



OUTCOMES REPORT EPEAT VERIFICATION ROUND PC-2013-06

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round PC-2013-06. This Round investigated randomly chosen products and criteria, and consisted of 67 investigations (all Level 1), of which approximately 55% were for required criteria and 45% for optional criteria. The numbers of investigations performed per criterion are provided in Table 1 starting on page 3 of this report.

- 4.1.2.1 Optional – Elimination of intentionally added cadmium
- 4.1.3.1 Required – Reporting on amount of mercury used in light sources
- 4.1.3.2 Optional – Low threshold for amount of mercury used in light sources
- 4.1.3.3 Optional – Elimination of intentionally added mercury used in light sources
- 4.1.4.1 Optional – Elimination of intentionally added lead in certain applications
- 4.1.5.1 Optional – Elimination of intentionally added hexavalent chromium
- 4.1.6.1 Required – Elimination of intentionally added SCCP flame retardants and plasticizers in certain applications
- 4.1.7.1 Optional – Batteries free of lead, cadmium, and mercury
- 4.1.8.1 Optional – Large plastic parts free of PVC
- 4.2.1.2 Optional – Minimum content of postconsumer recycled plastic
- 4.2.3.1 Declaration of product weight
- 4.3.1.1 Required – Identification of materials with special handling needs
- 4.3.1.2 Required – Elimination of paints or coatings that are not compatible with recycling or reuse
- 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
- 4.3.1.8 Required – Minimum 65% reusable/recyclable
- 4.3.1.9 Optional – Minimum 90% reusable/recyclable
- 4.4.1.1 Required – Availability of additional 3 year warranty or service agreement
- 4.4.2.1 Required – Upgradeable with common tools
- 4.4.2.2 Optional – Modular design
- 4.5.1.1 Required – ENERGY STAR
- 4.5.2.1 Optional – Renewable energy accessory available
- 4.6.2.1 Required – Provision of a rechargeable battery take-back service
- 4.7.1.1 Required – Demonstration of corporate environmental policy consistent with ISO 14001
- 4.7.2.1 Required – Self-certified environmental management system for design and manufacturing organizations
- 4.7.2.2 Optional – Third-party certified environmental management system for design and manufacturing organizations
- 4.7.3.1 Required – Corporate report consistent with Performance Track or GRI
- 4.8.1.1 Required – Reduction/elimination of intentionally added toxics in packaging
- 4.8.2.1 Required – Separable packing materials
- 4.8.2.2 Optional – Packaging 90% recyclable and plastics labeled
- 4.8.3.1 Required – Declaration of recycled content
- 4.8.3.2 Optional – Minimum postconsumer content guidelines
- 4.8.4.1 Optional – Provision of take-back program for packaging

All products that were currently active in the Registry at the time of the Round were eligible for investigation. All criteria, geographies and Subscribers were chosen randomly, with consideration of the following:

