this is complete. In advance of the training, GEC-approved CABs must notify the EPEAT Program of any Auditors that will be absent.
Metric 5	**Annual Auditor Proficiency** Qualified Auditors must pass the Annual Auditor Proficiency Exam with a score of 75% or greater.
Nonconformance Findings in Annual EPEAT Audit of CABs	
Metric 6	**Integration of EPEAT Program Requirements into Quality Management System** GEC-approved CAB should receive no more than five nonconformances related to the incorporation of EPEAT Program requirements (as per Section 5.1) into its quality management system. During EPEAT Audits of CABs, nonconformances will only be issued based on the effective version of P66, and not proposed revisions or versions not yet in effect.
Metric 7	**Conformity Assurance Decisions** GEC-approved CAB should receive no more than two nonconformances per product category due to unacceptable conformity decisions made during Documentation Review or Annual Renewal activities or due to lack of acceptable documentation of the rationale for conformance or competence during Documentation Review activities.

Table 2: CAB Performance Metrics and Annual Expectations

Metric 8	**Corrections Beyond the Agreed Resolution Timeframe** All nonconformances should be corrected and corrective action plans implemented in the agreed timeframe. In recognition that a CAB may experience delays out of its control when implementing corrective action plans, a CAB may request an extension and notify the EPEAT Program of the reason for the delay.
Continuous Monitoring	
Metric 9	**Late Investigations Reports** No reports should be returned to the EPEAT Program after the specified deadline, unless the CAB notifies the EPEAT Program at least 24 hours before the deadline.
Metric 10	**Insufficient Rationale to Support Recommendations** No more than two reports per product category should be returned to a CAB due to an insufficient rationale to support the conformity recommendation. Insufficient rationale to support the conformity recommendation means either a failure to address all aspects of the criterion, including a description of the evidence provided for each aspect, or an insignificant level of detail being provided to support the CAB's recommendation. While reviewing submitted Investigation Reports, the EPEAT Program may ask clarifying questions about the Investigation Report and evidence submitted by the Participating Manufacturer to further understand the evidence and/or CAB recommendation on conformity. In some cases, the EPEAT Program may ask the CAB to update the Investigation Report to include additional details. Only if the CAB does not make appropriate updates will the EPEAT Program consider there to be "insufficient rationale to support the conformity recommendation". At any time during the Investigation Phase, and until reports are due to the EPEAT Program, CABs may resubmit updated reports if they find an error, incomplete report, or report with insufficient rationale.
Metric 11	**Incomplete Investigation Reports** No more than four reports should be returned to a CAB because the reports are missing required entries or contain the name of the Participating Manufacturer or product under investigation. At any time during the Investigation Phase, and until reports are due to the EPEAT Program, CABs may resubmit updated reports if they find an error, incomplete report, or report with insufficient rationale.
Metric 12	**Recommendations that Differ from EPEAT's Final Conformity Decision** No more than two CAB recommendations on conformity per product category, or no more than 20% of recommendations on conformity per product category, should differ from the EPEAT Program's final decisions due to the CAB's misunderstanding of EPEAT Criteria or the associated conformity assurance requirements. Because the number of investigations a CAB conducts annually is dependent on the number of Participating Manufacturer clients it has, both metrics will be evaluated by the EPEAT Program, but CABs can choose which metric will be used in their annual performance review. An exception is if a CAB has two or less investigations per product category annually. In such cases, only the second metric will be evaluated. While reviewing submitted Investigation Reports, the EPEAT Program may ask clarifying questions about the Investigation Report and evidence submitted by the Participating Manufacturer to further understand the evidence and/or CAB recommendation on conformity. In some cases, the EPEAT Program may ask the CAB to change its recommendation on conformity based on the responses to the questions. Only if the CAB does not change its recommendation will the EPEAT Program consider it a "recommendation that differs from EPEAT's final conformity decision". The EPEAT Program recognizes that some differences in recommendations and final decisions may be due to unique Participating Manufacturer situations that are not fully addressed by EPEAT's conformity assurance requirements. Therefore, all differences are evaluated on a case-by-case basis.

5.4 CAB Summit

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

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

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

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

5.5 Inappropriate Use of EPEAT Name and Marks

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

5.6 Suspension or Termination

As per the *EPEAT Policy Manual (P65)*, GEC, at its sole discretion, may suspend or terminate a GEC-approved CAB and any decision to do so shall be considered final. CABs that are suspended may continue to provide EPEAT-related conformity assurance services to their existing Participating Manufacturer clients, for no longer than 12 months, but may not accept new Participating Manufacturer clients.

GEC first suspends a CAB to allow it to correct outstanding nonconformances and continue to provide service to existing Participating Manufacturers. Suspended CABs must correct all outstanding nonconformances and implement corrective action plans for each nonconformance to prevent the nonconformance from reoccurring within a 12-month timeframe. Failure to correct the nonconformances and identify plans to prevent them in the future will result in the CAB being terminated.

Termination is cancellation of the agreement between GEC and the CAB and bars the CAB from providing EPEAT conformity assurance services for a minimum of one year.

Grounds for suspension or termination as identified in *EPEAT Policy Manual (P65)* are as follows:

- Nonconformances identified during the Annual EPEAT Audit or an audit performed by an accreditation body that remain uncorrected beyond the agreed time.
- Non-payment of annual EPEAT CAB Participation Fees to GEC.
- Any breach of *Agreement Between Conformity Assurance Body and GEC (P33)* that goes uncorrected beyond the agreed upon time.
- Failure to meet the same Performance Metric for three consecutive years.
- Failure to conform with the requirements identified in the *EPEAT Conformity Assurance Implementation Manual (P66)* that remain uncorrected beyond the agreed time.
- Loss of accreditation to ISO/IEC 17020 *Conformity assessment – Requirements for the operation of various types of bodies performing inspection* or ISO/IEC 17065 *Conformity assessment – Requirements for bodies certifying products, processes and services*, or failure to provide a valid certificate.
- Intentionally sharing upcoming Continuous Monitoring Round details with Participating Manufacturers before authorized by the EPEAT Program with the intention of providing the Participating Manufacturer an unfair advantage.

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

If a Participating Manufacturer is accidentally informed or notified of Continuous Monitoring Round details before the start of the Round, the CAB must notify the EPEAT Program who will assign a new product or criterion to the Participating Manufacturer.

GEC notifies the CAB of GEC's intent to terminate and works cooperatively to attempt to resolve the issue. If termination is planned, GEC informs the CAB's Participating Manufacturer clients of the pending termination. *Agreement Between Conformity Assurance Body and GEC (P33)* requires that CABs transfer their Participating Manufacturer clients to a different GEC-approved CAB in the event of termination. GEC shall support this orderly transition.

6.0 Documentation Review

6.1 General Requirements

In both Initial and Ongoing Documentation Review, a GEC-approved CAB evaluates a Participating Manufacturer's Criteria selections and determines if the Participating Manufacturer understands the EPEAT Criteria and can provide evidence to demonstrate conformance with the Criteria. Documentation Review is the CAB's opportunity to ensure that they and their clients share a common understanding of the requirements, the Conformity Assurance process, and what evidence is needed to demonstrate conformance on an ongoing basis. Only Qualified Auditors can conduct Documentation Review activities and remove Documentation Review Requirements.

Initial Documentation Review must be completed before a Participating Manufacturer's products can become EPEAT-registered. Ongoing Documentation Review may be used for a variety of reasons, including the addition of new products, changes to the EPEAT Criteria selected for EPEAT-registered products and addressing nonconformances arising from Continuous Monitoring activities. In all cases, GEC-approved CABs must assess the integrity of documentation provided by Participating Manufacturers and ensure it demonstrates conformance with EPEAT Criteria.

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

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

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

6.1.1 Types of Evidence and Ensuring Integrity of Evidence

When assessing conformance to specified EPEAT Criteria, the CAB must use the following normative requirements and guidance to inform its decision:

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

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

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

- Information supplied by other parties must meet the requirements stipulated in the relevant EPEAT Criterion.
- Information provided should be clearly dated and dates should be consistent with the Criteria requirements.
- If information supplied by other parties includes a determination or evaluation, the individual making the determination or evaluation must be clearly identified along with an indication of their authority for making the evaluation/determination.

- Information such as test data or reports produced by a laboratory accredited to ISO/IEC 17025 by an ILAC member accreditation body may be considered as accurate, on the basis of the laboratory's accreditation. Similarly, certificates or reports produced by bodies such as certification bodies or inspection bodies that are accredited to a relevant ISO conformity assessment standard by an ILAC or IAF member accreditation body may also be considered as accurate. Some EPEAT Criteria require certification bodies to be accredited by an ILAC or IAF member body.
- All laboratory reports, including those from internal laboratories and accredited third-party laboratories must contain the following information: laboratory name and location; date of testing; identification of product, component or material evaluated; test method(s) used and if applicable, detection limits; evaluation results; sign off from an appropriate party at the laboratory; and if applicable, identification of relevant laboratory accreditations.

