| Green Electronics Council Registry Services Department | Verification Procedure | QP 15 Issue 1 Rev 2 |
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1. **Purpose**

   This document describes the Green Electronics Council (GEC) procedure for conducting surveillance of the EPEAT Registry, also known as Verification.

2. **Scope**

   This process applies to the Registry Services Department of GEC, all GEC approved Conformity Assurance Bodies and the Conformity Decision Panel.

3. **Definitions**

   **Auditor—**personnel who have the specific qualifications needed to conduct Verification Investigations.

   **Conformance Packets –** guidance prepared by CAMs or CACs prior to the start of each Verification Round

   **Conformity Assurance staff (CA staff) –** GEC staff member responsible for managing conformity assurance activities related to a specific GEC approved standard and to make decisions of conformity (when authorized). CA staff members include Conformity Assurance Manager (CAM), Conformity Assurance Coordinator (CAC), and EPEAT Operations Manager.

   **Conformity Decision Panel (CDP)—**committee convened by the GEC to make decisions of conformity or non-conformity based on the recommendation of a Conformity Assurance Body (CAB).

   **Investigation –** a specific instance of Verification, where a Manufacturer's conformance to specified requirements is evaluated

   **Investigation Period –** specified timeframe when CABs are conducting Investigations.

   **Investigation Report (Investigation Report) —** the standard report form that is completed by CABs for all Investigations.

   **CDP Deliberation Period**—timeframe after the end of the Investigation Period when the Conformity Decision Panel reviews Investigation Reports and makes decisions of conformity.

   **Verification—**ongoing surveillance of the EPEAT Registry. GEC plans Verification activities and the CABs are responsible for conducting Investigations that are assigned by the GEC.

   **Verification Round-** a batch of Investigations assigned by GEC.

4. **Responsibilities**

   - It is the responsibility of the CAMs and CACs to manage the Verification activities, including Investigations, for one or more GEC approved standards.
   - It is the responsibility of the CDP to: to make decisions on conformity, during verification Investigations and to determine if corrective actions are acceptable.

**5. Procedure Review and Approval Authority:**

Owner: EPEAT Operations Manager (OM)
Approver: EPEAT Director

**6. Related Documents**

P35/P36 *Investigation Report Form*
GEC approved standards
Manufacturer Declaration of Conformity
Conformity Assessment Protocols
CDP Clarifications
IEEE Interpretations

**7. Records**

| Record Name | Owner | Access | Minimum Retention Time | Location |
|---|---|---|---|---|
| Investigation Reports | CAM/CAC | GEC personnel | 3 Years | GEC Server |
| Outcome Reports | CAM/CAC | Public | 3 years | GEC Server and GEC website |
| Verification Round plans | CAM/CAC | Public | 3 years | GEC Server and GEC website |
| Annual Verification plans | CAM | GEC personnel | 3 years | GEC server |
| Conformance Notes | CAM/CAC | GEC personnel | 3 years | GEC server |
| CDP tracking spreadsheet | CAM/CAC | GEC personnel | 3 years | GEC Server |

**8. Change History**

| Issue | Rev | Owner | Description of Change | Approver | Approval date | Effective date |
|---|---|---|---|---|---|---|
| 1 | 0 | M. Bower | Initial release of document | J. Omelchuck | 11/5/15 | NA |
| 1 | 1 | M. Bower | Added clause 13.3 on product availability. Changed responsibilities for annual plan approval and modification to EPEAT OM in clause 11. Changed round plan approval from full CDP to one CDP member in 12.5. Removed CAM review of reports in clause 15. Changed length of level 1 investigation period from 30 to 60 days. Changed CDP quorum rules. Removed CDP approval of outcomes reports in clause 18.1. | J. Omelchuck | 8/8/16 | 8/8/16 |
| 1 | 2 | L. Fernandez-Salvador | Added procedures and limits to product purchasing in Section 15; updated CDP review process procedures in Section 15 | M. Bower | 1/05/2017 | 1/05/17 |

**9. Verification Investigations—General**

9.1. During Investigations, GEC confirms that products on the Registry meet specified criteria in GEC approved standards.

