CONFORMITY ASSURANCE BODY MANUAL:
EPEAT CONFORMITY ASSURANCE REQUIREMENTS

1. PURPOSE

The purpose of this Manual is to set out the requirements that all CABs must follow when conducting EPEAT Conformity Assurance activities, including Desk Review and Verification Investigations.

2. SCOPE

This Manual applies to all GEC approved CABs and to the EPEAT Conformity Assurance Services they provide.

Any clauses written as "shall", "must" or "will" indicate a requirement of the EPEAT Conformity Assurance process. Any clauses written as "should" or "may" indicate permissions or best practices and are not considered requirements. In general, if a CAB does not follow a "should"/best practice, they must be prepared to justify why or to demonstrate they have a comparable process that meets the intent of the clause.

3. TERMS AND DEFINITIONS

Activating a Product— when a CAB allows a product to appear on the EPEAT Registry.
CDP Deliberation Period—period after the Investigation Period when the CDP reviews IRs and makes determinations of conformance.
Conformity Assurance Body (CAB)—a conformity assurance body in the EPEAT System. CABs may also be referred to as PREs (Product Registration Entities).
Conformity Decision Panel (CDP)—independent body that makes decisions of conformance during Verification Investigations. The CDP may also be referred to as the PVC (Product Verification Committee).
Corrective Action Phase—14 day period when Manufacturer's must correct Non-Conformances identified during Verification Investigation.
Investigation Period—period when CABs or labs are actively conducting Verification Investigations
Investigation Report (IR)—report form completed by CABs as part of Verification Investigations.
Registry—a comprehensive list of the products that meet the environmental requirements of standards that are implemented in EPEAT.
Verification—surveillance process for checking the accuracy of declarations made the in Registry
Verification Investigation—a specific instance of Verification.
On Desk Review – status of a Manufacturer who has not demonstrated their competence at proving conformance to a specific criterion. When a Manufacturer is On Desk Review for a criterion, their claims against that criterion must be reviewed by their CAB before appearing publicly in the EPEAT Registry.
Off Desk Review – status of a Manufacturer who has demonstrated competence at proving conformance to a criterion. When a Manufacturer is Off Desk Review for a criterion, they may make claims against that criterion directly in the EPEAT Registry without oversight of a CAB.

4. APPROVALS

Author: EPEAT Operations Manager
Approver: EPEAT Director

5. REFERENCE DOCUMENTS

GEC approved standards
ISO/IEC 17020:2012
P35 and P36 *EPEAT Investigation Report Form*
P5 *EPEAT Requirements for CABs*
P15 *Verification Investigation Procedure*
P8 *Complaints and Appeals*

6. CHANGE HISTORY

Issue	Revision	Author	Description of Change	Approver	Date Approved
1	0	M. Bower	Initial release	J. Omelchuck	11/5/15
1	1	M. Bower	Changed length of Level 1 Investigations from 30 to 60 days in 8.3.4; added requirement to redact Manufacturer identifying information in 8.4.5	J. Omelchuck	8/8/16

7. DESK REVIEW

During Desk Review, a CAB evaluates a Manufacturer's declarations and determines if the Manufacturer understands the specified criterion and can provide evidence to demonstrate that the criterion is met. Desk Review is the CAB's opportunity to ensure that they and their client Manufacturers share a common understanding of the requirements, conformity and what evidence is needed to demonstrate conformance on an ongoing basis. Desk Review is critical to assuring and maintaining the accuracy of the Registry and to avoiding Non-Conformances. The Desk Review process is illustrated in Figure 1.

Types of Desk Review Decisions

For product-specific criteria, there are two different types of decisions made in the process of Desk Review, and each of the decisions is recorded differently using the Registry software.

- **Decision on criterion conformance:** In the first type of decision, the CAB evaluates and approves a specific declaration to appear in the Registry because the Manufacturer has provided the necessary evidence. This type of decision is based on evaluation of evidence provided by the Manufacturer and determination of conformance to the specified criteria.
- **Decision on criterion competence:** The second type of decision is when a CAB evaluates a Manufacturer's performance in providing appropriate evidence and determines the Manufacturer's competence at proving conformance. When the Manufacturer has demonstrated competence the CAB may choose to take the Manufacturer "Off Desk Review" for that criterion. When a Manufacturer is "Off Desk Review" the Manufacturer may claim conformance to that criterion without approval by the CAB. Those declarations appear in the registry immediately. This second type of decision requires CABs to use professional judgement in making the determination that a Manufacturer has demonstrated competence at proving conformance.