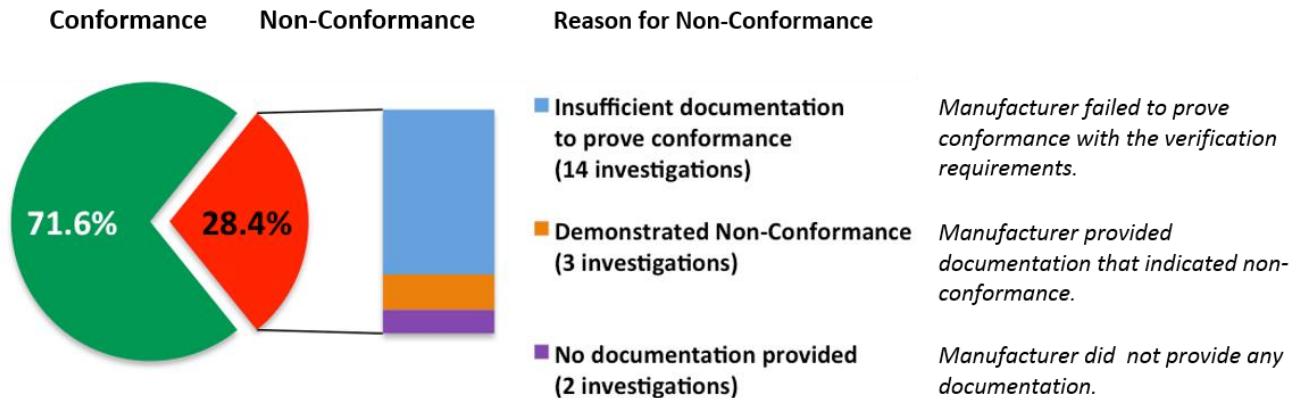
- If a criterion was randomly selected and the product has been investigated against that criterion in the last six months, that criterion was skipped and a new criterion randomly selected.
- If a criterion was randomly selected and the Subscriber had been investigated in 2013 against that criterion and found to be conformant, that criterion was skipped and a new criterion selected.
- No more than three investigations were performed for each Subscriber.

2. Summary of Outcomes

Highlights from this Verification Round are:

- **70** Investigations Planned
- **67** Investigations Completed
- **48** Decisions of Conformance
- **19** Decisions of Non-Conformance
(Reasons identified in Figure 1)

FIGURE 1: Overall Conformance Status for PC-2013-06
(as percentages of total investigations completed)



Note that three investigations were not launched due to changes after the Verification Plan was approved – two from a change in a Subscriber’s Product Registration Entity, and one from a change in the Registry declaration after the “snapshot” was taken but before the Round was launched.

Table 1 illustrates the number of investigations performed and Non-Conformances by criterion. Sixteen of the selected 34 criteria had at least one finding of Non-Conformance. Due to the low number of investigations performed per criterion, the Non-Conformance rate per criterion is not provided.