9.2. Verification Investigations are assigned by GEC to the CAB with which the Manufacturer has made declarations being investigated. Throughout this procedure, "CAB" refers to the CAB to which the Investigation has been assigned.

9.3. Verification Investigations are typically conducted in batches called "Verification Rounds".

9.4. GEC assigns a CAM to manage each Verification Round, including coordinating all of the activities and communications associated with the Round. Throughout this procedure, "CAM" refers to the CAM assigned to manage the round.

9.5. Unless otherwise indicated, references in this process to "criteria" mean the criteria in GEC approved standards.

9.6. All criteria declared for all products in all countries through all CABs are subject to verification at any time. Products and criteria are selected for Verification both randomly and for cause.

9.7. GEC selects the products and criteria that are checked during Investigations and also specifies the type of Investigation that is conducted (Levels 0-3, see section 10 below).

9.8. GEC approved standards, published interpretations and published CDP Clarifications are considered normative requirements, which must be considered when evaluating product conformance.

9.9. Conformity Assessment Protocols, Conformity Packets and Conformance Notes are considered guidance that should be used when evaluating conformance.

**10. Types of Verification Investigations**

10.1. GEC has defined three types of Investigations, Levels 0 through 3.

10.2. Level 0: Desk inspection of publicly available information. In a Level 0 Investigation, an Auditor assesses conformance to a criterion by examining publicly available information only – no products are obtained for inspection or testing, and the participating Manufacturer is not asked to submit documentation. In Level 0 Investigations, GEC may elect not to investigate all verification requirements and requirements within the text of the criterion. If publicly available information demonstrates that the requirements have been met, the Auditor recommends Conformance. If the publicly available information is inconclusive (i.e. was not available, could not be found from public sources, or did not provide enough details to determine Conformance), the Auditor recommends Inconclusive. For inconclusive Investigations the CAB may be instructed by GEC to proceed with a Level 1 Investigation.

Because Level 0 Investigations typically result in recommendations of Conformance or Inconclusive, Auditors do not normally recommend Non-Conformance as result of a Level 0 Investigation.

10.3. Level 1: Desk inspection of Manufacturer supplied verification evidence. In a Level 1 Investigation, an Auditor assesses conformance to a criterion by examining information submitted by a participating Manufacturer. No products are obtained for inspection or testing.

10.4. Level 2: Inspection for conformance with the standard. In a Level 2 Investigation, the CAB buys or obtains a product without the involvement of the participating Manufacturer, potentially has it disassembled, and inspected to assess conformance with one or more criteria. Level 2 Investigations are conducted in a laboratory or by another qualified organization. In Level 2 Investigations GEC may elect not to investigate all verification requirements and requirements within the text of the criterion. If the product is only sold to institutional buyers, the CAB may involve the Manufacturer in obtaining the product.

10.5. Level 3: Analytical testing of conformance to the standard. In a Level 3 Investigation, the CAB buys or obtains a product without the involvement of the participating Manufacturer and has it analytically tested to assess conformance with one or more criteria. Level 3 Investigations are conducted in a laboratory. In Level 3 Investigations, GEC may elect not to investigate all verification requirements and requirements within the text of the criterion. If the product is only sold to institutional buyers, the CAB may involve the Manufacturer in obtaining the product.

**11. Annual Verification Planning**

11.1. On an annual basis, GEC creates a plan for conducting Verification Investigations. This annual plan determines the approximate percentage of products from the EPEAT Registry that are sampled; the number of Verification Rounds; the timing of Verification Rounds; and the type(s) of Investigations (Level 0-3).

11.2. This annual plan is approved by the EPEAT Operations Manager. The annual Verification Plan is not published or otherwise made public.

11.3. GEC publishes an annual Verification Calendar that specifies the timing of Verification Rounds and the Investigations Level(s) planned for each Round (Levels 0-3).

11.4. The annual plan may be modified by Conformity Assurance Staff during the course of the year. These modifications must be approved by the EPEAT Operations Manager. Records of the modification(s) are saved.

**12. Developing and Publishing Verification Round Plans**

12.1. For each Verification Round, GEC determines the criteria, investigation methods and products that will be investigated.