Participating Manufacturers may designate their EPEAT-registered products as available for use by purchasers in specific countries, which requires them to select certain Criteria for specific countries, and in some cases, select EPEAT Criteria differently for individual countries. Evidence provided for these Criteria must demonstrate that the Participating Manufacturer and their products are conformant in the identified locations of use. Depending on the Pathway chosen, Participating Manufacturers must either demonstrate conformance for all identified locations of use (Certification Pathway) or a sample of identified locations of use (Priority Verification Pathway).

6.1.2 Priority Criteria

When a new product category is launched or revised, the EPEAT Program identifies "Priority Criteria". The list of Priority Criteria for each product category is available to Participating Manufacturers and CABs. Priority Criteria are the minimum EPEAT Criteria that must be reviewed by the CAB before allowing a Participating Manufacturer's products to become EPEAT-registered using the Priority Verification Pathway.

6.1.3 Documentation Review Records

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

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

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

6.2 Initial Documentation Review

6.2.1 Plan and Product Selection

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

To enable CABs to develop Documentation Review Plans and sample products or choose representative products, Participating Manufacturers must provide their CAB with an initial list of products they wish to register, and provide relevant information including but not limited to product configurations, components, bills of material, packaging, manufacturing processes and supply chains.

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

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

6.2.2 Assessing Conformance

CABs evaluate evidence submitted by Participating Manufacturers and make determinations of conformance with EPEAT Criteria using the guidance provided in Section 6.1.1 and keep appropriate records as identified in Section 6.1.3. Typically, the evaluation process is iterative, and CABs may request additional documentation from Participating Manufacturers. Participating Manufacturers may also demonstrate nonconformance to a Criterion and need to make appropriate changes to come into conformance. CABs must maintain a record of how the nonconformance was communicated, what new evidence was provided and how the evidence demonstrated conformance. Some nonconformances may result in denying product registration for select or all products.

6.2.3 Assessing Competence

CABs also use professional judgement to evaluate Participating Manufacturers' understanding of EPEAT Criteria and their ability to demonstrate conformance on an ongoing basis (referred to as "competence"). When a Participating Manufacturer demonstrates competence for a Criterion, the CAB may remove the requirement for further Documentation Review for that Criterion. The decisions made by CABs on Participating Manufacturer conformance and Participating Manufacturer competence are separate and may be made at different points in time.

Competence is evaluated on a Criterion-by-Criterion basis. If a Participating Manufacturer demonstrates competence and an understanding of the Criterion and the required evidence to show conformance, the CAB may remove the requirement for further Documentation Review for that Criterion.

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

In addition to the guidance provided in Section 6.1.1, positive indicators of Participating Manufacturer competence include:

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

Indicators that the competence threshold is not being met include:

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

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

Assessing Participating Manufacturer competence with EPEAT Criteria is required for the Priority Verification Pathway. When competence has been demonstrated for all Criteria selected for a new product, Participating Manufacturers can activate that product without additional Documentation

Review. In a similar manner, Participating Manufacturers may select new Optional Criteria for already registered product without the need for additional Documentation Review, if they have proven competence for those Criteria.

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

6.2.4 Activating Products

CABs allow products to appear in the EPEAT Registry by using the Registry software to "activate" the product(s). GEC may perform a data quality review of Criteria selections to ensure they are appropriate for the product type before the activation is approved. The table below outlines the process by which CABs activate products for both the Certification and Priority Verification Pathways.

Product Activation: Priority Verification Pathway	Product Activation: Certification Pathway
The CAB may activate products to appear in the EPEAT Registry after Initial Documentation Review of all Priority Criteria selected by the Participating Manufacturer is complete. The initial products may appear in the EPEAT Registry while the Participating Manufacturer completes Documentation Review for all non-Priority Criteria selected. The Participating Manufacturer has 12 months to complete this process. If not completed within this timeframe, the CAB archives all the Participating Manufacturer's products. Participating Manufacturers can select additional Optional Criteria for products that already appear in the EPEAT Registry without approval by the CAB only where the requirement for Documentation Review has been removed due to demonstration of competence.	The CAB may activate products to appear in the EPEAT Registry after Initial Documentation Review for all selected Criteria across all products (or product groups) and all identified purchaser locations of use is complete. Participating Manufacturers can modify their EPEAT Criteria selections only with approval from the CAB. Any addition of new Optional Criteria requires the CAB to perform Initial documentation Review of the Criteria. Results of the Initial Documentation Review are valid for three years, after which time the Participating Manufacturer must undergo the process again.

6.3 Ongoing Documentation Review

Whenever Participating Manufacturers are required to complete Ongoing Documentation Review, CABs must follow the same evaluation and decision requirements as per Section 6.2 on Initial Documentation Review. Ongoing Documentation Review takes place in several instances, including, but not limited to the scenarios outlined below.

A Participating Manufacturer wants new products to become EPEAT-registered.

- Under the Priority Verification Pathway: If the Participating Manufacturer is still completing Initial Documentation Review for non-Priority Criteria, it may add new products if both conformance and competence have been demonstrated for all Priority Criteria. In any other situation, if the Participating Manufacturer has not demonstrated competence for all Criteria selected for the new product, Ongoing Documentation Review is required for those Criteria before the new product can become EPEAT-registered.

- Under the Certification Pathway: The CAB may conduct an assessment to determine if the new products have similar characteristics (which do not affect how or if the products conform with all selected EPEAT Criteria) to those assessed in the Initial Documentation Review process. If the assessment reveals the new products have similar characteristics, the Initial Documentation Review results may be used for the new products. If the new products cannot be grouped with existing EPEAT-registered products due to dissimilar characteristics, Initial Documentation Review must be conducted for the new products.

A Participating Manufacturer selects new EPEAT Optional Criteria for EPEAT-registered products.

- Under the Priority Verification Pathway: If the Participating Manufacturer has not demonstrated competence for the new Optional Criteria, Ongoing Documentation Review is required for those Criteria before they can be added to EPEAT-registered products.
- Under the Certification Pathway, the Participating Manufacturer must complete Initial Documentation Review of the new Criteria before they can be added to EPEAT-registered products.

A Participating Manufacturer identifies a new purchaser location of use and associated EPEAT Criteria.

- Under the Priority Verification Pathway: If the Participating Manufacturer has not demonstrated competence for a Criterion that may be selected differently for different purchaser locations of use, Ongoing Documentation Review must be completed for the new location of use before the Criterion can be added to EPEAT-registered products. CABs may use professional judgement to determine if new evidence is required for the new purchaser locations of use or if previous evidence addresses the new location.
- Under the Certification Pathway: The Participating Manufacturer must complete Initial Documentation Review for the new purchaser location of use and associated EPEAT Criteria use before the Criterion can be added to EPEAT-registered products.

A CAB may lose confidence in a Participating Manufacturer's ability to demonstrate conformance with one or more EPEAT Criteria (typically as a result of a nonconformance finding from Continuous Monitoring activities) and may reinstate the Documentation Review requirement for the Criteria. In these cases, Participating Manufacturers must undergo Documentation Review again for the Criteria.

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

Table 3: Documentation Review Requirements for EPEAT Criteria Revisions

Type of Revision	Overview of Revision	Implementation and Documentation Review
Minor Criteria Revisions	• The scope of this revision is limited to corrections, changes, and updates to text to further clarify existing requirements. • The revisions are typically editorial changes with no obvious significant reduction of points for EPEAT-registered products. • The estimated timeframe for implementation is one to two months after publication of the revisions.	Priority Verification Pathway: • The EPEAT Program provides a timeline for when the revisions will be implemented and when Participating Manufacturers must come into conformance with the revisions. • Participating Manufacturers are responsible for reviewing applicable changes to Criteria, ensuring continued conformance with selected Criteria and unselecting Criteria or archiving products that are no longer conformant. • CABs are responsible for completing Ongoing Documentation Review activities for Participating Manufacturer clients before the date specified by EPEAT. Certification Pathway: • As part of Continuous Monitoring and Annual Renewal activities (see Section 7.3), CABs are responsible for assessing the impacts of Minor and Major Criteria Revisions on Participating Manufacturer clients. • Participating Manufacturers are responsible for reviewing applicable changes to Criteria, ensuring continued conformance with selected Criteria and unselecting Criteria or archiving products that are no longer conformant. Participating Manufacturers may be required to submit documentation to CABs for review to demonstrate conformance to Criterion changes. • Where applicable, CABs obtain and review new evidence from Participating Manufacturers to ensure ongoing conformance with the revisions.
Major Criteria Revisions	• The scope of this revision is limited to corrections, changes, and updates to text to further clarify existing requirements, new Criteria identified to address gaps in sustainability impact areas, and revisions requested by stakeholders. • These revisions could result in a loss of points and/or a change in EPEAT rating (Bronze, Silver, Gold) for EPEAT-registered products. • The estimated timeframe for implementation is four to six months after publication of the revisions.	

