Green Electronics Council

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OUTCOMES REPORT
EPEAT VERIFICATION ROUND IE-2016-01

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round IE-2016-01. This round focused on criteria which had not been verified previously. The products were selected as follows:

- All products that were active in the Registry were eligible for inclusion.
- Products were randomly selected from a list of products claiming the targeted criteria.
- All geographies and Manufacturers were eligible for inclusion.
- No Manufacturer was subject to more than six investigations during this Round.

Sixty investigations were conducted on ten criteria where 24 of the investigations were of required criteria and 36 of the investigations were of optional criteria. Round IE-2016-01 touched the following areas of the EPEAT Registry:

- 14 Manufacturers were investigated in the Round.
- Products were chosen from two countries (US and Canada).
- 9 criteria which had never been verified before out of 58 criteria in IEEE 1680.2-2012 were verified. Another criterion was planned to be investigated but no Manufacturers currently claim this criterion (4.2.2.2).

2. Summary of Outcomes

Highlights from this Verification Round:

- 60 investigations completed
- 55 decisions of Conformance
- 5 decisions of Non-Conformance

Figure 1:

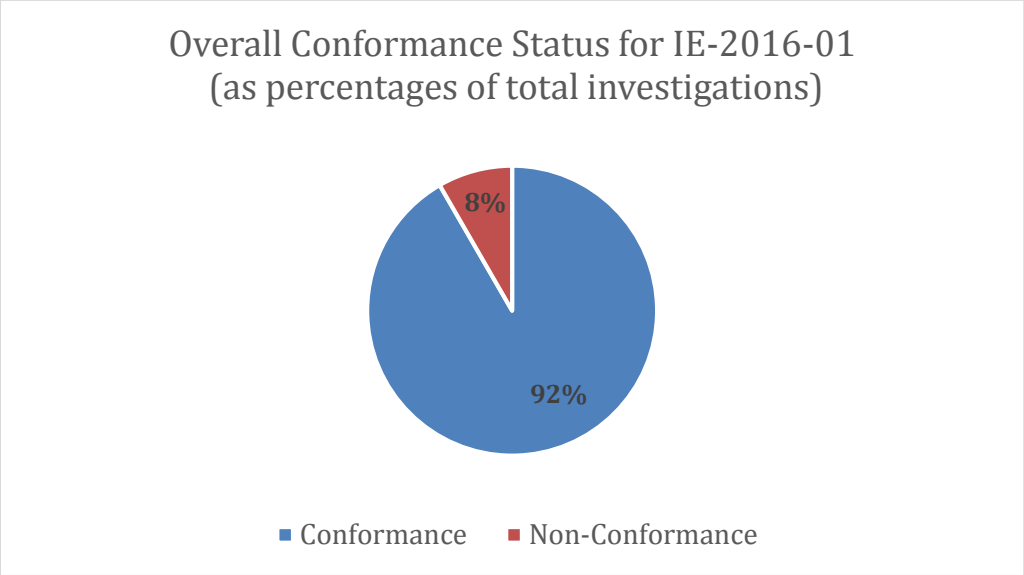

Figure 2:

