EPEAT Policy Manual
December 1, 2021
COVID Policy Addendum

The Global Electronics Council (GEC) recognizes that the EPEAT Program must take actions to address three primary program-related impacts arising from the COVID-19 pandemic:

- Participating Manufacturer delays in obtaining required verification-related documentation due to service delays (laboratory testing backlogs and challenges and delays associated with completion of onsite audits).
- Participating Manufacturer use of components or suppliers that may not meet EPEAT criteria due to unprecedented supply chain bottlenecks, transportation logistics issues, and material shortages.
- Reduction in EPEAT-registered product availability for EPEAT purchasers.

To address these impacts, GEC has implemented temporary conformity assurance modifications and associated policy changes. The temporary conformity assurance modifications are summarized in the table below.

The implementation requirements and responsibilities associated with the use of these temporary conformity modifications are outlined in the companion document, *Frequently Asked Questions and Implementation Guidance (2022)*. Participating Manufacturers and GEC-approved Conformity Assurance Bodies (CABs) must refer to the document *Frequently Asked Questions and Implementation Guidance (2022)* when using the modifications.

GEC Recognized COVID-19 Impacts	**Temporary Conformity Assurance Modifications Available from January 1, 2022 to December 31, 2022 (11:59 pm North America PT)**
Participating Manufacturer delays in obtaining required verification-related documents due to service delays *(Laboratory testing backlogs due to COVID impacts)*	• Investigative period of Continuous Monitoring Rounds involving laboratory assessment (called Level 2 Rounds) permanently extended by 30 days to 120 days. Note this is not a temporary modification but rather a permanent extension. • EPEAT will remain responsive to requests for other extensions where warranted.

GEC Recognized COVID-19 Impacts	**Temporary Conformity Assurance Modifications Available from January 1, 2022 to December 31, 2022 (11:59 pm North America PT)**
Participating Manufacturer delays in obtaining required verification-related documents due to service delays *(Challenges and delays associated with completion of onsite audits due to COVID impacts)*	• Extension allowed for completion of onsite audits. Available from January 1, 2022 until 11:59 pm North America Pacific Time on December 31, 2022. • Available only for the following criteria that have requirements which include onsite auditing. – Computers and Displays: 4.2.1.3, 4.6.3.1, 4.9.1.1, 4.9.1.2, 4.9.3.1, 4.9.4.1, 4.9.4.2, 4.10.1.1, 4.10.1.2, 4.10.2.3. – Imaging Equipment: 4.6.2.1, 4.6.2.2, 4.7.1.1, 4.7.1.2. – Mobile Phones: 11.2.1, 15.1.1, 15.2.1, 15.2.2, 15.3.2. – Network Equipment: 5.1.3, 5.6.3, 6.5.1, 7.1.1, 7.1.2, 7.4.1, 7.4.2, 7.4.3. – Photovoltaic Modules and Inverters: 8.1.1, 8.1.2, 8.1.3, 9.1.1, 11.1.1, 11.1.2, 11.3.2. – Servers: 5.5.1, 7.1.3, 7.1.4, 11.2.1, 12.1.1, 12.1.2, 12.4.1, 12.4.2, 12.4.3. – Televisions: 4.6.2.1, 4.6.2.2, 4.7.1.1, 4.7.2.1. • Scenario 1 – Delays in onsite audits conducted by a Certification Body for a certification that has a public listing on the Certification Body or other website: Use of this modification requires confirmation from the Certification Body that it has delayed the audit due to COVID impacts and rescheduled audit date. • Scenario 2 – Delays in onsite audits conducted by individual auditors or for a Participating Manufacturer supplier audit program or as part of self-declared management systems: Use of this modification requires submission of rescheduled audit date and signed and dated Onsite Audit Program Extension Attestation on Participating Manufacturer letterhead using template provided.
Participating Manufacturer use of specific suppliers that may not meet EPEAT criteria *(Changed specific suppliers to meet production needs, with acknowledgment that suppliers may not meet requirements)*	• Availability of Force Majeure Concept Attestation from January 1, 2022 until 11:59 pm North America Pacific Time on December 31, 2022 (as per criterion 4.2.1.2 found in Computers and Displays category). • Force Majeure Concept Attestation template for suppliers is available for use but not required; however, all details in the template must appear in the Attestation. • Requires submission of signed and dated Attestation on Participating Manufacturer letterhead that identifies: – Category and name of product(s). – Criteria impacted. – Names of previous and new suppliers with date of supplier change. – Steps Participating Manufacturer will take to reinstate or to bring new supplier into conformance. – Declaration that the steps will be completed by no later than six months of signing the Attestation. • Attestation is only valid for six months from the date the Attestation is signed. • Same Attestation [i.e., Attestation containing the same product(s), criteria, and discrete supplier change] only be submitted one time, after which Participating Manufacturers have six months from Attestation date to provide evidence demonstrating conformance with the criteria. • Previous Attestations (submitted prior to January 1, 2022) are no longer valid.

