



UPDATED OUTCOMES REPORT EPEAT VERIFICATION ROUND 2012-04

1. Summary and Details of Verification Round 2012-04

This report provides the detailed results of EPEAT Verification Round 2012-04. Round 2012-04 consisted of two discrete sets of investigations. Verification Round 2012-04 consisted of a total of 51 investigations.

Part 1:

The first set of investigations (a total of 48) involved 3 randomly selected products. Conformity assessment included Level 1, 2, and/or 3 investigations for the following criteria, if applicable to the selected product.

- 4.1.1.1 Required – Compliance with provisions of European RoHS Directive
- 4.1.2.1 Optional – Elimination of intentionally added cadmium
- 4.1.4.1 Optional – Elimination of intentionally added lead in certain applications
- 4.1.5.1 Optional – Elimination of intentionally added hexavalent chromium
- 4.1.8.1 Optional – Large plastic parts free of PVC
- 4.3.1.2 Required – Elimination of paints or coatings that are not compatible with recycling or reuse
- 4.3.1.3 Required – Easy disassembly of external enclosure
- 4.3.1.4 Required – Marking of plastic components
- 4.3.1.5 Required – Identification and removal of components containing hazardous materials
- 4.3.1.6 Optional – Reduced number of plastic material types
- 4.3.1.7 Optional – Molded / glued in metal eliminated or removable
- 4.3.2.1 Optional – Manual separation of plastics
- 4.3.2.2 Optional – Marking of plastics
- 4.5.1.1 Required – Energy Star
- 4.8.2.1 Required – Separable packing materials
- 4.8.2.2 Optional – Packaging 90% recyclable and plastics labeled

A list of currently active products on the Registry was used for selection of products to be verified. One product was selected randomly for verification from each of the Tiers 3, 4 and 5 Subscribers. EPEAT Inc. purchased three products on the retail market, and contracted with an independent test laboratory to perform these investigations.

The specific criteria were selected because they lent themselves to Level 2 and Level 3 investigations. Two investigations included an additional Level 1 investigation to obtain additional information from Subscribers to demonstrate conformance.

Part 2:

The second set of investigations (a total of 3) in this Round were follow up investigations from Verification Round 2012-03. In Round 2012-03 three Subscribers undergoing investigation for criterion 4.7.3.2 (Optional- Corporate report based on GRI) received Non-Conformances. These Subscribers did not provide an annual report during the investigation or the Corrective Action Phase. Verification Round 2012-04



investigated these Subscribers for conformance with criterion 4.7.3.1, which requires all manufacturers with products declared to the IEEE 1680.1 standard to produce an annual report.

- 4.7.3.1 Required – Corporate report consistent with Performance Track or GRI.

2. Outcomes of Round 2012-04

Following are the specific highlights of Round 2012-04 for both sets of investigations.

- Up to 51 investigations were planned for this round.
- 51 investigations were completed for this round.
- 46 investigations resulted in Conformance.
 - All 3 products investigated for required criterion 4.7.3.1 were found to be in Conformance.
- There were 5 decisions of Non-Conformance.
 - All 3 products investigated in Part 1 had at least one Non-Conformance.
 - Two products had one Non-Conformance.
 - One product had three Non-Conformances.
 - 2 products were archived until the Non-Conformances can be resolved.
 - 1 Subscriber brought the product into Conformance.

3. Key Lessons of Round 2012-04

General Message to Subscribers:

- IEEE 1680 and the EPEAT subscriber agreements require that Subscribers provide the information identified in Verification Requirements to prove the accuracy of their declarations within 30 days of EPEAT's request. Failure to provide that information is inconsistent with the agreement and may result in termination of the Subscriber from EPEAT.*
 - When contacted regarding participation in a Verification Round, EPEAT staff 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. This also helps the Qualified Verifier know they have a valid email address.*
 - Regarding criteria 4.3.1.2, 4.3.1.4, 4.3.2.2, the PVC made the following determination:*
 - The individual plastic layers within a LCD panel are not considered "plastic parts" or "plastic components" for the purposes of 4.3.1.2, 4.3.1.4 and 4.3.2.2. Therefore the individual plastic layers of the LCD panel are not subject to criteria 4.3.1.2, 4.3.1.4 or 4.3.2.2. If a LCD panel is made entirely of plastic, it would be considered a "plastic component."
- This Verification Round identified one Non-Conformance for criterion 4.3.1.2 - Elimination of paints or coatings that are not compatible with recycling or reuse. This criterion is required for all plastic parts > 100 g. Paint or coatings were found by the lab and an IZOD test report was requested from the Subscriber. The Subscriber provided a test report. However, the test report did not sufficiently demonstrate conformance. Additional information was requested but was not provided in the allotted time.



