Green Electronics Council Registry Services Department	Complaints and Appeals Procedure	P8 Issue 1, Rev0

1. **Purpose**

   This document describes the Green Electronics Council (GEC) procedure for handling complaints and appeals relating to the EPEAT Program.

2. **Scope**

   This process applies to: complaints relating to the EPEAT Program, including conformity assurance services provided by the Registry Services Department; complaints about GEC's administration of the EPEAT Program; and appeals to decisions made by the Conformity Decision Panel. Complaints and appeals relating to the Conformity Assurance Department of GEC are addressed in procedure QP 10.

3. **Definitions**:

   Appeal - a request by a Manufacturer or other stakeholder to reconsider a decision made by the Conformity Decision Panel. Appeals on Conformity Decision Panel decisions may only be made by Manufacturers. Appeals may be based on procedural or technical grounds.

   Complaint - an expression of dissatisfaction, other than an appeal, made to GEC by any person or organization. Complaints may relate to products on the EPEAT Registry or may relate to the services or activities of GEC.

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

   Procedural Appeal – an appeal made on the grounds that the conformity assurance decision is not correct because an internal or external process was not followed.

   Misuse of the Mark—any instance where the EPEAT Mark is used incorrectly, including (not limited to): placing the EPEAT Mark on a product that is not Registered and incorrectly reproducing the EPEAT Mark

   Misleading Claim—any instance, including verbal communications, of an inaccurate statement about EPEAT including misleading statements about the value and environmental benefits of EPEAT and incorrect statements about the status of products on the EPEAT Registry.

   Registered Product—product appearing on the EPEAT Registry

   Technical Appeal – an appeal made on the grounds that the conformity assurance decision is not correct because specified requirement was not interpreted correctly.

4. **Responsibilities**

   - It is the responsibility of the Credibility Manager to log and track complaints and open internal corrective actions as the result of complaints.
   - It is the responsibility of the Executive Director of Registry Services to manage complaints relating to Registered products.

- It the responsibility of GEC management to assign staff to investigate and resolve complaints relating to GEC services, activities and administration of the EPEAT Program
- It is the responsibility of the Conformity Decision Panel to review and make recommendations on technical appeals to Conformity Decision Panel decisions.
- It is the responsibility of the Appeals Committee to make decisions on technical and procedural appeals to Conformity Decision Panel decisions.

5. Procedure Review and Approval Authority:

Owner: Credibility Manager (CM)
Approver: Chief Executive Officer (CEO)

6. Related Documents

GEC approved standards
Conformity Assurance Protocols
Conformity Decision Panel Clarifications
IEEE Interpretations
P 28 Procedure on Misuse of the EPEAT Mark and Name

7. Records

Record Name	Owner	Access	Minimum Retention Time	Location
GEC Complaints and Appeals Log	CM	GEC CAB staff	3 years	GEC server

8. Change History

Revision	Owner	Description of Change	Approver	Date approved
1	M. Bower	Initial release of document	S. Davis	10/9/15

9. Complaints Relating to Registered Products

9.1. Any GEC personnel may receive a complaint regarding a Registered product. Personnel in receipt of a complaint about an EPEAT Registered product are responsible for informing the CM and the Executive Director of Registry Services (EDRS).

9.2. Complaints must be made in writing. There is no form that needs to be completed. The CM is responsible for logging all complaints.

9.3. If appropriate and feasible, the EDRS confirms receipt of the complaint. Within 5 business days of receipt of the complaint, the EDRS must determine if the complaint is valid relates to an issue within the scope of GEC approved standards. To be considered valid, complainants must clearly state the basis for their complaint and supply any applicable evidence.
NOTE: concerns about misuse of the EPEAT Mark and misleading claims are handled through P28 Misuse of the EPEAT Mark and Misleading Claims.

9.4. If the complaint is not within the scope of GEC approved standards or is not valid, the complainant is informed that no further investigation will take place. If the complaint is valid and within the scope of GEC approved standards, the complainant is informed that the CAB that supports the product will be investigating the complaint.

9.5. If the complaint is within the scope of the GEC approved standard, the EDRS informs the CAB that supports the product of the complaint.

9.6. The CAB that supports the product has 30 days to investigate the complaint and determine appropriate steps to resolve the complaint. Resolution of the complaint may involve the Manufacturer taking actions regarding the registered product, such as undeclaring a criterion.