GEC Recognized COVID-19 Impacts	**Temporary Conformity Assurance Modifications Available from January 1, 2022 to December 31, 2022 (11:59 pm North America PT)**
Participating Manufacturer use of specific components that may not meet EPEAT criteria *(Changed specific components to meet production needs, with acknowledgment that components may not meet requirements)*	• Availability of Force Majeure Concept Attestation from January 1, 2022 until 11:59 pm North America Pacific Time on December 31, 2022 (as per criterion 4.2.1.2 found in Computers and Displays category). • Force Majeure Concept Attestation template for components is available for use but not required; however, all details in the template must appear in the Attestation. • Available only for the following criteria in which environmental regulatory requirements exist (specific criteria for energy efficiency, chemicals, adherence to national or regional take-back programs, conflict minerals). – Computers and Displays: 4.1.1.1, 4.1.2.1, 4.1.6.1, 4.1.6.2, 4.1.7.1, 4.5.1.1, 4.5.1.2, 4.5.1.3, 4.5.1.4, 4.5.1.5, 4.6.1.1, 4.6.2.1, 4.6.3.1, 4.10.2.1. – Imaging Equipment: 4.1.1.1, 4.1.2.1, 4.1.4.1, 4.1.5.1, 4.5.1.1, 4.5.3.1, 4.5.3.2, 4.6.1.1, 4.6.1.2, 4.6.2.1, 4.6.2.2. – Mobile Phones: 7.1.1, 7.2.1, 9.1.1, 9.2.2, 10.1.1, 10.1.2, 10.1.3, 10.1.4, 11.1.1, 11.2.1, 15.3.1. – Network Equipment: 4.1.1, 4.1.2, 4.1.5, 4.1.6, 5.6.1, 5.6.2, 5.6.3, 6.1.1, 6.1.2, 6.2.1, 6.2.2, 6.3.1, 6.4.1, 7.3.1. – Photovoltaic Modules and Inverters: 5.2.1, 5.2.2, 5.2.6, 9.1.1, 11.4.1. – Servers: 5.1.1, 5.3.1, 5.4.1, 5.4.2, 5.4.3, 5.5.2, 5.5.3, 6.1.1, 6.1.2, 6.1.5, 6.1.6, 11.1.1, 11.1.2, 11.2.1, 11.2.2, 12.3.1. – Televisions: 4.1.1.1, 4.1.2.1, 4.1.5.1, 4.1.6.1, 4.5.1.1, 4.5.1.2, 4.5.2.1, 4.5.2.2, 4.6.1.1, 4.6.1.2, 4.6.2.1, 4.6.2.2. • Requires submission of signed and dated Attestation on Participating Manufacturer letterhead that identifies: – Category and name of product(s). – Criteria impacted. – Component(s) impacted. – Steps Participating Manufacturer will take to reinstate or to bring new components into conformance. – Declaration that the steps will be completed by no later than six months of signing the Attestation. • Attestation is only valid for six months from the date the Attestation is signed. • Same Attestation [i.e., Attestation containing the same product(s), criteria, and discrete component change] only be submitted one time, after which Participating Manufacturers have six months from Attestation date to provide evidence demonstrating conformance with the criteria. • Previous Attestations (submitted prior to January 1, 2022) are no longer valid.
Reduction in product availability *(Meeting healthcare and hospital frontline needs for electronics equipment)*	• All televisions meeting Energy Star for Televisions Version 7.0 (in addition to all other required criteria) can appear in the EPEAT Registry until Energy Star releases Version 9.0. Televisions are expected to meet Energy Star Version 9.0 as of the effective date of Version 9.0.