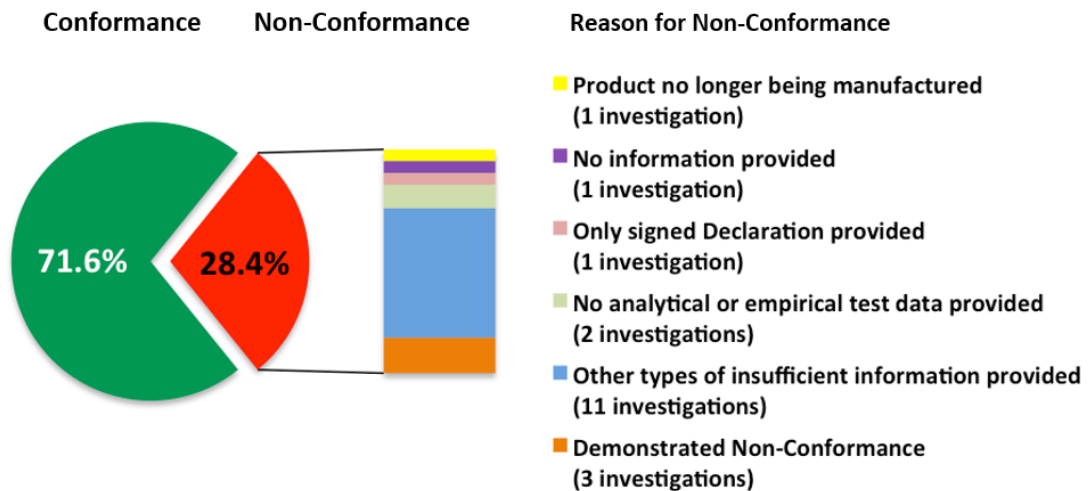
TABLE 1: Summary of Non-Conformance Findings				
Criterion	Description		Completed Investigations	Non-Conformances
4.1.2.1	Optional	Elimination of intentionally added cadmium	3	2
4.1.3.1	Required	Reporting on amount of mercury used in light sources	1	0
4.1.3.2	Optional	Low threshold for amount of mercury used in light sources	2	0
4.1.3.3	Optional	Elimination of intentionally added mercury used in light sources	1	0
4.1.4.1	Optional	Elimination of intentionally added lead in certain applications	1	1
4.1.5.1	Optional	Elimination of intentionally added hexavalent chromium	4	0
4.1.6.1	Required	Elimination of intentionally added SCCP flame retardants and plasticizers in certain applications	4	1
4.1.7.1	Optional	Optional – Batteries free of lead, cadmium, and mercury	2	0
4.1.8.1	Optional	Large plastic parts free of PVC	1	0
4.2.1.2	Optional	Minimum content of postconsumer recycled plastic	1	0
4.2.3.1	Required	Declaration of product weight	5	1
4.3.1.1	Required	Identification of materials with special handling needs	1	0
4.3.1.2	Required	Elimination of paints or coatings that are not compatible with recycling or reuse	2	1
4.3.1.4	Required	Marking of plastic components	1	1
4.3.1.5	Required	Identification and removal of components containing hazardous materials	1	0
4.3.1.6	Optional	Reduced number of plastic material types	2	2
4.3.1.8	Required	Minimum 65% reusable/recyclable	1	1
4.3.1.9	Optional	Minimum 90% reusable/recyclable	2	1
4.4.1.1	Required	Availability of additional 3 year warranty or service agreement	2	0
4.4.2.1	Required	Upgradeable with common tools	5	0
4.4.2.2	Optional	Modular design	1	1
4.5.1.1	Required	ENERGY STAR	2	0
4.5.2.1	Optional	Renewable energy accessory available	1	0
4.6.2.1	Required	Provision of a rechargeable battery take-back service	1	1
4.7.1.1	Required	Demonstration of corporate environmental policy consistent with ISO 14001	1	0
4.7.2.1	Required	Self-certified environmental management system for design and manufacturing organizations	6	0
4.7.2.2	Optional	Third-party certified environmental management system for design and manufacturing organizations	2	0
4.7.3.1	Required	Corporate report consistent with Performance Track or GRI	1	0

TABLE 1: Summary of Non-Conformance Findings				
Criterion	Description		Completed Investigations	Non-Conformances
4.8.1.1	Required	Reduction/elimination of intentionally added toxics in packaging	1	1
4.8.2.1	Required	Separable packing materials	1	0
4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	3	1
4.8.3.1	Required	Declaration of recycled content	1	1
4.8.3.2	Optional	Minimum postconsumer content guidelines	1	1
4.8.4.1	Optional	Provision of take-back program for packaging	3	2

Looking at the Non-Conformances through a different lens – by the reason for the Non-Conformance – reveals the following breakdown several trends (see Figure 2).

- One of the 19 Non-Conformances found in this Verification Round was due to the product no longer being manufactured, and the Subscriber either not providing the required information or not having access to it.
- Two of the Non-Conformances were due to the Subscriber either not responding to the request for information or only providing a signed Declaration form.
- The three demonstrated Non-conformances were for two required criteria (4.2.3.1 – Declaration of product weight and 4.3.1.4 – Marking of plastic components), and one optional criterion (4.4.2.2 – Modular design).
- Eleven Non-Conformances (representing 58% of all Non-Conformances) were due to the Subscriber providing insufficient information to prove conformance.

FIGURE 2: Further Breakdown of Non-Conformances for PC-2013-06
(as percentages of total investigations completed)



In Section 6, Table 2 presents further details on Non-Conformances including the identification of Subscribers and products.

Following the investigation phase, corrective actions were taken to resolve all identified Non-Conformances and restore the accuracy of the EPEAT Registry. The impacts of these corrective actions on the Registry were:

- 5 products Additional data were provided by Subscribers, bringing the products into Conformance with the criterion as originally declared.
- 5 products Archived by EPEAT.
- 7 products Archived by Subscribers (1 of which were archived prior to the end of the Verification Round).
- 2 product Subscriber undeclared the non-conformant criterion.

