



Sustainability for a Connected Future

GEC Criteria Development Process

This document identifies the process followed by the Global Electronics Council (GEC) to develop criteria, revise criteria, and evaluate criteria for use in its ecolabels, including the EPEAT Program.

GEC reviews *GEC Criteria Development Process (P74)* on an annual basis to determine if revisions are required.

The latest revisions to this document were published on February 15, 2024. These revisions, unless otherwise noted, are effective as of July 1, 2024.

Please direct any questions on this document to CRITERIA@GEC.org.

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1.0 Introduction

The Global Electronics Council® (GEC) is a mission driven non-profit working to create a more sustainable and just world. To achieve this goal, we focus on technology and supporting institutional purchasers in procuring only credible sustainable and circular technology products and services. GEC owns and operates EPEAT®, a comprehensive voluntary sustainability ecolabel that helps purchasers identify more sustainable and circular technology products and services. GEC ecolabel criteria address priority impacts throughout the life cycle of the product, based on an evaluation of scientific research and international best practices. Criteria are developed in balanced, voluntary consensus processes that align with and draw from the characteristics of voluntary consensus defined in:

- ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures*¹, and
- U.S. Executive Office of the President, Office of Management and Budget, OMB Circular A-119: *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*².

With its criteria development process, and specifically through the use of modular criteria, GEC implements an efficient and scalable voluntary consensus process that encourages broad and balanced stakeholder participation. GEC develops a Business Case to decide whether to launch a criteria development process; the Business Case identifies the landscape of relevant technology providers, large-scale purchaser demand, and where criteria have the potential to reduce sustainability impacts. The criteria development process, combined with routine maintenance of criteria, ensures that purchasers are able to procure technology products and services that respond to evolving science, leverage best practices and integrate a global perspective.

GEC Criteria are owned by GEC and, unless noted otherwise, their use is constrained to the tools and resources developed by GEC as part of its mission activities. GEC is interested in the harmonization of environmental and social criteria with existing regulations and global standards, as well as other ecolabels and voluntary programs, and welcomes requests to collaborate. All GEC Criteria are publicly available free of charge.

¹ Available at: <https://www.iso.org>

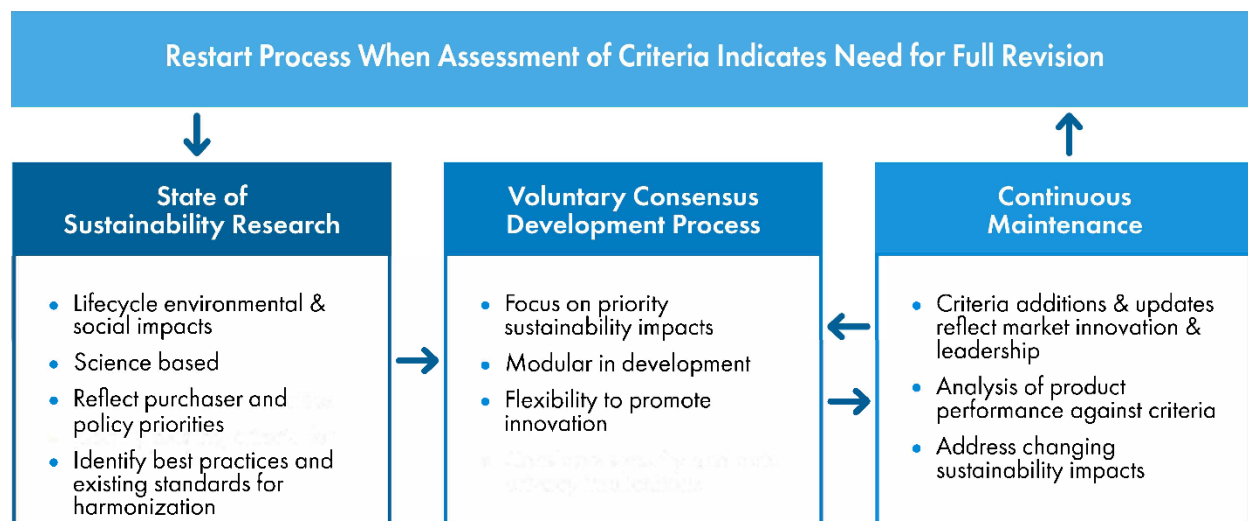
² Available at: https://www.whitehouse.gov/wp-content/uploads/2020/07/revised_circular_a-119_as_of_1_22.pdf

2.0 Criteria Development Process

The key goals of GEC's criteria development process, as illustrated in Figure 1, are:

- Criteria are science-based and address priority environmental and social impacts throughout the life cycle of electronic products and services, and harmonized with international best practices and standards, where applicable.
- Criteria developed with and adhering to the principles of transparency and voluntary consensus, including a process that is open without discrimination to interested parties and representing a balance of stakeholder interests.
- Criteria are continually maintained to ensure relevance, credibility and reflect market innovation in addressing sustainability impacts.

Figure 1: GEC Criteria Development Process



As shown in the process schematic in Figure 2, GEC performs preparatory work for criteria development, including State of Sustainability Research and compiling existing criteria that address identified sustainability impacts. GEC then brings together subject matter experts in Expert Ad Hoc Groups to provide technical guidance in the drafting of criteria. Draft criteria are provided as a starting point for the voluntary consensus process undertaken by the multi-stakeholder Technical Committee. GEC partners with third-party Criteria Development Organizations to manage the Technical Committee and ensure the objective adherence of the process to the principles of voluntary consensus.

Public consultation is actively sought and open to all stakeholders at two critical points in the criteria development process: 1) on the issuance of the draft State of Sustainability Research; and 2) on the Full Draft Criteria Document. These documents are initially available for public consultation for a period of no less than 60 days. A second stakeholder comment period also occurs to solicit feedback on changes made to the Full Draft Criteria Document by the Technical Committee after the initial public

consultation. This second stakeholder comment period is open for no less than 30 days. GEC notifies stakeholders of public consultation through GEC newsletters and specific announcements.