The interim policy changes [for EPEAT Policy Manual (P65 Issue 2 Revision 0)] associated with the temporary conformity assurance modifications are identified below.

Clause 5.2 (Documentation Review), fifth paragraph:

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

Shall be replaced with:

"Additional details on product registration and conformity assurance requirements for both Participating Manufacturers and GEC-approved CABs are identified in *EPEAT Conformity Assurance Implementation Manual (P66).* **This includes implementation of the temporary conformity assurance modifications, as per the December 1, 2021 Policy Addendum.**"

Clause 5.3 (Continuous Monitoring), first paragraph:

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

Shall be replaced with:

"To ensure the ongoing conformance of EPEAT-registered products, the EPEAT Program requires GEC-approved CABs to conduct Continuous Monitoring. These activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis. All EPEAT-registered products in all product categories are subject to Continuous Monitoring at any time, regardless of the conformity assurance pathway chosen. Specific Continuous Monitoring activities are described in *EPEAT Conformity Assurance Implementation Manual (P66)*. **This includes implementation of the temporary conformity assurance modifications, as per the December 1, 2021 Policy Addendum.**"

Clause 7.2 (Ongoing Requirements), fourth paragraph:

"Participating Manufacturers must abide by the requirements in *EPEAT Conformity Assurance Implementation Manual (P66)* on an ongoing basis."

Shall be replaced with:

"Participating Manufacturers must abide by the requirements in *EPEAT Conformity Assurance Implementation Manual (P66)* on an ongoing basis. **This includes implementation of the temporary conformity assurance modifications, as per the December 1, 2021 Policy Addendum.**"

Clause 7.3 (Changing CABs), first paragraph:

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

Shall be replaced with:

"Participating Manufacturers may transition from one GEC-approved CAB to a different GEC-approved CAB for any given product category. Participating Manufacturers must transfer the conformity assurance activities for all EPEAT-registered products in the product category to the new CAB but may engage different CABs for different product categories. Participating Manufacturers must maintain a contractual relationship with a GEC-approved CAB for all product categories in which they are active during the transition process. Details and requirements for the process of changing CABs are identified in *EPEAT Conformity Assurance Implementation Manual (P66)*. **This includes implementation of the temporary conformity assurance modifications, as per the December 1, 2021 Policy Addendum.**"

EPEAT Policy Manual

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

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

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

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

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

EPEAT Policy Manual

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1.0 Introduction

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

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

EPEAT Criteria are designed to address both attributes of the product and corporate activities of the Manufacturer and are identified as either Required or Optional. Required Criteria must be met for a product to become EPEAT-registered. Optional Criteria represent a Participating Manufacturer's commitment to innovation in environmental and social performance. Depending on the number of Optional Criteria met, a product may achieve an EPEAT 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 policies that govern and support EPEAT programmatic activities. As such, it applies to all manufacturers or brands that have active EPEAT-registered products or are in the process of confirming that their products conform with EPEAT criteria (Participating Manufacturers) and to all CABs approved to provide EPEAT conformity assurance services (GEC-approved CABs). A companion document, *EPEAT Conformity Assurance Implementation Manual (P66)*, defines the specific requirements and expectations of Participating Manufacturers and CABs when implementing EPEAT policies. The EPEAT Program reviews both this Policy Manual and the *EPEAT Conformity Assurance Implementation Manual (P66)* on an annual basis to determine if revisions are required.