3. Key Lessons

Listed below are key lessons from this Verification Round that may be useful for future Rounds. Additionally, Subscribers are encouraged to revisit the Conformity Assurance Protocols on their “My Account” page of the Registry to fully understand the information needed for the Product Verification Committee to determine conformance.

Provision of analytical or empirical test data:

The verification requirements for criteria in Section 4.1 of IEEE 1680.1-2009 call for “*Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance.*”

Interpretation 1-6 indicates: “*Empirical data may include supplier assurance of conformance, and must include component sampling or data collection that is evaluated within a quality control system that demonstrates conformance.*” Therefore, whether empirical or analytical, results from laboratory testing are required for these criteria. Subscribers are encouraged to be prepared with this information for Verification Rounds.

Material marking codes on plastic components greater than 100 grams (criterion 4.3.1.4):

Criterion 4.3.1.4 requires the marking of plastic components greater than 25 grams in accordance with the provisions of ISO 11469. This is a required criterion, and Subscribers are encouraged to work closely with their suppliers to determine if the verification requirements can be met. In particular, ISO 11469 requires reverse angled brackets (the marks “>” and “<”) around the material marking code and designated abbreviations for specific polymers, copolymers and polymer blends. Additionally, Subscribers are encouraged to revisit the Conformity Assurance Protocols to identify the types of information sought by the Product Verification Committee to determine conformance.

4. General Message to Subscribers

Archiving products that are no longer being manufactured:

All products active on the Registry are eligible for inclusion in a Verification Round at any time. If products are no longer being manufactured and the Subscriber is no longer actively working with suppliers on maintaining information related to conformance, Subscribers are encouraged to archive these products. Please note that archived products still appear in the Registry (listed under archived products for each Subscriber) should purchasers or other stakeholders want to access details regarding the product's previously active registration.

Conformance of products that may share similar traits and/or supply chains:

If a Non-Conformance is found for a particular criterion and product, Subscribers should be prepared to determine if other products on the EPEAT Registry are similarly impacted due to use of similar materials and/or supply chains, and develop corrective action plans to address the future conformance of these other products.

Initial response to Qualified Verifiers:

When contacted regarding participation in a Verification Round, EPEAT staff continue to request that Subscribers respond to the Qualified Verifier as soon as possible to let them know they are communicating with the correct person or to inform them of the correct contact. This also helps the Qualified Verifier know that s/he has a valid email address.

Provision of information for Verification Rounds:

The IEEE 1680 standard 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.

5. Looking Forward

Plans for Future Verification Activities:

Verification Rounds planned for 2014 for 1680.1 (Computers and Displays) may include Level 1, Level 2 and/or Level 3 investigations.

Conformity Assessment Protocols:

This and all future Verification Rounds have and will be conducted according to the guidance provided in the Conformity Assessment Protocols posted on www.epeat.net.

