



OUTCOMES REPORT

EPEAT VERIFICATION ROUND PC-2014-03

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round PC-2014-03. This Round investigated randomly chosen products and criteria. All products currently active in the Registry at the start of the Round and all criteria were eligible for investigation. First, products were selected randomly. Criteria were then selected randomly and assigned with consideration of the following:

- If a criterion was randomly selected and the product had been investigated against that criterion in the previous 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 the previous 12 months against that criterion and found to be conformant, that criterion was skipped and a new criterion selected for the product.
- No more than four investigations were performed for any one Subscriber.

In total, 75 investigations (all Level 1) were completed, of which approximately 49% were for required criteria and 51% for optional criteria. These criteria are listed below, and the numbers of investigations performed per criterion are provided in Table 1 starting on page three of this report.

Required Criteria

- **4.1.1.1** – Compliance with provisions of European RoHS Directive
- **4.1.6.1** – Elimination of intentionally added SCCP flame retardants and plasticizers in certain applications
- **4.2.1.1** – Declaration of postconsumer recycled plastic content
- **4.2.2.1** – Declaration of renewable/biobased plastic materials content
- **4.2.3.1** – Declaration of product weight
- **4.3.1.2** – Elimination of paints or coatings that are not compatible with recycling or reuse
- **4.3.1.4** – Marking of plastic components
- **4.3.1.5** – Identification and removal of components containing hazardous materials
- **4.3.1.8** – Minimum 65% reusable/recyclable
- **4.4.1.1** – Availability of additional 3 year warranty or service agreement
- **4.4.2.1** – Upgradeable with common tools
- **4.5.1.1** – ENERGY STAR
- **4.6.2.1** – Provision of a rechargeable battery take-back service
- **4.7.1.1** – Demonstration of corporate environmental policy consistent with ISO 14001
- **4.8.2.1** – Separable packing materials
- **4.8.3.1** – Declaration of recycled content

Optional Criteria

- **4.1.2.1** – Elimination of intentionally added cadmium
- **4.1.3.2** – Low threshold for amount of mercury used in light sources
- **4.1.3.3** – Elimination of intentionally added mercury used in light sources
- **4.1.4.1** – Elimination of intentionally added lead in certain applications
- **4.1.6.2** – Large plastic parts free of certain flame retardants classified under European Council Directive 67/548/EEC
- **4.1.7.1** – Batteries free of lead, cadmium, and mercury
- **4.1.8.1** – Large plastic parts free of PVC
- **4.3.1.6** – Reduced number of plastic material types
- **4.3.1.7** – Molded/glued in metal eliminated or removable
- **4.3.1.9** – Minimum 90% reusable/recyclable
- **4.4.3.1** – Availability of replacement parts
- **4.5.1.2** – Early adoption of new ENERGY STAR specification
- **4.6.1.2** – Auditing of recycling vendors
- **4.7.2.2** – Third-party certified environmental management system for design and manufacturing organizations
- **4.7.3.2** – Corporate report based on GRI
- **4.8.2.2** – Packaging 90% recyclable and plastics labeled
- **4.8.3.2** – Minimum postconsumer content guidelines
- **4.8.4.1** – Provision of take-back program for packaging
- **4.8.5.1** – Documentation of reusable packaging

Using a random selection process encourages a broader representation of the Registry to be examined in a single Verification Round, without partiality or preference in the selection process. In this regard, Round PC-2014-03 touched the following areas of the EPEAT Registry:

- 57% of the 44 Subscribers that had products active in the Registry at the beginning of the Round (25 Subscribers investigated);
- 69% of the 51 criteria in IEEE 1680.1-2009 (35 criteria investigated); and
- 60% of the 43 countries in the Registry (25 countries investigated).

