EPEAT, Inc.
227 SW Pine Street, Suite 300 • Portland, OR 97204 • V: (503) 279-9382 • F: (503) 279-9381 • www.epeat.net

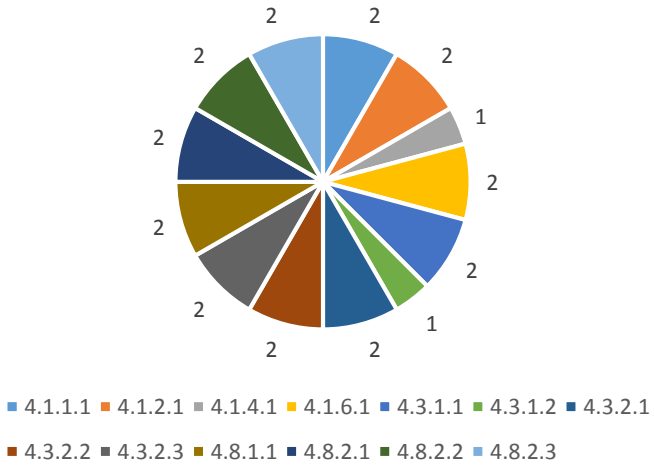
OUTCOMES REPORT
EPEAT VERIFICATION ROUND IE-2014-03

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round IE-2014-03. This Round consisted of a total of 24 investigations of the IEEE 1680.2™ criteria listed below and illustrated in Figure 1 below:

- 4.1.1.1 Required – Compliance with provisions of European Union RoHS Directive
- 4.1.2.1 Optional – Further reduction of the use of EU RoHS Directive hazardous substances (cadmium)
- 4.1.4.1 Optional – Reduction of substances on the EU REACH Candidate List of SVHCs
- 4.1.6.1 Required – Reducing BFR/CFR/PVC content of external plastic casings
- 4.3.1.1 Required – Ease of disassembly of product
- 4.3.1.2 Optional – Ease of disassembly of consumer products
- 4.3.2.1 Required – Use of single recyclable plastic type per plastic part
- 4.3.2.2 Required – Restriction on materials not compatible with reuse and recycling
- 4.3.2.3 Required – Manual separation and marking of plastics
- 4.8.1.1 Required – Elimination of intentionally added heavy metals in packaging
- 4.8.2.1 Required – Separable packing materials
- 4.8.2.2 Optional – Packaging 90% compostable/recyclable
- 4.8.2.3 Required – Plastics marked in packaging materials

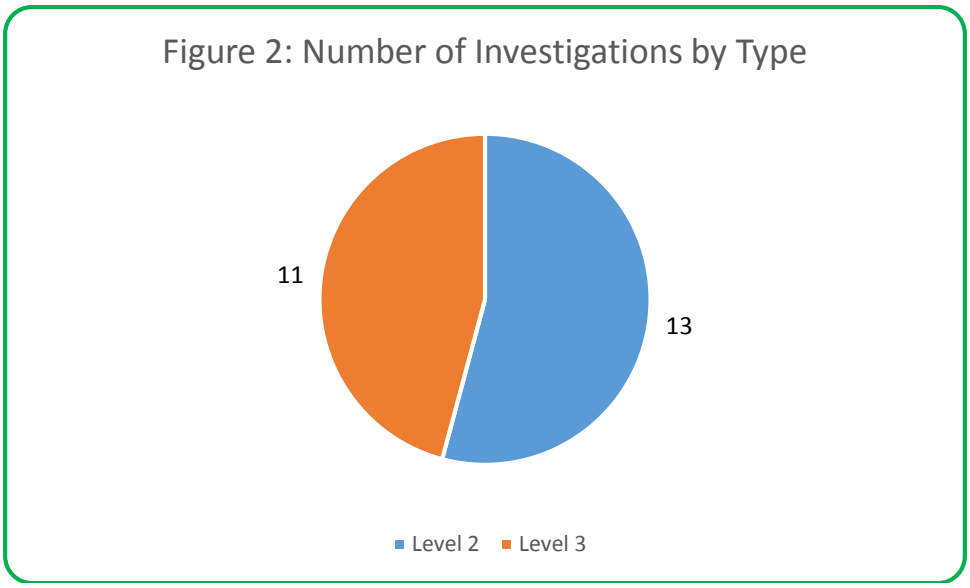
Figure 1: Number of investigations by Criterion



The Verification Round was intended to assure conformance for imaging equipment through laboratory evaluation.

This Verification Round consisted of 24 investigations that were a mix of Level 2 investigations and Level 3 investigations. A breakdown of the number of investigations by type can be seen in Figure 2 below. In

Levels 2 and 3 investigations, The PREs purchased products without the Subscriber's knowledge and sent them to a laboratory where they were disassembled and detailed analytical testing was conducted as applicable. Two PREs and two Subscribers were involved in this Round. If a Subscriber had already received a decision of Conformance for one of the criteria in the past year, they were not verified again for the same criteria.