Table 3: Documentation Review Requirements for EPEAT Criteria Revisions

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

6.3.1 Rebranding of EPEAT-Registered Products

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

The EPEAT Program allows for this to happen through an amended Documentation Review process described in Table 4 below. Each Participating Manufacturer is responsible for specific conformity assurance activities and may use their own CAB to implement them. If during this process, the Rebranding Participating Manufacturer (the one that wants to rebrand an already EPEAT-registered product as its own brand) also wishes to change to a different CAB, it must instead follow the requirements in Section 8.

Table 4: Responsibilities During Rebranding of EPEAT-Registered Products

Topic	**Original Participating Manufacturer Responsibilities** *(manufactures the product and originally obtained EPEAT registration)*	**Rebranding Participating Manufacturer Responsibilities** *(does not manufacture the product and is rebranding the EPEAT-registered product under its own brand)*
Rebranding agreement	The parties have a formal agreement in place that identifies the products that will be rebranded and stipulates fulfillment of the conformity assurance activities identified below. Specifically, this must include the Original Participating Manufacturer: • Taking responsibility for Continuous Monitoring Investigations assigned to the Rebranding Participating Manufacturer for product Criteria that do not have disclosure requirements and resolving any resulting nonconformances. • Notifying the Rebranding Participating Manufacturer of any changes in the rebranded product(s) registration status, EPEAT rating or EPEAT Criteria selected for product attributes.	
Initial Documentation Review for EPEAT Criteria that address product attributes	Must ensure that all products included in the rebranding agreement maintain EPEAT registration status and conform with all selected Criteria that address product attributes.	Must ensure that Initial Documentation Review is conducted for the products in the rebranding agreement for those Criteria that have product disclosure requirements including but not limited to criteria related to warranties, product servicing, spare parts, and public availability of LCAs. The EPEAT Program maintains a list of applicable Criteria for each product category. Must present the rebranding agreement as evidence during Initial Documentation Review. However, this agreement cannot be used to demonstrate competence with EPEAT Criteria or conformance for other products not included in the rebranding agreement.
Ongoing Documentation Review for EPEAT Criteria that address product attributes	Must meet all Ongoing Documentation Review requirements for all selected Criteria that address product attributes.	Must meet all Ongoing Documentation Review requirements for those Criteria that have product disclosure requirements. Must maintain a record that all products included in the rebranding agreement are actively EPEAT-registered at the effective date of the agreement and on an ongoing basis.
Initial and Ongoing Documentation Review for Criteria that address corporate activities	Must meet all Initial and Ongoing Documentation Review requirements for all selected Criteria that apply to its corporate activities.	Must meet all Initial and Ongoing Documentation Review requirements for all selected Criteria that apply to its corporate activities.
Removing (archiving) products	Must notify the Rebranding Participating Manufacturer if any products in the rebranding agreement are archived.	Must archive all products within two business days of receiving archival notification from the Original Participating Manufacturer.

Table 4: Responsibilities During Rebranding of EPEAT-Registered Products

Topic	**Original Participating Manufacturer Responsibilities** *(manufactures the product and originally obtained EPEAT registration)*	**Rebranding Participating Manufacturer Responsibilities** *(does not manufacture the product and is rebranding the EPEAT-registered product under its own brand)*
Continuous Monitoring	Must implement all Continuous Monitoring activities assigned to them for all EPEAT Criteria. Must take responsibility for Continuous Monitoring Investigations assigned to the Rebranding Participating Manufacturer for products in the rebranding agreement and for product Criteria that do not have disclosure requirements.	Must implement all Continuous Monitoring activities assigned to them for all EPEAT Criteria except for product Criteria that do not have disclosure requirements. These Investigations must be implemented by the Original Participating Manufacturer.
Nonconformances Related to Continuous Monitoring	Responsible for correcting nonconformances found from Continuous Monitoring activities identified above.	Responsible for correcting nonconformances found from Continuous Monitoring activities identified above.

6.4 Nonconformances Identified Outside of Continuous Monitoring

During ongoing interactions with a Participating Manufacturer client that are outside of Continuous Monitoring activities, a CAB may identify that an EPEAT-registered product is not in conformance with an EPEAT Criterion. The CAB must report this instance to the EPEAT Program and notify the Participating Manufacturer that it has 30 days in which to correct the nonconformance and restore accuracy to the Registry by either submitting documentation demonstrating conformance or unselecting the nonconformant Criteria. CABs are responsible for reviewing corrective actions and supporting evidence and determining if the actions demonstrate conformance as identified in Table 5 below.

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

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

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

7.0 Continuous Monitoring

7.1 Overview

The EPEAT Program ensures the ongoing conformance of EPEAT-registered products through an ongoing surveillance process known as Continuous Monitoring. Continuous Monitoring activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis. All EPEAT-registered products in all product categories and all Participating Manufacturers are subject to Continuous Monitoring, regardless of the conformity assurance pathway used during Initial Documentation Review.

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

Table 6: Continuous Monitoring Activities

Name	Investigative Methods Implemented by GEC-approved CABS	Duration	Conformity Assurance Pathway	Addressing Nonconformances
Level 0 Investigation	Review of publicly available information without the Participating Manufacturer's involvement. Occurs during Rounds.	14-day investigation period	Priority Verification and Certification	Nonconformances must be corrected in 30-day corrective action period
Level 1 Investigation	Review of evidence provided by Participating Manufacturer. Must use practices as identified in Documentation Review (Sections 6.1.1, 6.1.3 and 6.2.2). Occurs during Rounds.	60-day investigation period	Priority Verification and Certification	
Level 2 Investigation	Laboratory evaluation of products. Products acquired without Participating Manufacturer's involvement, where possible. Occurs during Rounds.	120-day investigation period	Priority Verification and Certification	
Annual Renewal	Documentation Review of Corporate Criteria with annual reporting requirements. Review of product or corporate changes to assess if ongoing conformance is affected. Review of minor revisions to EPEAT Criteria, formal Clarifications, conformity guidance and program documents to assess if additional documentation is needed.	Duration varies based on changes but cannot exceed Annual Renewal deadline.	Certification	Nonconformances must be addressed during Annual Renewal period

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

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

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

7.2 Continuous Monitoring Rounds

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

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

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

Continuous Monitoring Rounds include the following five phases:

Preparation Phase	The EPEAT Program develops Round materials, and CABs prepare for Round activities and receive Continuous Monitoring Training.
Investigation Phase	CABs actively conduct Investigations, make recommendations on conformity, and prepare Draft Investigation Reports. Participating Manufacturers may or may not be actively involved in the Investigations.
Deliberation Phase	The EPEAT Program reviews Draft Investigation Reports and supporting evidence and makes final decisions of conformity.
Corrective Action Phase	Participating Manufacturers correct nonconformances found during Investigations and CABs review for acceptability.
Reporting Phase	The EPEAT Program prepares and publishes an Outcomes Report summarizing the Round results.

7.2.1 Preparation Phase

The EPEAT Program develops an individual plan for each Continuous Monitoring Round, which specifies the EPEAT Criteria to be investigated, the method of investigation that CABs must use and the specific dates when the Investigation activities must be completed. The EPEAT Program also selects the Participating Manufacturers, EPEAT-registered products and identified locations for use for investigation and creates “assignments” for each CAB.

Specific Continuous Monitoring Round details are only provided at the time when the Round occurs. Within three weeks of a Round launch, the EPEAT Program provides CABs with Investigation assignments, the Round Plan, reporting templates, and other supporting materials and provides individual Continuous Monitoring Training for the CABs’ Qualified Auditors (see Tables 6, 7 and 8 in Section 7.2.2 for timing). For Level 2 Investigations, the EPEAT Program provides CABs with a laboratory report template that identifies expectations for what types of visual inspection and/or testing are required.

Prior to the start of the Investigation Phase, CABs may discuss assigned Investigations internally with their Qualified Auditors but may only inform Participating Manufacturer clients at specific times (see Tables 6, 7 and 8 in Section 7.2.2 for timing).

The week that the Round formally launches, the EPEAT Program publishes the Round Plan and announces the Round launch to stakeholders.

7.2.2 Investigation Phase

Each CAB is responsible for conducting all assigned Investigations using the identified method of investigation. CABs notify Participating Manufacturer clients of Investigations at the time specified by the EPEAT Program. In addition to Continuous Monitoring Round Training, CABs are encouraged to ask the EPEAT Program questions about applicable Criteria or Round logistics and raise any issues or concerns at any time during the Round.

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

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

Demonstrated Nonconformance	Evidence definitively shows the EPEAT Criteria are not met.
Insufficient Evidence to Demonstrate Conformance	Evidence provided by a Participating Manufacturer in a Level 1 Investigation is incomplete and does not definitively show either conformance or nonconformance.
No Documentation Provided	Participating Manufacturer has not provided any supporting evidence or documentation during the investigation period for a Level 1 Investigation.
Product Not Obtained for Testing	The CAB was unable to obtain the selected product within the 120-day investigation period of a Level 2 Investigation.

