



VERIFICATION PLAN – ROUND 2010-2

April 2010

Product Verification Committee

I. PURPOSE AND CONTENTS OF THIS DOCUMENT

This Plan describes the verification process to be used in the second EPEAT Verification Round for 2010, including the criteria that will be verified, the number of products to be verified for each criterion, and the method of verification for each.

The products and subscribers to be verified are not specifically identified. The intention is for the PVC to be blind to the specific product and subscriber about which they are making decisions. This information will be known by the staff and the Qualified Verifier, but will not be provided to the PVC until after completion of the initial conformance/non-conformance findings of the Round. However, when subscribers present specific information to the PVC regarding a decision, the subscriber and product will be revealed to the PVC in order to resolve any issues.

II. PRODUCT VERIFICATION COMMITTEE

Following are the members of the PVC:

Patty Dillon, Dillon Environmental Associates

Jack Geibig, Director, Center for Clean Products, University of Tennessee

Jim Arnold, Retired from Motorola Labs

III. QUALIFIED VERIFIERS

Following are the members of the Qualified Verifier (QV) team:

Patricia Atherton
Consultant

Pamela Brody-Heine
EcoStewardship Strategies

Stephen Greene
Howland Greene Consulting

Kim Holmes
4R Sustainability

Kelley Keogh
Sin Fronteras Consulting

Carson Maxted
Consultant

Dresden Skees-Gregory
Sustainable Environmental Services

Dawn Van Seggen
Consultant

IV. CHARACTERISTICS OF ROUND 2010-2

Round 2010-2 will verify two optional criteria that have been very widely claimed, but for which questions have been raised by stakeholders as to the potential for either misunderstandings or oversight by subscribers of the requirements of the criteria. A total of 45 investigations, equal to the number of subscribers on the Registry, will be conducted between these two criteria. Half of the subscribers will be verified to one and half to the other criterion.

One additional investigation will focus on a singular declaration that is questionable.

This Round is conducted under the revised IEEE 1680.1 standard including the new international registry representing 41 countries.

V. SELECTION OF PRODUCTS AND CRITERIA FOR VERIFICATION

Selection Process

1. A snapshot was taken of the Registry as the product declarations existed on 4/28/2010.
2. This Verification Round Plan lists the criteria that will be verified, the rules for selecting the subscribers and products, and the method of verification that will be used.
3. Upon adoption of the Plan by the PVC, staff will select the subscribers and products according to the rules in the Plan.

Selection Principles

Round 2010-2 will investigate especially two optional criteria that are very widely declared to and, for different reasons, have been brought to our attention as potentially problematic:

- 4.1.2.1 Elimination of intentionally added cadmium – It has been identified that some declarations to this criterion may be in error due to the fact that it does not incorporate the RoHS exemptions. It has been suggested that subscribers may be incorrectly assuming that the exemptions apply, however the criterion very specifically does not incorporate those exemptions. In addition these investigations will examine the quality of the conformity assurance systems that subscribers maintain for the lower thresholds of banned RoHS substances.
- 4.8.2.2 Packaging 90% recyclable and plastics labeled – Questions have been raised by some manufacturers as to the feasibility of meeting this criterion for packaging in all countries on the Registry. With the internationalization of the registry it is essential that criteria that may be difficult to meet in some countries are correctly declared to. Given the reliance of programs to meet this criterion on local recycling infrastructures, it is expected to be difficult to meet this criterion in some countries. *Note: This Verification Round will not verify the labeling of plastics as this portion of the criteria was addressed in a prior verification round.*

The 45 subscribers will be divided evenly between the 4.1.2.1 investigation and the 4.8.2.2 investigation.

- First, subscribers that have declared to 4.1.2.1, but not to 4.8.2.2, will be identified and a product randomly selected for verification of this criterion.
- Second, subscribers that have declared to 4.8.2.2, but not to 4.1.2.1 will be identified and a product randomly selected for verification to 4.8.2.2.
- Then the remaining subscribers (who have declared to both criteria) will be randomly divided between the two for verification and a product for each, which is declared to the applicable criterion, will be randomly selected.

In addition one investigation will be conducted for an optional criterion – 4.5.2.2 Renewable energy accessory standard – for which it is the sole declaration. Previous declarations to this criterion have been found to be Non-conformances.

Possible Out-of-Sequence Selections

In the event of special circumstances, the PVC may, at its prerogative, decide to schedule an additional investigation(s) at any time, including while Round 2010-2 is in progress. If the PVC determines that such investigation should be included as a part of Round 2010-2, this Verification Round 2010-2 Plan will be amended and reissued without disrupting the timing of the other verification investigations.

VI. Investigation Assignments

The following Verifiers will investigate the criteria:

- Patricia Atherton
- Stephen Greene
- Dresden Skees-Gregory
- Dawn Van Seggen

VII. ROUND 2010-2 INVESTIGATIONS

| Criterion | | Verification Selection and Process | Number of Investigations |
|---------------------------------------|--|---|--------------------------|
| 4.1.2.1 | Optional— Elimination of intentionally added cadmium | <p>Verification requirements per IEEE 1680.1:</p> <ul style="list-style-type: none"> a) Declaration from the manufacturer b) Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance <p>Notes: Most all products have been declared to this optional criterion – including 1433 of the 1550 products on the U.S. Registry</p> <ul style="list-style-type: none"> • Demonstration of conformance will especially be looked for in the high risk parts identified in the protocols and in the RoHS exemptions for Cadmium, which do not apply to 4.1.2.1, but may not be recognized by subscribers. | 22 |
| 4.5.2.2 | Optional— Renewable energy accessory standard | <p>Verification requirements per IEEE 1680.1:</p> <ul style="list-style-type: none"> a) Declaration from manufacturer b) Commercial documentation of product availability <p>Notes: Only one product on the registry has declared to this most problematic of criteria. We have found in desk reviews that there is misunderstanding of this criterion, and generally companies then do not declare to it.</p> <ul style="list-style-type: none"> • One product will be selected that declares to this criterion | 1 |
| 4.8.2.2 | Optional— Packaging 90% recyclable and plastics labeled | <p>Verification requirements per IEEE 1680.1:</p> <ul style="list-style-type: none"> a) Declaration from manufacturer b) Demonstration that material is normally recyclable or, if not, that there exists a market/use c) Record of visual inspections <p>Notes: Most all products have been declared to this criterion. However, questions have been raised regarding the feasibility of meeting this criterion for packaging in all countries on the Registry.</p> <ul style="list-style-type: none"> • See the selection process outlined for criterion 4.1.2.1. • This criterion will be investigated in non-U.S. countries. • One country will be randomly selected for each product for investigation. • <i>This Verification Round will not verify the labeling of plastics.</i> | 22 |
| Total number of investigations | | | 45 |