6. Investigations Table

TABLE 2: Specific Non-Conformance Findings and Corrective Action Taken

Subscriber	Product	Country	Product Type	Criterion	Required or Optional	Criterion Description	NC Finding Description	Corrective Action Taken
Ace Computers	Ace Nomad 10	United States	Notebooks	4.1.6.1	R	Elimination of intentionally added SCCP flame retardants and plasticizers in certain applications	Insufficient documentation to prove conformance	EPEAT archived the product
Acer Inc.	Acer Veriton M6620G	Australia	Desktops	4.3.1.8	R	Minimum 65% reusable/recyclable	No documentation provided	Subscriber archived the product
Apple Inc.	Apple 27-inch iMac (ME089)	United States	Integrated Desktop Computers	4.8.2.2	R	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
ASUSTeK Computer Inc.	ASUSTeK U36SG	United States	Notebooks	4.3.1.4	R	Marking of plastic components	Demonstrated Non-Conformance	Subscriber archived the product (prior to end of Round)
CIARA-TECH	CIARATECH DISCOVERY DQ67SW	Canada	Desktops	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
GETAC	Getac E100	United States	Notebooks	4.6.2.1	R	Provision of a rechargeable battery take-back service	Insufficient documentation to prove conformance	Subscriber archived the product
Hewlett-Packard	HP 250 G1 Notebook PC	Switzerland	Notebooks	4.3.1.2	R	Elimination of paints or coatings that are not compatible with recycling or reuse	Insufficient documentation to prove conformance	Subscriber archived the product
	HP EliteDisplay E231 23-inch LED Backlit Monitor	Latvia	Displays	4.1.2.1	O	Elimination of intentionally added cadmium	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Komparsa UAB	Komparsa Kopa U6100	Lithuania	Desktops	4.3.1.6	O	Reduced number of plastic material types	Insufficient documentation to prove conformance	Subscriber archived the product
LG Electronics Inc.	LG IPS235P	United States	Displays	4.8.4.1	O	Provision of take-back program for packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
MMD-Monitors & Displays Taiwan Ltd.	PHILIPS 226V3L (226V3LSB5)	Slovenia	Displays	4.3.1.9	O	Minimum 90% reusable/recyclable	Insufficient documentation to prove conformance	Subscriber archived the product

TABLE 2: Specific Non-Conformance Findings and Corrective Action Taken

Subscriber	Product	Country	Product Type	Criterion	Required or Optional	Criterion Description	NC Finding Description	Corrective Action Taken
NEC Display Solutions, Inc.	NEC EA294WMI (Black)	Netherlands	Displays	4.8.3.1	R	Declaration of recycled content	Insufficient documentation to prove conformance	EPEAT archived the product
Panasonic	Panasonic Toughbook 53	United States	Notebooks	4.8.3.2	O	Minimum postconsumer content guidelines	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Positivo Informática S.A.	POSITIVO Positivo FIT8510	Brazil	Displays	4.2.3.1	R	Declaration of product weight	Demonstrated Non-Conformance	EPEAT archived the product
	POSITIVO Positivo Master D550	Brazil	Desktops	4.1.2.1	O	Elimination of intentionally added cadmium	No documentation provided	Subscriber archived the product
Samsung Electronics	Samsung NP730U3E	Canada	Notebooks	4.4.2.2	O	Modular design	Demonstrated Non-Conformance	EPEAT archived the product
	Samsung S23C450D	Poland	Displays	4.8.4.1	O	Provision of take-back program for packaging	Insufficient documentation to prove conformance	EPEAT archived the product
Toshiba	Toshiba Satellite L75D-A PSKNJU	United States	Notebooks	4.3.1.6	O	Reduced number of plastic material types	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
	Toshiba Tecra R850 PT524C	Canada	Notebooks	4.1.4.1	O	Elimination of intentionally added lead in certain applications	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion

7. 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 according to policies and procedures described 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 1 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 Levels 2 and 3 investigations, EPEAT buys or borrows products without the Subscriber’s knowledge, disassembles them, and conducts detailed analytical testing if needed.

Investigations are performed by expert technical contractors called “Qualified Verifiers” working for an EPEAT approved Product Verification Entity (PRE). Qualified Verifiers are free of conflicts of interest, and their recommended decisions are reviewed and finalized by a five-person panel of independent technical experts (called the Product Verification Committee) who are also contractors free of conflicts of interest. Decisions of conformity by the Product Verification Committee are made blind to the identity of the products and companies they are judging, based only 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 Non-Conformances, either by bringing the product into Conformance, by un-declaring the criterion until Conformance is achieved, or by removing the product from the Registry. EPEAT also requires that Subscribers examine other registered products to determine if their declarations should be corrected as well. If a Subscriber corrects the Non-Conformance by un-declaring the criterion and the criterion is an optional criterion, they lose that 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, they must archive all of their registered products.