2.0 EPEAT Governance

2.1 Authority

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

Because the activities of GEC impact the interests of many stakeholders, GEC maintains an EPEAT Advisory Council that is comprised of a balanced representation of different stakeholder perspectives, to

provide advice and guidance to the EPEAT Program. The EPEAT Advisory Council does not influence conformity assurance activities. The EPEAT Advisory Council has no fiduciary responsibility, so it does not influence EPEAT Participating Manufacturer or CAB participation fees.

2.2 Role of GEC

GEC is both owner and manager of the EPEAT Program.

2.3 Program Transparency

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

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

2.4 Confidentiality

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

All GEC personnel, including consultants and subcontractors, are contractually bound to keep all information they have access to during their support of GEC activities confidential. GEC has contractual requirements on confidentiality in place with Participating Manufacturers [*EPEAT License and Participating Manufacturer Agreement (P26)*] and GEC-approved CABs [*Agreement Between Conformity Assurance Body and GEC (P33*)].

2.5 Type 1 Ecolabel

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

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

3.0 EPEAT-Registered Products

EPEAT-registered products are identified as Bronze, Silver or Gold rated. GEC maintains the online EPEAT Registry as a free resource where EPEAT-registered products can be found (https://epeat.net/). Participating Manufacturers may register products in any product category for which EPEAT Criteria exist and are responsible for only selecting EPEAT Criteria to which they can prove conformance. A product is considered "EPEAT-registered" only after a GEC-approved CAB has confirmed conformance and performed a data quality review.

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

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

4.0 EPEAT Criteria

EPEAT Criteria address environmental and social impacts across the entire product lifecycle, from extraction of resources and manufacturing, through to assembly, use and end of life. EPEAT Criteria are based on the best science available at the time of development and are revised as needed to maintain relevance. All EPEAT Criteria are publicly available at no cost.

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

4.1 Overview

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

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

- EPEAT Bronze products meet all Required Criteria.

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

Participating Manufacturers may choose to designate their EPEAT-registered products as available for use by purchasers in specific countries. In these cases, some EPEAT Criteria may be selected differently for individual countries. Participating Manufacturers must demonstrate their ability to meet EPEAT Criteria for those countries to ensure the country-specific benefits are realized for purchasers in those countries.

For some product categories, Innovation Points can be awarded if actions, programs, or policies exceed existing EPEAT Criteria or represent sustainability benefits not already addressed for the product category. GEC's Innovation Committee, an independent group of individuals with technology and sustainability expertise, reviews applications for Innovation Points and determines if Points should be awarded. Participating Manufacturers are not permitted to claim Innovation Points until awarded by the Innovation Committee.

4.2 Criteria Development

4.2.1 Dynamic Criteria Development Process

GEC's criteria development and revision processes are referred to collectively as the Dynamic Criteria Development Process. The Dynamic Criteria Development Process has three key components: publication of a State of Sustainability Research Report, criteria development through balanced voluntary consensus processes, and continuous maintenance of criteria.

4.2.2 State of Sustainability Research Report

GEC publishes a State of Sustainability Research Report as an important initial step in the development or revision of criteria. The report is science-based, and its purpose is to identify social and environmental impacts across the lifecycle of the product category, with the aim of considering how criteria can address these sustainability impacts. The data and analyses in the State of Sustainability Research Report serve as the scientific basis for the development or revision of criteria. GEC releases State of Sustainability Research Reports for public consultation for a minimum of 30 days.

4.2.3 Balanced, Voluntary Consensus Process

EPEAT Criteria are developed in a balanced, voluntary consensus process in alignment with the US Federal Government's description of characteristics of a voluntary consensus process[1]. Key characteristics of the criteria development process, whether developed by the GEC or in conjunction with an external criteria development organization, are:

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

[1] US Federal Government, Office of Management and Budget (OMB), Circular No. A-119.

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

- **Balance of interests:** The process includes a balance of stakeholders such as manufacturers, suppliers, policy representatives, purchasers, and environmental and social impact experts. Balance means that no single interest type shall comprise more than one third of the consensus body or dominate the decision-making process. Processes that fail to achieve or maintain such balance must provide acceptable evidence that they have undertaken special effort to maintain balance and must have included at least some representation of each stakeholder type.

