

EPEAT CONFORMITY ASSESSMENT PROTOCOLS

4.7 Corporate Performance

4.7.1 Corporate environmental policy

4.7.1.1 Required—Demonstration of corporate environmental policy consistent with ISO 14001

Verification Guidance	
IEEE Interpretations and PVC Verification Clarifications	At the time of this document, no interpretations or clarifications have been issued for this criterion.
IEEE 1680.1 Revisions (Potential and Adopted)	At the time of this document, no revisions (potential or adopted) are associated with this criterion.
References and Details	This criterion references the requirements of the environmental policy section of ISO 14001.
Verification Requirements	<ol style="list-style-type: none"> 1. Declaration from manufacturer (See 4.0 Verification Requirement – Declaration from manufacturer) 2. Copy of environmental policy indexed to ISO 14001 requirements

4.7.1.1 Verification Requirement	
Copy of environmental policy indexed to ISO 14001 requirements	
❖ Verification Protocols	
1. Request for data submission to subscriber	<ol style="list-style-type: none"> 1. Corporate Environmental Policy
2. Examples of potential evidence for conformance – generally more than one item of evidence may be provided such that conformance is adequately demonstrated	<ul style="list-style-type: none"> • Corporate environmental policy – online or hardcopy • Corporate ISO 14001 certification

3. Questions to assess conformance	Is there documentation that a Corporate Environmental Policy exists and is consistent with the requirement of the environmental policy section of ISO 14001?
4. Evaluation guidance	The environmental policy and associated information from subscriber should include: The environmental policy itself (defining and documenting per ISO 14001) How the policy is implemented and maintained How /where the policy is communicated

4.7.2 Environmental management system

4.7.2.1 Required—Self-certified environmental management system for design and manufacturing organizations

Verification Guidance	
IEEE Interpretations and PVC Verification Clarifications	At the time of this document, no interpretations or clarifications have been issued for this criterion.
IEEE 1680.1 Revisions (Potential and Adopted)	At the time of this document, no revisions (potential or adopted) are associated with this criterion.
References and Details	ISO 14001 and EMAS are available online. The EMS requirements of the U.S. EPA Performance Track program are described in the Performance Track Application (questions 1 through 10) and the corresponding EMS Worksheet section of its Application Help instructions document.
Verification Requirements	<ol style="list-style-type: none"> 1. Declaration from manufacturer (See 4.0 Verification Requirement – Declaration from manufacturer) 2. Documentation of self-certification to the specified standard

4.7.2.1 Verification Requirement	
Documentation of self-certification to the specified standard	
❖ Verification Protocols	
<ol style="list-style-type: none"> 1. Request for data submission to subscriber 	<ol style="list-style-type: none"> 1. List of all subscriber-owned design and manufacturing organizations 2. Identification of which standard(s) subscriber’s EMS meets 3. Description of required documentation for the identified EMS system 4. Sample documentation demonstrating how they met the required documentation for the identified EMS system

<p>2. Examples of potential evidence for conformance – generally more than one item of evidence may be provided such that conformance is adequately demonstrated</p>	<ul style="list-style-type: none">• ISO 14001 or EMAS third-party certificate• Detailed documentation indicating how the organization meets the EMS requirements of ISO 14001 or EMAS• Performance Track Application with EMS questions answered
<p>3. Questions to assess conformance</p>	<p>Has a list of all subscriber-owned design and manufacturing organizations been provided?</p> <p>Has the subscriber indicated which standard(s) their EMS meets?</p> <p>Is there adequate documentation showing compliance to meeting the requirements of ISO14001/EMAS or the EMS requirements of the U.S. EPA National Environmental Performance Track program?</p>
<p>4. Evaluation guidance</p>	<p>None</p>

4.7.2.2 Optional—Third-party certified environmental management system for design and manufacturing organizations

Verification Guidance	
IEEE Interpretations and PVC Verification Clarifications	At the time of this document, no interpretations or clarifications have been issued for this criterion.
IEEE 1680.1 Revisions (Potential and Adopted)	At the time of this document, no revisions (potential or adopted) are associated with this criterion.
References and Details	ISO 14001 and EMAS are available online. There are three ways to get this point, all of which require independent assessment—through the ISO or EMAS process, or through the more flexible requirements of Performance Track.
Verification Requirements	<ol style="list-style-type: none"> 1. Declaration from manufacturer (See 4.0 Verification Requirement – Declaration from manufacturer) 2. Documentation of registration to ISO or EMAS, or documentation of third-party certification to Performance Track

