

EPEAT Policy Manual



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1 Introduction

EPEAT® is a comprehensive voluntary sustainability ecolabel that helps purchasers identify more sustainable electronic products that have superior environmental and social performance.

Central to EPEAT are criteria development, conformity assurance and continuous maintenance activities that meet the technical rigor and credibility needs of the institutional purchasers who rely upon EPEAT.

The EPEAT Program Policy Manual provides information about the EPEAT Program and is intended to identify the policies that support the various aspects of the EPEAT Program.

This document applies to all Participating Manufacturers and Conformity Assurance Bodies (CABs) who participate in the EPEAT Program.

The following document is incorporated by reference and must be consulted in conjunction with this policy manual to be in full compliance with EPEAT program requirements:

EPEAT Requirements of CABs and Conformity Assurance Procedures

2 General EPEAT Program Information

2.1 Authority and Governance

The EPEAT Program was 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. EPEAT is managed by, and operates under the authority of, the Green Electronics Council, an independent not-for-profit corporation. GEC serves the public interest by making the EPEAT program and its other programs and activities available to the global public. GEC is overseen by a fiduciary board of directors. EPEAT is a program of GEC, and EPEAT 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 to the EPEAT Program. The EPEAT Advisory Council does not influence product verification plans and/or conformity assurance decisions or EPEAT program finances, including participation fees. The EPEAT Advisory Council has no fiduciary responsibility.

2.1.1 ISO 14024

GEC follows ISO 14020 and ISO 14024 when managing the EPEAT Program, which includes selection and development of product categories and criteria, and conformity assurance.

2.2 Roles and Functions

In order to achieve its mission, GEC supports the following key operational roles related to the EPEAT Program which are discussed in more detail below:

- Facilitating the definition of environmental and social performance criteria for different types of electronic products.
- Operating the EPEAT Registry of sustainable electronics and the EPEAT Conformity Assurance System

GEC also supports the following supporting roles related to EPEAT:

- Promoting the use of the EPEAT ecolabel as a credible way to identify sustainable electronics.
- Researching the environmental and social impacts of electronics, and ways to reduce them.
- Educating institutional purchasers and other stakeholders on the sustainability impact of electronics and what they can do to help reduce it.
- Evaluating the effectiveness of EPEAT in reducing the environmental and social impacts of electronic products.

To fulfill these roles and functions, GEC establishes relationships with relevant stakeholders, including product manufacturers, retailers, large purchasers of electronics, Conformity Assurance Bodies (CABs), Criteria Development Organizations (CDOs), and other organizations.

2.3 Impartiality in the EPEAT Program

As the owner of the EPEAT ecolabel and manager of the EPEAT Program, GEC works to ensure impartiality in its operations and in the EPEAT Conformity Assurance system. Impartiality means that GEC and its staff are free from conflicts of interest that may influence the formulation of the EPEAT criteria and accuracy of the EPEAT conformity assurance processes. Any situation where conformity assurance processes may be influenced by pressure from commercial, financial, organizational or other obligations is considered a conflict of interest. Impartiality means that GEC and its personnel can carry out core roles free from the influence of any individual or organization that has a vested interest in the outcomes. GEC has internal policies and procedures to manage potential conflicts of interest and ensure impartiality, and routinely reviews risks to impartiality.

2.3.1 Types of Conflict of Interest

This policy manual identifies five general types of conflict that might arise in the course of GEC undertaking conformity assurance as both scheme owner and CAB. GEC use several strategies to mitigate or eliminate the conflict. In instances where the conflict presents a serious threat to the credibility of the work of GEC and the EPEAT Program, the conflict is eliminated. In other cases, GEC relies on checks and oversight within the EPEAT conformity assurance process to ensure that conflicts are managed in such a way that the impartiality is not compromised. GEC is committed to operating in transparent and open manner, providing a basis for identifying and managing conflicts of interest.