Each of the steps in the process are described in more detail below.

Figure 2: Steps in Criteria Development Process



2.1. State of Sustainability Research

GEC publishes State of Sustainability Research as the initial step in the development and revision of criteria. The research identifies science-based social and environmental impacts across the life cycle of technology products and services, and strategies to reduce the identified sustainability impacts. The research also identifies best practices, existing regulations and existing voluntary leadership programs designed to reduce sustainability impacts. The data and analyses in the State of Sustainability Research serves as the foundation for the development and revision of criteria, as well as identification of opportunities for harmonization. GEC may contract with third parties for research and data analysis assistance during this step. At its discretion, GEC may also choose to contract with third parties for preparation of the State of Sustainability Research.

GEC makes the draft State of Sustainability Research available for public consultation for a minimum of 60 days. In the public consultation process, GEC invites stakeholders to review the scientific evidence presented in the State of Sustainability Research, identify gaps in the data, and share additional data and impact mitigation strategies. GEC notifies stakeholders of the availability of State of Sustainability Research for public consultation through GEC newsletters and announcements. All comments are considered, and, if appropriate, the State of Sustainability Research modified. The final State of Sustainability Research is published and made available on the GEC website. GEC also prepares a stakeholder comment report that summarizes comments received and how the research was modified in response. The stakeholder comment report includes a list of organizations who provided comments. The stakeholder comment report is provided directly to all public commenters and is available to interested stakeholders upon request.

2.2. Criteria

2.2.1. Criteria Drafting

GEC Criteria are intended to meet the six Principles for GEC Criteria in Table 1.

Table 1: Principles for GEC Criteria	
1.	Criteria address priority sustainability impacts throughout the life cycle of products and services, inclusive of the supply chain.
2.	Criteria establish baseline leadership performance by specifying criteria that are required to be met, while incentivizing continuous improvement and innovation through the use of optional criteria.
3.	Criteria represent leadership and current best practice for reducing identified sustainability impacts, with due consideration of life-cycle trade-offs, and of the ability of the market to meet the criterion within a reasonable timeframe.
4.	Criteria differentiate environmentally and socially preferable products from others in the market based on measurable differences in impact, acknowledging that the ability to quantify the outcome may be limited under some circumstances.
5.	Criteria align with international leadership best practices, whether regulations, standards or voluntary programs and do not create obstacles to international trade.
6.	Criteria requirements can be independently verified through objective measures and commonly accepted tools, methodologies, or standards.

Criteria are required to address sustainability impacts throughout the technology life cycle as identified in the State of Sustainability Research. Typically, this includes impacts in the areas of climate change, sustainable use of resources, chemicals of concern and supply chain performance. Criteria may also address impacts unique to a specific product type or category.

Criteria are also developed to reflect and address product function characteristics such as performance, lifetime, durability, repairability, and upgradability. Criteria include performance requirements as well as documentation and methods for the verification of conformance.

Draft criteria may originate from different sources, including, but not limited to:

- Existing GEC or EPEAT Criteria, if available and representing leadership, with or without modifications.
- GEC staff or partner organizations.
- Submissions from stakeholders.
- Expert Ad Hoc Groups.
- Technical Committees.

2.2.2. Selection of Verification Requirements

GEC, in conjunction with the Technical Committee, ensures all elements of a criterion can be independently verified in a manner that reduces bias and uncertainty, uses the best quality qualitative and quantitative data available, and to the extent possible, aligns with internationally recognized methods. Verification requirements are developed and approved for every criterion by the Technical Committee and identify the evidence necessary to demonstrate conformance with the criterion requirements. Verification requirements align with all required elements of the criterion, and to the extent applicable, specify published test methods, international standards (e.g., ISO, IEC) and certifications, regional and national standards (e.g., EU CEN, US ENERGY STAR), and recognized voluntary programs (e.g., Science Based Targets Initiative). Consideration is also given to the availability of qualified organizations, such as laboratories or certification bodies, to perform any required testing or evaluation of specific criteria elements. Where applicable, verification requirements may also outline alternative evidence that will demonstrate conformance to the criterion.

2.2.3. Required and Optional Criteria

Criteria are identified as Required and Optional and EPEAT-registered products are identified in the EPEAT Registry by tier as EPEAT Bronze, EPEAT Silver or EPEAT Gold. The tiers differentiate products by the percentage of Optional Criteria the products meet.

The Technical Committee is responsible for determining which criteria are identified as Required or as Optional, as part of the voluntary consensus process. Required Criteria must be met for a product to appear in the EPEAT Registry, and these criteria outline baseline sustainability leadership performance requirements for the EPEAT ecolabel. When designating criteria as Required, consideration is given to the ability of the market to meet the criterion in a reasonable timeframe, demonstrated best practices and availability of standardized methods, and the capacity of small and medium-sized enterprises to conform to the criterion.

Optional Criteria are used to incentivize innovation, to promote continuous improvement in product and supply chain performance, and to further develop methods and approaches to impact reduction. Products meeting all Required Criteria and a minimum of 50% of the available points for Optional Criteria achieve the EPEAT Silver tier recognition. Products meeting all Required Criteria and a minimum of 75% of the available points for Optional Criteria achieve EPEAT Gold tier recognition.

2.3. Expert Ad Hoc Groups

All draft criteria are reviewed, deliberated, and modified, as needed, by Expert Ad Hoc Groups before consideration by the consensus body, referred to as the Technical Committee. The review and refinement of draft criteria by the Expert Ad Hoc Groups prior to review by the Technical Committee streamlines the criteria development process and broadens multistakeholder participation.

GEC convenes Expert Ad Hoc Groups by impact topic, mitigation strategy, or cluster of closely related criteria associated with an impact identified in the State of Sustainability Research. The Expert Ad Hoc Groups review draft criteria and evaluate whether the draft criteria, as proposed, have the potential to mitigate the identified sustainability impacts and meet the Principles for GEC Criteria in Table 1. Expert

Ad Hoc Groups may be asked to develop draft criteria to address a specific impact identified by the State of Sustainability Research.

