



OUTCOMES REPORT EPEAT VERIFICATION ROUND 2010-01

1. Summary and Details of Verification Round 2010-01

This report provides the detailed results of EPEAT Verification Round 2010-01. This Verification Round focused specifically on the following:

- Optional criterion 4.2.1.2 – Minimum content of post-consumer recycled plastic.
- Optional criterion 4.2.1.3 – Higher content of post-consumer recycled plastic.
- Optional criterion 4.2.2.2 – Minimum content of renewable/biobased plastic material.
- Four other investigations of different criteria due to purchaser requests.

Verification Round Four in 2009 conducted nine investigations of recycled content claims, finding two non-conformances. These investigations focused on methods of calculation of recycled content, specifically to assure that all plastics were included in the calculation of percentage of recycled content. These results affected a substantial number of other product declarations resulting in removal of certain recycled content claims, and greatly decreasing the number of products claiming to meet the higher content criterion 4.2.1.3. The results also strongly indicated that meeting Optional Criteria 4.2.1.2, 4.2.1.3 and 4.2.2.2 is very challenging.

A primary focus of Verification Round 2010-01 was to expand the investigation of compliance with the recycled content and biobased material criteria. Specifically, the degree to which the supply chain is capable of guaranteeing the delivery of post consumer recycled and biobased resins and of essential conformance assurance information was of interest.

Following Round Four and the changes made by subscribers, extensive communication was issued to subscribers regarding the particulars of conformance with, and demonstration of conformance with the recycled content and biobased criteria. A spreadsheet tool for calculation of such claims, to assist subscribers and verifiers, was refined. However, upon further examination of the Registry it was observed that other products, by different subscribers, were being declared in inconsistent ways, and other potential problems persisted. Round 2010-1 specifically targeted these problems. Several non-conformances were found, as expected.

As in previous rounds, Round 2010-01 involves focused investigations that are not statistically representative of a random sampling of the full Registry. In future rounds the PVC may choose to conduct a random sampling of the products and subscribers on the Registry.

2. Outcomes of Round 2010-01

As expected, a high percentage of non-conformances were found. Where previous non-conformance rates were under 20 percent even when the round focused on problem areas, this round yielded a non-conformance rate of over 75 percent. However, perhaps most significant is that this round uncovered systemic problems in the supply chain for recycled and biobased content.

In brief, our conclusion is that manufacturers are not obtaining the kind of documented assurance that the material is as claimed with respect to recycled and biobased plastic. We conclude that this is due to the immaturity of that supply chain and the infrequency, in the marketplace as a whole, of

requirements for a system of conformity assurance.

Following are the specific highlights of Round 2010-01.

- 21 investigations were launched and completed.
 - 7 investigations addressed optional criterion 4.2.1.2 – Minimum content of postconsumer recycled plastic
 - 5 investigations addressed optional criterion 4.2.1.3 – Higher content of post-consumer recycled plastic
 - 5 investigations addressed optional criterion 4.2.2.2 – Minimum content of renewable/biobased plastic material
 - 1 investigation addressed required criterion 4.5.1.1 – ENERGY STAR, as a response to the identification of a potential problem by a stakeholder
 - 2 investigations addressed optional criterion 4.8.4.1 – Provision of take-back program for packaging
 - 1 investigation addressed optional criterion 4.5.2.2 – Renewable energy accessory standard
- There were 16 decisions of non-conformance. 15 were for optional criteria and one was for a required criterion. See the list of criteria for which non-conformances were identified in Table 1 and the details and identification of subscribers and products in Table 2.
 - Two decisions of non-conformance were determined to be inadvertent errors. See section 4 below entitled “Note regarding determination that a non-conformance is an inadvertent error.”
 - One was caused by erroneous translation and the other was a misunderstanding about the criterion. Both errors were corrected by undeclaring that criterion.
 - Eight decisions of non-conformance resulted in subscribers making changes in order to recover the accuracy of the declaration.
 - In seven cases, the subscribers undeclared the criterion.
 - Note: In two of these cases where subscribers undeclared the criterion, the resulting criteria section still appears to have errors. EPEAT is in the process of following up with these subscribers.
 - In one case, the subscriber made a change to their website which put them into conformance.
 - In another case, the subscriber archived the product.
 - Six decision of non-conformance were not corrected by the subscribers by the close of the Verification Round. Affected products were archived.
- The investigations of 4.2.1.2, 4.2.1.3, and 4.2.2.2 indicate a lack of understanding by the subscribers of what is needed to assure conformance with these criteria. See Key Lessons section below for more information.
- The overall impact on the Registry was:
 - 7 products lost optional points. Of those:

- 7 criteria were undeclared by the subscriber.
- 3 of the 7 products dropped from Gold to Silver.
- 1 product was archived by the subscriber.
- 7 products were archived by EPEAT.¹

3. Key Lessons of Round 2010-01

- **Recycled content:** Seventeen of the twenty-one investigations in this Verification Round (2010-01) looked at criteria relating to post consumer recycled plastic and biobased plastic. The criteria investigated were 4.2.1.3, 4.2.1.2 and 4.2.2.2. The results found only four out of seventeen subscribers to be in conformance. As noted above, EPEAT had suspected that these criteria would be troublesome and chose them intentionally. The results of the Verification Round support the hypothesis that there are issues with meeting these criteria. During the investigation several things became clear:
 - Some subscribers appear to be confused about the difference between post consumer recycled plastic and biobased plastic.
 - Some subscribers, and even suppliers, appear to not be clear on whether the recycled content in a plastic is considered post-consumer or post-industrial.
 - Some subscribers are still, even after notification following Round Four, are still not using the total weight of plastic in a product to calculate the percentage of recycled and/or biobased plastic.
 - In some cases when the percentages of post consumer recycled plastic and the biobased plastic are added up, the total exceeds 100%. To our knowledge there is no supply of plastic on the market that is both post-consumer recycled and biobased. See “*Messages to Subscribers*” below to see how EPEAT has corrected this.
 - The declaration of the percentage of recycled plastic in 4.2.1.1 and biobased plastic in 4.2.2.1 must align with the claims for content in optional criteria 4.2.1.2, 4.2.1.3 and 4.2.2.2. The percentages must be equal or greater than the required percentages.
 - For example, if the subscriber claims 11% recycled plastic, the subscriber CANNOT claim 4.2.1.3 because there is not enough recycled plastic to warrant that claim. The subscriber could, however, claim 4.2.1.2.
 - Some subscribers declare to these criteria without having adequate demonstration of proof from suppliers. The records of conformance simply could not be produced.
- **Messages to Subscriber:** EPEAT is planning the following actions in order to increase the accuracy of criteria 4.2.1.3, 4.2.1.2, 4.2.2.1 and 4.2.2.2.
 1. **Recycled and biobased content of plastics**
 - EPEAT will be providing in-person training for subscribers and others on conformance with the IEEE 1680.1 standard overall. Those subscribers who have been found to have a non conformance will be expected to attend this training. For all others the training is encouraged. This training is expected to be delivered globally during 2010 and 2011.

¹ Non-conformance decisions may have more than one impact on the Registry; for example, losing an optional point may result in a drop from Gold to Silver rating.

- EPEAT intends to provide a web-based seminar on conformance with the recycled and biobased plastic criteria. Attendance of all subscribers will be expected.
 - EPEAT has changed the declaration form on the www.EPEAT.net site. The declaration form will no longer allow a subscriber to enter post consumer recycled plastic and biobased plastic to add up to more than 100%. Also, depending on entries provided to 4.2.1.1 and 4.2.2.1, inconsistent entries for 4.2.1.2, 4.2.1.3 and 4.2.2.2 will not be available. For example, if the subscriber enters 4% for biobased plastic, the subscriber will not have the option of saying yes to 4.2.2.2 which requires 10%. These changes have been incorporated as of May 2010.
 - Based on the results of this round, EPEAT plans to review ALL the recycled plastic / biobased plastic claims in the database.
 - It is highly recommended that subscribers utilize the spreadsheet in the conformity assessment protocols to determine the percentage for all products that are declared to contain post-consumer recycled plastic or bio-based materials.
 - Subscribers should be especially cautious when declaring to 4.2.1.3 – 25% content, because this is very difficult to achieve for display devices when the full weight of all the plastics in the product, with the exceptions provided in the standard, are considered. This will continue to raise questions for verification.
 - Subscribers should become familiar with the 1680.1 standard update and any possible revisions of this criterion.
2. **Energy Star** The 4.5.1.1 criterion states: “all products shall be qualified to or comply with the eligibility criteria of the ENERGY STAR program requirements for the declared product at the time of declaration to the standard. Manufacturer shall declare the version of ENERGY STAR to which the product is qualified or compliant.”