For product specific criteria, the decision on criterion Conformance and decision on criterion competence are two separate decisions that may be made at different points in time.
However, for corporate criteria, the decision on criterion Conformance and decision on criterion competence are not separate decisions. If the CAB makes a positive decision on criterion Conformance for a corporate criterion, the Manufacturer is effectively "Off Desk Review".

Types of Desk Review
There are two types of Desk Review: Initial Desk Review and Ongoing Desk review.

Initial Desk Review takes place when a new Manufacturer is registering their first product(s) to a standard on the EPEAT Registry. Each Manufacturer registering products for the first time starts out "On Desk Review" for all criteria, meaning each of their declarations must be reviewed and approved by their CAB.

Ongoing Desk Review takes in several instances:

- When a Manufacturer that is actively participating in EPEAT first declares a criterion which they have not previously claimed.
- When a CAB loses confidence in a Manufacturer's ability to prove conformity to a criterion, usually as a result of a Non-Conformant decision during Verification (Nonconformity Desk Review).
- When a subscriber transfers products from one CAB to another CAB (Transfer Desk Review).

7.1. Determining Conformance

A CAB determines if a Manufacturer meets a specified criterion by requesting and evaluating the evidence. When assessing Conformance to specified criteria, the CAB must use the following normative requirements and guidance:

- Criteria text in the specified standard (normative)
- Verification Requirements in the specified standard (normative)
- Published IEEE Interpretations (normative)
- Published CDP Clarifications (normative)
- Published Conformity Assessment Protocols and/or Conformity Packets (guidance)

7.2 Assessing Manufacturer Competence

Assessing a Manufacturer's ability to provide appropriate evidence of conformity on an ongoing basis requires the CAB to use their professional judgment to assess the Manufacturer's competence. Positive indicators of competence include:

- Manufacturer supplies correct/accurate evidence with minimal guidance from CAB
- Manufacturer clearly indicates how evidence demonstrates Conformance (e.g. by directing the CAB to specific pages in a manual or indicating within a test report where the relevant test results can be found)
- For criteria that include multiple elements, Manufacturer demonstrates Conformance to ALL elements of the criterion
- Manufacturer applies appropriate normative references.

The following are indicators that the competence threshold is not being met:

- Manufacturer shows continued inability to provide relevant and adequate evidence and/or documentation
- Manufacturer does not supply evidence to support Conformance to ALL elements of a criterion
- Manufacturer provides CAB with large amounts of evidence (e.g. manuals, tests results) without indicating how the evidence demonstrates Conformance
- Manufacturer provides evidence that clearly demonstrates Non-Conformance (e.g. test report that shows non-conformant levels)
- Manufacturer provides the wrong type of evidence (e.g. CAB requests a test report for specific substances and Manufacturer provides a test report that does not include the requested information)
- Manufacturer consistently does not apply appropriate normative references.

It may be necessary for the CAB to review the same criterion for multiple products before they are confident in the Manufacturer's competence to provide evidence of Conformance when requested.

7.3. Desk Review Records

CABs must maintain records of the Desk Review they conduct of all Manufacturers, including records of the decisions to take Manufacturers Off Desk Review and evidence to support such decisions.

7.4. Initial Desk Review

During Initial Desk Review, CABs must review at minimum the Priority Criteria (see section 7.4.1) before activating a Manufacturer's products on the Registry.

7.4.1. Priority Criteria

7.4.1.1. Recognizing the need for flexibility, especially at times when new standards become available and all Manufacturers must go through Initial Desk Review, GEC makes provisions for CABs to allow products to appear on the Registry before they have conducted a complete review of all of the criteria claimed by the Manufacturer.

7.4.1.2. When a new standard is implemented, and from time to time thereafter, GEC will define Priority Criteria. Priority Criteria are the minimum criteria that must be reviewed by the CAB before the CAB allows the Manufacturer's first products to appear on the Registry. If a CAB has completed Desk Review of the claimed Priority Criteria for a specific product, they may allow the product to appear on the Registry, even if there are additional claimed criteria which have not completed Desk Review.