12.2. Verification Round Plans specify:

- The standard being investigated;
- The specific criteria being investigated;
- The method that GEC will use to select products for Investigation (see section 13);
- The steps that GEC will take to execute the Verification Round;
- The level of Investigation (Level 0-3);
- The names of the CDP members; and
- Identification of the CABs that may be involved in the Round.

12.3. In instances where an Investigation targets a specific Manufacturer, product or criteria for cause, the Conformity Assurance staff describes in the Verification Round Plan the nature of the concerns without identifying the product(s) or Manufacturer(s).

12.4. Verification Round Plans are developed by Conformity Assurance Staff, taking into consideration:

- The Annual Verification Plan;
- Results of past Verification Rounds;
- Inconsistent declaration in the Registry and informal Registry research indicating areas of high risk or low risk of Non-conformance;
- Declarations to rarely claimed criteria;
- Declarations in new countries;
- Recent interpretations or clarifications to criteria in GEC approved standards;
- Newly added product categories (i.e. tablets and slates); and
- Complaints.

12.5. For Level 1, 2 and 3 Investigations, the Verification Round Plan is published prior to the start date of the Round. The Verification Round Plan is published after a snapshot of the Registry has been taken and products selected for Investigation (see section 13) but the Round Plan does not identify the products and Participating Manufacturers being investigated.

For Level 0 Investigations, the Verification Round Plan is published after the Level 0 Investigations are completed and before the start of any related Level 1 Investigations.

**13. Product Selection**

13.1. Approximately 1-2 weeks before the start date of the Round, a snapshot of the EPEAT Registry is taken. Products are selected for Investigation from this point-in-time snapshot.

13.2. Products may be selected randomly or for cause.

13.3. For Verification Rounds where products are selected for cause, declarations that are at greater risk of being inaccurate are targeted. When selecting products for cause, Manufacturer past performance, input from external parties, declarations to rarely claimed criteria, declarations in new countries, products affected by recent interpretations or clarifications, complaints and inconsistent declarations in the Registry are taken into consideration

13.4. In Level 2/3 investigations, Conformity Assurance staff ensures to the extent possible that products are available on the market before assigning the investigations to CABs.

13.5. Once products are selected, Conformity Assurance staff confirms the declaration is valid for the selected product and assigns a unique number to each Investigation.

**14. Verification Round Preparation**

14.1. Prior to the start of each Verification Round using Level 0/1 Investigations, the Conformity Assurance Staff reviews with the CDP the criteria that are being verified and reviews Conformance Packets to ensure common understanding and consistent interpretation of the criteria. Conformance Packets are used to develop trainings for CABs and Manufacturers are not published.

14.2. Prior to the start of each Verification Round using Level 0/1 Investigations, the conformity assurance staff may conduct training for CABs on the criteria being verified. The trainings may include, but are not limited to, explanations and interpretations of the criteria, common Non-conformances, acceptable forms of evidence of conformance and any other information that facilitates execution of the Round.

14.2.1. CABs are required to have at least one staff person attend these trainings. This CAB staff person will be involved in the EPEAT program.

14.2.2. These trainings are optional for Manufactures.

14.2.3. Trainings materials may be made available upon request.

14.3. Prior to the start of each Verification Round using Level 2/3 Investigations, conformity Assurance staff should review with the CDP the criteria that are being investigated to ensure common understanding and consistent interpretation of the criteria. If necessary, the Conformity Assurance staff provides training or written guidance to CABs and/or testing laboratories.

**15. Conducting Verification Rounds**

15.1. Level 0 Investigations

15.1.1. GEC defines the start date of Verification Rounds using Level 0 Investigations, the length of the Investigation Period and date when Investigation Reports must be submitted to GEC.

15.1.2. Manufacturers are not informed they have been selected for Level 0 Investigations.

15.1.3. The CAB Auditor conducts the Investigation by searching publicly available information and make a recommendation on conformity.