The goal of Expert Ad Hoc Groups is to provide technical guidance on the approach, requirements, and language of draft criteria for the assigned topic to be included in the full draft of criteria submitted to the Technical Committee. GEC considers the Principles for GEC Criteria in Table 1 to determine criteria language to forward to the Technical Committee. GEC may choose to forward 2 or more criteria options (e.g., Option A and B) to the Technical Committee if upon evaluation it is determined that alternative approaches to draft criteria meet the Principles for GEC Criteria and address the impacts identified in the State of Sustainability Research. A summary of the Expert Ad Hoc Group discussions, rationale, and any points of technical dissension is documented and transmitted to the Technical Committee, along with the criteria recommendations.

Expert Ad Hoc Groups typically meet by teleconference on a schedule acceptable to participants, and to accommodate diverse time zones, as needed. The review of criteria by Expert Ad Hoc Groups also may be executed by electronic mail.

2.3.1. Expert Ad Hoc Group Membership

GEC assembles stakeholders with expertise and perspectives on the topic under consideration for each Expert Ad Hoc Group. GEC seeks representation from the following stakeholder categories, which are the same stakeholder categories assembled for the Technical Committee: manufacturers; sustainability advocates and government policy; purchasers and ecolabel criteria users; and other industry in the supply chain, as relevant to the criteria topic. GEC strives to include representation from each of these stakeholder categories; however, the primary focus is to ensure the Expert Ad Hoc Groups include expertise relevant to the topic under consideration. See Table 2 for the definition of each stakeholder category.

Table 2: Stakeholder Categories	
Manufacturers	Manufacturers of products or services covered by the scope of the criteria and their trade associations.
Other Industry	Other businesses commercially engaged with the products or services such as: • Suppliers and their trade associations • Recyclers, repair and refurbish companies, asset management service providers, and their trade associations • Other types of businesses commercially engaged with the product.
Sustainability Advocates and Government Policy	Individual from a public agency (local, regional, state, federal, or international) with an environmental / sustainability mission or representative of a professional public / environmental health / safety organization, academia, or not-for-profit environmental organization.
Purchasers and Ecolabel Criteria Users	An individual whose organization purchases, uses, or specifies products or services covered in the scope of the criteria. User/consumers and their trade association representatives, institutional purchasers, third-party conformity assessment bodies (e.g., testing laboratories), and retailers are included in this membership classification.

GEC notifies stakeholders of the opportunity to join Expert Ad Hoc Groups, following publication of the draft State of Sustainability Research. Any interested stakeholders may participate in Expert Ad Hoc Groups by notifying GEC staff of their interest. GEC may also recruit individuals with relevant technical expertise and stakeholder perspectives. Only one member from a single organization may serve on an Expert Ad Hoc Group to help maintain a balance of perspectives, unless the representatives represent different stakeholder categories. A member may invite technical experts to participate on calls, if needed, and designate an alternate participant if they are unable to attend a meeting. Individuals must complete GEC's Participant Agreement prior to joining an Expert Ad Hoc Group. A list of organizations participating in Expert Ad Hoc Groups is made available to the Technical Committee and is publicly available in the Full Draft Criteria Document.

If stakeholder category representation or expertise relevant to the criteria is not achieved for an Expert Ad Hoc Group, GEC may reach out to stakeholders not represented or underrepresented on the Expert Ad Hoc Group to bring in their perspectives. However, the work of the Expert Ad Hoc Group will proceed.

2.4. Full Draft Criteria Document

GEC compiles a comprehensive Full Draft Criteria Document based on the recommendations and technical guidance of the Expert Ad Hoc Groups and submits it to the Technical Committee (the consensus body) as the starting point for their deliberation. GEC reviews the Full Draft Criteria Document to determine if it addresses the environmental and social impacts identified in the State of Sustainability Research. If gaps are identified in the Full Draft Criteria Document, GEC may note this for consideration by the Technical Committee, or for future criteria updates.

The Full Draft Criteria Document is accompanied by a summary that includes the origins of the criteria, key discussion points, as well as areas of technical disagreement identified by the Expert Ad Hoc, to provide context for the Technical Committee. This summary also may identify whether an Expert Ad Hoc was unable to or chose not to develop a criterion recommendation to address an impact identified in the State of Sustainability Research, and why.

2.5. Voluntary Consensus Process

GEC partners with third-party Criteria Development Organizations to manage the multi-stakeholder consensus body, called the Technical Committee. Since credible and objective criteria development is important to GEC's mission, GEC selects partner organizations with experience in managing voluntary consensus processes involving participation of diverse stakeholders and without conflicts of interest or undue influence by any one stakeholder group on their activities. GEC only partners with organizations that maintain impartiality in their management of the Voluntary Consensus Process. The Criteria Development Organization must have documented procedures, reviewed by GEC, that address and adhere to the five characteristics of voluntary consensus in Table 3. Further, the Criteria Development Organization must allow sole ownership by GEC of the criteria resulting from the voluntary consensus process.

Table 3: Characteristics of Voluntary Consensus

1. Openness: The process is open to participation by all 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.
2. Balance of interests: The process includes a balance of stakeholder interests with no single interest dominating decision-making.
3. Due process: The process includes documented and publicly available policies and procedures, adequate notice of meetings and other activities, 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.
4. Appeals process: A process must be available for the impartial handling of procedural appeals.
5. Consensus: Consensus is defined as general agreement, but not necessarily unanimity, and includes a process for attempting to resolve objections by interested parties. All comments must be fairly considered, each objector must be advised of the disposition of his or her objection(s) and the reasons why, and the consensus body members must be given an opportunity to change their opinion after reviewing the comments.