9.7. The CAB provides the GEC with a report on the steps taken to resolve the complaint.

9.8. If the CAB has not resolved the complaint to the satisfaction of GEC, GEC may take additional steps to investigate and resolve the complaint, including directing the CAB to take additional steps or targeting the product or Manufacturer during Verification.

9.9. If appropriate and feasible, GEC provides the complainant with reports on the progress and outcomes of the investigation of the complaint.

10. Complaints Relating to GEC services, activities and administration of the EPEAT Program

10.1. Any GEC personnel may receive a complaint regarding GEC services or activities. Personnel in receipt of a complaint are responsible for informing the CEO and the CM.

10.2. Complaints must be made in writing. There is no form that needs to be completed. The CM is responsible for logging all complaints.

10.3. Within 5 business days of receiving the complaint, GEC evaluates the complaint and determines if it relates to the EPEAT Program and if it is valid. To be considered valid, complainants must clearly state the basis for their complaint and supply any applicable evidence.

10.3.1. If the complaint is valid, GEC assigns a staff person to manage, investigate and resolve the complaint. This staff person assigned will not be the subject of the complaint.

10.3.2. If appropriate and feasible, the staff person managing the complaint confirms receipt of the complaint.

10.3.3. If the complaint is not valid and does not warrant further investigation, the staff member managing the complaint informs the complainant.

10.4. The staff member managing the complaint is responsible for determining appropriate steps for investigating the complaint. The investigation should be appropriate for the severity of the complaint.

10.4.1. GEC makes reasonable efforts to keep the identity of the complainant confidential. If it is not possible to keep the identity of the complainant confidential, the complainant is informed, and has the option to withdraw the complaint if they wish.

10.4.2. If the complainant withdraws their complaint, GEC may elect to investigate without the statements or evidence supplied by the complainant and without identifying the complainant.

10.4.3. All steps taken to investigate the complaint will be documented.

10.5. Once the complaint is considered closed, the staff member managing the complaint informs the complainant of the outcome, if appropriate and feasible.

10.6. If necessary, GEC will open internal corrective action to address the root cause of the complaint and prevent reoccurrence.

11. Appeals to Conformity Decision Panel decisions

11.1. Manufacturers may appeal a Conformity Decision Panel decision of inconclusive or nonconformity or may appeal a Conformity Decision Panel decision that a corrective action is unacceptable.

11.2. GEC convenes an impartial Appeals Committee, members of which are not involved in the decision being appealed. The GEC Appeals Committee will be comprised of the EDRS, one member of the Committee on Safeguarding Impartiality and one Conformity Assurance Manager who was not involved in the decision being appealed. The Appeals committee reviews and makes decisions on appeals.

11.3. Manufacturers must appeal within 5 business days of receiving the IR provided to the Manufacturer by their CAB. Appeals are made to the Conformity Assurance Manager who is managing the Verification Round. Appeals may be made through a Manufacturer's CAB or to the Conformity Assurance Manager directly. CABs that are in receipt of an appeal from one of

their Manufacturers must immediately inform the Conformity Assurance Manager who is managing the Verification Round.

11.4. Appeals must be made in writing, and the Manufacturer must indicate if they are appealing on a procedural or technical basis. There is no form that needs to be completed. To be considered valid, the appellant must clearly state the reason for the appeal, state the relevant standards and clauses and supply any applicable evidence. Manufacturers may not appeal a Conformity Decision Panel decision of nonconformance in order to supply evidence that was not provided during the Verification Investigation.

11.5. The Executive Director of Registry Services who is responsible for evaluating the appeal and determining if it is valid. To be considered valid, complainants must clearly state the basis for their complaint and supply any applicable evidence. This evaluation takes place within 5 business days of receipt of the appeal.

11.6. If the appeal is not validated, the Manufacturer is informed and the appeal does not proceed further.

11.7. If the appeal is validated and proceeds to investigation, GEC is not be able to conceal the identity of the appellant from the Appeals Committee or the Conformity Decision Panel. The appellant is informed that their identity will be disclosed.

11.8. For technical appeals to Conformity Decision Panel decisions of nonconformance or inconclusive:

11.8.1. The Conformity Assurance Manager who is managing the round is responsible for gathering the necessary information on the appeal and providing this to the Conformity Decision Panel.

11.8.2. The Manufacturer may not supply additional evidence of conformance, beyond what was supplied during the Verification Investigation Round.

11.8.3. The Conformity Decision Panel reviews the same information that was provided to the CAB's during the verification round.