15.1.4. If publicly available information does not demonstrate Conformance, the Auditor recommends Inconclusive.

15.1.5. The Auditor completes the relevant sections of the Investigation Report.

15.1.6. Investigation Reports are submitted by the CAB to GEC before or on the date defined. The CAB removes any information that may identify the Manufacturer being investigated before the Investigation Report is submitted to GEC.

15.1.7. The Conformity Assurance staff member reviews the report.

15.1.7.1. If the CAB recommendation is Conformance or Inconclusive, the Conformity Assurance staff member may make a decision based on the report by the CAB to accept the recommendation. If the report does not support a CAB recommendation of Inconclusive or Conformance, the Conformity Assurance staff member may also submit the report to the Conformity Decision Panel for their review and decision.

15.1.7.2. If the CAB recommendation is Non-Conformance, the Conformity Assurance staff member submits the report to the CDP for their review and decision.

15.1.8. For decisions of Conformance, the Conformity Assurance staff member amends the Investigation Report to reflect the decision. The report is sent to the CAB, which is responsible for sending it to the Manufacturer. The Investigation is complete.

15.1.9. For decisions of Inconclusive, the Conformity Assurance staff member amends the Investigation Report, sends the report to the CAB and a Level 1 Investigation is launched.

15.2. Level 1 Investigations

15.2.1. GEC defines the start date of Verification Rounds using Level 1 Investigations. The Investigation Period for Level 1 Investigations is 60 days, and CABs have 60 days from the start of the date of Round to complete their Investigations. GEC defines the date that CABs must submit their Investigation Reports to GEC, typically one week after the end of the Investigation Period.

15.2.2. Approximately 1-2 weeks prior to the start date of the Verification Round, the Conformity Assurance staff informs CABs of the products that have been selected, the official start date of the Round and the end date of the Investigation Period.

15.2.3. On the start date of the round, CABs contact their client Manufactures to inform them they have been selected for Verification. CABs do not inform their client Manufacturers they are being targeted for an Investigation prior to the start date of the Round.

15.2.4. In instances where the CAB's client Manufacturer is unresponsive to the CAB's requests for information, the CAB may request that GEC intervene with their client Manufacturer directly.

15.2.5. The CAB Auditor conducts the Investigation and completes the relevant sections of the Investigation Report.

15.2.6. At the end of the Investigation Period the CAB must also provide a copy of the reviewed IR to their client Manufacturer, as a draft, so that the Manufacturer is informed of the CAB's recommendation on conformity.

15.2.7. Investigation Reports are submitted to GEC before or on the date defined.

15.2.8. Conformity Assurance Staff

15.2.9. If the CAB recommendation is Non-Conformance the Conformity Assurance staff member submits the report to the CDP for their review and decision. This ensures all recommendations of Nonconformance are reviewed by the Conformity Decision Panel. The only exception is if a CAB recommendation is Nonconformance because the Manufacturer did not provide any documentation. In this instance, the Conformity Assurance staff member makes the final decision based on the CAB recommendation.

15.2.10. If the CAB recommendation is conformance, the Conformity Assurance staff member will review the report. If the report clearly supports the CAB recommendation of, the

Conformity Assurance staff may accept the CAB recommendation or may choose to have the CDP review the report and make the final decision. In any instances where the report does not clearly support the CAB recommendation of conformance, the CDP will review the report and make the final decision.

15.2.11. Conformity Assurance staff amends the Investigation Report to reflect the final decision and any comments. The report is sent to the CAB, which is responsible for sending it to their Manufacturer.

15.2.11.1. For decisions of Conformance, the report is considered final and the Investigation is complete

15.2.11.2. For decisions of Non-Conformance, the corrective action phase is launched (see section 17).

15.3. Level 2/3 Investigations

15.3.1. Level 2 and 3 Investigations do not have a fixed timeframe. GEC specifies the start date of the Verification Round, the start date of the Investigation Period and the length of the Investigation Period, based on the number of Investigations and types of testing and analysis being conducted.

15.3.2. GEC and the CAB determine how the product will be obtained (e.g. bought in the open market).

15.3.3. Each year CAB may need to obtain at least one product and no more than the number of products which is equal to 20% of the number of manufacturers each CAB has as clients in each standard. These are not limits on expensive products but are yearly limits for Level 2/3 testing. In extraordinary circumstances GEC reserves the right to add additional testing.