7.4.1.3. If a CAB activates a product onto the Registry after reviewing on the Priority Criteria, the Manufacturer is still On Desk Review for all of the claimed criteria that were not reviewed. When activating products onto Registry without reviewing declared non-Priority Criteria, CABs must complete Desk Review of the remaining claimed criteria for the activated products within one year.

7.4.2. Product Sampling

If a Manufacturer submits more than one product during Initial Desk Review, the best practice is for the CAB to sample several products from the batch and review different sets of criteria

for each product. The Desk Review (including Desk Review of Priority Criteria) may be spread across several products in this way.

If a CAB is sampling several products in a batch, the CAB must have completed Desk Review for all of the sampled products before any of the products in the batch are activated to the Registry.

7.4.3. Desk Review Plan

When a Manufacturer submits to their CAB their initial product declarations, the CAB must communicate the specific products and criteria that will be reviewed before the Manufacturer's initial products can be activated to the Registry.

7.5. Ongoing Desk Review

7.5.1. Once a Manufacturer registers their initial products, they are still On Desk Review for any claimed criteria which have not been reviewed by the CAB, or criteria for which they have not demonstrated competence at proving conformance.

If the Manufacturer's initial products were activated to the registry using the Priority Criteria approach described above, the CAB must complete Desk Review for the claimed non-Priority Criteria within one year. After reviewing the Manufacturer's declarations, the CAB may take the Manufacturer "Off Desk Review" per section 7.7.

The CAB must follow the steps in section 7.1 through 7.4 when conducting Ongoing Desk Review.

7.5.2. When a Manufacturer receives a Non-Conformance from a Verification Investigation they have demonstrated the inability to prove conformance to a criterion and are placed back On Desk Review for that criterion. This may be referred to as Non-Conformance Desk Review

7.6. Transfer Subscriber Desk Review

7.6.1. Manufacturers may transfer their products from one CAB to another CAB. When transferring to a new CAB, a Manufacturer may transfer some or all of their products. A Manufacturer may retain more than one CAB at any time.

7.6.2. Transfer Manufacturers start out On Desk Review for all criteria. As with any new client Manufacturer the new CAB must conduct Desk Review in order to evaluate the transfer Manufacturer's conformance and competence at proving conformance.

7.6.3. When conducting Desk Review for a transfer Manufacturer the new CAB may develop a Desk Review plan (see section 7.4.3) that takes into account the number of products being transferred, the subscriber's experience with the EPEAT System and the subscriber's past performance in Verification Investigations and may adjust the Desk Review process accordingly. CABs may also take into account Desk Review performed by the Manufacturer's previous CAB.

7.7. Taking a Manufacturer Off Desk Review

A CAB should take a Manufacturer Off Desk Review for a criterion only when they have confidence in the Manufacturer's competence to demonstrate conformance when requested.

When a CAB determines that the Manufacturer is able to make accurate declarations to a criterion, they take the Manufacturer Off Desk Review for that criterion using the EPEAT Registry software.

The registry software records who clicked the "remove sub DR" button.

