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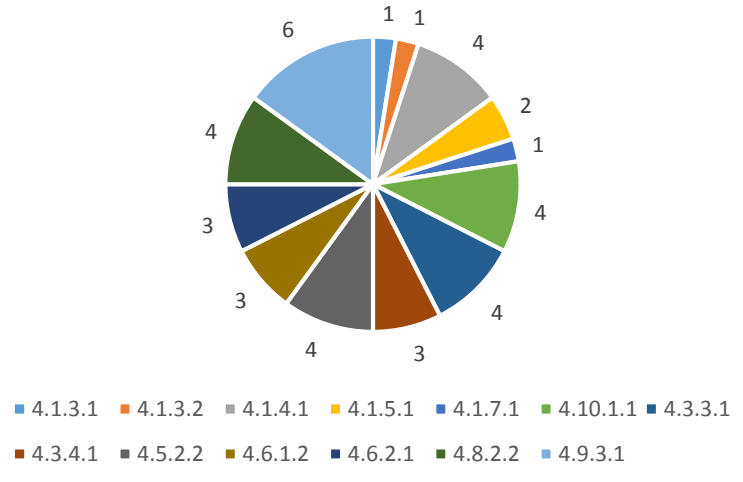
OUTCOMES REPORT
EPEAT VERIFICATION ROUND IE-2014-02

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round IE-2014-02. This Round consisted of a total of 40 investigations of the IEEE 1680.2™ criteria listed below:

- 4.1.3.1 Required -- Reporting on amount of mercury content in light sources
- 4.1.3.2 Optional -- Use of non-mercury containing light sources
- 4.1.4.1 Optional -- Reduction of substances on the EU REACH Candidate List of SVHCs
- 4.1.5.1 Required -- Compliance with provisions of EU Battery Directive
- 4.1.7.1 Optional -- Reduce fluorinated gas emissions resulting from flat panel display manufacturing
- 4.3.3.1 Required -- Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs
- 4.3.4.1 Required --Preparation of product end-of-life characterization report
- 4.5.2.2 Optional -- Product specific greenhouse gas emissions -- third-party verification or making LCA assessment publicly available
- 4.6.1.2 Optional -- Provision of take-back service for broader scope of products
- 4.6.2.1 Required -- End-of-life processing requirements
- 4.8.2.2 Optional -- Packaging 90% compostable/recyclable
- 4.9.3.1 Required -- Provision of take-back and end-of-life management for cartridges and containers
- 4.10.1.1 Required -- Indoor air quality emission requirements

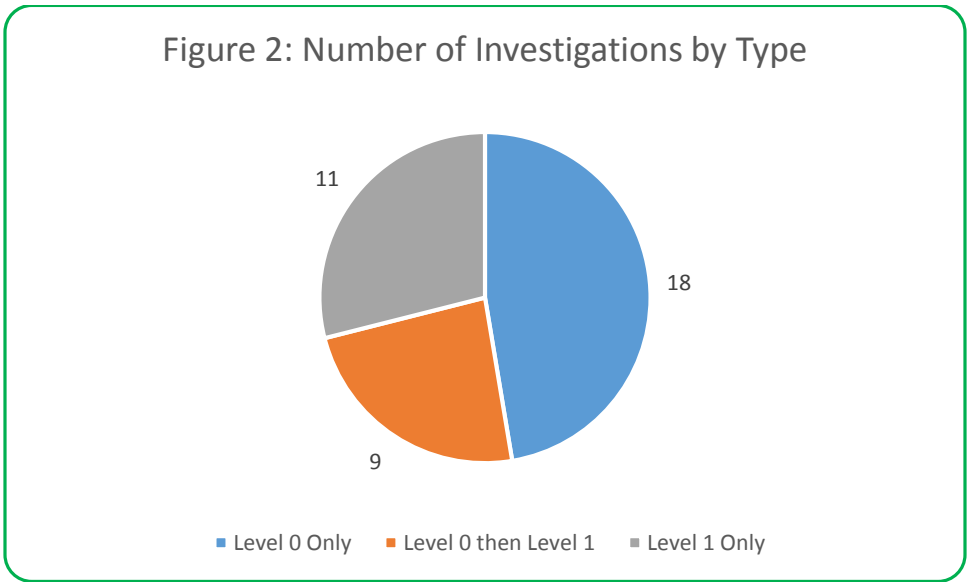
Figure 1: Number of Investigations by Criterion