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

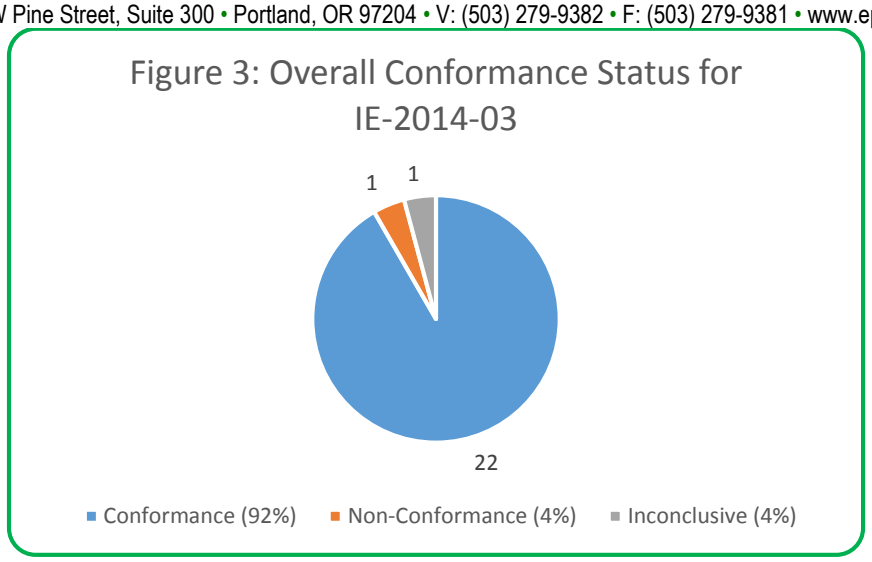
2. Summary of Outcomes

Highlights from this Verification Round are:

- **26** Investigations Planned
- **24** Investigations Completed
- **22** Decisions of Conformance
- **1** Decisions of Non-Conformance
- **1** Inconclusive Investigation*

Figure 3 below shows the overall conformance status for this Verification Round. Tables showing a Summary of Findings (Table 1) and Specific Non-Conformance Findings and Corrective Action Taken (Table 2) can be found in Section 4 below.

* Due to international shipping, the packaging received by the laboratory was obviously altered in transit. Therefore, the laboratory did not have all the packaging items to make a calculation.



3. Key Lessons

<u>1680.3: 4.8.2.2: Optional -- Packaging 90% compostable/recyclable:</u> This optional criterion requires all packaging to be 90% compostable or recyclable. To date, EPS (expanded polystyrene foam packaging) has not been found to meet the requirements of a recyclable material in the United States. Up to 10% of the packaging weight can come from materials that are not recyclable or compostable. However, the other 90% must be comprised of compostable, fiber based or recyclable materials. For more information pertaining to what evidence is acceptable to prove recyclability, see EPEAT Clarification #27.

4. Investigations Tables

TABLE 1: Summary of Findings

Criterion	Required or Optional	Description	Total Investigations	Completed Investigations	Inconclusive	Non-Conformances
4.1.1.1	Required	Compliance with provisions of European Union RoHS Directive	2	2	0	0
4.1.2.1	Optional	Further reduction of the use of EU RoHS Directive hazardous substances (cadmium)	2	2	0	0
4.1.4.1	Optional	Reduction of substances on the EU REACH Candidate List of SVHCs	1	1	0	0
4.1.6.1	Required	Reducing BFR/CFR/PVC content of external plastic casings	2	2	0	0
4.3.1.1	Required	Ease of disassembly of product	2	2	0	0
4.3.1.2	Optional	Ease of disassembly of consumer products	1	1	0	0
4.3.2.1	Required	Use of single recyclable plastic type per plastic part	2	2	0	0
4.3.2.2	Required	Restriction on materials not compatible with reuse and recycling	2	2	0	0
4.3.2.3	Required	Manual separation and marking of plastics	2	2	0	0
4.8.1.1	Required	Elimination of intentionally added heavy metals in packaging	2	2	0	0
4.8.2.1	Required	Separable packing materials	2	2	0	0
4.8.2.2	Optional	Packaging 90% compostable/recyclable	2	2	1	1
4.8.2.3	Required	Plastics marked in packaging materials	2	2	0	0

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
Fujitsu Limited	ScanSnap iX500	United States	Scanner	ULE	4.8.2.2	Optional	Packaging 90% compostable/recyclable	Packaging was not found to be 90% compostable / recyclable.	Subscriber undeclared criterion.

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 three planned Verification Rounds in 2015 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.