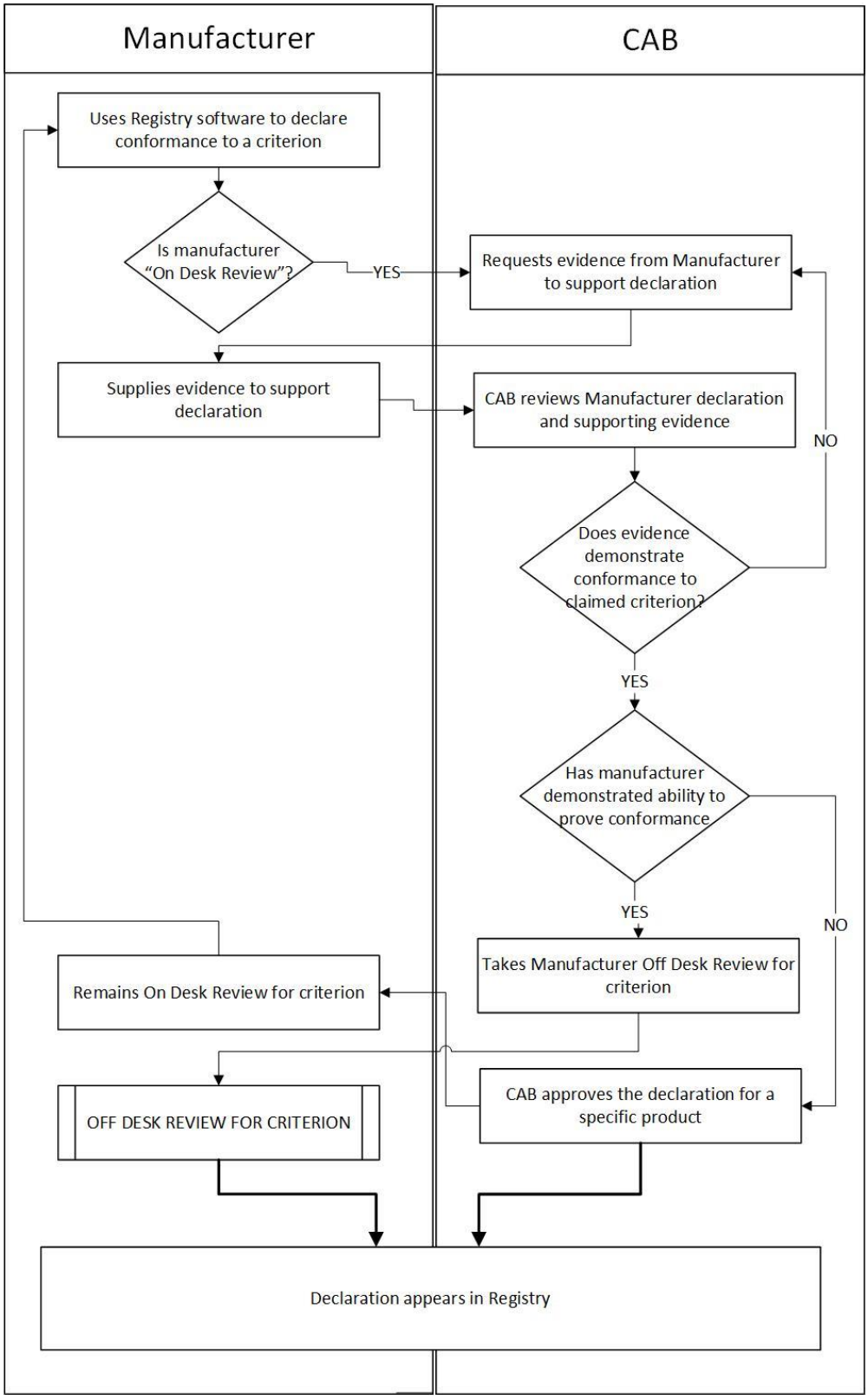

Figure 1: Desk Review Process

8. VERIFICATION

GEC ensures the accuracy of the EPEAT Registry through a surveillance process known as Verification. Verification tests the ability of Manufacturers to prove conformance of specific declarations in the Registry on an ongoing basis. All criteria of all products declared in all countries through all CABs are subject to Verification at any time.

Specific instances of Verification are called Verification Investigations. GEC assigns Verification Investigations, determining which criteria of which products will be investigated and the method of investigation (Level 0-3). Verification Investigations are assigned both randomly and for cause. Verification Investigations are usually conducted in batches known as Verification Rounds.

A Verification Round Includes the following periods: Investigation Period when CABs are actively conducting Investigations; CDP deliberation period, when the CDP reviews IRs and makes determinations on conformity and Corrective Action Phase, when Manufacturers correct the Non-Conformances found during Verification Investigations.

8.1. Assignment of Verification Investigations

GEC is responsible for developing Verification Round Plans which specify the criteria and products that will be investigated. GEC communicates to each CAB informing them of their Manufacturer's products that have been selected for Verification.

If a CAB's Manufacturer is selected for Verification, that CAB is responsible for conducting the Investigation and supporting the verification process.

In Level 2/3 Investigations, the CAB is required to obtain a product for testing and analysis. To reduce costs associated with Level 2/3 Investigations, in instances where GEC has randomly selected a product that costs more than $1,500 USD, the CAB and GEC may agree upon an alternate methods of verification (e.g. in-service testing or purchase of a component of the product).

8.2. Levels of Verification

When GEC assigns a verification Investigation to a CAB it also specifies which methods are to be used in the verification. There are four different methods for Investigation, known as Levels 0-3.