- **Due process:** The process must include documented and publicly available policies and procedures, adequate notice of meetings and other activities, sufficient time to review drafts and prepare views and objections, access to views and objections of other participants, and a fair and impartial process for resolving conflicting views.

- **Appeals process:** A process must be available for the impartial handling of procedural appeals.

- **Consensus:** Consensus is defined as general agreement, but not necessarily unanimity, and includes a process for attempting to resolve objections by interested parties. All comments must be fairly considered, each objector must be advised of the disposition of his or her objection(s) and the reasons why, and the consensus body members must be given an opportunity to change their opinion after reviewing the comments.

4.2.4 Collaboration with Criteria Development Organizations

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

- **Shared Intellectual Property Rights:** GEC must, at minimum, share the intellectual property rights for the output of every criteria development, revision, and maintenance process so that GEC can make the criteria and any accompanying resources freely available to stakeholders.

- **Balanced, Voluntary Consensus Criteria Development Process:** All criteria must be developed under a balanced, voluntary consensus process that is consistent with the elements described in Section 4.2.3. This could be achieved through a process that is in conformance with ISO 14024 or in conformance with the voluntary consensus elements of American National Standards Institute (ANSI) Essential Requirements (those elements in Section 4.2.3 of *EPEAT Policy Manual*).

- **GEC Dynamic Criteria Development Process:** The process must adhere to GEC's Dynamic Criteria Development Process described in Section 4.2.1.

- **Fees:** GEC has a strong preference to partner with organizations that do not charge fees for criteria development or for stakeholders to participate in the criteria development process, including committees or the consensus body.

4.2.5 Adopting Criteria for Use in the EPEAT Program

GEC evaluates criteria against the following requirements before they can be adopted for use as EPEAT Criteria:

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

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

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

4.3 Criteria Update and Revision

As part of the Dynamic Criteria Development Process, GEC implements a Continuous Maintenance Process to update and revise EPEAT Criteria. Following initial release, EPEAT Criteria are subject to the Continuous Maintenance Process to retain impact and relevancy. Revisions are published no more frequently than on an annual basis. The three levels of possible revision under Continuous Maintenance are:

- **Minor Criteria Revision:** The scope of this revision is limited to corrections, changes, and updates to text to further clarify existing requirements.
- **Major Criteria Revision:** 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.
- **Full Product Category Revision:** All Criteria are open to modifications and the process begins with an update of the State of Sustainability Research Packet.

GEC assesses the need for a full revision three years after the Criteria were initially published and initiates the revision process within six months of determining that a revision is required. If the

assessment determines that a revision is not required, GEC evaluates the need for a full revision of the Criteria every 12 months thereafter.

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

- Age and impact of existing Criteria.
- Comparison of existing Criteria against the current State of Sustainability Research Packet to ensure EPEAT Criteria reflect existing knowledge and any anticipated future advancements in science.
- Potential impact on and current capability of Participating Manufacturers to meet updated Criteria including design implementation, product lifecycle, and testing timeline.
- Ability of existing criteria to meet institutional purchaser needs.

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

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

When EPEAT Criteria are updated or revised, GEC establishes a transition period to allow Participating Manufacturers time to come into conformance with the updated or revised Criteria. GEC considers the number and complexity of new Criteria or proposed changes to existing Criteria when developing the timeframe of the transition period.

5.0 EPEAT Conformity Assurance System

5.1 Overview

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

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

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

5.2 Documentation Review

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

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

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

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

5.3 Continuous Monitoring

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

Some Continuous Monitoring activities require that investigations be conducted in discrete timeframes called Rounds. The EPEAT Program is responsible for developing timelines for the Rounds, selecting the EPEAT-registered products and EPEAT Criteria to be investigated, and identifying the method of investigation. Methods of investigation may include review of documentation provided by Participating Manufacturers and independent laboratory evaluation of products without the Participating Manufacturers' involvement. The EPEAT Program assigns the Investigations to GEC-approved CABs, which must fully participate in and are responsible for implementing Continuous Monitoring activities with their Participating Manufacturer clients. GEC-approved CABs submit Investigation Reports to the

EPEAT Program with their recommendation on conformity and the EPEAT Program makes the final decision on conformity based on the Investigation Report and accompanying evidence.