CABs must also categorize nonconformances as major or minor in the Investigation Reports (see Annex 1 for additional guidelines on assigning categories):

Minor Nonconformance	Typically described as isolated or non-critical instances. The four cases where nonconformances can be categorized as minor are: • Minor human error in data entry (e.g., value cited for EPEAT-product registration is insignificantly above or below the actual value). • Minor administrative errors (e.g., broken URLs, reports/certificates marginally outdated). • No documentation provided by the Participating Manufacturer during a Level 1 Investigation where the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market. • A CAB is unable to obtain a product from the market during a Level 2 Investigation where the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.
Major Nonconformance	Typically occur from systemic or significant breakdowns or absences of processes, controls, or documentation. All nonconformances that do not meet the definition of minor must be categorized as major. This specifically includes the following: • No response to a request for documentation or no documentation provided during the investigation period of a Level 1 Investigation (except for when the Participating Manufacturer indicated the product is end-of-life and no longer available on the market). • All nonconformances found in Level 2 Investigations (except for when the CAB was unable to obtain the product for evaluation by a laboratory and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.)

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

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

Table 7: Level 0 Investigation Activities

(also see flowchart in Annex 2)

Topic	Requirements and Additional Details
Applicable conformity assurance pathway(s)	Priority Verification and Certification
Investigative methods used by CABs during investigation period	Qualified Auditors evaluate publicly available information for conformance to assigned EPEAT Criteria or aspects of EPEAT Criteria (the EPEAT Program may elect not to have all requirements in the Criteria investigated). CABs are prohibited from requesting information or clarification from Participating Manufacturers. If the product was assessed during Initial Documentation Review through the Certification Pathway, CABs may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria. If a Participating Manufacturer switches to the Certification Pathway and completes the Initial Documentation Review for the product during the Round's investigation period, the CAB may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria.
CABs notify Participating Manufacturers of Investigations	Prohibited. Participating Manufacturers are only notified of Level 0 Investigations after the EPEAT Program makes the final conformity decision.
Recommendations by CABs	May be Conformance, Nonconformance, or Inconclusive. CABs recommend Inconclusive if publicly available information could not be found or did not provide enough details to determine conformance. When Inconclusive, the EPEAT Program may require CABs to further investigate the EPEAT Criteria during Level 1 Investigations.
Nonconformance categories	CABs must choose either minor or major as per the guidance in Section 7.2.2 and Annex 1
Assignments and Round documents to CABs	21 days before the Round Launch Date
Continuous Monitoring Training by EPEAT	7 days before the Round Launch Date
Length of investigation period	14 days
Draft Investigation Reports (with recommendation on conformity) and evidence due from CABs to EPEAT	14 days after the end of the investigation period, but CABs are encouraged to submit investigation reports as they are completed.
Draft Investigation Reports (same as submitted to EPEAT) sent to Participating Manufacturers by CABs	Prohibited. Investigation Reports can only be sent to Participating Manufacturers after the EPEAT Program makes the final decision on conformity.

Table 8: Level 1 Investigations Activities

(also see flowchart in Annex 3)

Topic	Requirements and Additional Details
Applicable conformity assurance pathway(s)	Priority Verification and Certification
Investigative methods used by CABs during investigation period	Qualified Auditors request evidence from Participating Manufacturers and evaluate it for conformance to assigned EPEAT Criteria. If the product was assessed during Initial Documentation Review through the Certification Pathway, CABs may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria. If a Participating Manufacturer switches to the Certification Pathway and completes the Initial Documentation Review for the product during the Round's investigation period, the CAB may use a valid certificate for a Participating Manufacturer's product as evidence of conforming with EPEAT Criteria.
CABs notify Participating Manufacturers of Investigations	CABs must notify Manufacturers in writing (e.g., by e-mail) on the Round Launch Date identified by the EPEAT Program
Recommendations by CABs	May be Conformance, Nonconformance or Inconclusive
Nonconformance categories	CABs must choose either minor or major as per the guidance in Section 7.2.2 and Annex 1 CABs must categorize a nonconformance as minor if the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market. CABs must categorize a nonconformance as major if there was no response or no documentation received from the Participating Manufacturer during the Investigation Period.
Assignments and Round documents to CABs	21 days before the Round Launch Date
Continuous Monitoring Training by EPEAT	7 days before the Round Launch Date
Length of investigation period	60 days
Draft Investigation Reports (with recommendation on conformity) and evidence due from CABs to EPEAT	14 days after the end of the investigation period, but CABs are encouraged to submit investigation reports as they are completed.
Draft Investigation Reports (same as submitted to EPEAT) sent to Participating Manufacturers by CABs	Within 5 business days of submission to the EPEAT Program

Table 9: Level 2 Investigation Activities

(also see flowchart in Annex 4)

Topic	Requirements and Additional Details
Applicable conformity assurance pathway(s)	Priority Verification and Certification
Investigative methods used by CABs during investigation period	CABs obtain products from the marketplace without Participating Manufacturer involvement. If unable to do so within 30 days (e.g., products are not commercially available or only sold through contracts), CABs notify the EPEAT Program and may obtain the product directly from the Participating Manufacturer. Products are then evaluated by independent laboratories for conformance to assigned EPEAT Criteria or aspects of EPEAT Criteria (the EPEAT Program may elect not to have all requirements in the Criteria investigated).
When products cost US $10,000 or more	CABs may work with the EPEAT Program and the Participating Manufacturer to find an alternate way to verify conformance to the identified Criteria. The approach will depend on the Criteria, and the EPEAT Program may offer suggestions on alternate ways to verify conformance (e.g., provision of high-risk components or materials for testing, onsite inspection of the product).
Laboratory requirements	Laboratories must have valid accreditation to ISO/IEC 17025 from a body that is an ILAC Member and signatory to the ILAC Mutual Recognition Arrangement (ILAC MRA). CABs must confirm that the evaluation methods are covered by the laboratory's accreditation scope or, for non-standard methods of evaluation, by other mechanisms or best practices to produce accurate and reliable results.
CABs notify Participating Manufacturers of Investigations	After the product has been received by the laboratory OR when CABs must reach out to Participating Manufacturers because the products could not be found in the market
Recommendations by CABs	May be Conformance, Nonconformance or Inconclusive. If unable to obtain the product within the 120-day Investigation Period, CABs automatically recommend nonconformances for all EPEAT Criteria investigated. This will be identified in the Outcomes Report. CABs and laboratories may not obtain information or documentation from the Participating Manufacturer during the testing process unless specified by the EPEAT Program in the laboratory report template or otherwise instructed by the EPEAT Program.
Nonconformance categories	CABs must categorize all nonconformances as major. Exception: if the CAB is unable to obtain the product and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market, the CAB must categorize the nonconformance as minor.
Assignments and Round documents to CABs	14 days before the Round Launch Date
Continuous Monitoring Training by EPEAT	7 days before the Round Launch Date
Length of investigation period	120 days
Draft Investigation Reports (with recommendation on conformity) and evidence due from CABs to EPEAT	14 days after the end of the investigation period. CABs must also send the laboratory reports at the same time. CABs are encouraged to submit investigation reports as they are completed.

Table 9: Level 2 Investigation Activities
(also see flowchart in Annex 4)

Draft Investigation Reports (same as submitted to EPEAT) sent to Participating Manufacturers by CABs	Within 5 business days of submission to the EPEAT Program. CABs must also send the laboratory reports at the same time.

7.2.3 Deliberation Phase

During the 28-day Deliberation Phase, the EPEAT Program reviews the Draft Investigation Reports and supporting evidence submitted by CABs for completeness and the rationale to support recommendations of conformity and makes the final decisions on conformity.

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

The EPEAT Program may ask questions or seek clarity from CABs. A CAB may be required to seek additional evidence or rewrite sections of an Investigation Report. In these cases, the CAB has five business days to update the Draft Investigation Report and re-submit it to the EPEAT Program. After the EPEAT Program's review and approval of the updated Report for Level 1 and 2 investigations, the CAB must send it to the investigated Participating Manufacturer within five business days. Level 0 Investigation Reports are only provided to Participating Manufacturers after the EPEAT Program makes all final decision of conformity for that Round.

If a CAB is unable to complete the update within the five business days, it must inform the EPEAT Program and propose an alternative timeline and the EPEAT Program may grant an extension. CABs that are unable to update reports within the specified timeframe may be required to submit a corrective action plan to address the underlying issue.

7.2.4 Corrective Action Phase

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

CABs are responsible for distributing the Investigation Reports with the final decision on conformity to Participating Manufacturer clients on the date identified by the EPEAT Program (seven days after sending the Reports to CABs). CABs are prohibited from distributing these reports earlier.

Investigated Products:

For both minor and major nonconformances, Participating Manufacturers have 30 days to make corrections for investigated products and restore accuracy to the EPEAT Criteria selected (see

Tables 9 and 10 for applicable options). CABs are responsible for reviewing corrective actions and supporting evidence and determining if the actions demonstrate conformance.