1. Sources of income and commercial pressures
2. Technical assistance and conformity assurance
3. Individual stakeholder pressure and conformity assurance
4. GEC CAB and independence
5. Using competent personnel while avoiding conflicts of interest

2.3.1.1 Sources of Income and Commercial Pressures

The need to be fiscally solvent is an inherent conflict of interest in any conformity assessment body. GEC generates revenues through collecting trademark fees to allow the use of the EPEAT logo by Participating Manufacturers, presenting a financial pressure that has the potential to influence the outcomes of conformity assurance activities.

Being aware of this, GEC carefully reviews any circumstances where increasing the number of Participating Manufacturers is a budgetary goal, such that the quality of conformity assessment services may be compromised. Trademark fees are based on the global sales of each respective participating manufacturer and are not linked to number of manufacturer products covered by EPEAT or any other factor under GEC's direct control. GEC also reviews any instances where a Manufacturer represents a substantial portion of GEC's income to confirm that the Manufacturer does not receive preferential treatment and is subject to verification, non-conformances, and desk review at the same rate as other Manufacturers with similar characteristics.

2.3.1.2 Technical Assistance and Conformity Assurance

GEC provides technical assistance and training to Participating Manufacturers, CABS and auditors to ensure accuracy and consistency in the use of the EPEAT online Registry, including making product declarations, and to ensure understanding of the EPEAT criteria. GEC occasionally offers training to current and potential CABS and Manufacturers. This EPEAT related training by GEC may be led by personnel who do conformity assurance work for the GEC CAB. If GEC is asked to run a private training course, it reviews any actual or perceived conflicts associated with offering a closed course.

2.3.1.3 Individual Stakeholder Pressure and Conformity Assurance

The EPEAT Program may be subject to pressures from stakeholders. Stakeholders may pressure GEC to change the requirements of the EPEAT Program so that it is easier to achieve compliance, or they may pressure GEC to make the conformity assurance process less rigorous. Manufacturers that have a vested interest in positive outcomes of the conformity assurance activities may try to influence the outcomes of conformity assurance activities. GEC must be sensitive to the needs of all users of the system without compromising the credibility of the EPEAT Program and the impartiality of the assurance processes.

If GEC does decide to make changes to the EPEAT Program, GEC avoids the real or perceived risk that changes are made at the direction of any one stakeholder.

2.3.1.4 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 works to maintain an organizational structure that ensures the impartiality at both levels by ensuring a firewall of EPEAT Program planned verification details from GEC CAB.

GEC works with third party assessors to evaluate and accredit the GEC CAB to the same requirements as for all CABS.

2.3.1.5 Using Competent Personnel While Avoiding Conflict 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 conformity assurance. It is likely that some GEC personnel may be involved in multiple aspects of the EPEAT Program including criteria setting, assurance and oversight.

To manage this, GEC reviews carefully the instances where GEC personnel (including contract workers and consultants) serve in more than one role and ensures that their roles are clearly defined and the potential for conflicts identified and mitigated.

3 Environmental and Social Performance Criteria in EPEAT

For EPEAT registration to apply to a type of product, the development of the criteria for that type of product must be accepted by GEC and then implemented in the EPEAT Program. GEC may evaluate and use existing criteria and, in cases where no suitable criteria exists, GEC may support the development of new criteria.

Criteria that are implemented in the EPEAT Program are developed in balanced voluntary consensus processes. This ensures that the criteria meet GEC's policy requirements of balanced and open participation and that no party dominates the process.

The criteria implemented in EPEAT address environmental and social impacts across the full life cycle of a product, from extraction of resources, through manufacturing, assembly, use, and end of life. The criteria are intended to be comprehensive and are based on the best science available at the time of development.

To date the following product categories have been implemented in EPEAT, providing for registration for the identified types of products. The criteria for these product categories can be found the GEC website.

