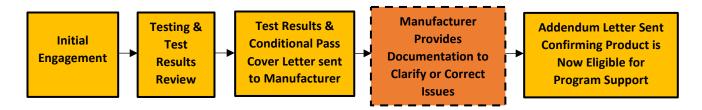




Conditional Pass Policy Version 3 September 2018

## Introduction

This document outlines the treatment of products that do not fully meet the Lighting Global Quality Standards due to easy-to-fix issues that can be addressed without retesting. In cases where a product does not fully meet the Quality Standards due to one of these issues, we use the term "conditional pass" to describe their status when reporting results to the manufacturer in the cover letter that accompanies the official test results. A conditional pass gives manufacturers an opportunity to make required changes in the product, packaging or documentation to meet the Quality Standards. After a manufacturer provides documentation of the changes and an acceptable timeline for making the changes, we will send an addendum letter that confirms the product is now eligible for program support. Once a product meets the Lighting Global Quality Standards, the product will receive a Specification Sheet and Verification Letter, be posted on the Lighting Global website, and be potentially eligible for further program support. <sup>1</sup>



Conditional passes may be divided into three categories:

- Conditional Pass Pending Clarification
- Conditional Pass Pending Correction
- Conditional Pass for Truth-in-Advertising on Lighting Global Specification Sheet

Each of these categories is treated differently. The specific failures that belong in each category are listed following the description of the category. Each category is summarized in Table 1 and described in detail below.

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<sup>&</sup>lt;sup>1</sup> Companies with one or more products meeting the Lighting Global Quality Standards must also comply with Lighting Global's <u>Intellectual Property Policy</u> to be fully eligible for Lighting Global program support. Note that firms would need to meet additional requirements and pass a World Bank Group due diligence check in order to qualify for Lighting Global Associate status. Regional and country-level programs may have additional entry requirements.

**Table 1. Summary of Three Conditional Pass Categories** 

	Conditional Pass Pending Clarification	Conditional Pass Pending Correction	Conditional Pass for Truth-in- Advertising on Lighting Global Specification Sheet (Renewal testing according to MCM and MCM testing only)
Program Support	Program requires clarifying information from manufacturers prior to determining status or receiving program support	Issues that can be fixed solely by changing packaging and advertising materials; digital corrections must be submitted prior to receiving program support	Product will maintain program support and Lighting Global will adjust the values on the Standardized Specification Sheet unless the manufacturer chooses to undergo additional testing of the product to maintain the current values
Examples of Issues	<ul> <li>•Voltage threshold is outside of the default range for overcharge or deep discharge protection, but issue may be resolved by providing the battery manufacturer's specification sheet</li> <li>• Fail to provide proof/approval for AC-DC Charger Safety</li> <li>• Product that meets the Lighting Global requirements for ingress protection (IP), but does not meet a higher, advertised level of ingress protection and the manufacturer can provide documentation of IP testing by an accredited lab</li> <li>• Manufacturer has not provided all required documentation, such as a UN38.3 report, details on lithium battery protection, and outdoor cable certification (SHS kits only)</li> </ul>	<ul> <li>No consumer-facing warranty</li> <li>Warranty does not meet requirements</li> <li>Does not comply with Performance Reporting Requirements</li> <li>A consumer-facing specification is &gt;15% above the average measured value</li> <li>Product includes an auxiliary appliance or charger that does not meet the Quality Standards</li> <li>Product does not meet water ingress protection levels, but issue may be addressed by including an appropriate warning label</li> <li>User manual does not meet requirements (SHS kits only)</li> <li>Packaging does not include a consumer-facing battery replacement statement (SHS kits only)</li> <li>Component replacement information is insufficient (SHS kits only)</li> </ul>	• A rating on the Lighting Global Standardized Specification Sheet is >15% above the average measured value

# **Conditional Pass Pending Clarification**

In some cases, products will be given a "conditional pass" when Lighting Global requires more information to determine whether the product meets the Quality Standards.

## What Manufacturers Should Do to Resolve the Issue

In these cases, if the manufacturer can provide the required clarifying information or documentation, the product's status can change from "conditional pass" to "pass," and the product will be considered to meet the Quality Standards. If the product is already listed on the website, this clarifying information must be delivered within two weeks of receiving the test results to maintain support. If the product is not yet listed, we request the information or documentation be provided as soon as possible.

