

Green Electronics Council	Procedure for Issuing Clarifications	P 20 Issue 1, Rev 1
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1.0 Purpose:

This document describes the process for issuing formal Clarifications in instances where the requirements in a GEC approved standard are ambiguous or unclear.

2.0 Scope:

This procedure applies to Clarifications approved by the GEC Conformity Decision Panel.

NOTE: Clarifications do not change the wording of GEC approved standards. Standard Development Organizations (SDOs) that own the standards used by GEC may have processes for changing the wording of a standard or for explaining how the standard should be interpreted or implemented. Any clarifications, interpretations or other explanations issued by SDOs are also applicable in EPEAT.

3.0 Definitions:

Clarification - formal document explaining how conformity is judged within the EPEAT system.

Clarifications are applied when making determinations of conformity during Verification and Desk Review.

Conformity Assurance Manager (CAM)—GEC personnel responsible for managing conformity assurance activities for a GEC approved standard.

Conformity Decision Panel (CDP) – independent committee convened by the GEC to make decisions of conformity based on the recommendation of the Conformity Assurance Body (CAB).

Release Date – the date on which GEC published a Clarification for public comment

Effective Date – the date on which the Clarification is implemented in EPEAT and will be used in determining conformity.

4.0 Responsibilities

- Any stakeholder may request a Clarification
- It is the responsibility of the CAM to manage the process of the Conformity Decision Panel’s review and approval of a Clarification
- It is the responsibility of the Conformity Decision Panel to approve Clarifications

5.0 Approvals

Author: EPEAT Operations Manager

Approver: Executive EPEAT Director

6.0 Reference Documents

P15 Verification Procedure

P3 Guidelines on Conflict of Interest and Impartiality

P27 Clarifications form

7.0 Records

Name	Owner	Minimum Retention Time	Access	Location
Published Clarifications	CAMs	As long as the clarification is relevant	public	EPEAT website
CDP meeting notes	CAMs	3 years	GEC staff	GEC server

8.0 Change History

Issue	Revision	Author	Description of Change	Approver	Date of Approval
1	0	M. Bower	Initial Release	J. Omelchuck	11/24/15
1	1	M. Bower	Changes to section 9 to clarify conditions under which Clarifications are made, and to section 12 on Publishing Clarifications, Effective Date.	J. Omelchuck	5/19/16

9.0 Identifying the need for Clarifications

9.1 Any stakeholder may request that GEC issue a Clarification of the requirements in GEC approved standards. GEC may also initiate the process of issuing a Clarification.

9.2 Requests for Clarifications must be made in writing. The request must clearly identify the wording of the standard that is ambiguous or unclear. The request should identify examples of how the ambiguity may result in different findings of conformance. The request may also propose language to address the ambiguity or may provide a draft Clarification. There is no form that must be completed.

9.3 On receiving a request for clarification, GEC determines whether a Clarification is needed. If GEC determines that the wording of the standard is clear, unambiguous and/or addressed by previously issued Clarifications or Guidance, a Clarification is not issued and the requestor is informed of the decision and the reason. If GEC determines that the wording of the standard is unclear or ambiguous and a Clarification is needed GEC prepares and sends a proposed Clarification to the Conformity Decision Panel.

10.0 Reviewing Clarifications

10.1 The Conformity Decision Panel reviews the proposed Clarification. If the Conformity Decision Panel determines that the wording of the standard is clear or unambiguous, they may determine a Clarification does not need to be issued and the requestor is informed that a Clarification will not be issued.

10.2 The Conformity Decision Panel may edit the proposed Clarification as necessary.

10.3 When reviewing and approving the proposed Clarification, the Conformity Decision Panel considers the language of the standard and its apparent intent.

11.0 Approving Clarifications

11.1 The Conformity Decision Panel votes as a body to approve the Clarification.

11.1.1 All members of the Conformity Decision Panel must vote to approve a Clarification or abstain from voting.

11.1.2 Approval of a Clarification requires a simple majority of votes in support of the Clarification.

11.1.3 If the CDP is not able to reach a majority decision because a member abstains from voting, the CDP continues to deliberate in good faith to reach a majority decision.

12.0 Public Comment

12.1 Once the CDP votes to approve a Clarification, GEC releases it for public comment.

12.2 The public comment period lasts at least 30 days and any stakeholders may comment. Comments must be made in writing.

12.3 If significant comments are received, they are considered by the CDP. The CDP may amend the Clarification.

12.4 If the Clarification is substantially amended, GEC releases an updated Clarification for public comment, as per clause 12.

13.0 Publishing Clarifications, Effective Date

13.1 After considering comments received during the public comment period, GEC publishes the final Clarification and its planned effective date, which is typically 30 days after publication but may be longer, based on the impact of the Clarification.

13.2 Clarifications are applied to determinations of conformity made after the effective date. For Verification, Clarifications are applied when the effective date precedes the date when the snapshot of the Registry is taken at the launch of the round (see P15, clause 13).

Annex A: Flowchart