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

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

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

5.4 Rebranding of EPEAT-Registered Products

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

5.5 EPEAT Technical Guidance and Authority

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

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

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

5.5.1 Clarifications

The EPEAT Program may issue a formal Clarification when EPEAT Criteria are ambiguous. Stakeholders may also submit a request for a Clarification to the EPEAT Program. The EPEAT Program seeks feedback from stakeholders on proposed Clarifications during a 30-day public comment period, and carefully considers any feedback received before formally publishing a Clarification. Clarifications are accessible by all GEC-approved CABs and Participating Manufacturers.

5.5.2 Conformity Guidance Materials

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

5.5.3 Calibration Meetings

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

5.5.4 Conformity Guidance Group

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

The Conformity Guidance Group is open to all stakeholders including but not limited to Participating Manufacturers, GEC-approved CABs, and Purchasers. There are no standing members and participants are asked to be technical experts themselves or individuals with access to relevant technical resources.

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

To ensure appropriate expertise is available for a given topic, the EPEAT Program may invite individuals with expert knowledge of that topic to participate. *EPEAT Conformity Assurance Implementation Manual (P66)* provides additional details on the Conformity Guidance Group, including how to participate.

5.5.5 Conformity Assurance Where Equivalent Regulatory Requirements Exist

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

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

Further details regarding use of this attestation and the development and maintenance of the list are identified in *EPEAT Conformity Assurance Implementation Manual (P66)*.

6.0 Requirements of Conformity Assurance Bodies (CABs)

6.1 CAB Eligibility Requirements

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

6.2 Approval

GEC accepts applications from all organizations interested in becoming a GEC-approved CAB and is solely responsible for the review and approval of CABs.

If GEC determines that an application supports an organization's capabilities to perform conformity assurance activities for the EPEAT Program, the organization is identified as a Provisional CAB. Provisional CABs must fully execute P33 *Agreement Between Conformity Assurance Body and GEC*. They may then begin soliciting business for EPEAT conformity assurance services but may not provide these services until formally approved by GEC.

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

- Provide all procedures, policies and accreditation documents related to the provision of conformity assurance services for the EPEAT Program.
- Ensure personnel undergo Initial EPEAT Auditor Training and pass the Initial EPEAT Auditor Exam for each product category in which the CAB wishes to provide EPEAT conformity assurance services.
- Successfully complete the Initial EPEAT Audit of CABs to determine if the CAB Eligibility Requirements are met.

Upon completion of the above in accordance with the requirements outlined in *EPEAT Conformity Assurance Implementation Manual (P66)*, the organization is identified as a GEC-approved CAB and may provide conformity assurance services for Participating Manufacturers for product categories in which they have completed training. GEC-approved CABs are also required to pay an annual CAB Participation Fee to GEC to maintain their status as an approved CAB for the EPEAT Program.

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

6.3 Qualified Auditor Proficiency and Training Requirements

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

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

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

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

6.4 Additional Oversight and Support

6.4.1 CAB Mentored Work Phase

The EPEAT Program supports and oversees newly approved CABs as they perform Documentation Review for their first Participating Manufacturer clients. This CAB oversight process is called CAB Mentored Work Phase and is intended to confirm and support CABs in understanding the conformity assurance requirements of EPEAT Criteria, seeking appropriate documentary evidence from

Participating Manufacturers, and appropriately evaluating evidence and assessing conformance in a manner consistent with published guidance and *EPEAT Conformity Assurance Implementation Manual (P66)*.

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

6.4.2 Annual EPEAT Audit of CAB

The EPEAT Program conducts an annual EPEAT Audit of all approved CABs to ensure the CABs' ongoing conformance with CAB Eligibility Requirements and all provisions in *EPEAT Conformity Assurance Implementation Manual (P66)*. Audit results are confidential and not disclosed to the public.