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

Similarly Affected Products:

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

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

Reinstatement of Requirement for Documentation Review:

For nonconformances, CABs may be required to reinstate the requirement for Documentation Review for the investigated EPEAT Criterion (see Tables 10 and 11 for requirements on reinstatement). The relevant steps for Documentation Review (Section 6) must then be followed to remove the Documentation Review Requirement for that EPEAT Criterion.

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

Correction Options for Participating Manufacturers	**Required Evaluation by CABs**
Participating Manufacturer unselects the EPEAT Criterion.	The CAB confirms the corrective action taken and updates the Investigation Report to identify the correction made and the recommendation that the correction is acceptable. The CAB must reinstate the requirement for Documentation Review for the EPEAT Criterion.
Participating Manufacturer removes the nonconforming product ("archives" the product). When archiving a product on the EPEAT Registry, the user must enter the reason for archival as "product found nonconformant in continuous monitoring activities (Round)".	

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

Participating Manufacturer makes appropriate changes to come into conformance and provides evidence of implementing these changes to the CAB. These changes may be to the investigated product or to corporate practices.	
Corrective Action Phase Activity	**Timeframe**
Corrective action period (timeframe in which correction must be made and reviewed)	30 days
Investigation Reports (with recommendations on correction acceptability) and evidence due from CABs to EPEAT	7 days after the end of the corrective action period. CABs are not required to send these Reports to Participating Manufacturers but may do so if they wish.
Final Investigation Reports (with final decisions on corrections) sent to CABs by EPEAT	14 days after the end of the corrective action period
Final Investigation Reports (with final decisions on corrections) sent to Participating Manufacturer by CABs	Within 5 business days of receiving Final Investigation Reports from the EPEAT Program

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

Correction Options for Participating Manufacturers	**Required Evaluation by CABs**
If the product is end-of-life and no longer available in the market, Participating Manufacturer must remove ("archive") the product. When archiving a product on the EPEAT Registry, the user must enter the reason for archival as "product found nonconformant in continuous monitoring activities (Round)".	The CAB confirms that the corrective action was taken (the end-of-life product was archived, or the evidence indicates the minor error was corrected and conformity re-established). In these cases, the CAB is not required to reinstate the Documentation Review requirement but may elect to do so. If the Participating Manufacturer does not take the appropriate action, the CAB is responsible for archiving the product. If the CAB does not do this, the EPEAT Program archives the product. In these cases, the CAB must reinstate the requirement for Documentation Review for the EPEAT Criterion. The CAB updates the Investigation Report with details on the corrective actions taken, the recommendation on acceptability and the rationale for the recommendation.
Participating Manufacturer corrects the minor human or administrative error and provides evidence of the correction to the CAB. Examples of corrections include but are not limited to: • Updating a value that was insignificantly above/below the actual value. • Fixing a broken URL. • Providing updated certificates or reports.	
Corrective Action Phase Activity	**Timeframe**
Corrective action period (timeframe in which correction must be made and reviewed)	30 days
Investigation Reports (with recommendations on correction acceptability) and evidence due from CABs to EPEAT	7 days after the end of the corrective action period. CABs are not required to send these Reports to Participating Manufacturers but may do so if they wish.
Final Investigation Reports (with final decisions on corrections) sent to CABs by EPEAT	14 days after the end of the corrective action period
Final Investigation Reports (with final decisions on corrections) sent to Participating Manufacturer by CABs	Within 5 business days of receiving Final Investigation Reports from the EPEAT Program

7.2.5 Reporting Phase

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

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

7.3 Annual Renewal

Annual Renewal is a form of Continuous Monitoring performed by CABs on products that used the Certification Pathway for Initial Documentation Review. In the Certification Pathway, results from Initial

Documentation Review are valid for a three-year period with the proviso that CABs perform Annual Renewal activities to confirm ongoing conformance. During the second and third years of this period, CABs must work with Participating Manufacturer clients to:

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

The timing of Annual Renewal activities is determined by the date the products first appeared as EPEAT-registered (the product registration date). For the second and third years, Annual Renewal activities must be completed prior to that year's anniversary of the product registration date.

7.3.1 Criteria with Corporate Level Annual Reporting Requirements

Participating Manufacturers must provide evidence demonstrating continued conformance with EPEAT Criteria that were selected as part of Initial Documentation Review and have annual performance, reporting or other disclosure requirements at the corporate level. A list of the applicable EPEAT Criteria for each product category is maintained by the EPEAT Program and available to CABs and Participating Manufacturers. CABs review the evidence in accordance with Documentation Review practices identified in Sections 6.1.1 and 6.2.2 and keep appropriate records as per Section 6.1.3.

7.3.2 Minor and Major Criteria Revisions

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

Where necessary, CABs obtain and review the additional evidence in accordance with Documentation Review practices identified in Sections 6.1.1 and 6.2.2 and keep appropriate records as per Section 6.1.3.

7.3.3 Product and Corporate Changes

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

- Product design or packaging.
- Materials and components.
- Manufacturing and assembly processes.
- Suppliers and supply chain performance.

- Environmental management systems.
- Third-party certifications.
- Participating Manufacturer operating procedures and/or conformance assurance processes.
- Services or support programs offered by the Participating Manufacturer to purchasers.
- Information on the product that is made publicly available by the Participating Manufacturer.

If one or more changes have the potential to affect conformance with EPEAT Criteria, CABs obtain and review new evidence from the Participating Manufacturers in accordance with Documentation Review practices identified in Sections 6.1.1 and 6.2.2 and keep appropriate records as per Section 6.1.3.

7.3.4 Updates to EPEAT Program Requirements and Guidance

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

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

Where necessary, CABs obtain and review the additional evidence in accordance with Documentation Review practices identified in Sections 6.1.1 and 6.2.2 and keep appropriate records as per Section 6.1.3.

7.3.5 Nonconformances and Corrections

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

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

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

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

If appropriate corrections are not made by the Participating Manufacturer, the CAB notifies the Participating Manufacturer that action must be taken (unselecting the applicable EPEAT Criteria or

archiving the product). If the Participating Manufacturer does not take action, the CAB is responsible for archiving the product. If the CAB does not do this, the EPEAT Program archives the product.

8.0 Changing CABs

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

A Participating Manufacturer must notify the EPEAT Program of their intention to change to a new GEC-approved CAB a minimum of 30 days prior to the change. The new GEC-approved CAB must provide the EPEAT Program with written acceptance of the Participating Manufacturer as a new client.

Participating Manufacturers must undergo Initial Documentation Review for all active products in each product category being moved to the new CAB. The new CAB is responsible for conducting these activities in accordance with Section 6 to evaluate the Participating Manufacturer's conformance with and competence against EPEAT Criteria. This includes collecting and evaluating evidence of conformance for selected EPEAT Criteria.

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

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

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

Until the transition process is complete, the existing CAB is still considered the CAB of record and is responsible for fulfilling all conformity assurance activities for the Participating Manufacturer. If the transition process is completed during an active Continuous Monitoring Round, the EPEAT Program will work with the Participating Manufacturer and both old and new CABs to determine how best to transition the investigative activities to the new CAB.

The EPEAT Program is exploring additional ways to facilitate the ability of a Participating Manufacturer to change from one GEC-approved CAB to a different CAB.

9.0 Complaints and Appeals

For the purposes of this document (*EPEAT Conformity Assurance Implementation Manual P66*), complaints and appeals referenced in this section are only related to conformity assurance activities, recommendations, and decisions for the EPEAT Conformity Assurance System.

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

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

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

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

9.1 Complaints

A Participating Manufacturer may raise a complaint with its GEC-approved CAB if there is disagreement regarding the CAB's conformity decision made during Documentation Review or Continuous Monitoring activities, or discoveries of nonconformances found outside of Continuous Monitoring. The complaint must be submitted in writing to the CAB within 30 days of receiving the conformity decision from the CAB or within the timeframe specified in the CAB's complaints process, whichever is less. The CAB then shall follow its complaints process and keep appropriate records of the investigation conducted and how the complaint was resolved. The CAB's complaints process shall be concluded within 30 days. GEC reserves the right to review such records during the Annual EPEAT Audit of CABs.

GEC-approved CABs may receive complaints that are not related to its Participating Manufacturer clients (e.g., complaints about non-client's EPEAT-registered products, conformity decisions made by other

CABs, other conformity assurance activities, potential misuse of the EPEAT mark, or misleading claims). CABs must forward all such complaints to the EPEAT Program and should not initiate an investigation regarding these issues unless explicitly instructed by the EPEAT Program to do so. The EPEAT Program will determine the appropriate next steps and only involve the CAB if warranted.