15.3.3.1. **Products that cost less than $10,000:** If a product chosen for Level 2 and / or 3 investigation costs less than $10,000, the CAB must purchase the product and conduct the Level 2/3 investigation(s) according to the requirements outlined in P5 EPEAT Requirements of CABs.

15.3.3.2. **Products that cost $10,000 or more:** If a product chosen for a Level 2 and / or 3 investigation costs $10,000 USD or more, the CAB may work with the EPEAT Program and the Manufacturer to find an alternate way to verify conformance to the identified criteria. Alternate ways to verify conformance may include:

- Provision of specified parts for lab testing. CAB requests the Bill of Materials for the product from the Manufacturer. Utilizing guidance in the Conformity Assessment Protocols the CAB identifies high risk parts. The CAB is responsible for obtaining high risk parts from the Manufacturer or from a Manufacturer-authorized spare parts or service provider. The CAB conducts the Level 2/3 investigation according to the requirements outlined in P5 EPEAT Requirements of CABs. Adjustments to the scope of the investigations may need to be made by GEC.
- On-site inspection or testing. CAB would arrange for an Auditor who has passed EPEAT training to visit a manufacturing, assembly, configuration, or service site to access parts for visual inspection, photographing, offsite testing, or otherwise verify conformance. Any parts that are damaged or that leave the facility would be at CAB expense. If onsite visit is chosen then arrangements must be preapproved by GEC, the Manufacturer, and relevant on-site

personnel. Testing and inspection are performed according to the requirements outlined in P5 EPEAT Requirements of CABs.

- On-site Conformity Assurance System (CAS) Audit. CAB would arrange for an Auditor to visit a manufacturing or other facility where parts are inspected, and verify that the Manufacturer's Conformity Assurance System (CAS) relative to the selected parts and criteria is documented, is implemented, and is effective at assuring conformance. If onsite CAS audit is chosen then arrangements must be preapproved by GEC, the Manufacturer, and relevant on-site personnel. Auditing is performed according to the requirements of ISO/IEC 17021.
- Other approaches approved in advance by GEC and acceptable to the Manufacturer.

The approach will depend on the criteria selected for verification. GEC understands that alternate approaches may extend the normal verification timeframe.

15.3.4. In some Level 2 and 3 Investigations, a single product may be tested for conformance to multiple criteria. In these instances, a unique Verification Investigation number is assigned for each criterion being assessed.

15.3.5. A laboratory conducts testing and analysis (see P5 Requirements of CABs for requirements regarding qualified laboratories).

15.3.6. The CAB completes the relevant section of the Investigation Report and make a recommendation on conformity based on the testing and analysis performed by the laboratory.

15.3.7. Investigation Reports are submitted to GEC before or on the date defined.

15.3.8. At the end of the Investigation Period the CAB must also provide a copy of the reviewed IR to their client Manufacturer, as a draft, so that the Manufacturer is informed of the CAB's recommendation on conformity.

15.3.9. Once the Investigation Report is reviewed by the CAM it is submitted to the CDP for their review and decision.

15.3.10. The CDP makes a decision on conformity.

15.3.11. GEC amends the Investigation Report to reflect the CDP decision on conformity. The report is sent to the CAB, which is responsible for sending it to the Manufacturer.

15.3.11.1. For decisions of Conformance, the report is considered final and the Investigation is complete

15.3.11.2. For decisions of Non-Conformance, the corrective action phase is launched (see section 17).

**Table 1:** Decision Making by Investigation Level and CAB Recommendation

| **Level 0 Investigations** | |
|---|---|
| **CAB recommendation** | **Decision made by** |
| Conformance | CDP or Conformity Assurance Staff |
| Inconclusive (no information publicly available) | Conformity Assurance Staff |
| Demonstrated Non-Conformance | CDP |
| First time a criterion is being verified | CDP |
| **Level 1 Investigations** | |

| CAB recommendation | Decision made by |
|---|---|
| Conformance | CDP or Conformity Assurance Staff |
| No documentation provided | Conformity Assurance Staff |
| Manufacturer only provides declaration | Conformity Assurance Staff |
| Insufficient documentation to prove conformance | CDP |
| Demonstrated non-conformance | CDP |
| Cancelled | CDP |
| Inconclusive | CDP |
| First time a criterion is being verified | CDP |
| **Level 2/3 Investigations** | |
| **CAB recommendation** | **Decision made by** |
| Conformance | CDP |
| Non-Conformance | CDP |
| Inconclusive | CDP |
| No product is provided for testing | Conformity Assurance Staff |