## **Examples of issues** that can be resolved with clarifying information include:

- A product has overcharge or deep discharge protection for its battery, but the voltage threshold is outside of the default range specified in the most recent version of the Lighting Global Quality Standards. The manufacturer may provide documentation proving the tested threshold is within the battery supplier's recommendations.
- A manufacturer may provide documentation confirming that their AC-DC charger has approval from a recognized consumer electronics safety regulator. Detailed guidelines are described in the <u>AC Charger Safety Approval Policy</u>.
- A product meets the Lighting Global requirements for ingress protection (IP), but does not meet a higher, advertised level of ingress protection. The manufacturer may provide documentation of IP testing by an accredited lab proving that the product meets the advertised IP requirement.
- A manufacturer has not provided all required documentation under the Quality Standards for Solar Home System (SHS) Kits, such as a UN38.3 report, details on lithium battery protection, and outdoor cable certification. At this time, these requirements only apply to products tested as SHS kits, which are typically larger than 10 Wp.

#### **Conditional Pass Pending Correction**

In cases where the product does not fully meet the Quality Standards due to an easy-to-fix issue related to the warranty, performance reporting requirements, water ingress labeling, or truth-in-advertising, the product will be given a conditional pass. Meeting the Lighting Global Quality Standards and accessing program support will not be possible until the Lighting Global team can confirm these issues are being addressed.

## What Manufacturers Should Do to Resolve the Issue

- 1. Manufacturers must submit a plan to the Lighting Global team outlining the actions that manufacturers will take to address the issue.
  - a. The plan must include a timeline and detailed description of how the issue will be corrected across the product line. If the product is already listed on the website, this

<sup>&</sup>lt;sup>2</sup> Upon request, companies may be granted an additional two weeks to finalize a decision if they are actively engaging with the Lighting Global Quality Assurance team regarding the issue.

plan must be delivered within two weeks of receiving the test results to maintain support.<sup>3</sup> If the product is not yet listed, we request the plan be provided as soon as possible.

- i. Typically, to address truth-in-advertising issues, plans must include details regarding changing all marketing and advertising materials (product packaging, instruction manual, website, posters, etc.) to accurately reflect the measured results from laboratory testing that has been accepted by Lighting Global.<sup>4</sup>
- ii. For issues related to consumer-facing materials, Lighting Global requires manufacturers to provide a digital copy of the updated materials and a timeline stating when the updates will be implemented. In general, if changes to the printed packaging cannot be made within three months, manufacturers are expected to apply stickers or labels to the existing packaging to correct any issues. Digital photos of the sticker or label and where it will be placed on the consumer-facing materials and the date of implementation of the stickers must be provided.
- b. Upon the Lighting Global team's approval of the plan, updated digital materials and timeline, the product's status can change from "conditional pass" to "pass," and the product will receive program support for up to two years from the date of receipt of the original test results. Any documentation and proof provided for resolving the issue will be included in an addendum letter. The product subsequently receives a Specification Sheet and Verification Letter, is posted on the Lighting Global website, and is potentially eligible for further program support.
- 2. To verify the changes have been made, manufacturers are required to provide photos of updated materials (e.g. re-designed product packaging) showing the changes have been implemented. <sup>7</sup>
  - a. This evidence must be submitted within three months or according to the agreed upon timeline.
  - b. At a minimum, the following two images are required: a close-up picture of the changes (e.g. printed packaging or instruction manual) and a picture of 100 units of product stock with the changes implemented.
  - c. If the evidence is acceptable, the product will maintain program support.
  - d. If this evidence is not provided the product will lose its status with regard to the Quality Standards immediately and will be removed from the Lighting Global

<sup>&</sup>lt;sup>3</sup> Upon request, companies may be granted an additional two weeks to finalize a decision if they are actively engaging with the Lighting Global Quality Assurance team regarding the issue.

<sup>&</sup>lt;sup>4</sup> Alternatively, manufacturers may choose to improve the product to match the advertised values. A change to the product would require that the product be re-tested for verification (targeted re-testing may be a possibility).

<sup>&</sup>lt;sup>5</sup> Up to an additional six months of support may be granted to account for the delay in receiving program support.

<sup>&</sup>lt;sup>6</sup> Companies with one or more products meeting the Lighting Global Quality Standards must also comply with Lighting Global's <u>Intellectual Property Policy</u> to be fully eligible for Lighting Global program support. Note that firms would need to meet additional requirements and pass a World Bank Group due diligence check in order to qualify for Lighting Global Associate status. Regional and country-level programs may have additional entry requirements.