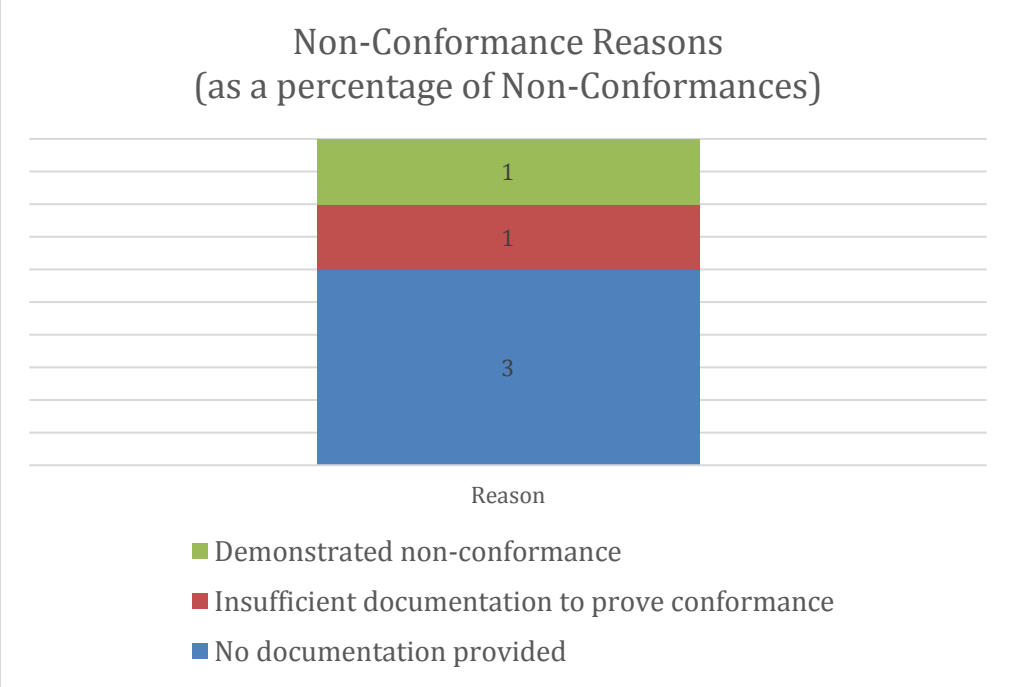

Table 1 below summarizes the number of investigations completed and which investigations were Non-Conformances.

TABLE 1: Summary of Non-Conformance Findings				
Criterion	Required or Optional	Description	Investigations	Non-Conformances
4.1.6.2	Optional	Eliminating or reducing BFR/CFR content of printed circuit board laminates	1	0
4.1.8.1	Optional	Inventory of intentionally added chemicals residing in the product	11	2
4.2.1.1	Required	Declaration of postconsumer recycled plastic content	11	1
4.2.1.2	Required	Minimum content of postconsumer recycled plastic	4	0
4.2.1.3	Optional	Minimum 5% to 10% content of postconsumer recycled plastic	3	0
4.2.1.4	Optional	Minimum 25% content of postconsumer recycled plastic	3	0
4.2.2.1	Required	Declaration of biobased plastic materials content	3	1
4.2.2.2	Optional	Minimum content of biobased plastic material	0	0
4.3.4.3	Optional	Minimum 90% reusable/recyclable	10	1
4.8.3.1	Required	Recovered content in select fiber-based packaging materials	6	0
4.9.3.3	Optional	Manufacturer recycles or reuses plastics collected through its cartridge and container take-back program	8	0
		Total	60	5

3. Key Lessons

4.1.8.1: Inventory of intentionally added chemicals:

This criterion requires documentation of a Conformance Assurance System (CAS). A CAS is defined in the Standard as "a process to ensure conformity to a design requirement where the key consideration is control of the supply chain of components, materials, packaging, and/or services…" Subscribers are required to demonstrate all 4 elements of a CAS:

1. Plan: Description of the requirement to the supplier.
2. Do: Collection of documents that show conformity.
3. Check: Demonstration of how conformance is assured.
4. Act: Corrective action.

4.2.2.1: Declaration of biobased plastic materials content:

Criterion 4.2.2.1 requires Manufacturers to declare the percentage of biobased plastic materials. The declaration should be calculated as a percentage of total plastic by weigh for each product. Declarations of zero are acceptable. However, if the declaration is for a value greater than zero, supplier letter(s) must be provided as evidence in order to prove conformance. In addition, a

documentation of the calculation must be provided. The calculated percentage should equal the declaration on the EPEAT Registry.

4. General Message to Manufacturers

Products "Active" on the EPEAT Registry:

All Active products on the EPEAT Registry are subject to Verification. When products reach their end of life, Manufacturers should remove the products from the EPEAT Registry. If a product which is Active on the EPEAT Registry has gone end of life and a Manufacturer cannot obtain required evidence due to the age of the product, it would still be considered a Non-Conformance.

Understanding documentation requirements for Verification Rounds:

EPEAT has pre-recorded training modules for every criterion in the IEEE 1680.2-2012 standard. These modules are designed to de-mystify the standard's requirements, and to illustrate the types of information needed during a Verification Round. Participating Manufacturers have access to these modules under the "My Account" section of EPEAT.net. Go to "Key Documents" and search for EPEAT Criteria Training Videos for links to all available videos.

Initial response to Auditors:

When contacted regarding participation in a Verification Round, Manufacturers should respond to the Auditor as soon as possible to let them know they are communicating with the correct person or to inform them of the correct contact. This also helps the Auditor know that the e-mail address is valid.