Source: Executive Office of the President, Office of Management and Budget, OMB Circular A-110: Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities, Section 2e. Accessed February 6, 2023 at: <https://www.epa.gov/vcs>.

The Criteria Development Organization must also have procedures in place to objectively select Technical Committee members, safeguard against anti-competitive behaviors, and avoid the use of commercial terms and other requirements that may restrict trade and competition. Approved minutes of Technical Committee meetings must be publicly available. GEC may provide technical support to the Criteria Development Organization.

All final decisions regarding criteria are made by the Technical Committee, following the Criteria Development Organization's procedures for voluntary consensus. GEC requires consensus, as defined in Table 3, by the Technical Committee on the Criteria Document for adoption by EPEAT.

2.5.1. Technical Committee Participation

GEC establishes general parameters, as identified throughout Section 2.5.1, for the operation of the Technical Committee to ensure that the process of criteria development is open and transparent to all interested organizations, while also fostering meaningful dialogue and the exchange of perspectives among the four stakeholder interest groups in Table 2. GEC provides stakeholders with the following opportunities for participation in the Technical Committee process: 1) Technical Committee Member; 2) Technical Committee Observer; and 3) Invited Expert. GEC notifies stakeholders of the opportunity to participate on the Technical Committee through GEC newsletters and announcements.

2.5.1.1. Technical Committee Member

GEC seeks individuals with expertise on the topics under consideration by the Technical Committee to participate on the consensus body. GEC seeks representation from the following stakeholder categories, as defined in Table 2: manufacturers; sustainability advocates and government policy; purchasers and ecolabel criteria users; and other industry in the supply chain. See Table 2 for the definition of each stakeholder category. The stakeholder categories are not mutually exclusive. For example, an individual associated with a public agency may be considered a "purchaser and ecolabel criteria user" if their role is specific to a procurement function within their organization.

Interested stakeholder must submit an application, including documentation of experience and qualifications, for membership on the Technical Committee. The Criteria Development Organization processes applications for Technical Committee membership and may request assistance from GEC in identifying prospective participants to achieve balanced stakeholder representation. The Criteria Development Organization is responsible for the final selection of Technical Committee Members.

GEC requires balanced representation of stakeholders with Technical Committee Member status from the four interest categories. The Criteria Development Organization must strive to achieve balance, defined as no one interest category representing more than 25% of voting Technical Committee Members, including active recruitment of stakeholders to fill available Technical Committee seats. If balanced representation is not achieved on a Technical Committee, weighted voting may be applied in balloting for criteria approval to achieve equal representation among the four stakeholder categories.³

Technical Committee Members are selected from among applications received for each stakeholder category using objective evaluation factors, including technical qualifications of the applicant on the criteria topic and geographic representation. For the manufacturer stakeholder group, the selection process also considers the inclusion of small and medium-sized enterprises and the type(s) of products manufactured by the brand. Applicants not selected for Technical Committee Member status are invited to participate as a Technical Committee Observer (see Section 2.5.1.2).

Technical Committee Members must complete GEC's Participant Agreement in advance of the first Technical Committee meeting, or risk forfeiture of Technical Committee membership.

The role of the Technical Committee is to evaluate the criteria against the Principles for GEC Criteria in Table 1, address public comments, and reach consensus on criteria. For transparency, the names of Technical Committee members and their affiliation are publicly available. Participation on the Technical Committee does not constitute an endorsement of the EPEAT Program, nor the criteria developed by the Technical Committee, by the individual or their affiliated organization.

³ In the application of weighted voting, each of the four stakeholder categories receives 25% of the voting power. The value of votes cast by individual members of the Technical Committee is dependent on the number of voting members in the stakeholder category casting a vote.

2.5.1.2. Technical Committee Observers

Stakeholders may also choose to sign up for observer status on the Technical Committee by notifying the Criteria Development Organization that is managing the Technical Committee. Observer status allows individuals to attend Technical Committee meetings and receive documents provided to the Technical Committee, such as meeting agendas and updates to the Full Draft Criteria Document. Technical Committee Observers may only observe meeting discussions, unless invited by the Technical Committee Chair to contribute to the meeting, either verbally or electronically. Technical Committee Observers submit comments through the public consultation process (see Section 2.5.2) and get no special treatment of their comments by the Technical Committee.

Technical Committee Observers are limited to two representatives from an organization. Organizations that have a representative with Technical Committee Member status are eligible to have one Technical Committee Observer. All Observers must sign an Observer Agreement before receiving Technical Committee documents or attending meetings. The names and affiliations of all Technical Committee Observers are publicly available.

2.5.1.3. Invited Experts

The Criteria Development Organization or the Technical Committee Chair, at their discretion, may invite technical experts to join a Technical Committee meeting for the express purpose of providing technical expertise on a discussion topic. Technical Committee members may also request of the Chair that a specific technical expert attend a meeting.

2.5.2. Public Consultation

The Full Draft Criteria Document is made publicly available for review and comment. The Criteria Development Organization administers the public consultation process, which must be open for no less than 60 days. The Criteria Development Organization provides stakeholders with a second opportunity to comment on changes made to the Full Draft Criteria Document by the Technical Committee since the initial public consultation. The second public consultation is limited to changes to the document and must be open for no less than 30 days. GEC notifies stakeholders of the public consultation period through GEC newsletters and announcements.

The Technical Committee considers comments submitted through the public consultation process as part of the Voluntary Consensus Process. The Criteria Development Organization prepares a comment resolution report, notifies public commenters of the resolution of their comments, and makes comment resolution publicly available.

2.5.3. Editorial Review and Delivery to GEC

After reaching consensus, as defined in Table 3, the Full Draft Criteria Document undergoes final editorial review by the Criteria Development Organization. Only editorial changes (e.g., typographical errors, formatting) are allowed at this step in the process. If any substantive issues are identified during editorial review, the Full Draft Criteria Document must be returned to the Chair of the Technical Committee to resolve the issue. Following editorial review, the final Criteria Document is delivered to GEC, who publishes the Criteria Document. GEC is solely responsible for adopting, making publicly

available, and implementing the Criteria within the EPEAT Program. Additional information on GEC use of the Criteria is in Section 3.0 of this document.