11.8.4. The Conformity Decision Panel reviews the appeal and makes a recommendation.

11.8.5. The GEC Appeals Committee reviews the Conformity Decision Panel's recommendation and makes a decision regarding the appeal. The Appeals Committee may take various actions to resolve the appeal including (but not limited to) granting the Manufacturer additional time to come into conformance, cancelling the investigation, or overturning the decision of the Conformity Decision Panel. The Conformity Assurance Manager who is managing the round informs the appellant and the Conformity Decision Panel of outcome and documents all of the steps taken to investigate and resolve the appeal.

11.9. For procedural appeals to Conformity Decision Panel decisions of nonconformance or inconclusive:

11.9.1. The Conformity Assurance Manager who is managing the round is responsible for gathering the necessary information on the appeal and providing this to the GEC Appeals Committee.

11.9.2. The Appeals Committee reviews the information and makes a decision regarding the appeal. The Appeals Committee may take various actions to resolve the appeal including (but not limited to) granting the Manufacturer additional time to come into conformance, cancelling the investigation, or overturning the decision of the Conformity Decision Panel.

11.9.3. The Conformity Assurance Manager who is managing the round informs the appellant and the Conformity Decision Panel of the outcome and documents all of the steps taken to investigate and resolve the appeal.

11.10. If a Manufacturer appeals a Conformity Decision Panel decision of nonconformance/inconclusive and the Appeals Committee overturns the Conformity Decision Panel decision, the product(s) and/or declared criterion remains on the Registry. The Conformity Decision Panel decision of nonconformance/inconclusive will not be published in the outcomes report.

11.11. If a Manufacturer appeals a Conformity Decision Panel decision of nonconformance/inconclusive and the Appeals Committee finds that Conformity Decision Panel decision of Non-Conformant is valid, the Manufacturer must correct the nonconformity. The 14 day corrective action phase will start on the date the Manufacturer is informed of the appeal decision. The Non-Conformance is published in the Outcomes Report. If the Appeals Committee finds that a Conformity Decision Panel decision of inconclusive for a Level 0 Investigation is valid, the Manufacturer proceeds to a Level 1 Investigation.

11.12. For technical and procedural appeals to Conformity Decision Panel decisions on corrective actions:

11.12.1. The Conformity Assurance Manager who is managing the round is responsible for gathering the necessary information on the appeal and providing this to the Conformity Decision Panel.

11.12.2. The Conformity Decision Panel reviews the same information that was provided to the CAB during the corrective action phase and makes a recommendation on the appeal.

11.12.3. The Appeals Committee reviews the Conformity Decision Panel's recommendation and makes a decision on the appeal.

11.12.4. The Conformity Assurance Manager who is managing the round informs the appellant of outcome and documents all of the steps taken to investigate and resolve the appeal.

11.13. If a Manufacturer appeals Conformity Decision Panel decision on a corrective action and the decision is against the appellant, the Manufacturer must restore accuracy of the Registry.

11.14. If a Manufacturer appeals to a Conformity Decision Panel decision on a corrective action and the decision is favor of the appellant, the corrective action is acceptable. The product and/or declared criterion remain on the Registry.

12. Other appeals

12.1. Other decisions made by GEC related to the EPEAT System and Conformity Assurance Process may be appealed, including a decision to keep a CAB on MSE review, or a decision to reject an applicant CAB's application. GEC decisions that are outside the scope of the conformity assurance process (such as operational decisions, policy decision) are NOT subject to the appeals process.

12.2. Appeals must be made in writing to the EDRS. There is no form that needs to be completed. The CM is responsible for logging the complaint.

12.3. The EDRS is responsible for evaluating the appeal and determining if it is valid. To be considered valid, the appellant must clearly state the reason for the appeal and supply any applicable evidence. This evaluation must take place within 5 business days of receipt of the appeal.

