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Procedure for managing complaints and applicable penalties

(Notably the terms and conditions for suspending or removing a PEP from the database or a verifier's accreditation)

Appendix: complaint form

1) Subject

This procedure describes how complaints shall be handled and the applicable sanctions (suspension or removal of a PEP or a verifier's accreditation).

2) Complaint management

Any user or PEP accredited verifier may file a complaint against any type of error, omission or abuse regarding a type III environmental declaration, known as a PEP Product Environmental Profile, within the scope of the PEP ecopassport Program.

Complaints are to be submitted to the PEP association by either e-mail or by letter using the form provided in the appendix hereto.

If the PEP association deems that the complaint is admissible, it shall be processed within a maximum of 20 business days following receipt. The PEP declaring party and the accredited verifier involved shall be informed and have 30 business days to provide a substantiated response. The PEP association processes the answer and may, if necessary, request that the declaring party take corrective actions or apply penalties.

The interested parties, i.e. the complainant, the declaring party and/or the accredited verifier shall be informed of the PEP association's decision.

Complaints of a financial nature are not admissible when the terms and conditions of the contract have been met.



Challenging a decision to validate a PEP does not have an immediate suspensive effect unless explicitly requested by the State supervisory authorities under Convention No. VDEPC-2016-02. In the latter case, the PEP association informs the declaring party and the accredited verifier involved.

3) Penalties

A complaint can lead to either a warning, a suspension or a removal of the PEP from the database.

In the event of a complaint involving an accredited verifier, the PEP association takes proportionate and graduated measures, which may involve the suspension or removal of the accreditation, particularly in the case of:

- Inadequate knowledge and/or skill;
- Insufficient audits;
- Non-compliance with training obligations;
- Insufficient level of activity (see AP0003 - PEP Verifier Accreditation Procedure);
- Lack of independence observed (the penalty may include a ban on third-party auditing and non-renewal of application).

The list of accredited verifiers (AP0006) is kept up to date according to the penalties applied.

a) Warning

In the case where complaints concern minor deficiencies, the PEP association shall inform the declaring party and the verifier of the anomalies and request that the declaration be updated.

b) Suspension

In the case where complaints concern major deficiencies, the PEP association may decide to:

- Temporarily withdraw a PEP from the database;
- Temporarily suspend a verifier's accreditation.

The PEP association establishes the duration and conditions of the suspension. The declaring party and/or the verifier involved are informed by letter.

c) Removal

In the case where complaints concern major deficiencies, the PEP association may decide to definitively remove:

- A PEP from the database
- A verifier's accreditation.



The decision is made by the PEP association unless explicitly requested by the State supervisory authorities under Convention No. VDEPC-2016-02.

The declaring party and/or the verifier involved are informed by letter.

4) Disputes

A suspension or removal decision may be disputed within a maximum of 15 business days after notification by the PEP association.

5) Follow-up of complaints

The PEP association conducts an annual review, which notably specifies the number and subject of complaints filed and investigated, as well as the penalties incurred, notably within the framework of Agreement No. VDEPC-2016-02.

6) Appendix

(See form on the next page)





Complaint form

Complaint No. (to be completed by PEP): _____

Date*: ___/___/_____

Surname*:

First name*:

Position:

Company:

Company address:

e-mail*:

Telephone*:

Registration No. of the PEP(s) involved*:

If applicable, accredited verifier No.:

Type of complaint*:

- Technical
- Administrative

Subject of the complaint*:

Form to be returned by either:

- Letter, addressed to:

Association P.E.P

11-17 rue de l'Amiral Hamelin

75783 Paris cedex 16 • France

- or via e-mail:

contact@pep-ecopassport.org

**mandatory fields*