2.6. Criteria Revisions

GEC reviews criteria approximately every three years from the last publication to ensure that the criteria remain relevant, continue to be impactful and incentivize leadership performance. In its review of criteria, GEC considers the following factors: 1) evolution of best practices and test methods since the last publication; 2) new science and data on sustainability impacts; 3) age and impact of existing criteria; 4) percentage of products meeting optional criteria; 5) evolution of technology, in general and product specific; 6) priorities for government policy and purchasers; and 7) stakeholder requests for criteria revisions. Based on this review, GEC may initiate a Full Criteria Revision or Limited Criteria Revision as defined further in Sections 2.6.1 and 2.6.2, respectively. If results of the initial GEC review determine that revisions are not necessary, GEC evaluates the need for revisions approximately every 12 months thereafter. This cadence is intended to adjust criteria in a timely manner and with the evolution of science and best practices, while providing the market sufficient time to adopt criteria.

GEC may also choose to initiate a limited and focused revision, based on the qualifications outlined in Section 2.6.2. Limited Criteria Revisions are published no more frequently than annually. The scope of Full Criteria Revision and Limited Criteria Revision are defined further in Sections 2.6.1 and 2.6.2, respectively. All modifications to Criteria Documents are considered and approved via voluntary consensus by Technical Committees, as outlined in Section 2.5.

GEC welcomes ongoing feedback on its criteria from all interested stakeholders, including requests for revisions to criteria, addition of new criteria, removal of existing criteria, or corrections to existing criteria. Stakeholders must provide written feedback using the Criteria Feedback and Revision Request Form, available upon request. This form requires stakeholders to provide the following information:

- The rationale for the proposed change, including evidence to support the request (e.g., new data illustrating sustainability impact, availability of new standard; emerging best practice to reduce sustainability impact), as appropriate.
- A specific proposal for the requested change including proposed text (e.g., what specific modifications are proposed for an existing criterion; draft proposal for a new criterion.)

GEC acknowledges receipt of all completed Criteria Feedback and Revision Request Forms and provides the stakeholder with information regarding the approximate timeframe for the next criteria review or revision cycle. All feedback and requests are considered in the next regularly scheduled Full Criteria Revision, as described in Section 2.6.1, unless the feedback meets the qualifications for a Limited Criteria Revision (Section 2.6.2) or Interim Correction (Section 2.6.3), as determined by GEC and the EPEAT Program.

2.6.1. Full Criteria Revision

In a Full Criteria Revision, all criteria are open to modification and revision. A Full Criteria Revision follows the Criteria Development Process, outlined in Sections 2.1 to 2.5 of this document, starting with State of Sustainability Research. GEC notifies stakeholders of the launch of the Full Criteria Revision

process. The notification includes a request for new/updated science, data and best practices, as well as preliminary proposed criteria revisions including modifications, additions and deletions. GEC solicits input from stakeholders by teleconference and/or in person meetings during the development of the State of Sustainability Research.

The State of Sustainability Research builds on the prior research and may be issued as an amendment or a substantially new report. The State of Sustainability Research for a Full Criterion Revision considers the following:

- Highlights relevant changes in technology, science, and best practice since the previous publication.
- Includes an evaluation of existing criteria to determine whether they remain impactful, represent leadership, and reflect the evolution in best practices.
- Reviews stakeholder feedback as submitted through Criteria Feedback and Revision Request Forms and Limited Criteria Revision (as described in Section 2.6.2.) since the last revision and any Interim Corrections (as described in Section 2.6.3).
- Considers criteria deferred by the previous Technical Committee(s) for future criteria development.
- Recommends the scope of the Full Criteria Revision, including which criteria should be updated or removed, which criteria should be transitioned from optional to required, as well as proposed new criteria. GEC may determine that some criteria do not need to be updated.

The State of Sustainability Research for a Full Criteria Revision is released by GEC for a minimum 60-day public comment period and follows the notification and publication process outlined in Section 2.1. Following publication of the State of Sustainability Research, GEC proceeds with criteria development as outlined in this document (P74), including convening Expert Ad Hoc Groups (Section 2.3), publishing a Full Criteria Document (Section 2.4), and launching a Voluntary Consensus Process (Section 2.5). The scope of the Full Criteria Revision is defined by the State of Sustainability Research. Public consultation on the Full Criteria Document follows the process described in Section 2.5.2.

2.6.2. Limited Criteria Revision

GEC may choose to initiate a Limited Criteria Revision in between Full Criteria Revisions for the following reasons:

- Significant issue in the text or requirements of Criteria that prohibits Criteria implementation by manufacturers or the consistent evaluation of evidence by GEC-approved Conformity Assurance Bodies (CABs) or results in unintended consequences that impede sustainability progress.
- Proposal for an impactful new criterion (or criteria) that is time sensitive, addresses an emerging critical issue or tackles a complex topic that would benefit from a focused criteria development process.

For Limited Criteria Revisions, GEC prepares a Proposal for Limited Criteria Revision, which outlines the rationale for the revision and the proposed scope of the revision. GEC solicits stakeholder input by teleconference and/or in person meetings during the development of the Proposal for Limited Criteria Revision. If the Limited Criteria Revision proposes modifications to existing criteria, the proposal indicates the scope of criteria covered in the Limited Criteria Revision. GEC makes the draft Proposal for Limited Criteria Revision available for public consultation for a minimum of 30 days, notifying stakeholders of its availability through GEC newsletters and announcements. All comments are considered, and GEC makes a final determination about whether to proceed with the Limited Criteria Revision. If appropriate, the Proposal for Limited Criteria Revision is modified, and a final Proposal for Limited Criteria Revision is issued, and stakeholders notified through GEC newsletters and announcements. GEC prepares a stakeholder comment report that summarizes comments received and, if applicable, how the proposal was modified in response to comments. The stakeholder comment report includes a list of organizations who provided comments. The stakeholder comment report is provided directly to all public commenters and is available to interested stakeholders upon request.

