

#### Tracking of the versions

Version	Comment	As of
1.0	Introduction of version numbers, revision and/or extension to meet requirements for an accredited body according to ISO 17065.	2022-04-20
2.0	Clear regulations on the division of tasks, documentation and verification/validation of the effectiveness of measures were added in detail.	2023-09-20
3.0	The technical advisory board (TAC), rather than the management, now decides whether a complaint relates to EPD projects carried out by Bau EPD GmbH and is included in the scope of accreditation.	2026-02-19

#### Management of appeals and complaints according to ISO 17065, item 7.13

**Complaint:** Dissatisfaction and a response is expected. Examination necessary to determine whether the complaint is appropriate.  
Examples of complaints: timely implementation, costs, service quality, customer orientation

**Appeal:** The result in the EPD is doubted.

#### Operational procedure and establishment of an arbitration board

##### 1. Receipt of the complaint or appeal

Complaints and appeals can be communicated directly to the Management of Bau EPD GmbH or can be lodged with verifiers/validators, LCA practitioners, members of the advisory committee or shareholder representatives. If these are not received directly by the Management, the named team members are obliged to forward the complaints or appeals to them.  
Complainants or appealing parties are requested to submit their concerns in writing.

##### 2. Examination whether complaints or appeals relate to activities in the field of activity of Bau EPD GmbH.

The TAC (technical advisory board) will examine whether the complaint or appeal demonstrably relates to EPD projects that have been or will be handled by Bau EPD GmbH and is thus included in the scope of accreditation.

##### 3. Acknowledgement of receipt of complaint and information to advisory committee or PCR committee

If this is the case, the Management will confirm by e-mail to have received the written complaint. If not, reasons are given for not pursuing the complaint/appeal.

The advisory committee will deal with complaints.

Appeals on EPD results are referred to the PCR committee.

The decision as to which body is appropriate is made by the HCAB (head of the conformity assessment body).

In the course of the confirmation to the complainant, it can already be mentioned which body will deal with the complaint.

#### **4. Obtaining all necessary information as a basis for decision-making**

The Management will, in consultation with the acting body, discuss what documentation the complainants or appealing parties will need to provide in order to make an assessment and decision on the concern. This may include, for example, all PCRs, including those under development, all EPD documents and project reports or life cycle inventory analysis documents, as well as verification/validation reports or logs in addition to the documents required for a project. In the event that confidential, non-public data must be assessed, all affected data holders must be informed and appropriate non-disclosure agreements must be in place with those people who have been assigned to clarify the situation based on item 5. M-Doc 31 "NDA non-disclosure agreement" can be consulted for this purpose.

#### **5. Mechanism for dealing with complaints/appeals, selection of team to deal with the complaint/appeal**

The decision clarifying the complaint or appeal must be made or assessed and approved by a person (persons)

who has (have) not been involved in the EPD process flow to which the complaint or appeal relates. To ensure that there is no conflict of interest, neither individuals who have verified/validated the projects in question nor individuals who have provided or provide LCA consulting services to customers may be selected. In addition, individuals that have been employed by a customer may not be used by the certification body to assess or approve the resolution of a complaint or appeal by that customer if they have been involved in consultation sessions or in an employment relationship with the customer within the past two years.

This needs to be kept in mind especially in the case of members of the advisory committee.

The Management must ensure that this is the case.

In the event that confidential, non-public data must be assessed, all affected data holders must be informed and appropriate confidentiality agreements must be in place with those people who have been assigned to clarify the situation based on item 5. M-Doc 31 "NDA non-disclosure agreement" can be consulted for this purpose.

#### **6. Examination and reporting of the result to the Management of Bau EPD GmbH**

The team selected to handle the appeal or complaint (chosen members from the PCR panel and TAC) has to report on its examination to the Management of Bau EPD GmbH on an ongoing basis, especially if further documentation is required or the involvement/questioning of additional stakeholders is necessary.

The final result of the assessment shall be communicated to the Management of Bau EPD GmbH, which shall officially inform the complainant or the appealing party.

#### **7. Information about the result**

The Management shall formally inform the complainant or appealing party in writing of the outcome and termination of the complaint/appeals procedure.

#### **8. Other measures**

Bau EPD GmbH must take all necessary follow-up measures to resolve the complaint or appeal.

The documentation of complaints and objections is done on the one hand in the minutes of PKR committee and advisory board meetings and on the other hand in M-Dok 30, "Measures Management". The description of measures and the review of their effectiveness must also be dealt with in M-Doc 30.

If the Management of the programme operator does not follow the input and recommendations of the above-mentioned mechanism for handling complaints or appeals (independent teams of PCR committee or advisory committee members), the above chosen team (equivalent to the arbitration board) shall be entitled to take independent action (e.g. inform authorities, accreditation bodies, stakeholders). When taking independent measures, non-disclosure requirements regarding the customer and programme operation need to be taken into account.

If Bau EPD GmbH implements the decision, no further complaints or appeals on the same subject will be accepted.