**16. CDP and Conformity Assurance staff member review of Investigation Reports and Decision on Conformity**

16.1. The CA staff member collects the Investigation Reports from all CABs involved in the Round.

16.2. If the CA staff member has not made a decision on conformity as per 15.1.7, 15.2.7, or 15.2.8, the CA staff member provides the Investigation Reports to the CDP for their review. The evidence provided by the Manufacturer to the CAB during the Investigation Period is not provided to the CDP.

16.3. In Level 1, 2 and 3 Investigations, the CDP may be unable to make a determination of conformity based on the evidence presented. In these cases, the CDP makes a determination of "Inconclusive" and recommends appropriate actions to resolve or conclude the Investigation (e.g. cancelling the Investigation).

16.4. The CDP makes decisions of conformity as a body. Each CDP member votes once and decisions are based on the votes. Quorum is a simple majority.

16.4.1. During Verification, the CPD makes two types of decisions: decisions on conformity during Verification Investigations and decisions on corrective actions during the corrective action phase.

16.4.2. Routine decisions on conformity and corrective action may be made with a full vote or a quorum of CDP members.

16.4.2.1. In instances where quorum is reached but votes are not unanimous, the decision of the CDP is that of the majority of members.

16.4.2.2. In instances where majority decision is not made but quorum is met, the CDP to deliberate in good faith to reach a majority decision.

16.4.3. All CDP members must vote in instances where the standard or verification requirements are unclear and the CDP must therefore interpret the standard or verification

requirements in order to make a conformity decision. The conformity assurance staff member who is managing the Round is responsible for determining if this condition is met.

16.4.4. CDP members may abstain from voting if they have a conflict of interest or are unable to render an impartial and unbiased decision. If a CDP member abstains from voting, the requirement that all CDP members must vote (16.6.3) does not need to be met.

16.5. If the CDP has questions or requests for clarification, the Conformity Assurance staff member facilitates the exchange of information between CABs and the CDP.

16.6. The decisions of the CDP or Conformity Assurance staff members are not communicated or considered final until all of the Investigation Reports from the Verification Round have been reviewed. This ensures consistency in the CDP's decisions.

16.7. Once the CDP or CA staff member had made a decision, the CA staff member completes the relevant parts of the Investigation Report recording the decision and any CDP comments and sends it back to CAB, which is responsible for sending it to the Manufacturer.

16.8. Manufactures may appeal a CAB's recommendation of Non-conformance. Such appeals are handled directly by the CAB. In instances where a Manufacturer has appealed a CAB's recommendation of Non-Conformance, the CDP does not review the Investigation Report until after the CAB's appeal process is complete.

**17. Corrective Action Phase**

17.1. GEC defines the start date of the Corrective Action Phase. The start date of the Corrective Action Phase is typically one week after the CABs are informed of the CDP's decision on conformity.

17.2. Manufacturers have 14 days from the date they are informed by their CAB of the Non-Conformance to take corrective action to restore the accuracy of the Registry.

17.3. The CAB is responsible for notifying their Manufacturers of any Non-Conformances raised during Verification. The Manufacturer is also informed that they must determine if other products on the EPEAT Registry may be affected by the issues(s) underlying the Non-Conformance. A summary of the Manufacturer's analysis of potentially affected products is included in the Investigation Report.

17.4. Manufacturers are responsible for making corrections to restore the accuracy of the Registry. There are four ways a Manufacturer may correct a Non-Conformance and restore accuracy of the Registry.