4.7.2.2 Verification Requirement	
Documentation of registration to ISO or EMAS, or documentation of third-party certification to Performance Track	
❖ Verification Protocols	
1. Request for data submission to subscriber	<ol style="list-style-type: none"> 1. List of all OEM-owned design and manufacturing organizations 2. Identification of which standard(s) subscriber’s EMS meets 3. Current ISO/EMAS certifications or current third-party documentation of certification to Performance Track
2. Examples of potential evidence for conformance – generally more than one item of evidence may be provided such that conformance is adequately demonstrated	<ul style="list-style-type: none"> • ISO 14001 or EMAS certificates for each organizations from accredited third party auditor • Third party auditor certification of each organizations meeting Performance Track criteria

3. Questions to assess conformance	<p>Has a list of all subscriber-owned design and manufacturing organizations been provided?</p> <p>Has the subscriber indicated which standard(s) their EMS meets?</p> <p>Has the subscriber provided current ISO/EMAS certifications or current third-party documentation of certification to Performance Track?</p>
4. Evaluation guidance	<p>As this is a corporate point, all OEM-owned design and manufacturing organizations worldwide must show the required level of certification. Certifications must be valid at the time of review.</p>

4.7.3 Corporate reporting

4.7.3.1 Required—Corporate report consistent with Performance Track or GRI

Verification Guidance	
IEEE Interpretations and PVC Verification Clarifications	<p>Clarification 1-8</p> <p>The index should be provided to purchasers and other stakeholders in whatever form the full report is provided. The criterion does state that the report and the index shall be provided with the verification data.</p> <hr/> <p>The effective language from the 1680 standard is “This Agreement shall commit the manufacturer to providing accurate product and company information...” This can only mean that when a subscriber declares that a product meets the terms of a criterion, it does in fact meet those terms. Therefore, the product must meet all the requirements of a criterion when the subscriber declares to that criterion, and it would be a non-conformance to declare to a criterion, and then later to bring the product into conformance. The reference in the standard to “all units sold...shall conform” does not provide a condition for when the declaration must be accurate.</p> <p>Clarification 3-2</p> <p>Annual report must exist such that a publically available copy can be provided at verification. It shall also be demonstrated that the subscriber intends to produce the report annually.</p>
IEEE 1680.1 Revisions (Potential and Adopted)	<p>Approved 1680.1 Standard language to be balloted:</p> <p>Amend the criteria labels “Annual Report Criterion” used for each criterion in sections 4.6 and 4.7 as follows:</p> <p style="padding-left: 40px;">Replace the term “Annual Report Criterion” in these criteria labels with the term “Annual Corporate Declaration Criterion”.</p>
References and Details	<p>The Performance Track Annual Performance Report requirements applicable to this criterion include the following:</p> <ul style="list-style-type: none"> • A summary of the facility's EMS assessment activities and progress towards meeting EMS objectives and targets, including brief descriptions of audits conducted and improvements made

	<ul style="list-style-type: none"> • A brief report on progress made in meeting the facility’s environmental performance commitments • A summary of the facility’s public outreach activities <p>Manufacturers may meet the reporting criteria on the corporate level, rather than the facility level as specified in the Performance Track requirements.</p> <p>An Annual Performance Report format and preparation instructions are available from the U.S. EPA Web site.</p>
Verification Requirements	<ol style="list-style-type: none"> 1. Declaration from manufacturer (see 4.0 Verification Requirement – Declaration from manufacturer) 2. Copy of annual report 3. Index to report showing reports compliance with first three Performance Track requirements (listed below in References and Details) and/or GRI.