- The verification requirements for this criterion include “documentation showing manufacturer test, or supplier verification if paints or coatings are used on plastic parts > 100 g.”
- *Message to Subscribers:*
- *This information should be available upon request for all products containing plastic parts with paints or coatings that are greater than 100 g. It is likely that this criterion will be verified in 2013.*
- This Verification Round identified one Non-Conformance for criterion 4.3.1.4 - Marking of plastic components. This criterion is required and all parts over 100 g must be “marked with a material code in accordance with the identification and marking requirements of ISO 11469:2000.”
 - The referenced document has very specific requirements regarding how plastics must be marked.
 - *Message to Subscribers:*
 - *All parts greater than 100g must be marked in accordance with ISO 11469:2000. Paper labels are not an acceptable way to mark plastic.*
 - *In several cases, parts were found to be marked, but they were marked incorrectly. Please ensure there is a system in place for marking plastics correctly and verifying the markings.*
- This Verification Round identified two Non-Conformances for criterion 4.3.2.2- Marking of plastic components. This criterion is optional and all parts over 25 g must be “marked with a material code in accordance with the identification and marking requirements of ISO 11469:2000.”
 - The referenced document has very specific requirements regarding how plastics must be marked.
 - *Message to Subscribers:*
 - *All parts greater than 25g must be marked in accordance with ISO 11469:2000. Paper labels are not an acceptable way to mark plastic.*
 - *In several cases, parts were found to be marked, but they were marked incorrectly. Please ensure there is a system in place for marking plastics correctly and verifying the markings.*
- This Verification Round identified one Non-Conformance for criterion 4.8.2.2- Packaging 90% recyclable and plastics labeled.
 - This criterion is optional and states that “All plastics shall be identified by material type” and “90% of the packaging (by weight)” must be able to be recycled.
 - See the “Applies to” section of this criterion for information about labeling exemptions.
 - *Message to Subscribers:*
 - *Be sure that all plastics greater than or equal to 25g used for packaging are labeled and that the total percentage of all packaging materials (including all plastics) have a recyclability greater than or equal to 90% by weight.*

4. Looking Forward

1. **Plans for Future Verification Activities:** There are 6 Verification Rounds planned for 2013 for 1680.1



for Computers and Displays. Investigations will include Level 1, Level 2 and Level 3 investigations.

2. **Conformity Assessment Protocols:** This and all future rounds will be conducted according to the guidance provided in the Conformity Assessment Protocols posted on www.epeat.net.

5. Investigation Tables

TABLE 1: Non-Conformance Findings

Criteria	Required or Optional	Description	Total # of Investigations	# of Completed Investigations	# of Non-Conformances
4.1.1.1	Required	Compliance with provisions of European RoHS Directive	3	3	0
4.1.2.1	Optional	Elimination of intentionally added cadmium	3	3	0
4.1.4.1	Optional	Elimination of intentionally added lead in certain applications	3	3	0
4.1.5.1	Optional	Elimination of intentionally added hexavalent chromium	3	3	0
4.1.8.1	Optional	Large plastic parts free of PVC	3	3	0
4.3.1.2	Required	Elimination of paints or coatings that are not compatible with recycling or reuse	3	3	1
4.3.1.3	Required	Easy disassembly of external enclosure	3	3	0
4.3.1.4	Required	Marking of plastic components	3	3	1
4.3.1.5	Required	Identification and removal of components containing hazardous materials	3	3	0
4.3.1.6	Optional	Reduced number of plastic material types	3	3	0
4.3.1.7	Optional	Molded/glued in metal eliminated or removable	3	3	0
4.3.2.1	Optional	Manual separation of plastics	3	3	0
4.3.2.2	Optional	Marking of plastics	3	3	2
4.5.1.1	Required	ENERGY STAR	3	3	0
4.8.2.1	Required	Separable packing materials	3	3	0
4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	3	3	1
4.7.3.1	Required	Corporate report consistent with Performance Track or GRI	3	3	0
		Total	51	51	5



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TABLE 2: Non-Conformance Findings: Corrective Actions Taken

Subscriber	Product	Country	Product Type	Criteria	R or O	Criterion Description	Description of NC finding	Corrective Action Taken
MMD-Monitors & Displays Taiwan Ltd.	PHILIPS 201BL2	United States	Displays	4.3.1.2	Required	Elimination of paints or coatings that are not compatible with recycling or reuse	Inadequate information was provided.	Product was archived by EPEAT
MMD-Monitors & Displays Taiwan Ltd.	PHILIPS 201BL2	United States	Displays	4.3.1.4	Required	Marking of plastic components	The declaration on the EPEAT Registry was inaccurate.	Product was archived by EPEAT
MMD-Monitors & Displays Taiwan Ltd.	PHILIPS 201BL2	United States	Displays	4.3.2.2	Optional	Marking of plastics	The declaration on the EPEAT Registry was inaccurate.	Product was archived by EPEAT
ViewSonic Corporation	CDP4237-L/VS14678	United States	Displays	4.3.2.2	Optional	Marking of plastics	The declaration on the EPEAT Registry was inaccurate.	Product was archived by Subscriber
Transource	Transource NB-R15M	United States	Notebook	4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	The declaration on the EPEAT Registry was inaccurate.	Subscriber implemented process to move into Conformance



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6. Background

To assure the credibility of the EPEAT Registry, verification of the claims by participating manufacturers (called “Subscribers”) are 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 are given no forewarning that their products will be verified and verification is performed based on 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 to demonstrate their conformance to each criterion of the standard in a timely manner that demonstrates Conformance, such as supply chain management records. In level two and three investigations EPEAT buys or borrows products without the Subscriber’s knowledge, disassembles them, and conducts detailed analytical testing if needed. Level two investigations can also take the form of site visits. Investigations are performed by expert technical contractors who are free of conflicts of interest, and their recommended decisions are reviewed and finalized by a 5-person panel of independent technical experts (called the Product Verification Committee or PVC) who are also contractors free of conflicts of interest. Verification activities conducted by the Product Verification Committee are done 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 an Outcomes Report, for purchasers, competitors, and others to see.

Subscribers must correct findings of Non-Conformance, either by bringing the product into Conformance, by un-declaring the criterion until Conformance is achieved, or by removing the product from the registry, 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.