12.4. If the appeal is not validated, the EDRS informs the appellant and the appeal does not proceed further.

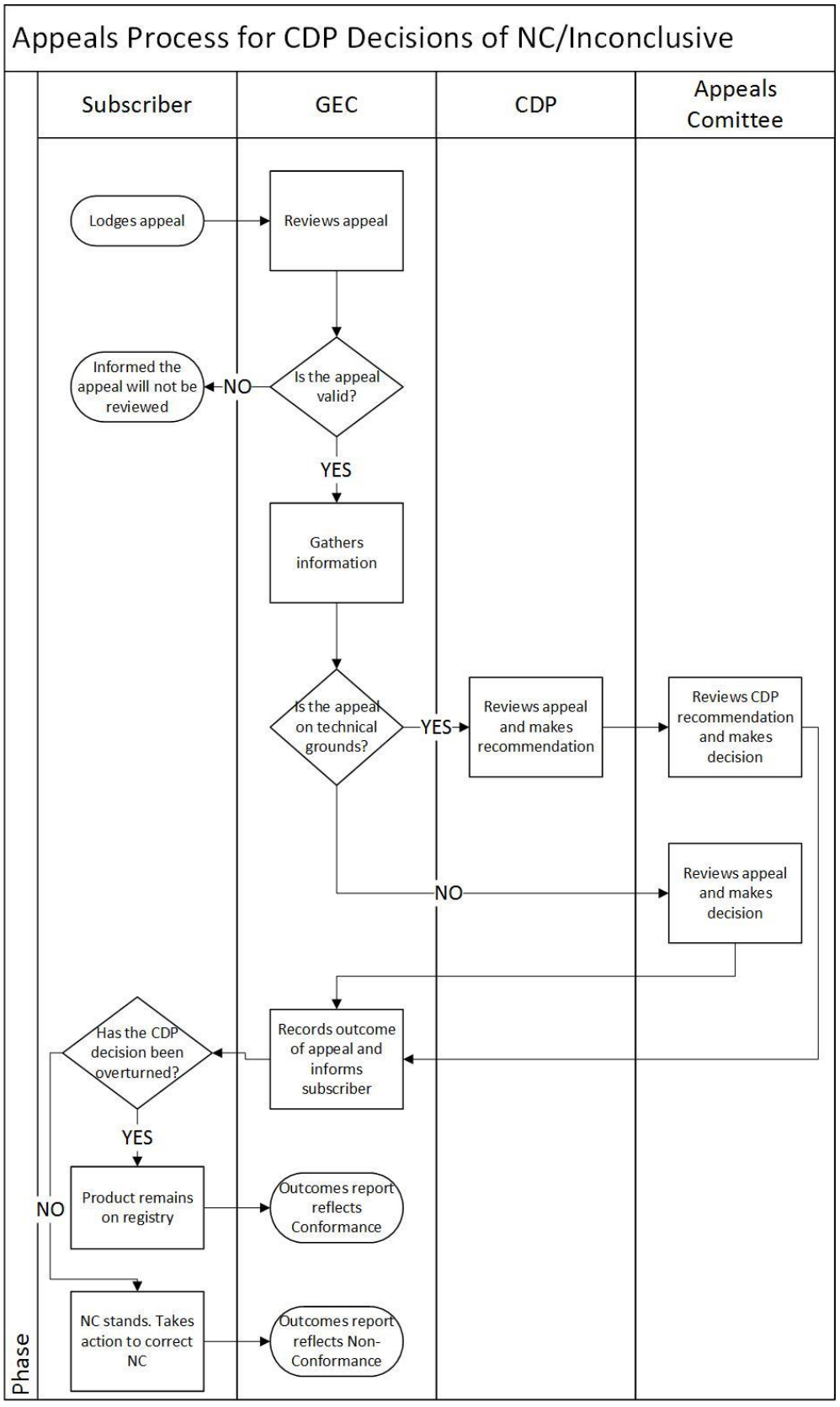
12.5. If the appeal is validated, the GEC Appeals Committee is responsible for reviewing the appeal and making a decision.

12.5.1. The EDRS is responsible for gathering the necessary information on the appeal and providing this to the GEC Appeals Committee.