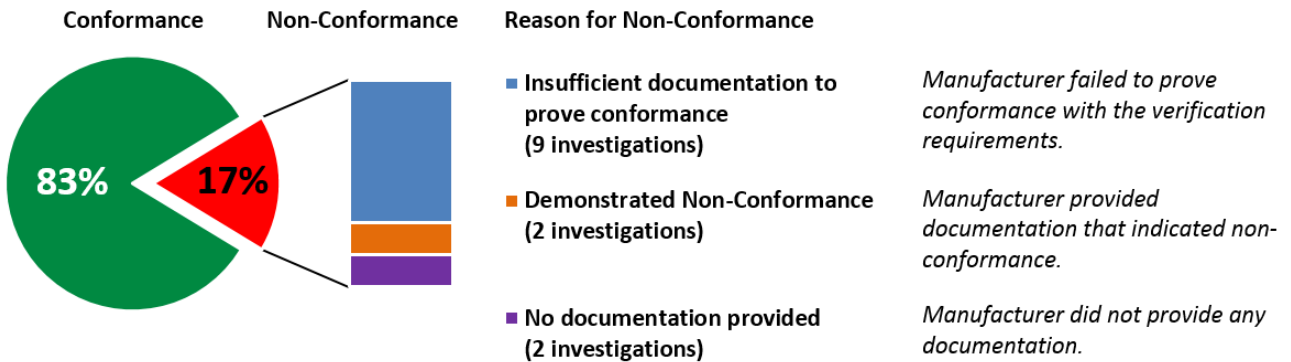
Countries Investigated in PC-2014-03	
Australia	Lithuania
Austria	Mexico
Brazil	Netherlands
Bulgaria	New Zealand
Canada	Poland
Cyprus	Portugal
Czech Republic	Romania
Denmark	Spain
Estonia	Sweden
France	Switzerland
Germany	Taiwan
Italy	United Kingdom
Latvia	United States

2. Summary of Outcomes

Highlights from this Verification Round are:

- **75** investigations completed
- **62** decisions of Conformance
- **13** decisions of Non-Conformance (*reasons identified in Figure 1*)

FIGURE 1: Overall Conformance Status for PC-2014-03
(as percentages of total investigations completed)



On the following page, Table 1 summarizes the number of investigations performed and Non-Conformances by criterion. Due to the low number of investigations performed per criterion, the Non-Conformance rates per criterion are not provided. Ten of the selected 35 criteria had at least one finding of Non-Conformance.

Note that all seven investigations for criterion 4.2.2.1 (Required – Declaration of renewable / biobased plastic materials content) were found Conformant. For these investigations, all Registry declarations were zero percent renewable/biobased plastic materials content. In a Verification Round where products and criteria are specifically targeted (i.e. not selected randomly), a zero percent declaration would not normally be investigated. However, Round PC-2014-03 purposefully used a random process to identify products and criteria. As such, investigations for all chosen declarations, even if zero percent, proceeded.

TABLE 1: Summary of Non-Conformance Findings

Criterion	Description	Completed Investigations	Non-Conformances
4.1.1.1	Required Compliance with provisions of European RoHS Directive	1	0
4.1.2.1	Optional Elimination of intentionally added cadmium	1	0
4.1.3.2	Optional Low threshold for amount of mercury used in light sources	1	0
4.1.3.3	Optional Elimination of intentionally added mercury used in light sources	3	0
4.1.4.1	Optional Elimination of intentionally added lead in certain applications	2	2
4.1.6.1	Required Elimination of intentionally added SCCP flame retardants and plasticizers in certain applications	1	0
4.1.6.2	Optional Large plastic parts free of certain flame retardants classified under European Council Directive 67/548/EEC	1	0
4.1.7.1	Optional – Batteries free of lead, cadmium, and mercury	3	0
4.1.8.1	Optional Large plastic parts free of PVC	1	1
4.2.1.1	Required Declaration of postconsumer recycled plastic content	3	0
4.2.2.1	Required Declaration of renewable/biobased plastic materials content	7	0
4.2.3.1	Required Declaration of product weight	2	1
4.3.1.2	Required Elimination of paints or coatings that are not compatible with recycling or reuse	3	0
4.3.1.4	Required Marking of plastic components	4	1
4.3.1.5	Required Identification and removal of components containing hazardous materials	2	0
4.3.1.6	Optional Reduced number of plastic material types	1	0
4.3.1.7	Optional Molded/glued in metal eliminated or removable	1	0
4.3.1.8	Required Minimum 65% reusable/recyclable	4	0
4.3.1.9	Optional Minimum 90% reusable/recyclable	3	2
4.4.1.1	Required Availability of additional 3 year warranty or service agreement	1	0
4.4.2.1	Required Upgradeable with common tools	1	0
4.4.3.1	Optional Availability of replacement parts	3	2
4.5.1.1	Required ENERGY STAR	2	0
4.5.1.2	Optional Early adoption of new ENERGY STAR specification	3	0
4.6.1.2	Optional Auditing of recycling vendors	2	2
4.6.2.1	Required Provision of a rechargeable battery take-back service	2	0

