



OUTCOMES REPORT EPEAT VERIFICATION ROUND 2011-01

1. Summary and Details of Verification Round 2011-01

This report provides the detailed results of EPEAT Verification Round 2011-01. Round 2011-01 investigated two criteria in the area of packaging, specifically:

- Required criterion 4.8.3.1 -- Declaration of recycled content.
- Optional criterion 4.8.3.2 -- Minimum postconsumer content guidelines.

These criteria were chosen because they have never been verified. Criterion 4.8.3.1 is required and criterion 4.8.3.2 is optional.

This Round was conducted under the revised IEEE 1680.1 standard including the international registry representing 41 countries. A total of 45 investigations were conducted. This was equal to the number of subscribers on the EPEAT Registry with products applicable to these criteria minus two Subscribers that were involved with Verification Round 2010-06 at the start of the round. Twenty-five of the subscribers were verified to the required criterion 4.8.3.1 and 20 of the subscribers were verified to the optional criterion 4.8.3.2. The criteria were investigated on randomly selected products for which these criteria were applicable. 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 2011-01

Criterion 4.8.3.1 is required and criterion 4.8.3.2 is optional.

Following are the specific highlights of Round 2011-01.

- 45 investigations were launched and 44 completed.
 - 25 investigations looked at required criterion 4.8.3.1
 - 20 investigations looked at optional criterion 4.8.3.2
 - One investigation (for criterion 4.8.3.1) was withdrawn due to some confusion about the declaration. The entry on the EPEAT Registry contained nothing at all. This should not have been possible due to the safeguards in the EPEAT system. The EPEAT Staff is investigating the error and the Subscriber has entered the appropriate information.
- There were 32 decisions of Conformance for these investigations.
- There were ten decisions of non-conformance for required criterion 4.8.3.1 and two decisions of non-conformance for optional criterion 4.8.3.2. Non-conformances are identified in Table 1 and the details and identification of the subscribers and products in Table 2.
 - The ten decisions of non-conformance for criterion 4.8.3.1 resulted in a variety of actions including Subscribers correcting the declaration on the EPEAT Registry, Subscribers providing additional information, and products archived by the EPEAT Staff.
 - The two decisions of non-conformance for criterion 4.8.3.2 resulted in the EPEAT Staff



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archiving one of the products and a Subscriber undeclaring the criterion for the other product.

- The overall impact on the Registry was:
 - Subscribers made changes to seven non-conformant product declarations for criterion 4.8.3.1., which brought the products into conformance.
 - EPEAT Staff archived three non-conforming products: two for 4.8.3.1 and one for 4.8.3.2.
 - One non-conformant product was registered to a Subscriber that was found to have an inactive account, and therefore, this product had already been deactivated.
 - One Subscriber undeclared criterion 4.8.3.2 for the investigated product.
 - One product changed from EPEAT Gold to EPEAT Silver.

3. Key Lessons of Round 2011-01

- Required criterion 4.8.3.1 Declaration of recycled content.
 - It became clear early in this investigation that the text entry box for this criterion was usually filled out during the original declaration of the product and then forgotten. In many cases, the supplier letters received for a given product did not match the declaration of recycled content on the EPEAT Registry.
 - The IEEE 1680.1 standard states the product criterion as follows: *“Manufacturer declares whether packaging contains recycled content or does not. Manufacturer also declares approximate recycled content (by weight or volume specified by manufacturer) in the packaging materials used, with the approximate range of recycled content in each material. A manufacturer may provide different information for different regions or countries regarding the recycled content.”*
 - *Message to Subscribers:*
 - *All packaging materials must be listed even if they do not contain recycled content. This information must be updated as changes are made to ensure the accuracy of the EPEAT Registry.*
 - *The product criterion recommends a range of recycled content and the EPEAT Staff encourages putting a range due to the availability of recycled content.*
- Required criterion 4.8.3.2 -- Minimum postconsumer content guidelines.
 - Two Subscribers were found to be non-conformant specifically because they did not provide any information during the investigation. These two decisions of non-conformance resulted undeclaring the optional criterion.
 - *Message to Subscribers:*
 - *The declaration of criterion 4.8.3.1 is directly related to criterion 4.8.3.2. Make sure you*



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are able to provide data to back up your claim of the recycled content reported in 4.8.3.1

- Other Key Lessons
 - *Message to Subscribers:*
 - *Recently, all Subscribers were asked to update their contacts. If you have not already done so, take the time to review the primary contacts on www.EPEAT.net and make changes to ensure all information is correct.*
 - *When you are contacted regarding your participation in a Verification Round, we request that you respond to the Qualified Verifier quickly to let them know they are communicating with the correct person or to inform them who they should be communicating with.*

4. Looking Forward

1. **Plans for Future Verification Activities:** There are 6 verification rounds planned for 2011. They will include Level 1, Level 2 and Level 3 investigations as needed.
2. **Training:** The next international training session will be held in Shenzhen May 17-20, 2011. Please contact EPEAT staff for more information. We are planning a training session in North America in Fall, 2011. The location and date is TBD. Is your company able to host? Let us know if your company is willing and able to host the North American training session.
3. **Conformity Assessment Protocols:** This and all future rounds will be conducted according to the Conformity Assessment Protocols posted on www.epeat.net.

5. Investigation Tables

TABLE 1: Non-Conformance Findings

Criterion	Description	Total # of Investigations	# of NCs
4.8.3.1	Declaration of recycled content.	25	10
4.8.3.2	Minimum postconsumer content guidelines.	20	2
	Total	45	12



TABLE 2: Non-Conformance Findings: Corrective Actions Taken

Subscriber	Product	Country	Verification Criterion	Criterion Description	Description of NC Finding	Corrective Actions Taken
Action S.A.	SIERRA 300G	Poland	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	Subscriber updated declaration on EPEAT.net.
Arquimedes Automacao e Informatica Ltda	Corporativo B N04	Brazil	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	Subscriber updated declaration on EPEAT.net.
Corporativo Lanix S.A. de C.V	Lanix Wizz Tablet	Mexico	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	EPEAT Staff archived this product.
General Dynamics Itronix	GD6000	United States	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	Subscriber updated declaration on EPEAT.net and provided updated packaging information.
GETAC	M230	United States	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	Subscriber updated declaration on EPEAT.net.
NCS Technologies Inc.	Gemini CT2-A381	United States	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	Subscriber updated declaration on EPEAT.net.
Northern Micro Inc.	Spirit P5945G-AS	Canada	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	Subscriber updated declaration on EPEAT.net.
Tangent Inc.	VITA 2000	United States	4.8.3.1	Declaration of recycled content.	Subscriber did not provide any information to prove conformance.	Product was already "deactivated" due to suspension of Subscriber.

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ViewSonic Corporation	VA2231wm-LED	Canada	4.8.3.1	Declaration of recycled content.	Subscriber declaration did not match evidence provided (Supplier letters).	Subscriber updated declaration on EPEAT.net.
Wyse Technology Inc.	R90L	United States	4.8.3.1	Declaration of recycled content.	Subscriber did not provide adequate information to prove conformance.	EPEAT Staff archived this product.
On Line Datensysteme GmbH	>>es on<< line SL-I09XX 01	Germany	4.8.3.2	Minimum postconsumer content guidelines.	Subscriber did not provide any information to prove conformance.	Subscriber undeclared this criterion.
MDG Computers Canada Inc.	Prism Vxi5-680	Canada	4.8.3.2	Minimum postconsumer content guidelines.	Subscriber did not provide any information to prove conformance.	EPEAT Staff undeclared this criterion.

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. 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 undeclaring 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.