17.4.1. A Manufacturer may undeclare the criterion for the product that was investigated.

17.4.2. A Manufacturer may remove the non-conformant product from the Registry (also referred to as "archiving the product").

17.4.3. The Manufacturer may supply additional evidence to the CAB that demonstrates product conformance. This must be evidence that was NOT supplied to the CAB during the Investigation Period.

17.4.4. The Manufacturer may make changes to their product and/or practices to come into conformance with the criterion.

17.5. Once the Manufacturer has submitted evidence of their corrective action, the CAB reviews the corrective action.

17.6. If Manufacturer corrects the Non-conformance using steps 17.4.1 or 17.4.2 (undeclaring the criterion or removing the product from the Registry):
17.6.1. The CAB accepts the corrective action.
17.6.2. The CAB completes the relevant section of the Investigation Report and sends it to GEC.

17.7. If Manufacturer corrects the NC using steps 17.4.3 or 17.4.4:
17.7.1. The CAB reviews the corrective action.
17.7.2. If the CAB finds the corrective action acceptable, the CAB recommends acceptance. The CAB completes the relevant section of the Investigation Report and sends it to GEC. The CDP decides if the corrective action is acceptable. If the CDP finds the corrective action acceptable, the product remains on the Registry. If the CDP finds the corrective action is not acceptable, the CAB or the Manufacturer must restore the accuracy of the Registry.
17.7.3. If the CAB finds that the corrective action is not acceptable and the 14 day Corrective Action Phase has not ended, the CAB continues to work with the Manufacturer to obtain evidence of conformance.
17.7.4. If the Manufacturer is unable to take corrective action that the CAB finds acceptable within 14 days, the Manufacturer takes steps to restore the accuracy of the Registry (e.g. undeclaring the criterion or archiving the product). If the Manufacturer does not restore the accuracy of the Registry, the CAB is responsible for restoring accuracy of the Registry. The CAB completes the relevant sections of the Investigation Report, indicating that the corrective action is not acceptable and the steps taken to restore accuracy of the Registry.

17.8. At the end of the 14 Corrective Action Phase, the CAB puts the Manufacturer back On Desk Review for the criterion that was found non-conformant.
17.8.1. If the Manufacturer has corrected the Non-Conformance using steps 17.4.3 or 17.4.4, the CAB may elect to not put the Manufacturer back On Desk Review for the non-conforming criterion if the Manufacturer has demonstrated competence at proving conformance through their corrective action
17.8.2. The steps in section 7 of P16 *CAB Manual: EPEAT Conformity Assurance Requirements* must be followed to remove a Manufacturer's Desk Review.

17.9. GEC publishes an Outcomes Report at the conclusion of the Verification Round, identifying the criteria investigated, methods of Investigation, methods of selecting products for Investigation, the resulting conformity decisions, the identity of the products and Manufacturers that received Non-Conformances, and the actions that were taken to restore the accuracy of the Registry.

17.10. **Corrective Action for Potentially Affected Products**
17.10.1. When receiving a Non-Conformance during a Verification Investigation, Manufacturers are required to conduct an analysis of other products that may be affected by the issue underlying the Non-Conformance. Manufacturers must develop a corrective action plan for addressing these potential Non-Conformances.

17.10.2. The analysis of potentially affected products and correction action plan are submitted to the Manufacturer's CAB by the end of the 14 day Corrective Action Phase.

17.10.3. CABs are responsible for reviewing and accepting the Manufacturer's list of potentially affected products, their corrective action plan and timeframe for implementing corrective actions. This information is recorded in the Investigation Report.

17.10.4. CABs are responsible for following up with their Manufacturers to ensure the corrective action plan is implemented.

17.10.5. Once corrective action plans are implemented, CABs report to GEC on the steps taken to restore accuracy of the Registry.

17.10.6. GEC may follow up with CABs to ensure effective implementation of corrective action plans for similarly affected products.

**18. Outcomes reports**

18.1. GEC publishes an Outcomes Report for each Verification Round after all of the corrective actions are completed. Outcomes Reports identify the criteria investigated, methods of Investigation, methods of selecting products for Investigation, the resulting conformity decisions, the identity of the products and Manufacturers that received Non-Conformances, and the actions that were taken to restore the accuracy of the Registry.