If the Limited Criteria Revision moves forward, GEC proceeds with criteria development as outlined in this document [*GEC Criteria Development Process (P74)*], including convening Expert Ad Hoc Group(s) (Section 2.3) and launching a Voluntary Consensus Process per Section 2.5. The scope of the Limited Criteria Revision is defined by the final Proposal for Limited Criteria Revision. Preparation of the Full Criteria Document (Section 2.4) reflects and is limited to the scope of the Limited Criteria Revision. Public consultation follows the process described in Section 2.5.2.

2.6.3. Interim Corrections

GEC may find it necessary to issue a provisional correction of EPEAT Criteria to address, in a timely manner, minor errors (e.g., typographical error), omissions or outdated references that impede Criteria implementation. A Criteria Feedback and Revision Request Form must be submitted for consideration of an Interim Correction. Any stakeholders may submit a request for an Interim Correction, including but not limited to, GEC, Conformity Assurance Bodies, and Participating Manufacturers. It is not the intent of Interim Corrections to reverse decisions made by Technical Committees. For this reason, GEC defers to the next Criteria Revision any requests for an Interim Correction when there is clear evidence that an error or omission did not occur; such evidence would include, for example, Technical Committee ballots and adjudication of negative ballots.

GEC forms and facilitates, on an as needed basis, Correction Committee(s) to review and reach agreement by voluntary consensus on requests for Interim Correction(s) of published Criteria. A Correction Committee is comprised of a balance of stakeholder interests and individuals with relevant topical expertise and product representation for Criteria under consideration for an Interim Correction(s). GEC may also solicit the opinion of or invite to Committee meetings additional experts, including past Technical Committee members and Expert Ad Hoc Group participants. All Interim Corrections approved by a Correction Committee are issued by the EPEAT Program in a Criteria Corrections document in redline/strikeout format and separate from published Criteria.

Interim Corrections are considered informative (not normative) and are maintained by the EPEAT Program for use by Participating Manufacturers and GEC-approved CABs.

GEC maintains a log of all decisions of Correction Committees. All Interim Corrections are subject to review in the next Full Criteria Revision or Limited Criteria Revision, if within scope. The Interim Correction sunsets when the Full Criterion Revision or Limited Criteria Revision is implemented by EPEAT.

2.7. Complaints and Appeals

GEC operates a complaints and appeals process to allow stakeholder concerns about criteria development to be addressed fairly. GEC has a documented process to receive, evaluate, and make decisions on complaints and appeals regarding GEC's criteria development or revision activities.

- Complaints may be raised, in writing, by any party and may address any aspect of GEC's criteria development or revision activities.
- Any party may appeal, in writing, any procedural matter (actions or inactions) in the implementation of GEC's criteria development or revision activities. Examples of procedural matters include but are not limited to whether procedures were followed to address public or Technical Committee member comments or whether the voluntary consensus process procedures were followed. Appeals regarding technical or substantive content of GEC Criteria or GEC's criteria development process are not permitted; however, appeals may be submitted on whether a technical issue was afforded due process according to procedures. The membership and recommendations of Expert Ad Hoc Groups cannot be appealed on either technical or procedural grounds.
- Complaints and appeals pertaining to the Voluntary Consensus Process must first be directed to, and investigated by, the Criteria Development Organization managing the Voluntary Consensus Process. If the complainant/appellant is not satisfied with the resolution of the complaint/appeal, then the complainant/appellant may raise the complaint or appeal, in writing, directly with GEC.

Complaints and appeals must be made in writing to GEC within 30 calendar days of the decision or action prompting the complaint or appeal, and must include the following information to be considered complete:

1. The reason for the complaint/appeal;
2. If the complaint or appeal was first raised with a Criteria Development Organization regarding the Voluntary Consensus Process, the reason why the complainant/appellant does not deem the resolution satisfactory;
3. If the complaint/appeal is regarding GEC's criteria development or revision activities, identification of the relevant clause(s) of this document, *GEC Criteria Development Process (P74)* against which the complaint or appeal is based;
4. Evidence substantiating the basis for the complaint/appeal;
5. The specific damage(s) or disadvantage(s) caused by the decision, action, or inaction; and
6. The specific resolution requested.

Within five business days of receipt of a complaint or appeal, GEC evaluates the complaint or appeal for completeness and notifies the complainant/appellant of the outcome of the evaluation. If determined to be complete, GEC assigns a Complaint/Appeal Manager, conducts an investigation, and convenes a Complaints/Appeals Committee. The complainant or appellant is informed of the name and title of the individuals serving on the Committee, which is comprised of at least three individuals. During the investigation, the complainant/appellant may be asked to respond to questions or provide additional information.

The Complaints/Appeals Committee, which may be comprised of individuals outside of GEC, reviews the complaint/appeal, all submitted documentation, and results of the investigation and makes a final decision on the complaint/appeal. The Complaint/Appeal Manager may also serve as a member of the Committee.

Complaints and appeals are handled swiftly and as transparently as possible, while still respecting the confidentiality of all parties involved. Any GEC personnel specifically cited in the complaint or appeal are not involved in the investigation of that complaint or appeal and are not permitted to serve on the Complaints/Appeals Committee. GEC ensures that complaints and appeals do not result in discriminatory actions. No complainant, appellant, or other individual shall be negatively treated for bringing forward a complaint or appeal, providing information related to a complaint or appeal, or helping to resolve a complaint or appeal.

GEC notifies the complainant/appellant in writing of its decision on the complaint/appeal within 60 business days of evaluating the complaint/appeal for completeness. GEC retains full authority to make the final determination in the case of all complaints and appeals pertaining to GEC's criteria development process.