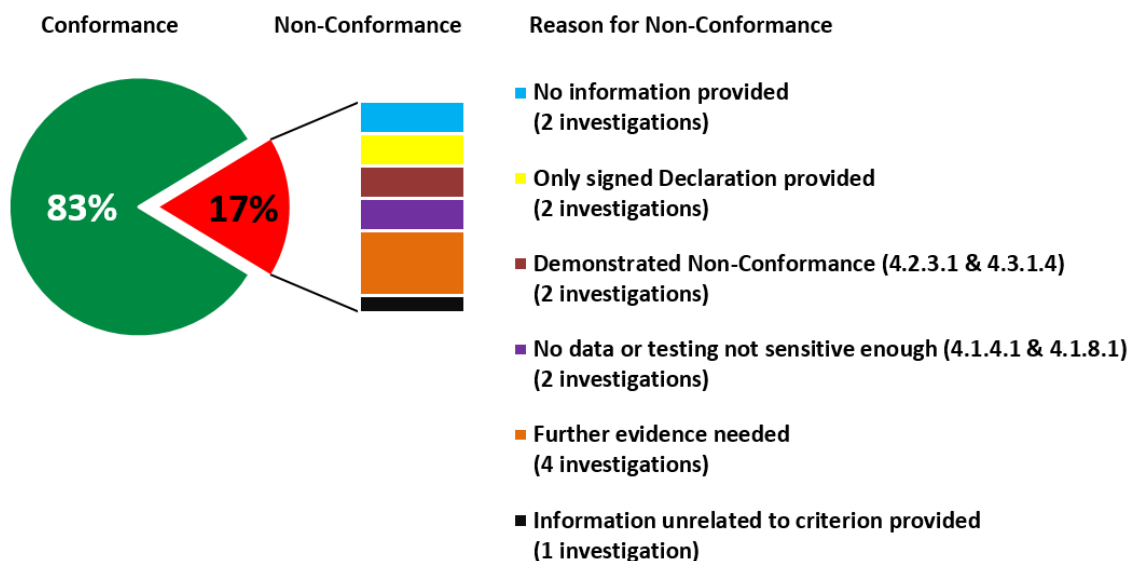
TABLE 1: Summary of Non-Conformance Findings

Criterion	Description	Completed Investigations	Non-Conformances
4.7.1.1	Required Demonstration of corporate environmental policy consistent with ISO 14001	1	0
4.7.2.2	Optional Third-party certified environmental management system for design and manufacturing organizations	2	0
4.7.3.2	Optional Corporate report based on GRI	3	0
4.8.2.1	Required Separable packing materials	2	0
4.8.2.2	Optional Packaging 90% recyclable and plastics labeled	3	1
4.8.3.1	Required Declaration of recycled content	1	0
4.8.3.2	Optional Minimum postconsumer content guidelines	2	0
4.8.4.1	Optional Provision of take-back program for packaging	2	1
4.8.5.1	Optional Documentation of reusable packaging	1	0

Looking at the Non-Conformances through a different lens reveals the following breakdown (see Figure 2 on the following page).

- Two of the 13 Non-Conformances were a result of the Subscriber not providing any information, and an additional two were a result of Subscribers only providing a signed Declaration form.
- The two demonstrated Non-conformances were for required criteria (4.2.3.1 – Declaration of product weight and 4.3.1.4 – Marking of plastic components). More specifically, these Non-Conformances resulted from an inaccurate declaration in the Registry (criterion 4.2.3.1) and a material marking code that was not fully in accordance with ISO 11469 (criterion 4.3.1.4).
- Two of the Non-Conformances were a result of the provision of either no test data or data with an insufficient sensitivity to assess conformance with the criterion’s threshold (for further insights, see Section 3 on Key Lessons).
- In four investigations, Subscribers provided documentation related to the criterion but further information was needed to assess conformance, thereby resulting in Non-Conformances.
- One Non-Conformance resulted from the provision of information that was not related to the criterion or the criterion’s verification requirements; no other documentation was provided.

