



# Lighting Global Accelerated Verification Method

# **Draft Policy – Circulated for comment April 2015**

Lighting Global is working to create a new, faster framework for product quality verification. This **Accelerated Verification Method (AVM)**<sup>1</sup> will be an optional alternative quality verification pathway that is faster than the standard Quality Test Method (QTM) testing pathway. Verification of products through the AVM will include three elements:

- 1) Eligibility based on the manufacturer's strong history of success with the Lighting Global quality assurance (QA) program,
- 2) Expedited verification entry testing, and
- 3) Strong incentives for compliance through market check tests and penalties for poor check test results

We expect the proposed AVM to cut the QA verification time from the status quo of about four months to approximately eight to ten weeks. Time savings come from (i) reducing the number of samples required for testing, (ii) shortening the period for lumen maintenance testing, and (iii) eliminating third-party sampling of the units used in verification entry testing.

While the timeline and requirements for **verification entry testing** will be reduced, the rigor and value of the quality verification will be maintained through a combination of **eligibility screening** and more comprehensive **market check testing**. The AVM will be available only to organizations that meet eligibility criteria that are based on their prior track record with the Lighting Global QA program.<sup>2</sup> Every product that has its quality verified through the AVM will have randomly-selected market samples tested according to the <u>Lighting Global Market Check Testing policy</u><sup>3</sup> at least once during the two-year period that its status as a quality-verified product is valid. This creates a strong incentive to maintain permanent product quality and mitigates the risk of manipulation via "golden samples."<sup>4</sup>

The total fee for the AVM pathway will be US\$10,000. The increase in price relative to standard QTM verification covers administrative costs and the requisite market check testing.

Following initial review and feedback on the proposed AVM, the Lighting Global team plans to implement the method for eligible manufacturers on a pilot basis. Following a trial period, some adjustments may be made as needed, with further adjustments managed through normal QA stakeholder outreach processes. Should an eligible manufacturer desire more extensive evaluation during verification entry testing, they would have the option to request that more samples be tested under the AVM, but would need to pay a higher fee and accept a longer timeline. Eligible manufacturers, of course, also retain the option to use standard QTM testing instead of AVM testing.

<sup>3</sup> Lighting Global policies may be downloaded from: www.lightingglobal.org/resources/policies-and-guidelines/

<sup>&</sup>lt;sup>1</sup> A glossary of key terms is available at the end of this document.

<sup>&</sup>lt;sup>2</sup> See eligibility details below.

<sup>&</sup>lt;sup>4</sup> By "golden samples," we mean: high-performing samples chosen by the manufacturer for AVM testing that are not representative of the product's average performance.

The proposed AVM testing pathway is divided into five main components:

- 1. Meeting eligibility requirements
- 2. Verification entry testing under AVM
- 3. Lighting Global program support (for products that pass)
- 4. Guaranteed market check testing
- 5. Consequences of non-compliance under the AVM

# 1. Eligibility Requirements

This section includes a summary of eligibility criteria and requirements that companies must meet to use the AVM.

These eligibility criteria are intended to identify companies that have a consistent track record for quality within the Lighting Global QA Program and to reduce the risk that products submitted for AVM will fail during market check testing. This practice helps protect the value of the quality assurance verification for products that are covered by the Lighting Global framework along with protecting the interests of off-grid lighting product buyers. This practice also ensures that manufacturers establish reliable quality control processes and a full understanding of the Lighting Global QA program before they attempt to operate under the AVM, which carries greater downstream non-compliance consequences.<sup>5</sup>

- The manufacturer must have a good track record with the Lighting Global program:
  - O The company must be a current Lighting Global Associate.
  - O The company must have had at least three products that have met the Lighting Global Quality Standards through QTM testing (different model generations in the same product line may count as separate products for this criterion, provided that full QTM testing was used to evaluate the products in each case). At least one of these products must currently meet the Quality Standards (i.e., at least one existing product made by the company must be posted on the Lighting Global website and have a Standardized Specification Sheet at the time that the new product is submitted for evaluation)
  - The company must have no products that failed AVM tests, QTM tests or market check tests in the past two years<sup>6</sup>
  - o The company must have a **history of professional conduct** in the market and open, honest communication with the Lighting Global/Lighting Africa/Lighting Asia teams

# 2. Verification Entry Testing Under AVM

To participate in verification entry testing under the AVM manufacturers must carry out the following steps:

- **Contact the Lighting Global QA team:** Manufacturers will first contact the Lighting Global QA team to clarify the terms of testing under the AVM method and coordinate testing.
- Submit Products: Manufacturers will submit six product units to allow for verification entry testing with a sample size of two for each test. All samples must be representative of the final products that the manufacturer plans to distribute. Note that the number of samples required for this testing is considerably smaller than the number required for QTM testing (18 product units in order to achieve a sample size of six for each test). Note also that the random sampling procedure used in the QTM process will not be required.
- Provide Company and Product Information: Manufacturers will provide routine information requested
  on the manufacturer information form, along with information related to their intended markets and
  distributors to assist with sample collection for market check testing, as described above.