- Computers and Displays
- Imaging Equipment
- Televisions
- Mobile Phones
- Servers
- Photovoltaic Modules and Photovoltaic Inverters

EPEAT's policy for implementing new or revised criteria in EPEAT is that new or revised criteria are implemented according to a defined plan, that all stakeholders understand the new/revised criteria, and that there are appropriate resources to support declaration to the new criteria using the EPEAT Registry software.

3.1 Policy on EPEAT Criteria Development

3.1.1 Balanced Voluntary Consensus Process

EPEAT utilizes criteria developed through a balanced voluntary consensus process, as defined in the US Federal Government Office of Management and Budget (OMB) Circular A-119 document. The voluntary consensus process is defined by the following attributes:

- a. Openness. The procedures or processes used are open to interested parties. Such parties are provided meaningful opportunities to participate in criteria development on a non-discriminatory basis. The procedures or processes for participating in criteria development and for developing the criteria are transparent.
- b. Balance of interest. GEC seeks a balance of stakeholders to include manufacturers, suppliers, policy representatives, purchasers, and environmental and social impact experts. Balance means that no single interest type shall comprise more than 1/3 of the criteria group. Processes that fail to achieve or maintain such balance shall provide acceptable evidence that they have undertaken special effort to do so and must have included at least some representation of each stakeholder type.
- c. Due process. Due process shall include documented and publicly available policies and procedures, adequate notice of meetings and criteria development, sufficient time to review drafts and prepare views and objections, access to views and objections of other participants, and a fair and impartial process for resolving conflicting views.
- d. An appeal process. An appeals process shall be available for the impartial handling of procedural appeals.
- e. Consensus, which is defined as general agreement, but not necessarily unanimity, and includes a process for attempting to resolve objections by interested parties, as long as all comments have been fairly considered, each objector is advised of the disposition of his or her objection(s) and

the reasons why, and the consensus body members are given an opportunity to change their votes after reviewing the comments.

3.2 Qualification of a Criteria Development Organization

When working with external organization to develop EPEAT criteria, GEC seeks to work with organizations that meet the following requirements:

- a. Shared Intellectual Property (IP) Rights: GEC must share the intellectual property rights for the output of every criteria development, revision and maintenance process.
- b. Balanced Voluntary Consensus Criteria Development Process: All criteria are created utilizing a balanced voluntary consensus process that is consistent with the elements described above.
- c. GEC Dynamic Criteria Development Process: Adheres to or has a willingness to develop or amend existing operating procedures that align with, or allow for use of, GEC's Dynamic Criteria Development Process.

The organization must also:

- d. Operate in conformance with ISO 14024 Environmental labels and declarations—Type 1 environmental labelling—Principles and procedures: or
- e. Have one of the following accreditations:
 - i. ANSI accredited Criteria Development Organization; or
 - ii. ANSI Eligible Type 1 Environmental Certification Labeling Scheme (to ISO 14024).

GEC has a strong preference for working with organizations that do not charge fees for criteria development.

3.3 Launch of EPEAT Product Categories

3.3.1 Business Case Overview

GEC staff builds the business case for potential new EPEAT categories. The below attributes are part of GEC's business case when considering new product categories:

- a. Product scope, market size, key geographies, market drivers, and leading brands and manufacturers of the identified technology. This research relies on findings published by research firms and educational institutions.
- b. Sustainability impacts and opportunities for improvements in the technology and its supply chain. Lifecycle analyses and other published research is a key component of this assessment.
- c. The demand for the technology by large-scale institutional purchasers in the private and public sectors. Searchable public records and discussions with purchasers are the basis for these findings. Current national and international legislation and agreements are considered.

3.3.2 Proposal for Product Category

Once the business case is complete, GEC is in the position to decide whether to pursue development of criteria for a new EPEAT category. Stakeholders are queried on their interest in supporting the criteria development process via a public comment period.