The subscriber’s product being investigated was not registered in the ENERGY STAR database. The subscriber had a power consumption test done to demonstrate compliance. A finding of non-conformance was made, due to an error in the classification, according to ENERGY STAR requirements, of the product.

Subscribers should ensure that their products are either listed on the ENERGY STAR database with the same name as on the EPEAT Registry, or, if not, ensure that all appropriate evidence of compliance with the ENERGY STAR specifications, including correct categorization, can be readily provided.

3. **Take-back program for packaging**

Subscriber information regarding packaging take-back must be clear to purchaser. With the increase in state legislation requiring packaging take-back, there is a high possibility for a confusing message.

4. **Note regarding determination that a non-conformance is an “inadvertent error”**

Some findings of non-conformance have been assessed to be due to inadvertent errors – as will be noted in the description of the results for a product. Inadvertent errors are still non-conformances, and provide serious miscommunication via the Registry to purchasers. However, in these cases, the Verifier and PVC have determined that evidence has been provided to support a subscriber’s contention that the non-conformance declaration was not an intentional misrepresentation and has not been perpetrated into the market. Verifiers look for evidence of inadvertence; for example the erroneous declaration was for one product only and other products with similar overall declarations

did not repeat the error.

5. Looking Forward

1. **Plans for Future Verification Activities:** A group of new Qualified Verifiers were hired and trained the week of April 26, 2010. The plan is to start two concurrent Verification Rounds in May 2010. EPEAT's goal is a total of 6 Verification Rounds in 2010.
2. **Conformity Assessment Protocols:** This and all future rounds will be conducted according to the Conformity Assessment Protocols posted on www.epeat.net.
3. **Conformance and Verification Training Workshop:** EPEAT staff has developed training workshops on EPEAT/IEEE 1680 Conformance and Verification that we intend to deliver globally throughout 2010 and beyond. The workshops, based on Conformity Assessment Protocols, will cover questions of conformance assurance for declaration and demonstration of conformance for verification. The intended audiences are subscribers, potential future Verifiers, individuals who wish to provide conformity consulting services to subscribers, and others. This will be an in depth examination of how to assure conformance for all criteria and how verification is performed. We expect that it will significantly improve and expand attending Subscribers understanding of the details and complexities of the declaration process, and hope that in so doing it will reduce the occurrence of nonconformance related to lack of full understanding of the standard's requirements and evidence required.

6. Investigation Tables

TABLE 1
Criteria Involving Non-Conformance Findings

Criterion	Description	Total # of Investigations	# of NCs
4.2.1.2	Minimum content of postconsumer recycled plastic	7	6
4.2.1.3	Higher content of postconsumer recycled plastic	5	2
4.2.2.2	Minimum content of renewable/bio-based plastic material	5	5
4.5.1.1	ENERGY STAR®: 5.0-Desktops and Notebooks	1	1
4.5.2.2	Renewable energy accessory standard	1	1
4.8.4.1	Provision of take-back program for packaging	2	1
	Total	21	16