<sup>&</sup>lt;sup>5</sup> See the "Consequences of non-compliance" section below.

<sup>&</sup>lt;sup>6</sup> See the definitions of failed tests in the Glossary section below.

#### • Provide Declarations:

O Upon submission of the product for AVM testing, the company will be required to sign a declaration certifying that: A) the samples provided for testing are an accurate and true representation of the final production model, B) are from a full production run in which the manufacturer has cumulatively produced at least 1000 units of the same product model, C) are representative of what they plan to distribute, and D) the product is expected to meet the Lighting Global Minimum Quality Standards.

# Manufacturers must submit documentation to assist with market check testing, including, but not limited to:

- An annual report listing the main markets in which their quality-verified products are being sold, differentiated by product model name
- The names and contact details of the principal distributors to whom they sell their products
- o Annual shipment figures (for the previous year) of quality-verified products
- o The intended markets and distributors that will be used for the product under test

All non-public information, as always, will be managed by the Lighting Global QA team in a way that ensures confidentiality. The exception to this is that manufacturers will grant the Lighting Global QA team authorization to contact any distributor on the supplied list to facilitate the pursuit of market check testing enquiries and may be asked to alert distributors to this arrangement and to request their full cooperation with the Lighting Global market check testing process. Note, that, in the event that the Lighting Global QA team experiences persistent difficulties in identifying and accessing product samples for market check testing, they reserve the right to rescind a manufacturer's AVM eligibility.

• Pay Fees: Manufacturers will pay a fixed-price quality assurance fee of US\$10,000.7 This quality assurance fee covers two separate activities; one portion of the fee covers verification entry testing and the other covers the verification process and market check testing. Initially, all AVM-related testing will be conducted through submissions to Lighting Global designated test laboratories. In other words, manufacturers will not have the option to conduct AVM verification entry testing through an approved independent test laboratory, though this testing route may be a possibility in the future (see the <u>Lighting Global Product Testing Policy</u> for more details).

#### The Lighting Global QA team will:

- Test Products: Testing will be done using procedures described in the most recent edition of IEC 62257-9-5. Testing will be equivalent to conducting an Initial Screening Method (ISM) test with a sample size of two. Initial screening method tests involve the same procedures as QTM tests, except that the Lumen Maintenance test is for 500 hours instead of 2000 hours and the random sampling requirement is not applied.
- Provide Test Reports and Grant Verification: Following testing, the manufacturer will receive a detailed
  test report. If the results from verification entry testing suggest that a product meets the Lighting Global
  Minimum Quality Standards, the product will be eligible for program support, as described below. If a
  product fails verification entry testing, the product and manufacturer may be subject to consequences as
  outlined in Section 5, below.

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<sup>&</sup>lt;sup>7</sup> This fee may vary by a modest amount if a product requires a custom test plan.

# 3. Lighting Global program support

Products that meet the Lighting Global Quality Standards via AVM entry testing process will immediately be provided with support identical to that available to those that are verified using QTM testing. If the results from verification entry testing suggest that a product meets the Lighting Global Quality Standards, the product will: a) receive a Standardized Specification Sheet and Verification Letter, b) be placed on the Lighting Global website, and c) be potentially eligible for further Program support. This support will continue through a two-year period, or until support is rescinded due to a failure in market check testing. The support may be extended using processes that are available to all companies with QA verified products, as described in the Policy for Renewing Test Results.

# 4. Evaluating Compliance via Market Check Testing

All products tested under AVM will be market check tested and these market check tested products will be expected to perform similarly to or better than the product sample submitted for verification entry testing. Products that fail market check testing will be subject to the consequences of non-compliance.

Market check testing will be conducted for all products within a two-year period, with most being tested within the first year and some being tested more than once within the two-year period. When a product passes a market check test (meaning the initial performance and quality is verified in the market), a test report and short summary of the sampling and testing will be provided confidentially to the manufacturer.