3.4 EPEAT Dynamic Criteria Development Process

3.4.1 State of Sustainability Research Packet

The State of Sustainability Research Packet is developed from materials publicly available, provided by stakeholders interested in sharing relevant technical data, and by research institution(s) engaged by GEC. The research packet identifies science-driven priority environmental and social impacts, specific institutional purchaser needs/opinions, and includes consideration of relevant product security issues. Its purpose is to provide a baseline understanding of sustainability impact for that product category for all participants involved.

3.4.2 Timing

GEC's Dynamic Criteria Development process relies on a modular approach to criteria development. This means that criteria are discussed and developed in groupings of impact topics. Two of the modules, focused on product and corporate criteria respectively, are "common" and applicable across all product categories, leveraging prior criteria development processes and facilitating harmonization across EPEAT product categories. Use of common criteria results in lowering the overall level of financial and time commitment of stakeholders to participate.

3.4.3 Updating and Amending Criteria

The EPEAT continuous maintenance process serves to update, remove, and add criteria continuously to maintain the credibility and impact of the EPEAT ecolabel. GEC's policy is to assess the need for a full revision of the criteria every 3 years after the public launch of the category in EPEAT. GEC initiates the revision process within 6 months of finding that a revision is required. If the finding is that a revision is not required, GEC assesses the need for a full revision of the criteria every twelve months thereafter. In assessing the need for a full revision, GEC considers the following factors:

- a. Age of existing criteria.
- b. Comparison of existing criteria against updated "State of Sustainability" research for that product/service category.
- c. Impact on Manufacturers including design implementation, product lifecycle, and testing timeline.
- d. Number and complexity of new criteria recently submitted through continuous maintenance.
- e. Ability to meet institutional purchaser needs.

GEC shares the outcome of the assessment with and seeks input from a balanced group of stakeholders. GEC makes the final decision as to whether a revision to the EPEAT criteria is warranted.

The policy of EPEAT is that after the decision is reached to implement updates, removal, and/or addition of criteria there is a transition period to allow manufacturers to come into conformance with or phase-in amended criteria. The coming into conformance or phase-in period is determined by considering factors such as the urgency of amending the criteria, the extent of the change (e.g. the length of time and the level of complexity for manufacturers to make the change), the need to involve the supply chain, whether the change is due to legislative requirements, and the time that it takes for the EPEAT program to implement the change through CAB trainings and technically on the EPEAT Registry.

3.5 Criteria Qualification for EPEAT Adoption

EPEAT considers adoption of criteria based on the following factors: sustainability impact of the criteria, whether the criteria were developed using a balanced voluntary consensus process, no cost to use criteria including GEC assuming intellectual property rights, and that the criteria are both life cycle based and science driven. Once the evaluation of criteria against those factors is complete, GEC shares the outcome with the EPEAT Advisory Council for their input. GEC makes the final decision to implement any criteria.

3.5.1 Sustainability Impact and Verifiability of Criteria

The criteria should provide at least one of the following three sustainability benefits:

- a. Provide clear environmental and/or social benefits that are measurable, verifiable, and credible.
- b. Represent incremental steps towards a sustainability benefit, establishment of systems to provide benefit, or foundational elements of an environmental or social management system.
- c. 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.

Additionally, the criteria must be clearly written and verifiable through use of objective metrics and commonly accepted tools, methodologies and/or standards. To the extent possible, criteria should harmonize with international environmental and social requirements and standards, including voluntary eco-labels and market requirements.

3.6 EPEAT Criteria

3.6.1 Required and Optional Criteria

All criteria implemented in EPEAT are identified as being either Required (or prerequisite) or Optional. Required criteria must be met for a product to be EPEAT Registered. Optional criteria represent higher levels of environmental and social performance and may be met in order to achieve a higher tier rating. Some optional criteria result in innovation points. These innovation points are awarded by an independent committee, comprised of members with expertise in the criteria and technology.

3.6.2 Product Ratings: EPEAT Bronze, Silver, and Gold

The EPEAT ecolabel was developed to recognize three levels of sustainability performance: Bronze, Silver, and Gold. This multi-tier rating provides increased recognition and thereby is an incentive for Manufacturers to meet additional optional criteria.

