



**EPEAT Clarification #19  
Auditing of Recycling Vendors**

**This Clarification applies to the following IEEE Standards and criteria:**

**Applicable Standards:**

- IEEE 1680.1 – Personal Computers and Displays
- IEEE 1680.2 – Imaging Equipment
- IEEE 1680.3 – Televisions

**Applicable Criteria:**

4.6.1.2

**PVC Determination:**

Standard 1680.1 criterion 4.6.1.2 requires annual audits of all first, second, and third tier recyclers. Certification of recyclers to qualified recycling standards as defined by 1680.2 and 1680.3 does not meet criterion 4.6.1.2 in 1680.1 unless documentation of annual audits of all first, second and third tier recyclers is provided as required by this criterion.

**Background Information:**

In a recent EPEAT verification round for products declared to 1680.1, a question arose about whether certification of an electronics recycler to either R2 or e-Stewards was adequate documentation of conformance to 1680.1 criterion 4.6.2.1. The most recent standards in the 1680 family of standards reference certification to “qualified recycling standards” in criteria for end-of-life management. Qualified recycling standards are listed on the EPEAT Registry, and currently include e-Stewards and R2.

R2 and e-Stewards, as well as other standards, were found to be “functionally equivalent” to EPA Plug-In Guidelines, which is required by 1680.1 criterion 4.6.1.2 for processing equipment. However, 1680.1 criterion 4.6.1.2 also defines a specific frequency (annual) for audits and requires auditing of all first, second and third tier recyclers, which may not be required by recycling standards qualified for use to conform with 1680.2 and 1680.3. Documentation of annual audits of all first, second and third tier recyclers to the EPA Plug-In Guidelines, or functionally equivalent standards such as R2 and e-Stewards, are required to demonstrate conformance with 1680.1.

**Change History:**

Revision A approved by the PVC and effective on February 1, 2013.
Revision B approved by the PVC and effective on April 26, 2013.