8.2.1. 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's investigation is 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.

8.2.2. 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.

8.2.3. Level 2: Inspection for conformance with the standard. In a Level 2 Investigation, the CAB buys or borrows products without the involvement of the participating Manufacturer, potentially has it disassembled, and inspects 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.

8.2.4. Level 3: Analytical testing of conformance to the standard. In a Level 3 Investigation, the CAB buys or borrows products 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.

8.3. Investigation Period Timeline

8.3.1. Prior to the start of the Investigation Period, GEC will inform the CAB which of their Manufacturers have been selected for Investigations, the criteria that are to be investigated and the type of investigation (Level 0-3) that will be done. This typically takes place 1-2 weeks prior to the start of the Investigation Period.

8.3.2. While CABs may discuss assigned Verification Investigations internally, including with their Auditors, CABs are NOT permitted to inform their Manufacturers that they have been selected for Level 1-3 Investigations prior to the start date of the Round. For Level 0 Investigations, CABs are NOT permitted to inform their Manufacturers that they have been selected for investigation until AFTER the end of the Level 0 activities once the CDP has made a decision on conformity.

8.3.3. For Level 0 Investigations, GEC defines the start date of Verification Round, the length of the Investigation Period and date when IRs must be submitted to GEC. IRs are typically submitted to GEC 7 days after the end of 30 day Investigation Period.

8.3.4. For Level 1 Investigations, GEC defines the start date of the Verification Round. In Level 1, the Investigation Period is 60 days. The CAB informs their Manufacturers that they have been selected for Verification on the start date of the Investigation Period. CABs have 60 days to obtain evidence of conformance from their Manufacturer and make a recommendation on conformity. GEC defines the date when IRs must be submitted to GEC. This is typically 7 days after the end of 60 day Investigation Period.

8.3.5. For Level 2 and 3 investigations, GEC determines the start date of the Investigation Period and the length of the Investigation Period based on the number of products and criteria being investigated. The CAB informs their Manufacturers that they have been selected for investigation once the product(s) has been obtained for testing.

8.4. Verification Investigation Procedure

8.4.1. For all Investigations, the CABs must report on the Investigation and make a recommendation on conformity using the EPEAT Investigation Report (IR) form.

8.4.2. In Level 0 and 1, CABs use the following documents to determine if the information made available by the Manufacturer demonstrates conformance:

- Criteria in the relevant standard, including requirements in the text of the criteria
- Verification Requirements from the relevant standard
- Applicable IEEE Interpretations
- Published CDP clarifications
- Published Conformity Assessment Protocols and Conformity Packets

8.4.3. For all Level 1 investigations, the CAB must obtain a signed "Declaration from Manufacturer."

8.4.4. At the end of the Investigation Period, the CAB completes the relevant section of the IR.

8.4.5. The CAB internally reviews IRs before submitting them to GEC. The review includes removal of any information identifying the Manufacturer being investigated. The CAB's review should address any inconsistencies or lack of clarity in the Auditors report. The reviewer at the CAB must have the same training as an Auditor.

8.4.6. Once the CAB's investigation is completed and the IR has been reviewed, the CAB sends it to GEC. The CAB must send any supporting evidence (such as lab test reports, certificates, other records supplied by the manufacturer, etc.) with the IR.

8.4.7. In a Level 1 Investigation, 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.

8.4.8. The CDP Deliberation Period commences after the conclusion of the Investigation Period. During the CPD Deliberation Period, the CDP may ask questions or seek clarifications from CABs through GEC. GEC may ask the CAB to supply additional evidence or information or to rewrite the IR.

8.4.9. The CDP makes a decision on conformity based on the IR.

8.4.10. Once the CDP has made a decision, a GEC CAM completes the relevant section of the IR. The IR is then sent back to the CAB and the CAB is responsible for sending the report to

their Manufacturer within 4 business days. If the CDP has decided conformity, the report is considered final. If the CDP has decided nonconformity, the report is not considered final and the Corrective Action Phase (see section 9) is launched.