The product rating (B/S/G) is determined as follows:

- EPEAT Bronze rated products meet all the Required criteria
- EPEAT Silver rated products meet all the Required criteria and 50% of the Optional criteria
- EPEAT Gold rated products meet all the Required criteria plus 75% of the Optional criteria

Manufacturers may choose different optional criteria to focus on, in order to achieve higher tier ratings, and different products with the same rating (i.e. EPEAT Gold) may meet different optional criteria.

3.6.3 Product Criteria and Corporate Criteria

Specific criteria implemented in EPEAT may relate either to attributes of the product or may relate to the activities of the Manufacturer. This distinction is identified in the criteria or verification

requirements. “Product” criteria apply to the product, and “corporate” criteria apply to the corporate activities of the Manufacturer registering the product.

3.6.4 Geographic Applicability of EPEAT

Most criteria implemented in EPEAT must be met equally in all countries (i.e. most criteria that relate to product content), but some criteria may be met in some countries and not others. For example, a Manufacturer may offer packaging take-back services in some countries and not others. The “geographic applicability” of each criterion is identified in the criterion. In order to maintain accurate communication to purchasers and the public, the EPEAT Registry identifies the countries for which the product meets country specific criteria.

4 EPEAT Product Registration and the EPEAT Registry

GEC is committed to making available the list of products that meet the EPEAT criteria via the EPEAT Registry located online at www.greenelectronicscouncil.org. The EPEAT Registry is maintained by GEC and provides a list of “active” EPEAT products, those products that currently meet EPEAT criteria, and at least three years of “archived” products, those that previously met EPEAT criteria.

4.1 The EPEAT Conformity Assurance System

EPEAT operates a Conformity Assurance program to ensure the accuracy of product declarations and to maintain the credibility of EPEAT as a resource for purchasers. Manufacturers may participate in the Conformity Assurance system via Post-Market Verification or Certification.

The Conformity Assurance program has three primary processes to ensure the accuracy of product declarations—: Selection and Oversight of CABs, Post-Market Verification, and Certification.

4.1.1 Selection and Oversight of CABs

The EPEAT Program is responsible for the review and approval of applications by organizations to become an EPEAT CAB, and oversight of all EPEAT CABs. GEC does not control the pricing of CAB services and participating Manufacturers are free to choose any CAB within the EPEAT CAB ecosystem.

GEC has formal eligibility requirements that must be met for organizations to be approved as a CAB, ongoing requirements that CABs must meet to retain their status as an EPEAT CAB, an audit process to ensure that the CAB eligibility requirements are met, processes for CABs to correct identified eligibility discrepancies, and processes to terminate CABs that fail to maintain eligibility requirements.

4.2 Post-Market Verification and Certification

EPEAT policy allows the use of two different rigorous conformity assurance processes: Post-Market Verification and Certification. Both processes entail the CAB working with the Manufacturer to ensure that the Manufacturer understands the requirements of the criteria, is making accurate declarations, and is prepared to demonstrate conformance when needed. Manufacturers can choose either conformity assurance process.

Post-Market Verification requires that the CAB verify all priority criteria declared by the Manufacturer before products are recognized as “EPEAT Registered” and listed on the EPEAT Registry. Remaining claimed criteria are verified within one year of the first registered products in that product category.

Certification requires that the CAB verify all claimed criteria before products are recognized as “EPEAT Registered” and listed on the EPEAT Registry. All products that are certified must have an initial Certification, followed by Annual Renewal and Ongoing Compliance. Certification is valid for three years.

EPEAT registered products are not identified in the EPEAT Registry as “Post-Market Verified” or “Certified”. Regardless of the verification process used, all EPEAT products are continuously monitored as part of EPEAT’s ongoing verification of active EPEAT registered products.