All GEC criteria development, revision, and implementation activities continue without limitation during an investigation into a complaint or appeal.

2.8. Conflicts of Interest

GEC recognizes that impartiality and managing conflicts of interest are fundamental to maintaining the integrity of the EPEAT Program. To this end, GEC does not allow commercial, financial, or other pressures to compromise impartiality in the EPEAT Program and eliminates or mitigates conflicts of interest that may influence development and maintenance of Criteria. The voluntary consensus process, by design, prevents any single stakeholder group or organization from having undue influence in the development and revision of criteria because the process requires, and ensures, balanced representation from all stakeholder groups in the consensus body. If GEC accepts significant external funding (more than \$10,000 or more than 20% of the anticipated funding needs) for a specific criteria development initiative, the source of funding is disclosed at each step in the criteria development process (Figure 2), and in the final criteria document.

More information regarding the EPEAT Program's approach to managing impartiality and conflicts of interest can be found in Section 8.0 of the *EPEAT Policy Manual (P65)*.

2.9. Patent Policy

GEC Criteria can include the use of an essential patent claim (one whose use would be required for compliance with the Criteria) if it is considered that technical reasons justify this approach. Participants in the criteria development process should bring patents with claims believed to be essential to the attention of GEC.

In order to include an essential patent claim in GEC Criteria, GEC shall receive from the patent holder or a party authorized to make assurances on its behalf, in written or electronic form, either:

- a) assurance in the form of a general disclaimer to the effect that such party does not hold and does not currently intend holding any essential patent claim(s); or
- b) assurance that a license to such essential patent claim(s) will be made available to applicants desiring to utilize the license for the purpose of implementing the GEC Criteria either:
 - i) under reasonable terms and conditions that are demonstrably free of any unfair discrimination; or
 - ii) without compensation and under reasonable terms and conditions that are demonstrably free of any unfair discrimination.

Such assurance shall indicate that the patent holder (or third party authorized to make assurances on its behalf) will include in any documents transferring ownership of patents subject to the assurance, provisions sufficient to ensure that the commitments in the assurance are binding on the transferee, and that the transferee will similarly include appropriate provisions in the event of future transfers with the goal of binding each successor-in-interest. The assurance shall also indicate that it is intended to be binding on successors-in-interest regardless of whether such provisions are included in the relevant transfer documents.

When GEC receives assurance from a patent holder the affected GEC Ecolabel or Criteria shall include a note as follows:

NOTE – The user’s attention is called to the possibility that conformance with these criteria requires use of an invention covered by patent rights. The patent holder has filed a statement with GEC of willingness to grant a license under these rights on reasonable and nondiscriminatory terms and conditions to applicants desiring to obtain such a license. Details may be obtained from GEC.

3.0 Use of Criteria by GEC

GEC considers for adoption in EPEAT and other initiatives criteria developed using the *GEC Criteria Development Process (P74)*. Before criteria can be used by the EPEAT Program, they must be formally adopted. Further details regarding the adoption of GEC criteria for use in the EPEAT Program are available in the *EPEAT Policy Manual (P65)*. GEC only considers for adoption Criteria as developed and approved by the voluntary consensus process without modification. This includes newly developed criteria, Full Criteria Revisions or Limited Criteria Revisions. Interim Corrections are considered informative (not normative). As such, adoption for use by the EPEAT Program is not necessary.

GEC Criteria are owned by GEC and, unless noted otherwise, their use is constrained to the tools and resources developed by GEC as part of its mission activities. GEC is interested in the harmonization of environmental and social criteria with existing regulations and global standards, as well as other ecolabels and voluntary programs, and welcomes requests to collaborate. All GEC Criteria are publicly available free of charge.

4.0 Revisions and Effective Date

GEC reviews *GEC Criteria Development Process (P74)* on an annual basis to determine if revisions are required. Revisions to this document are generally published on February 15 and take effect on July 1 of any given year; however, GEC may, at its sole discretion, identify specific revisions which take effect on another date before or after July 1.

GEC considers programmatic needs when determining the effective date for all revisions and is committed to ensuring its decision is transparent and fair for all stakeholders, including Participating Manufacturers, GEC-approved CABs, and purchasers.

5.0 Supplementary Information

5.1. References

The following documents are referenced in this document, *GEC Criteria Development Process (P74)*, and are indispensable for its application. Undated references indicate that the latest edition of the referenced document applies.

- ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures*
- ISO/IEC 17020 *Conformity assessment—Requirements for the operation of various types of bodies performing inspection*
- ISO/IEC 17065 *Conformity assessment—Requirements for bodies certifying products, processes, and services*
- U.S. Executive Office of the President, Office of Management and Budget, OMB Circular A-119: *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*

5.2. Definitions

The following definitions are referenced throughout this document, *GEC Criteria Development Process (P74)*, and are indispensable for its application.

Appeal: For the purposes of this document, *GEC Criteria Development Process (P74)*, a written request for reconsideration of a procedural decision in the development of GEC Criteria that is considered by the appellant to be inconsistent with the policies and procedures in this document. Based on definition of appeal in ISO/IEC 17000 *Conformity assessment — Vocabulary and general principles*.

Complaint: For the purposes of this document, *GEC Criteria Development Process (P74)*, a complaint is a written expression of dissatisfaction, that is not a procedural appeal, regarding GEC's criteria development or revision activities, and/or GEC's management of the EPEAT Program. Based on definition of complaint in *ISO/IEC 17000 Conformity assessment — Vocabulary and general principles*.

Consensus Body: The multi-stakeholder Technical Committee charged with reaching consensus on GEC criteria.

Continuous Maintenance Process: The process for reviewing and revising GEC Criteria to ensure they remain relevant, continue to be impactful, and recognize changes in technology, science, and best practice in reducing impacts.

Criteria Development Organization: The third-party organization that administers all aspects of the Technical Committee, which is the consensus body for the criteria development process.