Summary of Types of Verification Investigations				
Level	**Type of Inspection**	**When is Manufacturer notified?**	**Duration of round**	**What is evaluated?**
0	Desk Inspection of publicly available information	After the CDP has made a decision on conformity	Determined by GEC, usually 2-3 weeks	Publicly available information
1	Desk inspection of Manufacturer supplied verification evidence	On start date of round, determined by GEC	60 days after start date of round	Evidence supplied by Manufacturer
2	Inspection of conformance with the standard	Once product has been purchased and prepared for testing	Determined by GEC, based on # of investigations and types of tests performed by labs	Product
3	Laboratory analytical verification of conformance with the standard	Once product has been purchased and prepared for testing	Determined by GEC based on # of investigations and types of tests performed by labs	Product

9. CORRECTIVE ACTION PROCESS

If the CDP makes a decision of Non-Conformance during a Verification Investigation, the Manufacturer is required to take corrective action to address the Non-Conformance and restore accuracy of the EPEAT Registry. The corrective action process is described in Figure 2.

9.1. Corrective Action Phase Timeline

9.1.1. 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.

9.1.2. 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.

9.2. Corrective Action Process

9.2.1. 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.

9.2.2. 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.

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

9.2.2.2. A Manufacturer may remove the nonconformant product from the registry (also referred to as "archiving the product").

9.2.2.3. 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.

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

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

9.2.4. If Manufacturer corrects the nonconformance as per section 9.2.2.1 or 9.2.2.2:

9.2.4.1. The CAB accepts the corrective action.

9.2.4.2. The CAB completes the relevant section of the IR and sends it to GEC.

9.2.5. If Manufacturer corrects the nonconformance as per section 9.2.2.3 or 9.2.2.4:

9.2.5.1. The CAB reviews the correction

9.2.5.2. If the CAB finds correction acceptable, the CAB recommends acceptance. The CAB completes the relevant section of the IR and sends it to GEC. The CDP decides if the correction is acceptable. If the CDP finds the corrective action acceptable, the product remains on the Registry. If the CDP finds the correction is not acceptable, the CAB or the Manufacturer must restore the accuracy of the Registry.

9.2.5.3. If the CAB finds that the correction 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.

9.2.5.4. If the Manufacturer is unable to make a correction 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 restore the accuracy of the Registry, the CAB is responsible for restoring accuracy of the Registry. The CAB completes the IR, indicating that the correction is not acceptable and the steps taken by the CAB to restore accuracy of the Registry.

9.2.6. At the end of the 14 Corrective Action Phase, the CAB will put the Manufacturer back On Desk Review for the criterion that was found Non-Conformant.

9.2.6.1. If the Manufacturer has corrected the nonconformity as per section 9.2.2.3 or 9.2.2.4the CAB may elect to not put the Manufacturer back On Desk Review for the nonconforming criterion if the Manufacturer has demonstrated competence at proving conformance through their corrective action(s).

9.2.6.2. The relevant steps in section 7 of this procedure must be followed to remove a Manufacturer's Desk Review.

9.2.7. 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 were found Non-Conformant, and the actions that were taken to restore the accuracy of the Registry. At the discretion of GEC, situations may arise where the identity of products and manufacturer is not published.