Conformance of products that may share similar traits and/or supply chains:

If a Non-Conformance is found for a particular criterion and product, Manufacturers should be prepared to determine if other products on the EPEAT Registry are similarly impacted due to use of similar materials and/or supply chains, and develop corrective action plans to address the future conformance of these other products.

5. Looking Forward

Plans for Future Verification Activities:

All 2016 Verification Rounds for Imaging Equipment have been kicked off. The third and final Verification Round for 2016 for Imaging Equipment involves Level 0 and Level 1 investigations. The Level 1 investigations are expected to start October 21, 2016. Planning for 2017 Verification Rounds has not yet begun.

6. Investigations Table

Table 2: Specific Non-Conformance Findings and Corrective Action Taken								
Participating Manufacturer	**Product**	**Country**	**Product Type**	**Criterion**	**Required or Optional**	**Criterion Description**	**NC Finding Description**	**Corrective Action Taken**
Toshiba	eStudio6540CG	United States	Multifunction Device (MFD)	4.1.8.1	O	Inventory of intentionally added chemicals residing in the product	No documentation provided	Product archived by Manufacturer
Kodak	i2800	United States	Scanner	4.1.8.1	O	Inventory of intentionally added chemicals residing in the product	Insufficient documentation to prove conformance	Manufacturer provided evidence of changes which restored accuracy of EPEAT Registry
Toshiba	eStudio6540CG	United States	Multifunction Device (MFD)	4.2.1.1	R	Declaration of postconsumer recycled plastic content	No documentation provided	Product archived by Manufacturer
Sharp	MX-5141N	United States	Multifunction Device (MFD)	4.2.2.1	R	Declaration of biobased plastic materials content	Demonstrated non-conformance	Manufacturer provided evidence of changes which restored accuracy of EPEAT Registry
Toshiba	eStudio6540CG	United States	Multifunction Device (MFD)	4.3.4.3	O	Minimum 90% reusable/recyclable	No documentation provided	Product archived by Manufacturer

7. Background

To assure the credibility of the EPEAT Registry, verification of the claims by Participating Manufacturers are rigorous, independent and transparent. Verification is conducted according to policies and procedures described in documents provided on www.epeat.net. Manufacturers are given no forewarning that their products will be verified, and verification is performed based on the declarations as they are in the Registry at the time the Verification Round begins.

Investigations are performed by expert technical contractors called Auditors working for a Conformity Assurance Body approved by the Green Electronics Council (GEC). Auditors are free of conflicts of interest, and their recommended decisions are reviewed and finalized by a five-person panel of independent technical experts (called the Conformity Decision Panel) who are also contractors free of conflicts of interest. Decisions of conformity by the Conformity Decision Panel are made blind to the identity of the products and companies they are judging, based only on evidence collected and analyzed by Auditors. A serious consequence of receiving a Non-Conformance is that it is published publicly in an Outcomes Report, for purchasers, competitors, and others to see.

- In a Level 0 investigation, an Auditor assesses Conformance to a criterion by examining publicly available information only – no products are obtained for inspection or testing, and the Manufacturer is not asked to submit documentation. If the publicly available information is inconclusive (i.e. was not available, could not be found from public sources, or did not provide enough details to determine conformance), the Auditor may be instructed to proceed with a Level 1 investigation.

- In a Level 1 investigation, an Auditor assess Conformance to a criterion by examining information submitted by a Manufacturer. The Manufacturer is required to provide detailed and accurate information in a timely manner.

- In Level 2 investigations, the Conformity Assurance Body obtains a product without the Manufacturer's knowledge or involvement, and has the product disassembled and inspected to assess conformance with one or more criteria.

- In Level 3 investigations, the Conformity Assurance Body obtains a product without the Manufacturer's knowledge or involvement, and has the product analytically tested to assess conformance with one or more criteria.

Manufacturers must correct Non-Conformances, either by bringing the product into Conformance, by un-declaring the criterion until Conformance is achieved, or by removing the product from the Registry. The Green Electronics Council also requires that Manufacturers examine other registered products to determine if their declarations should be corrected as well. If a Manufacturer corrects the Non-Conformance by un-declaring the criterion and the criterion is an optional criterion, they lose that point, and possibly the product drops a tier. If it is a required criterion, they must archive the product. If it is a required corporate criterion, they must archive all of their registered products.