FIGURE 2: Further Breakdown of Non-Conformances for PC-2014-03
(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, the following corrective actions were taken to resolve all identified Non-Conformances and restore the accuracy of the declarations:

- 6 products Additional data provided by Subscribers, bringing the products into Conformance with the criterion as originally declared.
- 1 product Declaration in the Registry corrected by Subscriber.
- 6 products Non-conformant criterion undeclared by Subscribers.

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 (criterion 4.1.4.1 and 4.1.8.1):

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. Additionally, the data must show that the analysis was sensitive enough to demonstrate meeting the criterion’s threshold. 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 100 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 polymers, flame retardants, fillers and/or plasticizers. 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.

Understanding verification requirements and documentation needs for Verification Rounds:

[EPEAT’s Online Learning Center](#) has pre-recording training modules for every criterion in the 1680.1 standard. These modules are designed to de-mystify the standard’s requirements, and to illustrate the types of information needed during a Verification Round. Subscribers are encouraged to access these modules on EPEAT’s Online Learning Center. If you do not yet have access to the Learning Center, please contact [Andrea Desimone](#).

4. General Message to Subscribers

Provision of information during Verification Rounds:

The IEEE 1680 standard and the EPEAT Subscriber agreement require that Subscribers provide the information identified in Verification Requirements to prove the accuracy of their declarations within 30 days of EPEAT’s request. Subscribers are reminded that 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 procedure also helps the Qualified Verifier know that s/he has a valid email address.

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 strongly 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.

5. Looking Forward

Plans for Future Verification Activities:

There are four Verification Rounds planned for 2015 for 1680.1 (Computers and Displays). These Rounds 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
Apple Inc.	iPad with Retina display (MD513)	United States	Tablets/Slates	4.3.1.9	O	Minimum 90% reusable/recyclable	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
ASUSTeK Computer Inc.	VM60	Germany	Desktops	4.2.3.1	R	Declaration of product weight	Demonstrated non-conformance	Subscriber corrected the declaration on the EPEAT Registry
Fujitsu Limited	LIFEBOOK E544	Canada	Notebooks	4.1.4.1	O	Elimination of intentionally added lead in certain applications	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Hyundai IT America Corp.	P227DS	United States	Displays	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
	P247DPU	United States	Displays	4.3.1.4	R	Marking of plastic components	Demonstrated non-conformance	Subscriber provided evidence demonstrating Conformance
NEC Display Solutions, Inc.	E231W-WH	Italy	Displays	4.8.4.1	O	Provision of take-back program for packaging	No documentation provided	Subscriber undeclared the Non-Conformant criterion
	EA234WWMi-WH	Latvia	Displays	4.6.1.2	O	Auditing of recycling vendors	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
	EA273WWMi (Black)	Bulgaria	Displays	4.4.3.1	O	Availability of replacement parts	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
Positivo Informática S.A.	19EB13P	Brazil	Displays	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
Samsung Electronics	S19C300N	United Kingdom	Displays	4.6.1.2	O	Auditing of recycling vendors	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
	Syncmaster S19C200NY	Romania	Displays	4.1.4.1	O	Elimination of intentionally added lead in certain applications	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
TPV Technology Limited	E2050SW	Poland	Displays	4.3.1.9	O	Minimum 90% reusable/recyclable	No documentation provided	Subscriber provided evidence demonstrating Conformance
ViewSonic Corporation	VA2406-LED, VA2406m-LED, VA2406p-LED VS14634	Canada	Displays	4.4.3.1	O	Availability of replacement parts	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance

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 Registry at the time the Verification Round begins.

In Level 0 investigations, Qualified Verifiers attempt to establish Conformance by examining publicly available information only – no products are obtained and Subscribers are not asked to submit documentation. If a Qualified Verifier is unable to establish conformance based on publicly available information, the investigation proceeds to Level 1. In Level 1 investigations, Subscribers are required to provide detailed and accurate information to demonstrate their conformance to a selected criterion in a timely manner. In Levels 2 and 3 investigations, EPEAT buys or borrows products without the Subscriber’s knowledge, disassembles them, and has detailed analytical testing conducted, 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.