TABLE 2: Non-Conformance Findings Showing Corrective Actions Taken and Outcomes

Subscriber	Product	Verification Criterion	Criterion Description	Description of NC Finding	Corrective Actions Taken and Outcomes	Final Decision
NEC	NEC EA221WMe-BK	4.2.1.3	Higher content of post-consumer recycled plastic	Inadvertent error.	Undeclared criterion.	C
NTT	NTT BUSINESS W 907G	4.2.1.3	Higher content of post-consumer recycled plastic	Incomplete information provided.	Archived product.	NC
Hyundai	Hyundai K224W	4.2.1.2	Minimum content of post-consumer recycled plastic	No supplier declaration.	Undeclared criterion.	C
Cybernet	iOne-MP171 Medical Grade All-in-One LCD PC	4.2.1.2	Minimum content of post-consumer recycled plastic	Incomplete information provided.	Undeclared criterion.	C
M&A	MANDA 17" LCD	4.2.1.2	Minimum content of post-consumer recycled plastic	Incomplete information provided.	Archived product.	NC
NTT	NTT BUSINESS W 907G	4.2.1.2	Minimum content of post-consumer recycled plastic	Incomplete information provided.	Archived product.	NC
PC Factory	PC2 MB Toro2 Series	4.2.1.2	Minimum content of post-consumer recycled plastic	Incomplete information provided.	Archived product.	NC
Samsung	Samsung SyncMaster F2380	4.2.1.2	Minimum content of post-consumer recycled plastic	Incomplete information provided.	Undeclared criterion.	C
Action SA	ACTINA SIERRA VB 700X	4.2.2.2	Minimum content of renewable/biobased plastic material	Incomplete information provided.	Undeclared criterion.	C
Incom SA	ADAX DELTA PD8600ESx	4.2.2.2	Minimum content of renewable/biobased plastic material	Incomplete information provided.	Subscriber archived product.	C
Fujitsu	Fujitsu LifeBook T2020	4.2.2.2	Minimum content of renewable/biobased plastic material	Inadvertent error.	Undeclared criterion.	C
Cybernet	iOne-MP171 Medical Grade All-in-One LCD PC	4.2.2.2	Minimum content of renewable/biobased plastic material	Incomplete information provided.	Undeclared criterion.	C
NTT	NTT BUSINESS W988G	4.2.2.2	Minimum content of renewable/biobased plastic material	Incomplete information provided.	Archived product.	NC
Cybernet	All-in-One LCD PC iOne-GX31 19"	4.5.1.1	ENERGY STAR	ENERGY STAR test results provided were invalid.	Archived product.	NC
BenQ	BenQ ID2201	4.8.4.1	Provision of take-back program for packaging	Confusing information on website.	Made changes to website to come into conformance.	C
NTT	NTT BUSINESS W 907G	4.5.2.2	Renewable energy accessory standard	Renewable energy accessory doesn't provide enough power to claim this point.	Archived product.	NC



Explanation of Table 2 – The findings are based on the product declaration on the Registry when the round is begun. Nothing prevents subscribers from changing their declaration or even removing the product during the round, but verification decisions reference the declaration as it stood when the round began. When a declaration is found to be in non-conformance the subscriber is required to take corrective action to return their declaration to conformance. They may undeclare the non-conforming criterion or may change the product to bring it into conformance with the declaration.

Product archiving – If the non-conformance is not corrected by a given date, the product is archived by EPEAT staff. If the declaration or product is later changed to resolve the non-conformance, the product can be reactivated.

EPEAT policy is that the subscriber, not EPEAT staff, performs edits on product declarations by changing a criterion declaration, even when non-conformances must be corrected. If such edits are not performed by the deadline, EPEAT staff archive the product.

7. Background

To assure the credibility of the EPEAT Registry, verification of the claims by participating manufacturers (called “Subscribers”) must be rigorous, independent and transparent. Verification is conducted strictly according to policies and procedures described in the IEEE 1680 Standard and in documents provided on www.epeat.net. Subscribers have no forewarning that their products will be verified and verification proceeds against the declarations as they are in the database at the time the round begins.

In level one verification investigations, subscribers are required to provide detailed and accurate information in a timely manner that demonstrates conformance, such as supply chain management records. In level two and three investigations EPEAT buys products without the manufacturer’s knowledge and disassembles them, and possibly conducts detailed analytical testing if needed. Investigations are performed by expert technical contractors who are free of conflicts of interest, and their recommended decisions are reviewed and finalized by a 3-person panel of independent technical experts (called the Product Verification Committee or PVC) who are also contractors free of conflicts of interest and are blind to the identity of the products and companies they are judging. This panel makes a conformance/non-conformance decision on each investigation, based on evidence collected and analyzed by Qualified Verifiers. A serious consequence of receiving a non-conformance is that it is published publicly in this report, for purchasers, competitors, and others to see.

Subscribers must correct findings of non-conformance, either by bringing the product into conformance or by un-declaring the criterion until conformance is recovered, and they must do so for all products that are similarly incorrectly declared, not only the product(s) that were investigated. If they correct the non-conformance by un-declaring the criterion and the criterion is an optional criterion, they lose a point, and possibly the product drops a tier. If it is a required criterion, they must archive the product. If it is a required corporate criterion, all their products must be archived.