



## OUTCOMES REPORT

### EPEAT VERIFICATION ROUND 2010-04

#### 1. Summary and Details of Verification Round 2010-04

This report provides the detailed results of EPEAT Verification Round 2010-04. This Verification Round focused specifically on the following:

- Required criterion 4.3.1.1— Identification of materials with special handling needs
- Required criterion 4.3.1.3—Easy disassembly of external enclosure
- Required criterion 4.4.2.1—Upgradeable with common tools

Round 2010-04 investigated three required criteria in the areas of Design for End of Life and Product Longevity / Life Cycle Extension. Criteria 4.3.1.1 and 4.4.2.1 were chosen because they have never been verified. Criterion 4.3.1.3 was chosen because as products get more compact and efficient, there was a suspicion that conformance to this criterion may have gotten more difficult over time. All three of these criteria are required criteria.

This Round was conducted under the revised IEEE 1680.1 standard including the new international registry representing 41 countries. Subscribers chosen for this verification round were found to be under-verified based on an analysis of all Verification Rounds. Products were chosen randomly from among the countries in which the Subscriber had products declared. All aspects of the requirements of these criteria were investigated using level one investigations.

#### 2. Outcomes of Round 2010-04

All three criteria investigated in this Verification Round are required criteria. Subscribers provided detailed information to prove Conformance and some of the responses were impressive.

Following are the specific highlights of Round 2010-04.

- 6 investigations were launched and completed:
  - 2 investigations looked at required criterion 4.3.1.1
  - 2 investigations looked at required criterion 4.3.1.3
  - 2 investigations looked at required criterion 4.4.2.1
- There were 5 decisions of conformance for these investigations.
- There was 1 decision of non-conformance for required criterion 4.3.1.1. See the non-conformance identified in Table 1 and the details and identification of the subscriber and product in Table 2.
  - The decision of non-conformance resulted in EPEAT archiving the Subscriber's product.
- No products changed EPEAT level. The overall impact on the Registry was:
  - 1 product was archived by EPEAT.



### 3. Key Lessons of Round 2010-04

- Required criterion 4.3.1.1— Identification of materials with special handling needs
  - Verification requirements:
    - Declaration from manufacturer as to how information is provided to reuse and recycling facilities or Web link to where information is available.
  - Two investigations looked at this criterion.
    - One Subscriber provided a list of materials with special handling needs and a link to a website where they provided information on handling and disposal. This Subscriber was found to be in Conformance.
    - The other Subscriber did not appear to understand what they needed to provide. With prompting, they provided a list of materials with special handling needs but did not show how the information is provided to reuse and recycling facilities. This Subscriber was found to be Non-Conformant.
  - *Message to Subscribers:*
    - Meeting the WEEE directive in the European Union does not automatically put you into Conformance with this Criterion. Please ensure that the information about materials with special handling needs is readily available.
- Required criterion 4.3.1.3—Easy disassembly of external enclosure
  - Verification requirements:
    1. Declaration from manufacturer.
    2. Supporting documentation demonstrating that the external enclosure design does not unreasonably obstruct the disassembly process.
  - Two investigations looked at this criterion.
    - Both Subscribers provided the required Declaration from Manufacturer plus supporting documentation including a list of tools plus instructions for disassembly. Both Subscribers were found to be in Conformance.
- Required criterion 4.4.2.1—Upgradeable with common tools
  - Verification requirements:
    1. Declaration from manufacturer.
    2. Supporting documentation demonstrating that the product is upgradeable with commonly available tools.
  - Two investigations looked at this criterion.
    - Both Subscribers provided the required Declaration from Manufacturer plus supporting documentation including a list of tools plus instructions for upgrading the product. Both



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Subscribers were found to be in Conformance. One of the Subscribers provided an excellent document which included photos and clear instructions.

### 4. Looking Forward

1. **Plans for Future Verification Activities:** Verification Round 2010-05 started on November 3, 2010. EPEAT's goal is to start a total of 6 Verification Rounds in 2010.
2. **International Training:** An international training event was held in Taiwan on November 29-30, 2010. We are currently generating the training schedule for 2011.
3. **Conformity Assessment Protocols:** This and all future rounds will be conducted according to the Conformity Assessment Protocols posted on [www.epeat.net](http://www.epeat.net).

### 5. Investigation Tables

**TABLE 1: Non-Conformance Findings**

Criterion	Description	Total # of Investigations	# of NCs
4.3.1.1	Identification of materials with special handling needs	2	1
4.3.1.3	Easy disassembly of external enclosure	2	0
4.4.2.1	Upgradeable with common tools	2	0
	Total	6	1



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

Subscriber	Product	Verification Criterion	Country	Criterion Description	Description of NC Finding	Corrective Actions Taken	Final Decision
On Line Datensysteme GmbH	>>>es on<<< view 170	4.3.1.1	Germany	Identification of materials with special handling needs	Provided a list of materials with special handling needs but did not show how the information is provided to reuse and recycling facilities.	Subscriber took no corrective actions. EPEAT 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 / country is archived by EPEAT staff. If the declaration or product is later changed to resolve the non-conformance, the product / country can be reactivated on the EPEAT Registry.

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.



## 6. 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](http://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.