In the event that a product either fails or "conditionally passes" the initial market check test, the manufacturer will be contacted and the results communicated.<sup>8</sup> The manufacturer may then have options of accepting the results and the consequences, providing clarifying information, performing corrective actions, or paying for additional samples to be taken for further check tests to be conducted (as is the standard practice for the current market check testing framework). During the time that further tests are being conducted, at the sole discretion of Lighting Global, the product may be removed from the Lighting Global website and the use of the Lighting Global Verification Letter may not be permitted.

In the event that a product is deemed to have failed or has not corrected the issues resulting in a "conditional pass," the consequences of non-compliance will be effective as described below. If the manufacturer chooses to pay for additional samples to be tested following the initial market check test results, the financial penalties will not be enacted until the full testing is complete.

## 5. Consequences of Non-compliance Under the AVM

Because AVM relies on limited entry testing and stronger use of market check testing and reputational evidence, it is important that there are strong incentives to discourage abuse of the system at the verification entry testing stage. To ensure that companies only submit products that are very likely to meet the Quality Standards, both financial and non-financial penalties for non-compliance may be used.

Below we list a clear set of consequences of non-compliance. The non-financial penalties reduce the likelihood of repeat (or first-time) offenders. The role of the financial penalties is non-punitive and their levels are therefore set at an amount sufficient to cover the cost of extra market check testing that is necessary to ensure program integrity is maintained in the event of failures. The AVM verification route therefore places even greater emphasis on manufacturers being able to control and maintain their product quality internally than the QTM route.

- If a product fails an <u>AVM verification entry test</u> (i.e., does not meet the Minimum Quality Standards) the following consequences apply:
  - The product is not eligible to receive a Standardized Specification Sheet, Verification Letter or other program support.

<sup>&</sup>lt;sup>8</sup> See the definitions of failed tests and "conditional pass" in the Glossary section below.

- O The manufacturer is not eligible to submit products for testing under the AVM method for two years from the date of the failure. They must also have two successive products meet the Minimum Quality Standards via the QTM pathway following the failed AVM entry test. NOTE: During the first year of the AVM program, each eligible manufacturer will be allowed to have up to one AVM verification entry test failure prior to this penalty being enforced.
- The manufacturer does not receive any refund from the full US\$10,000 test fee. Leftover funds will be used to cover the cost of market check testing other products.
- If a product currently receiving program support based on AVM entry testing does not pass an AVM market check test the following consequences apply:
  - If a product receives a "conditional pass" and the easy-to-fix issue is fully addressed (corrected across the entire product line) within one month: the manufacturer must pay a fee of US\$5,000 for the product to maintain its status. The manufacturer will not be eligible to submit products for testing under the AVM for two years from the date of the failure. The manufacturer must also have two successive products meet the Minimum Quality Standards via QTM testing before being eligible to again use the AVM. Note: if the "conditional pass" can be resolved simply by the manufacturer providing clarifying information and documentation, this penalty may not apply.
  - A product fails an AVM market check test and the issues are not resolved: the non-compliant product is delisted, use of the Verification Letter is no longer permitted, and the manufacturer has to pay a fee of US\$5,000 in addition to the current QTM or renewal testing fee for the next submitted product. <sup>9</sup> As noted above, the manufacturer will not be eligible to submit products for testing under the AVM for two years from the date of the failure, and the manufacturer must have two successive products that meet the Minimum Quality Standards via QTM testing before being eligible to again use the AVM.

To re-list a product that failed a market check test, the manufacturer may resubmit through the QTM pathway. The full QTM testing fee, plus any applicable penalties, must be paid again.

# Anticipated Timeline for policy changes (subject to change)

**Pilot Phase - July 2015 – December 2015:** The AVM will be available as a pathway for manufacturers who are eligible to participate in a pilot phase according to the eligibility criteria listed above. These manufacturers will be contacted by the Lighting Global Team.

**Policy finalization - January 2016:** Based on experience in the pilot phase, revisions to the policy may be enacted by the Lighting Global team.

**Incorporated with normal operation:** February 2016 and onward.

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<sup>&</sup>lt;sup>9</sup> Renewal testing is used to renew test results two years after the Standardized Specification Sheet and Verification Letter were issued. Renewal testing may consist of a two-sample ISM test or full QTM testing depending on the extent the product has changed. In both cases, renewal testing requires random selection of product samples.