<sup>&</sup>lt;sup>7</sup> This step of the policy will be enforced for all products receiving a conditional pass beginning March 1, 2018.

website. If the company then requests to have the product re-listed, the product would need to undergo a full QTM test to verify that it now meets the Quality Standards.<sup>8</sup>

WARNING: If the issue identified during testing was previously identified in QTM/Renewal according to MCM/AVM /MCM test results and not corrected by the manufacturer, the product may be required to undergo additional inspections instead of submitting photos as described in Step 1 and 2 above. Lighting Global will randomly sample units from the warehouse and subsequently from the market and conduct a visual inspection to verify that the product's packaging, user manual, or warranty card has been corrected. The costs for the inspections will be paid by the manufacturer. If the additional inspections confirm that the required corrections have not been made, the product will lose Lighting Global support.

3. Products that receive conditional pass pending correction may be subject to follow-up market surveillance activities, such as website monitoring, Market Check Tests, and market inspections. The Lighting Global team will request a list of distributors and locations where we can inspect the products in the market to verify the updates were implemented. If this information is not provided the product will lose its status with regard to the Quality Standards immediately and will be removed from the Lighting Global website.

#### **Examples of Issues**

Table 3 provides some example of issues that are easy to fix, but are required to be resolved before the product can receive program support.

Table 3. Easy-to-Fix Issues

Category	Metric	Issue
Warranty	Minimum Warranty	• No consumer-facing <sup>9</sup> warranty
		<ul> <li>Warranty does not meet the minimum</li> </ul>
		requirements
Truth In	Consumer-facing	• Does not comply with the Performance Reporting
Advertising	performance claims	Requirements <sup>10</sup>
		• A run time other than the solar run time for the
		highest setting is advertised without stating the
		setting name
	•	• A consumer-facing specification is > 15% above
		the average measured value

<sup>&</sup>lt;sup>8</sup> Under certain conditions, a company may be able to be reinstated after providing the required evidence or undergoing targeted re-testing, at the discretion of Lighting Global.

<sup>&</sup>lt;sup>9</sup> Consumer-facing means that the end user has access to the information via the packaging, user's manual, etc., prior to the time of purchase. Posting warranty information on a website, while useful, does not provide sufficient notice to consumers as many end-users do not have access to the Internet.

<sup>&</sup>lt;sup>10</sup> See <u>Performance Reporting Requirements Policy</u> for more details.

Truth In Advertising  Quality and Durability	Auxiliary Appliance Use & Other Aspects  Water Protection	•	Information provided in a consumer facing location is not accurately specified Product includes an auxiliary appliance or charger that does not meet the Quality Standards, and the manufacturer decides to no longer include this appliance or charger with the system  Does not meet required water ingress protection levels, but may be able to address this issue by including an appropriate warning label.
Consumer Information (SHS kits only)	User Manual	•	User manual does not meet requirements described in the Quality Standards for SHS Kits
Consumer Information (SHS kits only)	Component Specifications and Replacement Methods	•	Packaging does not include a consumer-facing battery replacement statement  Component replacement information is insufficient

# Conditional Pass for Truth-in-Advertising on Lighting Global Specification Sheet

In cases where products with an existing Lighting Global Specification Sheet are re-tested, such as during Renewal Testing according to the Market Check Test Method or a Market Check Test, the new test results might indicate a decrease in performance and not be within 15% of the original test results. If the product performance is advertised accurately in all locations except the Lighting Global Specification Sheet, the product may maintain program support and Lighting Global will adjust the values on the Standardized Specification Sheet unless the manufacturer chooses to undergo additional testing of the product to maintain the current values. [Note that in the case of improved performance, the SSS will not be revised with performance measurements that exceed the original QTM results unless a 6-sample test is completed to confirm the 2-sample renewal results.]

#### What Manufacturers Should Do to Resolve the Issue

In these cases, the manufacturer will be given two weeks to decide whether to have Lighting Global adjust the values on the Standardized Specification Sheet to match the recently measured values or to undergo additional testing of the product in order to maintain the current values reported on the Standardized Specification Sheet. If a decision is not provided within two weeks, Lighting Global will adjust the values on the Standardized Specification Sheet. Once the values are updated on the Standardized Specification Sheet, the product's status can change from "conditional pass" to "pass," and the product will be considered to continue to meet the Quality Standards.

The manufacturer may instead prefer that the product undergo further testing to confirm the new test results or choose to make changes to the product to ensure it performs similarly to the original testing. In these cases, additional testing will be required, and, depending on the specific issue, the product may or may not continue to receive program support.

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<sup>&</sup>lt;sup>11</sup>Upon request, companies may be granted an additional two weeks to finalize a decision if they are actively engaging with the Lighting Global Quality Assurance team regarding the issue.

# **Examples of Issues**

The main example of an issue in this category is a rating on the Lighting Global Standardized Specification Sheet that is greater than 15% above the average measured value, though there could be other similar changes to the Standardized Specification Sheet that would also be relevant.