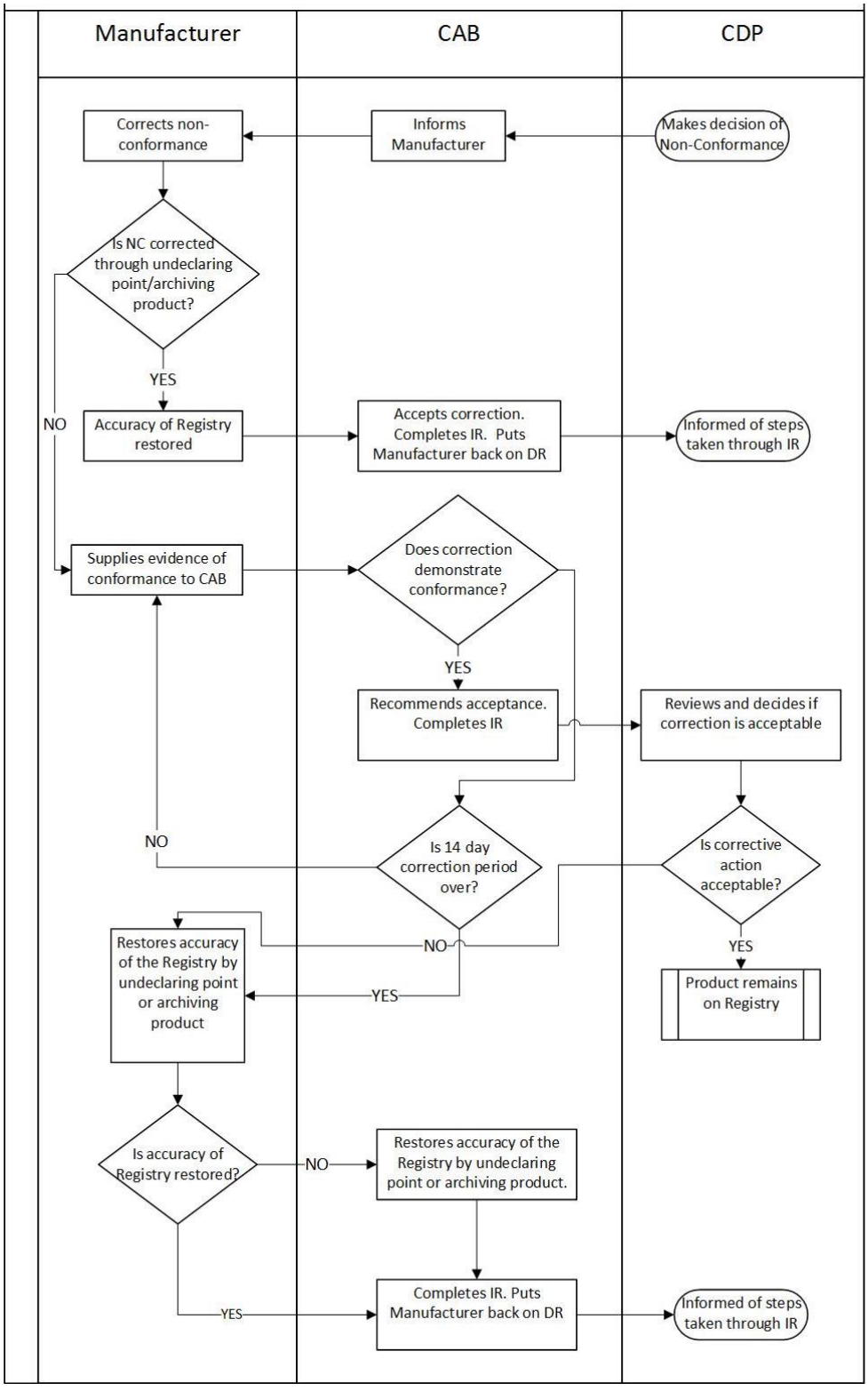

Figure 2: Corrective Action Process

9.3. Corrective Action for Potentially Affected Products

9.3.1. When found Non-Conformant during Verification Investigation, Manufacturers are required to conduct an analysis of other products that may be affected by the Non-Conformance. Manufacturers must develop a corrective action plan for addressing these potential non-conformances.

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

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

9.3.4. CABs are responsible for following up with their client Manufacturer's to ensure the corrective action plan is implemented.

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

9.3.6. GEC may follow up with CABs to ensure effective implementation of corrective action plans.

10. COMPLAINTS

10.1. Upon receiving a complaint relating to an EPEAT Registered product, the CAB will determine if the complaint relates to a product they support and to an issue within the scope of GEC approved standards.

10.2. If the CAB supports the product and the issue is within the scope of GEC approved standards, the CAB will conduct an investigation and resolve the complaint.

10.3. Once this determination is made, the CAB will have 30 days to complete the investigation and resolve the complaint.

10.4. The investigation and resolution should be appropriate for the severity of the complaint.

10.5. At the end of the 30 day period, the CAB will report to GEC on the steps taken to investigate and resolve the complaint.

10.6. GEC may take additional steps to resolve the complaint, including instructing the CAB to take additional action or targeting the Manufacturer/product in a Verification Investigation.

11. APPEALS

11.1. Subscribers may appeal a CAB's decision to recommend Non-Conformance during a Verification Investigation. Subscribers must appeal within ten days of receiving the draft IR from the CAB.

11.2. If a CAB receives an appeal to the recommendation made during a Verification Investigation, they have 4 days to determine if the appeal is valid.

11.3. If the appeal is valid, the CAB informs the GEC CAM who is managing the Verification Investigation round.

11.4. The CDP will postpone their review of the CAB's IR until the CAB has concluded with their appeals process.