The Verification Round targeted three types of criteria:

1. Criteria with official Clarifications
2. Time based criteria
3. Criteria with possible Not Applicable declarations

This Verification Round consisted of 40 investigations that were a mix of Level 0 Surveillance investigations (formerly Level 2) and Level 1 investigations. A Level 1 investigation involves a review of Subscriber submissions. A Level 0 investigation involves the Qualified Verifier attempting to establish Conformance based on publicly available information, as applicable. All active PREs and Subscribers were considered in selection for this Round. If a Subscriber had already received a decision of Conformance for one of the criteria in a different Verification Round, they were not verified again for the same criteria.



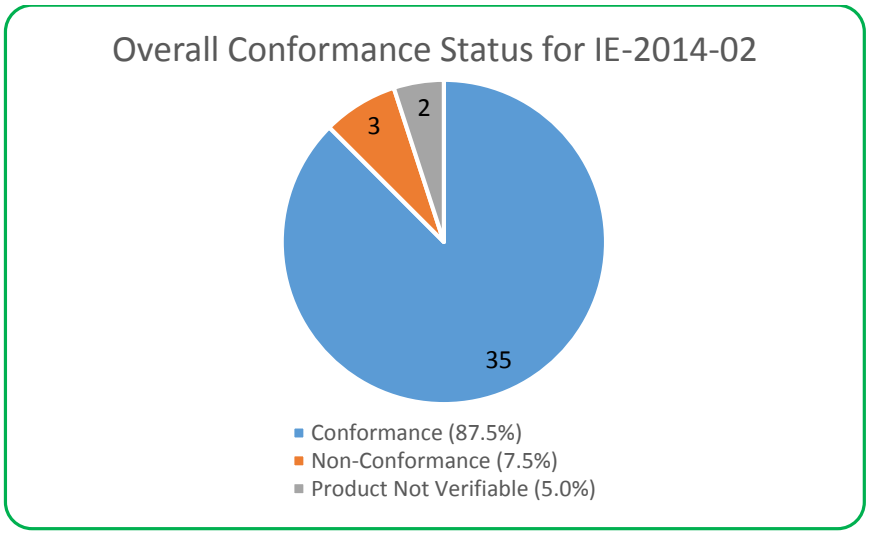
The PREs involved in this Verification Round were DEKRA, EPEAT, Intertek and ULE.

2. Summary of Outcomes

Highlights from this Verification Round are:

- **40** Investigations Planned
- **35** Decisions of Conformance
- **2** Products Not Verifiable*
- **38** Investigations Completed
- **3** Decisions of Non-Conformance

* Product Not Verifiable means that criteria were chosen by the MSE which were unable to be verified. In this round the criteria were not able to be verified due to the fact that the Verification Requirements for the criteria were time-based and the amount of time allowed (for example, to publish a report) had not passed.



3. Key Lessons

1680.2: 4.6.1.2 - Optional -- Provision of take-back service for broader scope of products: This optional criterion requires that Subscribers declaring to this criterion have a take-back service for the products for which they are declaring plus more products than those included in the scope of the standard. It applies to all products for which they are declaring and also consumer electronics as defined in the criterion. The criterion contains requirements to report volumes of products collected including mandated programs and voluntary programs. The volume reporting requirements are country specific so global numbers declared for this criterion would not be sufficient evidence. Country specific volumes must be publicly available. Also, the volumes are required to be reported annually so Subscribers should be sure that their volume numbers are up to date.

1680.2: 4.1.4.1 - Optional -- Reduction of substances on the EU REACH Candidate List of SVHCs: In addition to the general information in support of the Conformance Assurance System (CAS), the evidence should include:

- *Specific information on what risk-based screening was performed and a listing of which REACH substances were tested for all three of the following categories:*
    - *Product*
    - *External attachments*
    - *Associated accessories*
- *If one of the categories above is not applicable, there must be a statement indicating why it is not applicable. This is to ensure the PVC that all three categories have been taken into account.*
- *How the 0.1% weight by weight threshold is being met:*
- *Either there is a calculation of weight and weight of included SVHCs that demonstrates the product / external attachments / associated accessories meets the threshold*

  OR

- *Test results show each component of the product / external attachments / associated*

accessories is below 0.1%, and

- *The date the product was first registered, which Candidate list was used, and why the Candidate list used was the valid one. This can also be met by showing a documented process as part of the CAS for using the latest List of SVHCs.*

1680.2: 4.3.3.1 - Required -- Notification regarding the identification of both materials and components and 4.3.4.1 Required --Preparation of product end-of-life characterization report: Both criteria have a requirement for Subscribers to do something "within one year after the equipment is put on the market." Products that have not been on the market for a year may not able to be verified as the information is not required to be there until 1 year after the date the product is put on the market.

