



**EPEAT Clarification #34
Country variability of certain criteria**

This Clarification applies to the following IEEE Standards and criteria:

Applicable Standards:

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

Applicable Criteria:

- 4.6.1.1, 4.6.2.1
- 4.6.1.1, 4.6.1.2, 4.6.2.1, 4.6.2.2, 4.9.3.1, 4.9.3.2, 4.9.3.3
- 4.6.1.1, 4.6.1.2, 4.6.2.1, 4.6.2.2

Please note that the applicable Criteria are all Annual Corporate Declaration Criteria that are related to the end of life handling of products and consumables.

Conformity Decision Panel (CDP) Determination:

If they are claimed, criteria that contain the phrase *“The requirement is applicable only in those regions or countries for which the manufacturer has products declared on the MSE Registry”* (or similar phrase) must be met in all countries in which the subject product is registered. These criteria cannot be claimed in some countries in which the product is registered and not others.

Background information:

Criteria that contain the phrase *“The requirement is applicable only in those regions or countries for which the manufacturer has products declared on the MSE Registry”* (or similar phrase) are set-up in the EPEAT Registry such that they must be claimed the same in all countries in which the Participating Manufacturer registers products. Manufacturers and Conformity Assurance Bodies have sometimes asserted that Manufacturers should be able to claim these criteria in some countries and not others.

Section 1.4 of IEEE 1680, Conformance with the IEEE 1680 family of standards, (which is referenced in Section 1.4 of IEEE 1680.1, .2 and .3, Conformance with this standard), reads in part *“The criteria in a product declaration shall consist of two types: 1) criteria that are independent of a region or country and therefore shall be declared as meeting the criteria per clause 4 wherever sold; and 2) criteria that are dependent on a region or country, a subscriber shall declare conformance by country for each of these criteria. Clause 4 of the standard shall designate the independence or dependence of regional or country level designation as listed on the MSE’s registry.”*

There are effectively three types of “country applicability” treatments of criteria. If a criterion is mute on country applicability then a declaration to it applies *everywhere the product is sold* regardless of where products are registered. This is the case for most criteria related to product content. Example: if 4.1.1.1 is claimed in the US then, if that product is sold in Japan, the criterion must also be met in Japan. The EPEAT Registry is set-up to require all declarations to these criteria to be the same in all countries.

If a criterion is not mute on country applicability, it may have two different treatments as indicated by wording in the criterion. If the criterion reads *“This requirement is applicable only in those regions or countries for which the manufacturer has products declared on the MSE Registry”* (or similar) then, if claimed, the criterion must be met everywhere the Manufacturer has products on the Registry. This phrase designates “country applicability” as “only those regions or countries for which the manufacturer has products declared on the MSE Registry.” However, this phrase does not designate the independence of the criterion by country or region as stated in IEEE 1680: *“Clause 4 of the standard shall designate the*

independence or dependence of regional or country level designation as listed on the MSE’s registry.” The criterion need not be met in countries where the Manufacturer does not register products, even if they are sold there. Example: If 4.6.2.1 is claimed in the US, and the Manufacturer also registers products in Germany, then it must also be met in Germany. If the Manufacturer does not register their products in Spain then the criterion need not be met in Spain, despite the fact that the products are sold there. The EPEAT Registry is set-up to require all declarations to these criteria to be the same in all countries in which the Manufacturer registers products.

If a criterion reads *“This criterion is dependent on the region or country and may be declared by a manufacturer differently in different regions or countries”* then it may be declared differently in different countries. Example: The Registry is set-up to allow 1680.3: 4.8.4.1 to be claimed in Germany and not in the US.

The distinction between the two treatments of country applicability above is the explicit reference to dependence or independence of the criterion by country or region.

Summary of Country Applicability of Criteria

Type	Phrase in Criterion	Country Treatment and Applicability	Example
1	None. Criterion is mute on country applicability.	<p>Criterion must be declared the same in all countries in which the product is registered.</p> <p>Declaration applies to products sold everywhere, regardless of where products are registered.</p>	<p>If 4.1.1.1 is claimed in the US then, if that product is sold in Japan the criterion must also be met in Japan.</p>
2	<i>“The requirement is applicable only in those regions or countries for which the manufacturer has products declared on the MSE Registry”</i> (or similar phrase)	<p>Criterion must be declared the same in all countries in which the manufacturer registers products (to this standard).</p> <p>Declaration applies only to products sold in regions or countries in which the manufacturer has registered products (to this standard).</p> <p>Declaration does not apply in countries where the Manufacturer does not register products, even if they are sold there.</p>	<p>If 4.6.2.1 is claimed in the US, and the Manufacturer also registers products in Germany, then the criterion must also be met in Germany. If the Manufacturer does not register their products in Spain then the criterion need not be met in Spain, despite the fact that the products are sold there.</p>
3	<i>“This criterion is dependent on the region or country and may be declared by a manufacturer differently in different regions or countries”</i>	<p>Criterion may be declared differently in different countries.</p> <p>Declaration applies only to products sold in the specified countries.</p>	<p>1680.3: 4.8.4.1 could be claimed in Germany and not in the US.</p>

This Clarification is principally about the second type of country applicability. The CDP is aware that the phrase *“This requirement is applicable only in those regions or countries for which the manufacturer has products declared on the MSE Registry”* does not clearly express that a criterion must be claimed the same everywhere products are registered (hence the need for this clarification). The CDP researched a number of documents that indicate that this was stakeholder’s intent when IEEE 1680: 2006 was separated into two standards, IEEE 1680: 2009 and IEEE 1680.1: 2009. This is the first time the standards addressed country variability and is the first time these phrases were used. This convention was carried forward in writing IEEE 1680.2 and .3 and was actively discussed and applied by some of the work groups, although it is certainly possible that not all stakeholders understood the convention or its impact.

Change History:

Revision A approved by the CDP 13 Nov. 2015 and set out for public comment on 24 Nov. 2015. It is planned to become effective on 31 Dec. 2015.
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Revision B – in response to public comments, minor edits were made for clarity which don’t affect the decisions of conformity. Revision B approved by the CDP on 29 Jan 2016, published 2 Feb 2016, effective immediately.
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