



**EPEAT Clarification #1-6**  
**Optional corporate annual reporting criterion: 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:**

The 4.6.1.2 criterion applies only in the regions/countries where the product is declared to the criterion. It is the intent of the criterion in part to address environmentally unfriendly recycling resulting from export. Since the criterion applies to recycling vendors, rather than the product itself, it should apply wherever the recycling vendors (first through third tier) are located. Note that the 4.6.1.1 criterion requires that a product take-back service be offered to institutional purchasers anywhere that the product is declared on the Registry. It seems to follow that auditing should apply to recycling vendors anywhere who are downstream processors servicing product from the subscriber registered to this standard.

The subscriber should provide to the Qualified Verifier a map or guide to the first through third tier recyclers that participate in the subscriber’s “take-back and recycling service” to support the verification process. Note that some components may be removed from products during recycling and sold for reuse. If sold as tested working products or components, they leave the recycling stream and therefore do not require further auditing. The auditing requirement applies only to the take-back and recycling service. However, if materials are separated and sold for recycling, the audit requirements apply.

The criterion does not exclude subscribers from conducting audits (i.e. second party audits) of their recycling vendors or utilizing third party audits; however, in all cases an on-site visit must be conducted by the subscriber or a third party to ascertain the adequacy and relevance of the audit to the requirements of this criterion.

If this criterion is selected for verification, additional guidance may be forthcoming to assist the subscriber.

**Background Analysis:**

*Subscribers have asked: What is the geographic scope of this criterion? Are only the recycling vendors in North America (or the US) required to be audited annually to the 3rd tier, or does the criterion have worldwide application? If worldwide, does that mean all regions where first through third tier recyclers are located, or all regions where the product is sold? It has also been asked what type of auditing is required.*

This criterion was adopted late in the EPEAT development process and was discussed as being a partial “make-up” for not including restrictions on export of product to be recycled. Auditing of recycling vendors was discussed as partial protection against environmentally irresponsible recycling, including overseas where the major problems have been documented.

**Further Background Analysis:**

The revision of the 1680.1 Standard added language to both 4.6.1.1 and 4.6.1.2 that clarified the geographic application of the criteria. These revisions require a change of some of the text in the Clarification, but not the essential message.

**Change History:**

Revision A approved by the PVC, published, and effective January 2007.
Revision B approved by the PVC, published, and effective on July 5, 2013.