# **GLOSSARY**

#### Definition of failed tests and "conditional pass"

A product that receives a "fail" on the cover letter sent to the manufacturer from a Quality Test Method (QTM), Market Check Test or Accelerated Verification Method (AVM) is considered to have **failed a test**. In these cases, the issue causing the failure was significant and could not be easily corrected and verified without re-testing.

In some cases a product does not fully meet the Lighting Global Quality Standards due to an easy-to-fix issue and cannot receive an initial "pass"; our team typically uses the term "conditional pass" in evaluating these products. A conditional pass gives the manufacturer an opportunity to prove that they have made the required change in the product to meet the Quality Standards. Once proven, the product's status is changed from "conditional pass" to "pass." Easy-to-fix issues include the following:

- No consumer-facing<sup>10</sup> warranty
- Warranty is not  $\geq 12$  months
- A consumer-facing specification is > 15% above the average measured value
- Product does not meet required protection levels with regard to water ingress, but may be able to address this issue by including an appropriate warning label

Note that in some cases, products will be given a "conditional pass" when the test lab requires more information to determine whether the product meets the Quality Standards.<sup>11</sup> 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 for the purposes of the AVM framework, the penalties described above will not apply.

#### Accelerated Verification Method Abbreviation: AVM

The testing pathway described in this document that proposes to shorten testing time by reducing the number of samples and eliminating the random sampling requirement for verification entry testing. The method maintains the rigor expected of the Lighting Global QA program by performing market check tests on all products verified through this process.

## IEC Technical Specification 62257-9-5 ed 2.0

In April 2013 the Lighting Global Quality Test Method procedures were institutionalized through the International Electrotechnical Commission (IEC) as IEC Technical Specification 62257-9-5 ed 2.0. The document can be purchased from the <a href="IEC Webstore">IEC Webstore</a>.

<sup>&</sup>lt;sup>10</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>11</sup> Examples of issues resolved with clarifying information include:

A product has overcharge or deep discharge protection, but the voltage threshold is outside of our default range.
 The manufacturer may provide documentation proving the tested threshold is within the battery supplier's recommendations.

<sup>•</sup> A manufacturer may provide material specifying that their AC-DC charger has approval from a recognized consumer electronics safety regulator.

#### Initial Screening Method Abbreviation: ISM

An abbreviated, low-cost version of the QTM, used to provide rapid feedback on product quality and performance and evaluate a product's likelihood of passing the QTM. ISM test results are based on manufacturer-supplied samples and are valid for 1 year from the month the manufacturer is sent the results.

#### **Market Check Testing**

Used for random quality checks and updates to products receiving Program support. Market Check Test results are based on samples that are procured by agents of Lighting Global from the distribution supply chain (e.g. through purchase from a retail outlet) without prior notice. See the <u>Market Check Testing Policy</u> for full details.

#### **Quality Standards**

Lighting Global maintains the Quality Standards, a set of off-grid lighting benchmarks that set a baseline level of quality, durability, and truth-in-advertising to protect consumers.

# Quality Test Method Abbreviation: QTM

Lighting Global's most comprehensive testing methodology, used to qualify products for program support, generate Standardized Specification Sheets (SSS), and judge products in the Outstanding Product Awards competition. QTM test results are based on randomly-selected samples and are valid for 2 years from the month the manufacturer is sent the results.

#### **Renewal Testing**

Renewal testing is conducted to renew a product's QTM test results and maintain its Program status two years after the Standardized Specification Sheet and Verification Letter were issued. Products that have not changed may be renewed using a two-sample ISM test (note that the product samples for these tests must be collected by an agent of Lighting Global as per our sample collection procedures), while products which have been updated may require QTM testing. See the <u>Lighting Global Policy for Renewing Test Results</u> for full details.

#### Standardized Specification Sheets Abbreviation: SSS

A Standardized Specification Sheet is an easy-to-read summary of the QTM results. Standardized Specification Sheets are posted to the <u>Lighting Global website</u>, thereby providing a reliable and independent source of information about product quality and performance.

#### **Verification Entry Testing**

Verification entry testing refers to any test which verifies whether a product meets the Lighting Global Minimum Quality Standards and enables a product to receive program support. Currently, the QTM test is the only verification entry test used, though the current document proposes conducting a shortened verification entry test, equivalent to an ISM test with a sample size of two as part of the AVM.

#### **Verification Letters**

A Lighting Global Verification Letter officially states that a product has met the Minimum Quality Standards and that the testing results are valid for two years. The Verification Letter may be used by some programs and customs officials as an entrance requirement. The validity of a Verification Letter may be checked on the <u>Lighting Global website</u>.