As a result of the audit, the EPEAT Program may identify opportunities for improvement or nonconformances. GEC-approved CABs must correct identified nonconformances within 30 days and develop corrective action plans to prevent re-occurrence. A nonconformance may be related to a CAB's conformity decision in Documentation Review or Annual Renewal and may subsequently result in a Participating Manufacturer client being found nonconformant with one or more EPEAT Criteria. In such cases, the Participating Manufacturer may be provided three months to provide additional documentation to demonstrate conformance to the CAB or to make appropriate corrections to the EPEAT Registry.

6.4.3 Performance Metrics

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

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

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

6.4.4 Annual CAB Summit

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

- Strengthen GEC-approved CAB understanding of current EPEAT policies and conformity assurance requirements.

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

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

6.5 Suspension or Termination

GEC, at its sole discretion, may suspend or terminate a GEC-approved CAB and any decision to do so shall be considered final. CABs that are suspended may continue to provide EPEAT-related conformity assurance services to their existing Participating Manufacturer clients, for no longer than 12 months as they undertake corrective action but may not accept new Participating Manufacturer clients. Termination is cancellation of the agreement between GEC and the CAB and bars the CAB from providing conformity assurance services for the EPEAT Program for a fixed period. *EPEAT Conformity Assurance Implementation Manual (P66)* provides additional details regarding both suspension and termination of CABs.

Grounds for suspension or termination include any of the following:

- Non-conformances identified during the Annual EPEAT Audit or an audit performed by an accreditation body that remain uncorrected beyond the agreed time.
- 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 *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.

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

7.0 Requirements of Participating Manufacturers

7.1 Initial Requirements

Participating Manufacturers must execute *EPEAT License and Participating Manufacturer Agreement (P26)* with GEC and pay an annual EPEAT Participation Fee for each product category, which allows an unlimited number of EPEAT-registered products for a given product category. Participating Manufacturers are granted access to the EPEAT Registry only after a fully executed *EPEAT License and Participating Manufacturer Agreement (P26)* is in place and GEC has received payment for the applicable EPEAT Participation Fees.

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

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

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

7.2 Ongoing Requirements

Participating Manufacturers must update their EPEAT Criteria selections as needed to reflect changes (including but not limited to changes in product materials, components, contract services or corporate activities) if any of the changes impact how they are conforming with the Criteria and/or their ability to successfully meet the Criteria. Participating Manufacturers must also unselect EPEAT Criteria immediately if they are no longer able to meet the Criteria.

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

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

Participating Manufacturers must abide by the requirements in *EPEAT Conformity Assurance Implementation Manual (P66)* on an ongoing basis.

7.3 Changing CABs

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

7.4 Termination

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

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

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

8.0 Managing Impartiality and Conflicts of Interest

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

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

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

In instances where a risk to impartiality is identified and presents a serious threat to the credibility of the EPEAT Program, the conflict is eliminated. In other cases, GEC mitigates the risks in such a way to

ensure impartiality is not compromised. This is accomplished through organizational and personnel control measures, checks and oversight within criteria development and maintenance processes, and the rigorous requirements in the EPEAT Conformity Assurance System. GEC also accepts and investigates stakeholder complaints regarding potential conflicts of interest.