Figure 1: Verification Investigation Procedure

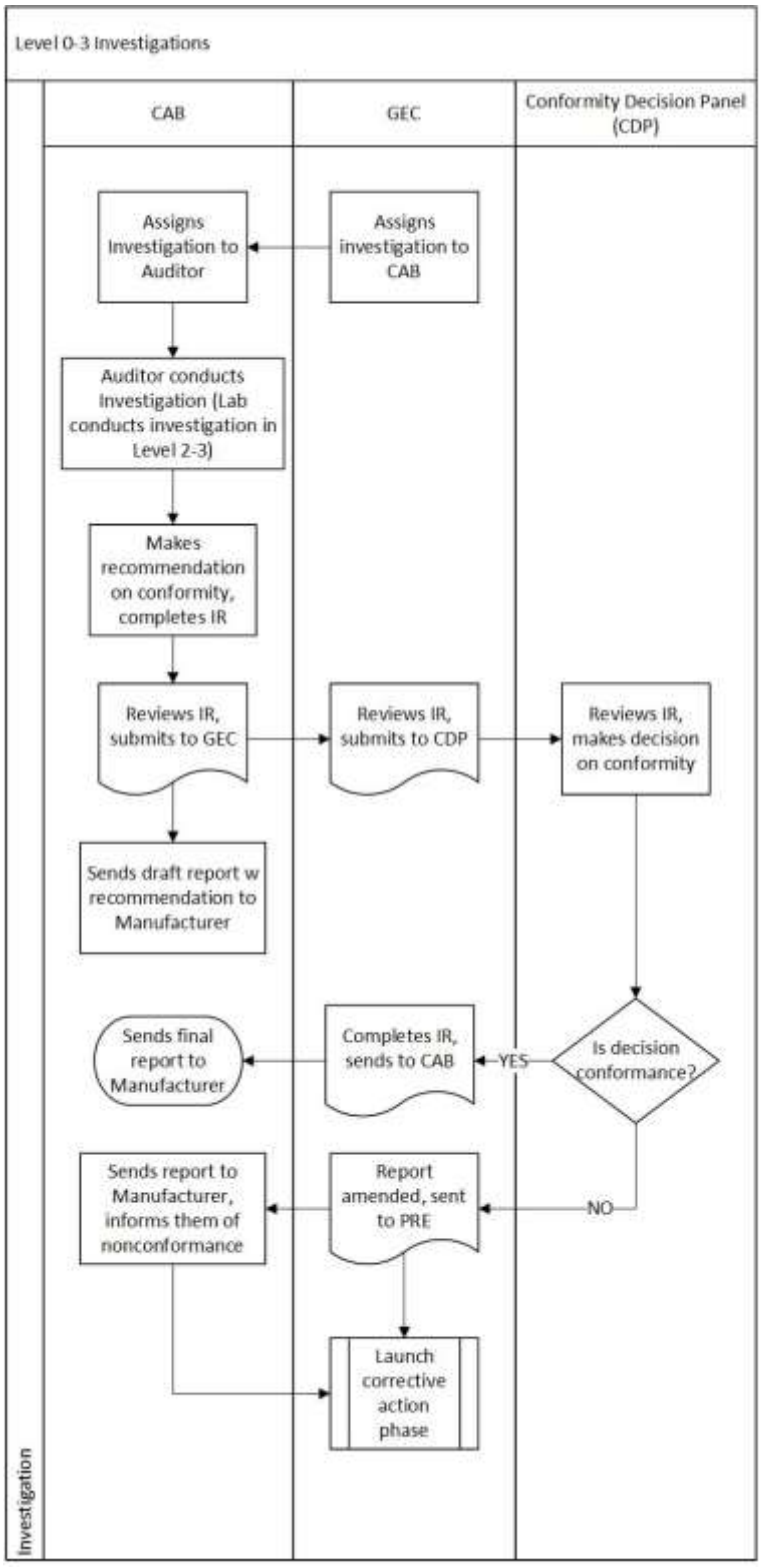

Figure 2: Corrective Action Process