4.7.3.1 Verification Requirement	
Copy of annual report	
❖ Verification Protocols	
1. Request for data submission to subscriber	<ol style="list-style-type: none"> 1. Annual Report 2. Documentation from subscriber showing that they annually produce a report that is consistent with either Performance Track or GRI
2. Examples of potential evidence for conformance – generally more than one item of evidence may be provided such that conformance is adequately demonstrated	<ul style="list-style-type: none"> • Annual Report • History of producing annual reports • Policies or procedures for producing reports annually
3. Questions to assess conformance	<p>Has an Annual Report been provided either via email, website or hardcopy?</p> <p>Is there documentation showing that the report is produced annually?</p> <p>Is there documentation demonstrating that the Annual Report is consistent with either Performance Track or GRI?</p>

4. Evaluation guidance	None
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4.7.3.1 Verification Requirement	
Index to report showing reports compliance with first three Performance Track requirements and/or GRI	
❖ Verification Protocols	
1. Request for data submission to subscriber	1. An index to the report, cross referencing the first three Performance Track requirements (see references and details) and/or the GRI Sustainability Reporting Guidelines.
2. Examples of potential evidence for conformance – generally more than one item of evidence may be provided such that conformance is adequately demonstrated	<ul style="list-style-type: none"> • Index with GRI cross referenced • Index with first three Performance Track requirements crossed referenced
3. Questions to assess conformance	Has an index been provided showing that the report meets the first three requirements of Performance Track and/or the GRI?
4. Evaluation guidance	For GRI, the index should indicate which GRI level is being reported to.

4.7.3.2 Optional—Corporate report based on GRI

Verification Guidance	
IEEE Interpretations and PVC Verification Clarifications	<p>Clarification 1-8</p> <p>The index should be provided to purchasers and other stakeholders in whatever form the full report is provided. The criterion does state that the report and the index shall be provided with the verification data.</p>
	<p>The effective language from the 1680 standard is “This Agreement shall commit the manufacturer to providing accurate product and company information....” This can only mean that when a subscriber declares that a product meets the terms of a criterion, it does in fact meet those terms. Therefore, the product must meet all the requirements of a criterion when the subscriber declares to that criterion, and it would be a non-conformance to declare to a criterion, and then later to bring the product into conformance. The reference in the standard to “all units sold...shall conform” does not provide a condition for when the declaration must be accurate.</p> <p>Clarification 3-2</p> <p>Annual report must exist such that a publically available copy can be provided at verification. It shall also be demonstrated that the subscriber intends to produce the report annually.</p>
IEEE 1680.1 Revisions (Potential and Adopted)	<p>Approved 1680.1 Standard language to be balloted:</p> <p>Amend the criteria labels “Annual Report Criterion” used for each criterion in sections 4.6 and 4.7 as follows:</p> <p style="padding-left: 40px;">Replace the term “Annual Report Criterion” in these criteria labels with the term “Annual Corporate Declaration Criterion”.</p>
References and Details	Information on the GRI is available online.
Verification Requirements	<ol style="list-style-type: none"> 1. Declaration from manufacturer (see 4.0 Verification Requirement – Declaration from manufacturer) 2. Copy of annual report 3. Index to report showing how report is based on GRI

4.7.3.2 Verification Requirement	
Copy of annual report	
❖ Verification Protocols	
1. Request for data submission to subscriber	<ol style="list-style-type: none"> Annual Report Documentation from subscriber showing that they annually produce a report that is consistent with GRI
2. Examples of potential evidence for conformance – generally more than one item of evidence may be provided such that conformance is adequately demonstrated	<ul style="list-style-type: none"> Annual Report History of producing annual reports Policies or procedures for producing reports annually
3. Questions to assess conformance	<p>Has an Annual Report been provided either via email, website or hardcopy?</p> <p>Is there documentation showing that the report is produced annually?</p> <p>Is there documentation demonstrating that the Annual Report is consistent with GRI?</p>
4. Evaluation guidance	None

4.7.3.2 Verification Requirement	
Index to report showing how report is based on GRI	
❖ Verification Protocols	
1. Request for data submission to subscriber	<ol style="list-style-type: none"> An index to the report demonstrating how the report is based on GRI Sustainability Reporting Guidelines. Demonstration that the index is publically available
2. Examples of potential evidence for conformance – generally more than one item of evidence may be provided such that conformance is adequately demonstrated	<ul style="list-style-type: none"> Report index with GRI cross referencing Sample of documentation showing that the index is publically available

3. Questions to assess conformance	Has an index been provided showing that the report meets at least the minimum reporting requirements of GRI? Is there documentation demonstrating that the index is publically available?
4. Evaluation guidance	The index should make it clear which portions of the GRI Sustainability Reporting Guidelines are covered as well as what GRI level of reporting the subscriber is complying to.