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

The EPEAT Program may receive a complaint from any stakeholder regarding the status of an EPEAT-registered product, conformity decisions or recommendations, or other conformity assurance activities. In such cases, the EPEAT Program may notify the applicable GEC-approved CAB and instruct the CAB to initiate an investigation where appropriate. Within 30 days of notification by the EPEAT Program, the CAB must conduct the investigation following its complaints process, document the steps taken, and communicate the outcome of the investigation to the EPEAT Program. If the investigation results in a Participating Manufacturer being found nonconformant with one or more EPEAT Criteria, the steps identified in Section 6.4 shall be followed.

9.2 Appeals

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

9.2.1 Appeals During Documentation Review Activities

A Participating Manufacturer may appeal a GEC-approved CAB's conformity decision made during Documentation Review activities. The appeal must be submitted in writing to the CAB within 30 days of receiving the conformity decision from the CAB or within the timeframe specified in the CAB's appeals process, whichever is less. Within four days of receiving the appeal, the CAB must determine if enough information has been provided to proceed with the appeal. The CAB then shall follow its appeal process and keep appropriate records of the investigation conducted and the final decision on the appeal. The CAB's appeals process shall be concluded within 30 days. GEC reserves the right to review such records during the Annual EPEAT Audit of CABs.

9.2.2 Appeals During Continuous Monitoring Activities

A Participating Manufacturer may appeal a GEC-approved CAB's conformity decision made during Annual Renewal activities conducted for the Certification Pathway. The appeal must be submitted in writing to the CAB within 30 days of receiving the conformity decision from the CAB or within the timeframe specified in the CAB's appeals process, whichever is less. Within four days of receiving the

appeal, the CAB must determine if enough information has been provided to proceed with the appeal. The CAB then shall follow its appeal process and keep appropriate records of the investigation conducted and the final decision on the appeal. The CAB's appeals process shall be concluded within 30 days. GEC reserves the right to review such records during the Annual EPEAT Audit of CABs.

A Participating Manufacturer may appeal a GEC-approved CAB's decision to recommend nonconformance for an Investigation in a Continuous Monitoring Round. The appeal must be submitted in writing to the CAB, within 10 days of receiving the draft Investigation Report from the CAB or within the timeframe specified in the CAB's appeals process, whichever is less. Within four days of receiving the appeal, the CAB must determine if enough information has been provided to proceed with the appeal and inform the EPEAT Program of this decision. If the appeal is proceeding, the EPEAT Program will postpone review of the CAB's Draft Investigation Report until the CAB has concluded its appeals process. The CAB's appeals process shall be concluded within 30 days.

Participating Manufacturers and GEC-approved CABs may appeal final decisions on conformity made by the EPEAT Program during Continuous Monitoring Round Investigations. Appeals must be submitted in writing within 10 days of receiving the Investigation Report with the final decision on conformity. The appellant must indicate whether the appeal is based on procedural or technical grounds. The EPEAT Program evaluates if the appellant has provided enough documentation to warrant proceeding with the appeal before proceeding with an investigation into the appeal. The EPEAT Program's appeals process shall be concluded within 30 days of receiving the request for appeal.

If a Participating Manufacturer or GEC-approved CAB appeals a final decision on conformity made for a Level 2 Investigation, the appellant must be prepared to provide another, identical product for re-evaluation by the laboratory, at their own cost, if necessary. The written appeal must include documentation that establishes the need for re-evaluation (e.g., internal lab reports or other documentation that indicate Level 2 results may be incorrect).

9.3 Non-Conformity Assurance Related Complaints

GEC-approved CABs may receive complaints regarding potential misuse of the EPEAT mark and misleading claims. CABs must forward all such complaints to the EPEAT Program and should not initiate an investigation regarding these issues unless explicitly instructed by the EPEAT Program to do so. The EPEAT Program will determine the appropriate next steps and only involve the CAB if warranted.

10.0 Force Majeure Events

The EPEAT Program may issue temporary addenda to this document, *EPEAT Conformity Assurance Implementation Manual (P66)*, to address unforeseeable and extraordinary circumstances that are beyond the control of Participating Manufacturers or GEC-approved CABs. Such circumstances include but are not limited to natural disasters, acts of war or terrorism, significant labor strikes, devastating accidents to a supplier facility, epidemics, or pandemics.

11.0 Supplementary Information

11.1 Acronyms

The following acronyms are used in this document.

CAB: Conformity Assurance Body

CGG: Conformity Guidance Group

IAF: International Accreditation Forum

ILAC: International Laboratory Accreditation Cooperation

11.2 References

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

- *Agreement Between Conformity Assurance Body and GEC (P33)*
- *CAB Application Form (P40)*
- *EPEAT License and Participating Manufacturer Agreement (P26)*
- *EPEAT Policy Manual (P65)*
- ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*
- ISO/IEC 17020 *Conformity assessment—Requirements for the operation of various types of bodies performing inspection*
- ISO/IEC 17025 *General requirements for the competence of testing and calibration laboratories*
- ISO/IEC 17065 *Conformity assessment—Requirements for bodies certifying products, processes, and services*
- *Level 0 Investigation Report Template (P70)*
- *Level 1 Investigation Report Template (P35)*
- *Level 2 Investigation Report Template (P36)*
- *Outcomes Report Template (P63)*

11.3 Definitions

The following definitions are referenced throughout this document, *EPEAT Conformity Assurance Implementation Manual (P66)*, and are indispensable for its application.

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

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

Antitrust Statement: GEC assigns the highest priority to full compliance with both the letter and the spirit of antitrust laws and therefore a statement is read at the beginning of meetings that are facilitated

by GEC and include industry members to remind participants not to engage in anti-trust behaviors and that care should be taken to avoid discussions that may suggest or tend to reflect agreements among competitors as to: price; terms of sale that could impact price; allocation of customers, markets or territories; bid-rigging; and boycotts or joint refusals to do business with others. Participants must abide by the antitrust statement and avoid any conduct that might violate, or would create the appearance of a violation of, antitrust laws.

Appeal: For the purposes of this document, *EPEAT Conformity Assurance Implementation Manual (P66*), a written request for reconsideration of a conformity recommendation or decision based on either procedural or technical grounds. Appeals can be made to GEC-approved Conformity Assurance Bodies or the EPEAT Program.

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

Archived / Archive: Term that refers to the status of a product that once appeared in the EPEAT Registry but is no longer identified as meeting EPEAT Criteria ("archived") or the process of using the EPEAT Registry software to remove a product from the EPEAT Registry ("archive").

Certification Pathway: One of two ways to complete Initial Documentation Review, where Documentation Review is completed immediately and requires a Participating Manufacturer to demonstrate conformance with all selected EPEAT Criteria at the outset.

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

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

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

Conformance: Result of conformity assurance activities in which the party being assessed has demonstrated to the assessor that a specific requirement is met.

Conformity Assurance Body (CAB): An independent, impartial body that performs conformity assessment activities, excluding accreditation. Same as conformity assessment body defined in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*.

Conformity Assurance Body Mentored Work Phase (CAB Mentored Work Phase): Period of time where GEC provides additional support to a newly approved Conformity Assurance Body to increase its proficiency in EPEAT Program required methods of conformity assurance. During this Phase, GEC evaluates and approves the Conformity Assurance Body's conformity decisions made in the Initial

Documentation Review for its initial Participating Manufacturer clients. Because Conformity Assurance Bodies in this Phase cannot activate products or newly selected Criteria or remove a Documentation Review requirement for a Criterion, GEC facilitates these activities for them.

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

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

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

Continuous Monitoring Round: Discrete period of time where GEC-approved Conformity Assurance Bodies conduct Investigations that have been selected and assigned to them by the EPEAT Program. The EPEAT Program identifies which products and EPEAT Criteria must be evaluated, specifies the method of investigation (Level 0, Level 1 or Level 2), and assigns Investigations to Conformity Assurance Bodies.

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

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

Corrective Action Plan: Plan, with actions and timelines, developed to eliminate the root cause(s) of a nonconformance so as to prevent reoccurrence.

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

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

Documentation Review: Iterative process where a GEC-approved Conformity Assurance Body evaluates evidence provided by a Participating Manufacturer to assess conformance and determine if the Participating Manufacturer understands the EPEAT Criteria. Initial Documentation Review must be completed before a Participating Manufacturer's products can become EPEAT-registered. Ongoing Documentation Review may occur for a variety of reasons, including the addition of new products, changes to the EPEAT Criteria selected for EPEAT-registered products and addressing nonconformances arising from Continuous Monitoring activities.

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

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

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

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

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

Full Product Category Revision: One of the three levels of possible revision under GEC's Continuous Maintenance Process for EPEAT Criteria. In this type of revision, all EPEAT Criteria are open to modification and revision and the estimated timeframe for implementation is nine to eighteen months after publication.

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

Inconclusive: Result of an Investigation where sufficient and objective evidence has been evaluated but conformance or nonconformance cannot be determined due to limitations in the evaluation technique(s). Typically, only Level 2 Investigations result in a finding of Inconclusive.

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

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

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

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

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

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

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

Major Criteria Revision: One of the three levels of possible revision under GEC's Continuous Maintenance Process for EPEAT Criteria. In this type of revision, the scope is limited to corrections, changes, and updates to text to further clarify existing requirements, new criteria identified to address gaps in sustainability impact areas, and revisions requested by stakeholders. Estimated timeframe for implementation is four to six months after publication.