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

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

8.1 Recognized Potential Conflicts of Interest

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

- **Sources of income and commercial pressures:** The need to be fiscally solvent is an inherent conflict of interest. GEC generates revenues through collecting trademark fees to allow the use of the EPEAT Mark by Participating Manufacturers and through collecting EPEAT CAB Participation Fees from CABs. Both sources of income present financial pressures that have the potential to influence the outcomes of conformity assurance activities.
- **Technical assistance and conformity assurance:** GEC provides technical assistance and training to Participating Manufacturers, GEC-approved CABs and Qualified Auditors, while also operating and overseeing the Conformity Assurance System.
- **Individual stakeholder pressure and conformity assurance:** Stakeholders may pressure GEC to change the requirements of the EPEAT Program so that it is easier or more difficult to achieve compliance, or they may pressure GEC to make the conformity assurance process more or less rigorous.
- **GEC CAB and independence:** GEC recognizes that as EPEAT Program owner and operator of a Conformity Assurance Body, GEC is responsible for conformity assurance activities at the EPEAT Program level and GEC CAB level. GEC CAB is subject to the same level of scrutiny and performance requirements as all other GEC-approved CABs.
- **Using competent personnel while avoiding conflicts of interest:** Given the highly specialized nature of the EPEAT Program, there are a limited number of individuals who possess the qualifications and specific knowledge needed to work within these operations. It is likely that some GEC personnel may be involved in multiple aspects of the EPEAT Program activities.

8.2 GEC CAB and Independence

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

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

9.0 Complaints and Appeals

The EPEAT Program has a documented process to receive, evaluate and make decisions on complaints and appeals and requires GEC-approved CABs to have a complaints and appeals process in place.

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

Complaints regarding dissatisfaction with a GEC-approved CAB must first be directed to that CAB. If the complainant is not satisfied with the resolution of the complaint, then the complainant may raise the issue directly with the EPEAT Program. The EPEAT Program strives to resolve such issues jointly with the GEC-approved CAB. Appeals may be raised by Participating Manufacturers and GEC-approved CABs regarding conformity assurance recommendations and decisions. Details regarding the management of complaints and appeals related to conformity assurance activities, recommendations and activities are identified in *EPEAT Conformity Assurance Manual (P66)*.

Procedural appeals raised during criteria development and maintenance activities shall be managed through the voluntary consensus process.

Complaints and appeals shall be handled swiftly and as transparently as possible, while still respecting the confidentiality of all parties involved. Any GEC personnel involved in the complaint or appeal are not involved in the investigation process. The EPEAT Program ensures that complaints and appeals do not result in discriminatory actions. No complainant, appellant or other individual shall be negatively treated for bringing forward a complaint or appeal, providing information related to a complaint or appeal, or helping to resolve a complaint or appeal.

The EPEAT Program takes full responsibility for decisions made at all levels of the complaints and appeals process and retains the authority to make the final determinations in the case of all complaints and appeals.

10.0 Use of the EPEAT Name and Mark

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

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

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

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

11.0 Force Majeure Events

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

12.0 Supplementary Information

12.1 Acronyms

The following acronyms are used in this document.

ANSI: American National Standards Institute

CAB: Conformity Assurance Body

CGG: Conformity Guidance Group

12.2 References

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

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

12.3 Definitions

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

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

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

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

by the antitrust statement and avoid any conduct that might violate, or would create the appearance of a violation of, antitrust laws.

Appeal: For the purposes of this document, *EPEAT Policy Manual (P65)*, a written request for reconsideration of a procedural matter during the voluntary consensus process for criteria development and revision or for reconsideration of a conformity recommendation or decision.

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.

Complaint: For the purposes of this document, *EPEAT Policy Manual (P65)*, a written expression of dissatisfaction, other than an appeal, regarding EPEAT-registered products, misuse of the EPEAT mark or misleading claims about EPEAT product registration, and/or GEC's management of the EPEAT Program.

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, and assigns Investigations to Conformity Assurance Bodies.

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

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

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.

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.

GEC-approved Conformity Assurance Body (GEC-approved CAB): Status of a Conformity Assurance Body assigned by GEC after successful completion of the Initial EPEAT Audit, including correction of all nonconformances and implementation of all corrective action plans, and successful qualification of at least two individuals to be Qualified Auditors for each product category in which the Conformity

Assurance Body offers conformity assurance services for the EPEAT Program. GEC-approved CABs may provide EPEAT conformity assurance services for Participating Manufacturer clients.

Impartiality: Presence of objectivity, where objectivity means that conflicts of interest do not exist or are resolved so as not to adversely influence subsequent activities.

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

Major Criteria Revision: One of the three 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.

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.

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.

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.

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".

13.0 Document Change History

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