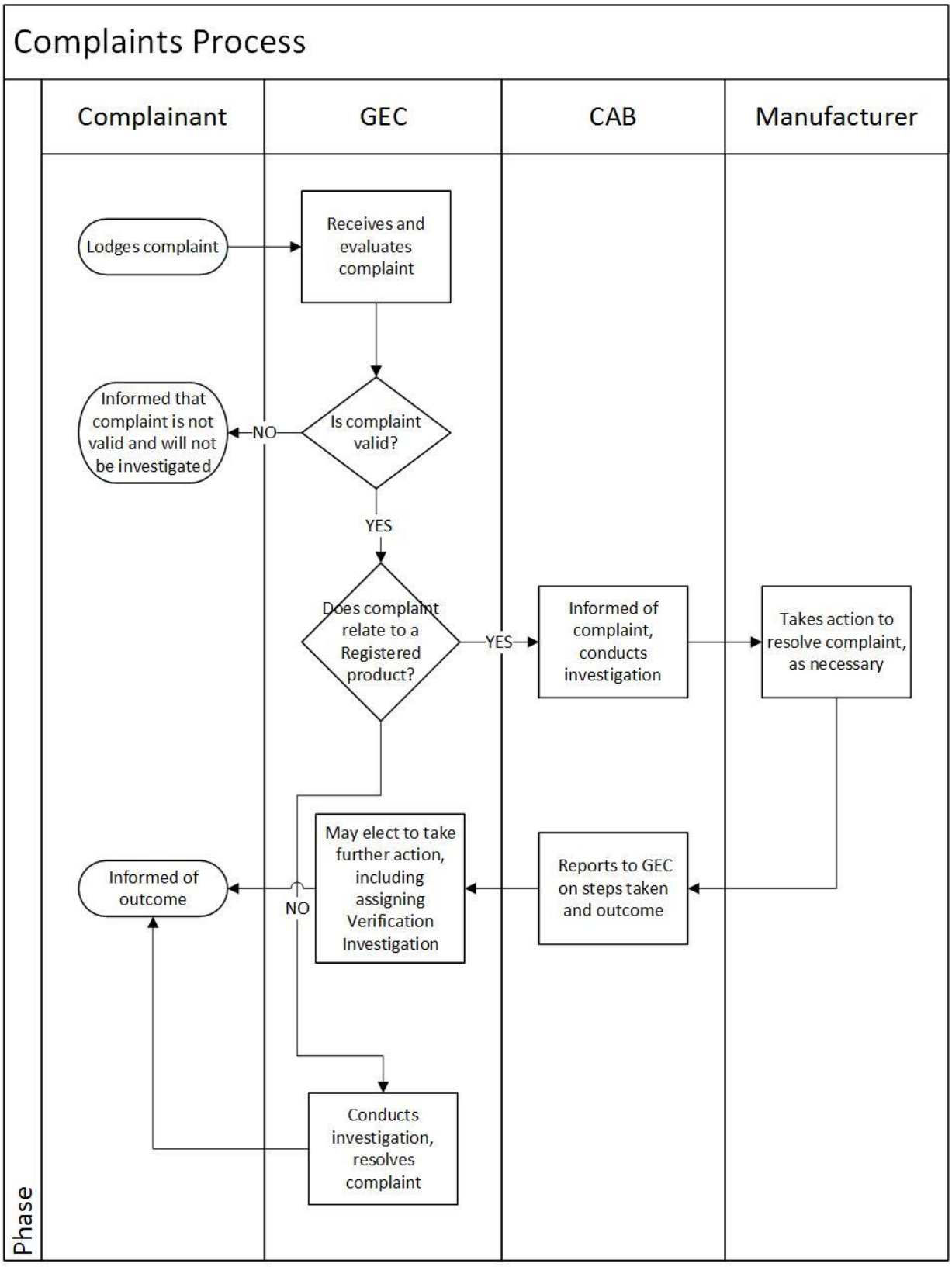
12.5.2. Efforts will be made to keep the identity of the appellant confidential, but during an appeal this may not be possible.

12.6. The EDRS is responsible for documenting the steps in reviewing the appeal and the decision made.

Annex A


Appeals Process for CDP Decisions of NC/Inconclusive
Subscriber
GEC
CDP
Appeals Comittee
Lodges appeal
Reviews appeal
Informed the appeal will not be reviewed
NO
Is the appeal valid?
YES
Gathers information
Is the appeal on technical grounds?
YES
Reviews appeal and makes recommendation
Reviews CDP recommendation and makes decision
NO
Reviews appeal and makes decision
Has the CDP decision been overturned?
Records outcome of appeal and informs subscriber
YES
NO
Product remains on registry
Outcomes report reflects Conformance
NC stands. Takes action to correct NC
Outcomes report reflects Non-Conformance
Phase

Annex B


Complaints Process
Complainant
GEC
CAB
Manufacturer
Lodges complaint
Receives and evaluates complaint
Informed that complaint is not valid and will not be investigated
NO
Is complaint valid?
YES
Does complaint relate to a Registered product?
YES
Informed of complaint, conducts investigation
Takes action to resolve complaint, as necessary
Informed of outcome
NO
May elect to take further action, including assigning Verification Investigation
Reports to GEC on steps taken and outcome
Conducts investigation, resolves complaint
Phase