Major Nonconformance: Category assigned to a nonconformance resulting from an Investigation that typically occur from systemic or significant breakdowns or absences of processes, controls, or documentation. All nonconformances that do not meet the definition of Minor Nonconformance must be categorized as a Major Nonconformance. This specifically includes the following: no response to a request for documentation or no documentation provided during the investigation period of a Level 1 Investigation (except for when the Participating Manufacturer indicated the product is end-of-life and no longer available on the market); and all nonconformances found in Level 2 Investigations (except for when the CAB was unable to obtain the product for evaluation by a laboratory and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.)

Minor Criteria Revision: One of the three levels of possible revision under GEC's Continuous Maintenance Process for EPEAT Criteria. In this type of revision, the scope is limited to corrections, changes, and updates to text to further clarify existing requirements. Estimated timeframe for implementation is one to two months after publication of the revisions.

Minor Nonconformance: Category assigned to a nonconformance resulting from an Investigation that typically is described as an isolated or non-critical issue. For the purposes of the EPEAT conformity assurance system, there are four cases where a nonconformance may be categorized as Minor: minor human error in data entry (e.g., value cited for EPEAT-product registration is insignificantly above or below the actual value); minor administrative errors (e.g., broken URLs, reports/certificates marginally outdated); no documentation provided by a Participating Manufacturer during a Level 1 Investigation where the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market; or a CAB is unable to obtain a product from the market during a Level 2

Investigation where the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.

Nonconformance: Result of conformity assurance activities in which the party being assessed has not demonstrated to the assessor that a specific requirement is met or has definitively demonstrated to the assessor that a specific requirement is not met.

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

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

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

Procedural Appeal: Appeal made on the grounds that the conformity decision is not correct because a required internal or external process was not followed.

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

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

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

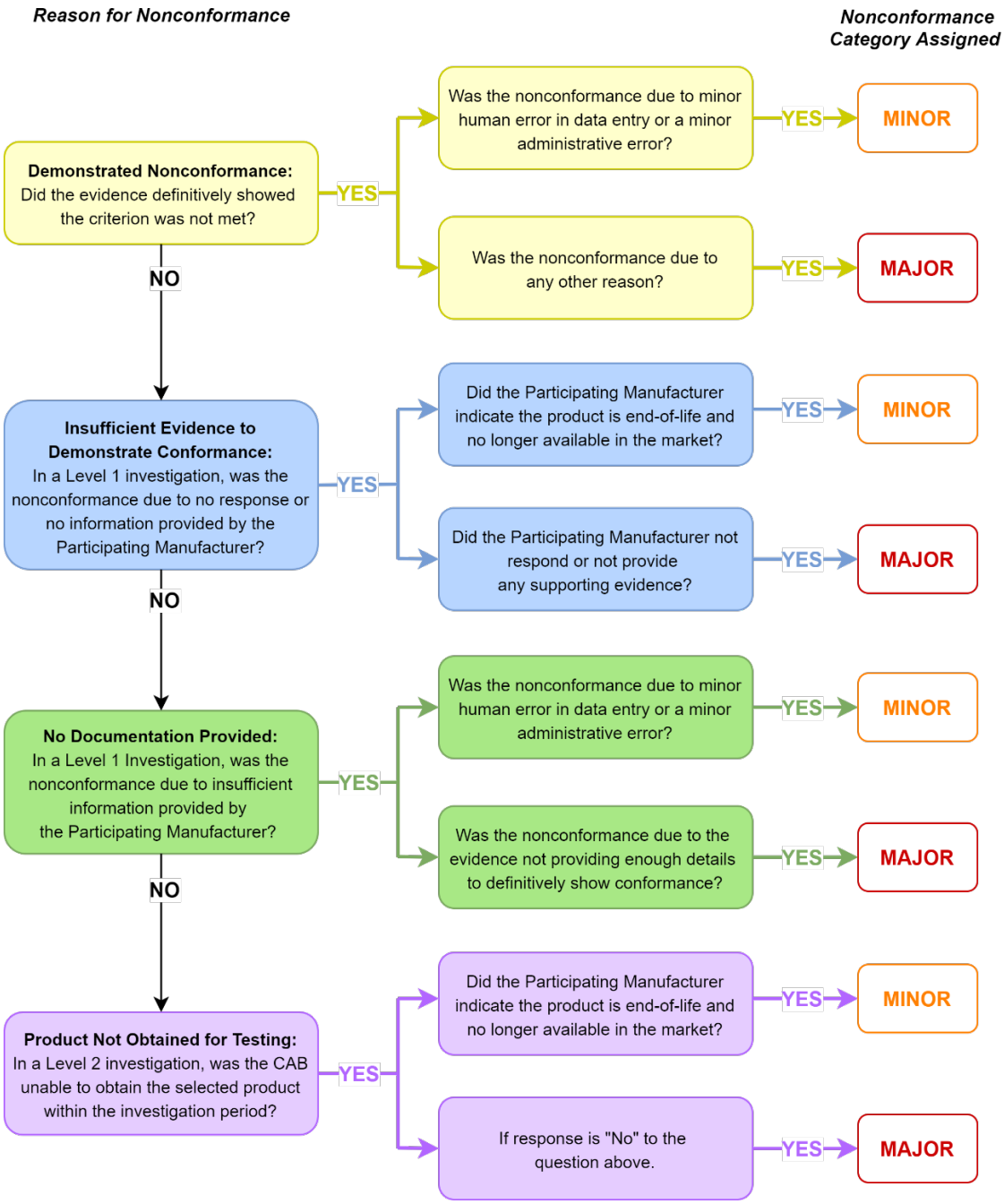
Priority Verification Pathway: One of two ways to complete Initial Documentation Review, where Documentation Review is staggered over several months for up to one year.

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

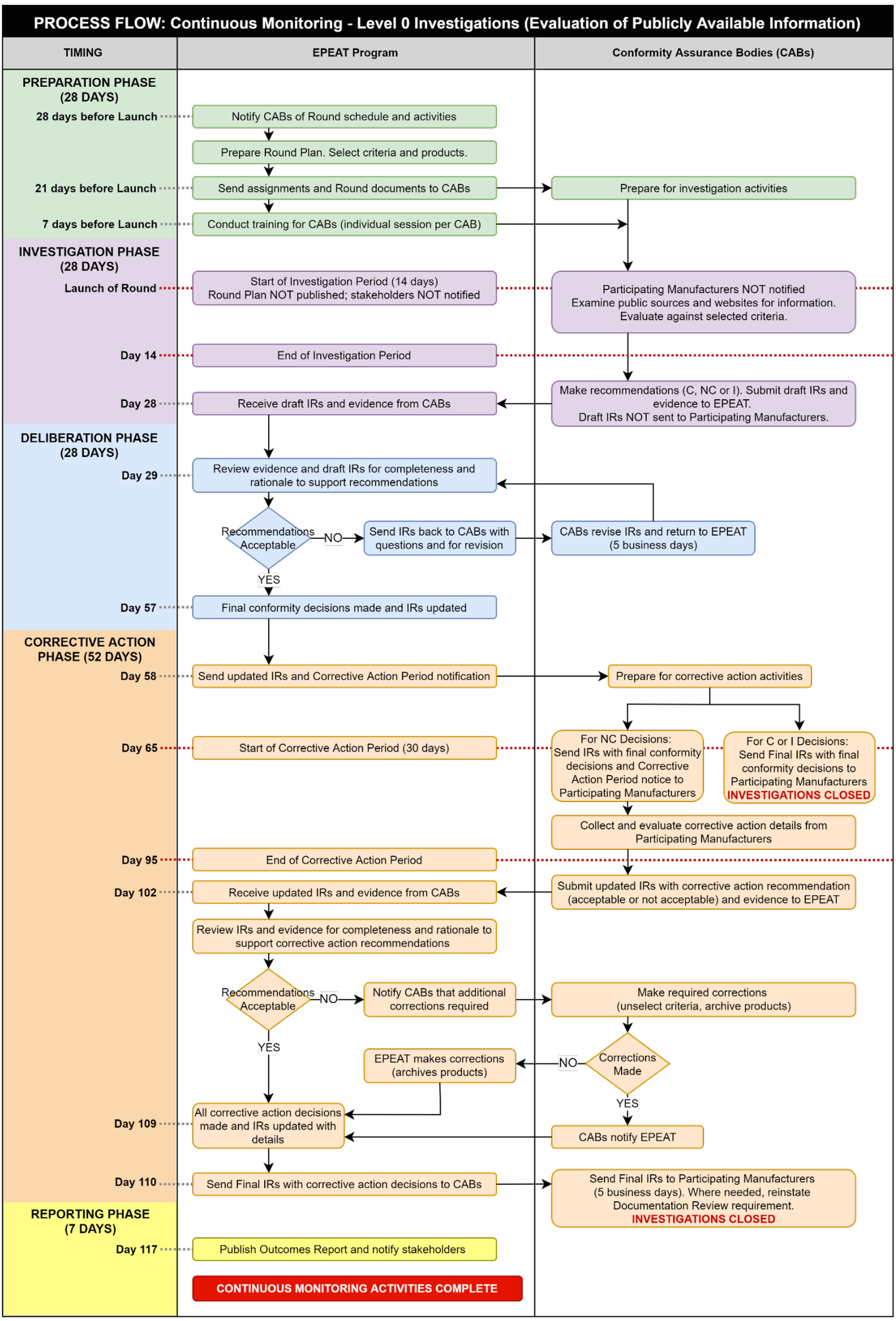
Technical Appeal: Appeal made on the grounds that the conformity assurance decision is not correct because a specified requirement was not interpreted correctly.