4.2.1 Ongoing Verification of Active EPEAT Registered Products

The EPEAT Program employs an ongoing verification process for all “active” EPEAT registered products. This verification process is comprised of Verification Investigations and Verification Rounds. Verification Investigations test the accuracy of Manufacturer declarations for their active EPEAT Registered products, at the time the Investigation begins.

GEC is committed to transparency so both Verification Rounds and their results are made publicly available. GEC believes that this public disclosure of Verification Round outcomes is an incentive for Manufacturers to maintain accurate declarations.

4.2.2 Clarifications

EPEAT’s policy is to consider issuing a formal Clarification when criteria and associated verification requirements are ambiguous or unclear. Requests for Clarification can be made by any stakeholder and must be made in writing and must clearly identify the wording of the criteria or verification evidence that is ambiguous or unclear. Requests for Clarifications will be reviewed considering the Continuous Maintenance process to determine whether a Clarification and/or criteria adjustment is warranted.

4.2.3 Conformity Guidance Packets

The EPEAT program creates and maintains Conformity Guidance Packets which provide guidance to Manufacturers and CABs on EPEAT criteria. Conformity Guidance Packets are guidance only and their use does not guarantee conformance. EPEAT criteria always take precedence over guidance provided in a Conformity Guidance Packet.

4.2.4 Non-conformance and Corrective Action Phase

If a Manufacturer is found to have made an inaccurate declaration, a non-conformance is issued. Non-conformances are classified as either Major or Minor. Manufacturers must either correct the nonconformance or submit a corrective action plan within the Corrective Action Phase.

5 Other Important Functions of the EPEAT Program

5.1 Use of the EPEAT Name and Marks

Manufacturers can refer to products as “EPEAT Registered” if they appear publicly as active on the EPEAT Registry and can refer to a tier (Gold/Silver/Bronze) based on the number of required and optional points achieved by the product.

5.1.1 The EPEAT Name and Mark

Manufacturers that participate in EPEAT have a license to use the EPEAT name and relevant marks to promote the sustainability of their products. It is EPEAT’s policy that manufacturers are not required to

use the EPEAT name and/or marks on their products and/or packaging., Instead, purchasers and the public can ascertain whether a product is EPEAT Registered by accessing the online EPEAT Registry.

The EPEAT marks of conformance are shown below:



5.1.2 Monitoring and Enforcement of Proper Use of Marks and Claims

The EPEAT name and marks are trademarked in the US, EU and several other countries worldwide by the Green Electronics Council. EPEAT 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 ensure the credibility of the EPEAT brand.

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

5.2 Measuring Program Effectiveness

5.2.1 EPEAT Environmental Benefits Calculator

GEC has developed a tool to evaluate the benefits that accrue as a result of the purchase of EPEAT registered products. The tool is available to the global public at no cost and can be accessed on the Green Electronics Council website.

5.3 Complaints and Appeals

GEC operates a complaints and appeals program to allow stakeholder concerns about the EPEAT Program and/or EPEAT registered products to be addressed fairly.

Formal complaints about EPEAT registered products or about GEC's management of the EPEAT Program may be registered by any stakeholder at any time. Formal appeals to conformity decisions made by the EPEAT Program may be made by Manufacturers or CABs.

There is no form to submit for complaints or appeals, but they must be made in writing to GEC staff. In order to be considered complete, the complainant or appellant should state the basis for the complaint or appeal and include enough evidence to move forward with a formal investigation. The complainant or appellant will be notified of the progress and outcomes of any investigation.

All complaints and appeals are handled impartially, and GEC ensures that complaints and appeals do not result in discriminatory actions.

6 References

ISO 14020 Environmental labels and declarations—General Principles

January 2020

ISO 14024 Environmental labels and declarations—Type 1 environmental labelling—Principles and procedures

7 Change History

Issue	Revision	Author	Description of Change	Approver	Date Approved
1	0	L. Hoppe		L. Fernandez-Salvador	1/17/2020