*1680.2: 4.10.1.1 - Required -- Indoor air quality emission requirements: There are only a few instances where a Subscriber **may declare NA** for this criterion.*

1. *If the product is a black and white device with speeds 65 images per minute or faster.*
2. *If the product is a color device with hard copy speeds 50 images per minute or faster.*
3. *If the product's sole function is a date stamp, postage or document counter.*

   In all other cases, the Subscriber must declare which type of product it is and that it meets the emission rate limits.

4. Investigations Tables

TABLE 1: Summary of Non-Conformance Findings						
Criterion	Required or Optional	Description	Total Investigations	Completed Investigations	Product Not Verifiable	Non-Conformances
4.1.3.1	Required	Reporting on amount of mercury content in light sources	1	1	0	0
4.1.3.2	Optional	Use of non-mercury containing light sources	1	1	0	0
4.1.4.1	Optional	Reduction of substances on the EU REACH Candidate List of SVHCs	4	4	0	0
4.1.5.1	Required	Compliance with provisions of EU Battery Directive	2	2	0	0
4.1.7.1	Optional	Reduce fluorinated gas emissions resulting from flat panel display manufacturing	1	1	0	0
4.3.3.1	Required	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	4	3	1	0
4.3.4.1	Required	Preparation of product end-of-life characterization report	3	2	1	0
4.5.2.2	Optional	Product specific greenhouse gas emissions -- third-party verification or making LCA assessment publicly available	4	4	0	0
4.6.1.2	Optional	Provision of take-back service for broader scope of products	3	3	0	1
4.6.2.1	Required	End-of-life processing requirements	3	3	0	0
4.8.2.2	Optional	Packaging 90% compostable/recyclable	4	4	0	0
4.9.3.1	Required	Provision of take-back and end-of-life management for cartridges and containers	6	6	0	0
4.10.1.1	Required	Indoor air quality emission requirements	4	4	0	2
		Totals	**40**	**38**	**2**	**3**

TABLE 2: Specific Non-Conformance Findings and Corrective Action Taken									
Subscriber	**Product**	**Country**	**Product Type**	**PRE**	**Criterion**	**Required or Optional**	**Criterion Description**	**NC Finding Description**	**Corrective Action Taken**
Dell, Inc.	C2660dn	Canada	Printer	EPEAT, Inc.	4.6.1.2	Optional	Provision of take-back service for broader scope of products	Volumes reported on website were global instead of being specific to Canada as required for this criterion.	Subscriber undeclared criterion in Canada.
*	*	United States	Printer	EPEAT, Inc.	4.10.1.1	Required	Indoor air quality emission requirements	NA declaration was found to be erroneous.	Subscriber changed declaration and provided test data to prove conformance.
*	*	United States	Multifunction Device (MFD)	UL Environment	4.10.1.1	Required	Indoor air quality emission requirements	NA declaration was found to be erroneous.	Subscriber changed declaration and provided test data to prove conformance.

* During the course of this investigation, it was determined that the text of criterion 4.10.1.1 is inherently confusing. The PVC will be reviewing the criterion to determine if a formal clarification is needed. It was felt that the Subscribers inappropriately declared NA for this criterion due to confusion of the text of the criterion. Therefore, the PVC decided not to publish the name of the Subscriber or the name of the products in this Outcomes Report.

5. General Message to Subscribers

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.

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.

6. Looking Forward

Plans for Future Verification Activities: There are no more planned Verification Round in 2014 for imaging equipment.

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.

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 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.

Level 0 investigations are based on the Qualified Verifier attempting to establish Conformance based on publicly available information (without obtaining a product). This type of investigation is only applicable to some criteria. If the Qualified Verifier is unable to establish conformance based on publicly available information, the investigation proceeds to Level 1. 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 who 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. Verification activities conducted by the Product Verification Committee are done blind to the identity of the products and companies they are judging. The Committee 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 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 recommends that Subscribers also examine other products to determine if these 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 rating 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.