



EPEAT Clarification #21
Certification of programs exempt from EOL processing requirements

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 (enter here):

- 4.6.2.2
- 4.6.2.2

PVC Determination:

Optional criterion 4.6.2.2 requires that “All programs, operated by the manufacturer or their contractual agent, that are exempt from criterion 4.6.2.1 are certified to a qualified recycling standard ...” The “programs operated by a manufacturer” that must be certified to a qualified recycling standard include the actual operations that process equipment of the exempt program, including, for example, receiving equipment, troubleshooting or diagnostics, repair and/or refurbishment, testing, and the disposition of the working equipment, usable components and scrap parts and materials. It is not sufficient that the scrap or residue from the programs is sent to a certified recycler, as that is required by 4.6.2.1.

Consistent with the protocols, conformance to 4.6.2.2 can be demonstrated by providing evidence that all exempt programs are certified to a qualified recycling standard. Below are two examples of how a manufacturer might demonstrate this:

- a) Providing the certificates, the scope of which should read, for example “The <manufacturer> lease program located at ...”, and that program could be operated by manufacturer’s employees or those of a contractor, or
- b) Providing a contract with a second party to *operate* the exempt programs and the applicable certificate(s), in which case the certificate scope(s) might read “<Contractor’s> facilities located at ...”

During the grace period a certificate might be replaced by evidence of second or third party audits to a qualified recycling standard.

Background information:

Different subscribers and their PREs have taken different interpretations of 4.6.2.2 related to what must be certified.

4.6.2.2 reads in part “All programs, operated by the manufacturer or a contractual agent, that are exempt for 4.6.2.1 are certified ...”

4.6.2.1 reads, “The following programs operated by the manufacturer (or their contractual agent) are exempt from this requirement:

- a) Management of leased products ...
- b) Trade-in/Exchange programs ...
- c) Product servicing and/or warranty programs ...

In addition, manufacturers shall ensure that any residual equipment and components ..., scrap, and materials derived from ... these programs are processed by a” certified recycler.

The “programs operated by the manufacturer or their contractual agent” refers to the actual operations of the exempt program, including, as applicable, receiving the equipment for lease return or trade-in or servicing/repair, troubleshooting or diagnosing any failures, repairing the equipment, and the disposition the working equipment, reusable components and scrap parts and materials.

Conformance to 4.6.2.2 is not achieved by sending the scrap or residual equipment from the exempt programs to a certified recycler, which is required by required criterion 4.6.2.1.

Change History:

Revision A approved by the PVC, published, and effective on 03/15/13.