11.4 Annex 1: Assigning Minor/Major Nonconformance Categories

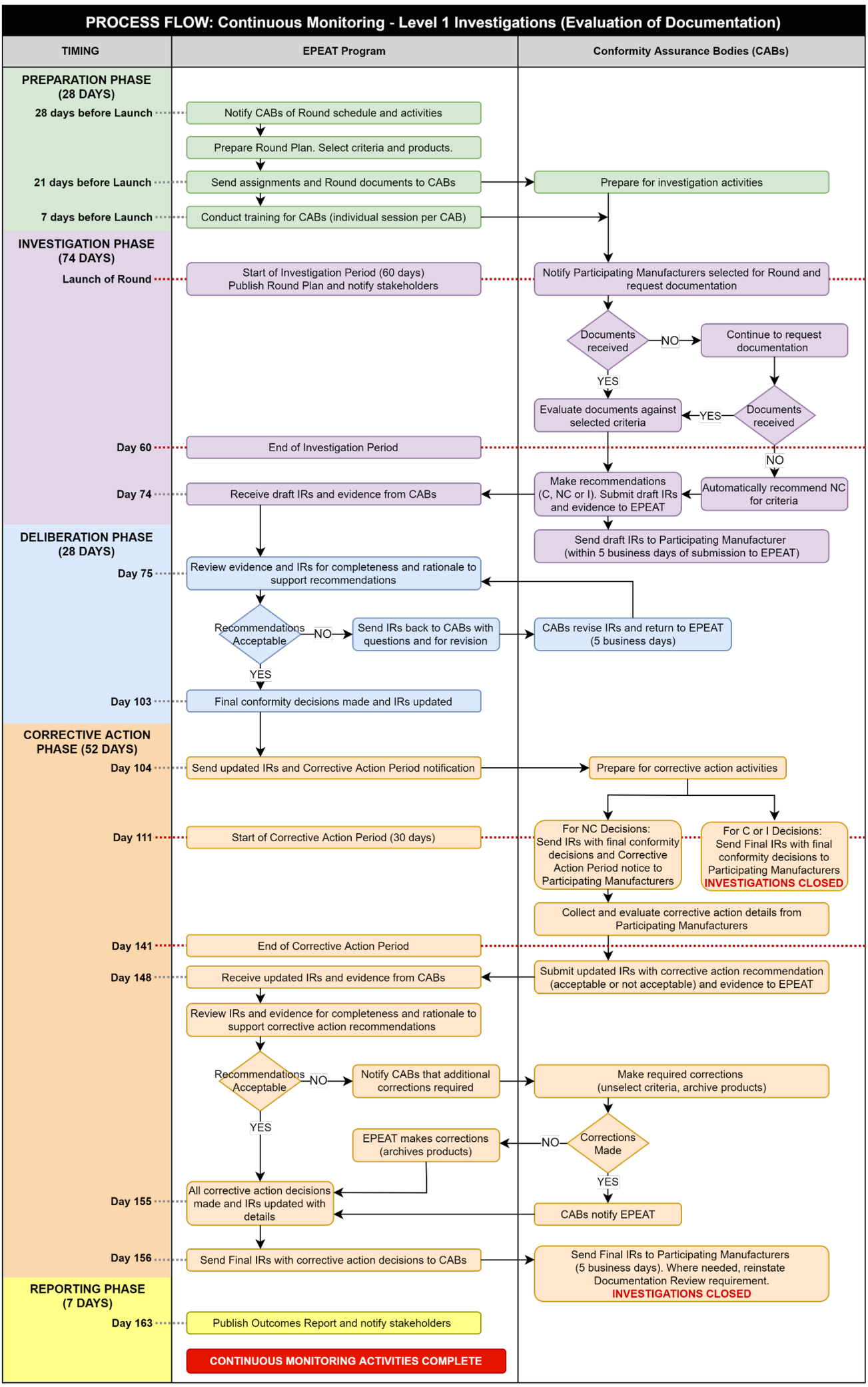
The flowchart below provides additional guidance to GEC-approved CABs for categorizing nonconformances resulting from Continuous Monitoring Investigations as either minor or major.



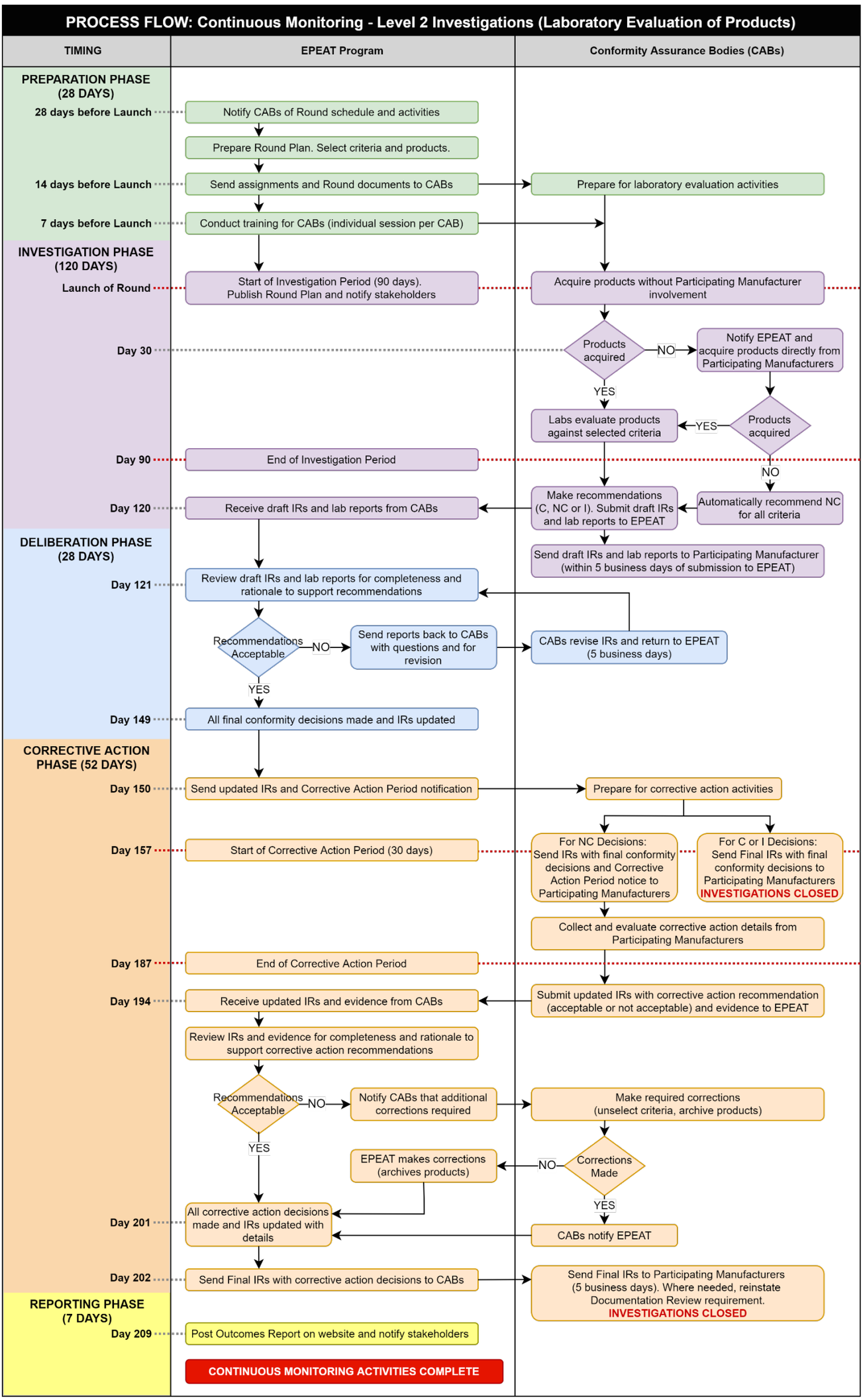
11.5 Annex 2: Level 0 Investigations



11.6 Annex 3: Level 1 Investigations



11.7 Annex 4: Level 2 Investigations



12.0 Document Change History

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