Criteria Document: The criteria with associated definitions, references and annexes that is approved by the Voluntary Consensus Process and considered for adoption by the EPEAT Program.

Criteria Development Process: The process used by GEC to develop its Criteria consistent with the characteristics of voluntary consensus and the requirements of *ISO 14024 Environmental label and declarations – Type 1 environmental labelling – Principles and procedures*.

Expert Ad Hoc Group: A multi-stakeholder group convened by GEC and serving in an advisory capacity to review and draft criteria that address sustainability impacts for a technology or service.

GEC Criteria: Environmental and social requirement intended to reduce the sustainability impacts of a technology or service, developed through a balanced, voluntary consensus process, and adopted by GEC for application it its ecolabel(s).

Full Draft Criteria Document: The compilation of criteria recommendations from the Expert Ad Hoc Groups into a single document, which is the starting point for deliberation by the Technical Committee.

Impartiality / Impartial: Presence of objectivity, where objectivity is understood to mean that conflicts of interest do not exist or are resolved so as not to adversely influence conformity assurance and programmatic activities. Based on the definition of impartiality in *ISO/IEC 17000 Conformity assessment — Vocabulary and general principles* and *ISO/IEC 17065 Conformity assessment—Requirements for bodies certifying products, processes, and services*.

Participating Manufacturer: Brand owner that registers products to a GEC ecolabel and is responsible for ensuring ongoing conformance of the products against the GEC Criteria selected for those products. Sometimes referred to as Manufacturer.

State of Sustainability Research: The presentation and analysis of available data on the life cycle sustainability impacts of a technology or service that guides the development of GEC Criteria.

Technical Committee: The multi-stakeholder committee serving as the voluntary consensus body for GEC Criteria and administered by a third-party Criteria Development Organization.

Voluntary Consensus Process: The process used to develop GEC Criteria that aligns with and draws from similar principles for the characteristics of voluntary consensus as defined in ISO 14024 *Environmental labels and declarations – Type 1 environmental labelling – Principles and procedures* and in the US Government’s Office of Management and Budget (OMB) Circular A-119: *Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities*.

5.3. Document Change History

This document, *GEC Criteria Development Process (P74)*, defines the process that GEC follows for the development, routine maintenance, and revision of criteria. While not solely dedicated to the development of EPEAT Criteria, this document, *GEC Criteria Development Process (P74)*, is controlled as part of the EPEAT Quality Management System.

Issue	Revision	Author	Description of Change	Approver	Approval Date	Effective Date
1	0	Snr Director, Category and Criteria Development	Initial release	CEO	2021 April 30	2021 April 30
1	1	Snr Director, Category and Criteria Development	Added Section 2.8, Patent Policy	CEO	2021 May 20	2021 May 20
1	2	Snr Director, Category and Criteria Development	Updated Section 1.0 to reference Business Case	CEO	2021 June 17	2021 June 17
1	3	Snr Director, Category and Criteria Development	Section 2.5.1 Addition of further details on Technical Committee Participation. New section 2.5.1.1 for Technical Committee Member and addition of consideration of MSMEs. New Section 2.5.1.2 for Observers. New Section 2.5.1.3 for Invited Experts.	CEO	2022 Jan 14	2022 Jan 14
1	4	Snr Director, Category and Criteria Development	Further clarifications to existing policies: GEC Criteria available free of charge (1.0, 3.0); Expert Ad Hoc Groups (2.3, 2.3.1); Voluntary Consensus Process (2.5.2); Weighted voting (2.5.1.1); Continuous Maintenance (2.6); Complaints and appeals (2.7); Definitions (4.2). New: 60-day public consultation instead of 30-day (2.0, 2.1, 2.5.2). Addition of definitions used in other EPEAT documents (4.2).	CEO	2022 Feb 15	2022 Feb 15
1	5	VP, Criteria and Category Development	Clarifications: Updated Figure 1 to clarify key aspects of GEC’s Criteria Development Process (2.0); Clarified role of Expert Ad Hoc Groups (2.0, 2.3, 2.4); Further clarification regarding how criteria address product function characteristics (2.2.1); Additional clarity on Expert Ad Hoc Group participation (2.3.1), Technical Committee membership (2.5.1.1), Continuous Maintenance (2.6), and Complaints and Appeals (2.7). Additions: Addition of second stakeholder comment period (2.0, 2.5.2); Clarity on availability of State of Sustainability Research (2.1); Additional details regarding CDO’s GEC may partner	CEO	2023 Feb 15	2023 Jul 01

Issue	Revision	Author	Description of Change	Approver	Approval Date	Effective Date
			with (2.5); New sections related to Selection of Verification Requirements (2.2.2), Required and Optional Criteria (2.2.3), Conflicts of Interest (2.8), and Revisions and Effective Date (4.0); New definition for Consensus Body (5.2).			
1	6	VP, Criteria and Category Development	Additions: Third parties may develop State of Sustainability Research (2.1); Proposal for new criteria may originate in Technical Committee (2.2.1); Members of Expert Ad Hoc Groups may invite experts to participate in meetings (2.3.1); Editorial review / delivery of criteria to GEC (new section 2.5.3); Evaluation factors used to initiate criteria revisions (2.6); New definitions (Criteria Document, Full Criteria Revision, Limited Criteria Revision, Interim Correction) (5.2). Additional Clarity: Consensus on criteria required for EPEAT adoption (2.5, 3.0); Stakeholder categories for Technical Committees (TCs) (2.5.1.1); TC members may request Invited Experts attend TC meetings (2.5.1.3). Changes: Nomenclature for criteria development and criteria revision throughout; Criteria Development Organization must strive to achieve stakeholder balance on TCs (2.5.1.1); Increased number of TC Committee Observers (2.5.1.2); Corporate ESG impact area now “supply chain performance” (2.2.1); Restructured and redefined the Criteria Revision Process (2.6).	CEO	2024 Feb 01	2024 Jul 01