

**EPEAT Clarification #39 Revision C**  
**Proving a “market/use” for criterion 4.8.2.2**

This Clarification applies to the following IEEE Standards and criteria:

**Applicable Standards:**

- IEEE 1680.1 – Computers and Displays
- IEEE 1680.2 – Imaging Equipment
- IEEE 1680.3 – Televisions

**Applicable Criteria:**

4.8.2.2

**Conformity Decision Panel (CDP) Determination:**

The CDP provides the following as guidance to prove “market/use” for verification requirement b) for 4.8.2.2. Manufacturers must be able to demonstrate how the material is collected and used in the market. This may be done in a variety of ways.

The CDP has determined that evidence addressing the following must be provided:

- a) Evidence that demonstrates the actual recovery of the company’s packaging material and its eventual return to the marketplace through re-use.

**OR**

- b) Evidence that adequately demonstrates each of the following:
  - i. Evidence that demonstrates that waste packaging material is likely to be captured at the end-of life, either by the company, or through available established systems.
  - ii. Evidence that shows packaging material of the same type used by the manufacturer is being acquired/sold by an external source.
  - iii. Evidence that recovered material has an established record of being used in products sold to the marketplace for a period greater than one year.
  - iv. Evidence to confirm that the market demand for the material reuse is of a similar magnitude to the volumes of waste packaging generated for the product.

Note: The Conformity Decision Panel understands that there may be multiple ways to prove the requirements for “market/use” under option b) above, and is flexible in terms of the evidence manufacturers may provide, as long as each of the requirements are demonstrated to the satisfaction of the CDP. The CDP will examine evidence from Manufacturers on a case by case basis.

**Background information:**

Participating EPEAT Manufacturers have requested clarity on what evidence is needed for verification requirement b) in 1680.1 which reads, “Demonstration that material is normally recyclable or, if not, that there exists a market/use.” In particular, numerous questions have arisen regarding how to prove there exists a market/use for packaging materials that are not considered “normally recyclable” per the IEEE 1680.1 standard (Note: See Clarification #38 for guidance from the CDP on demonstration of materials being “normally recyclable”). Unfortunately, the definition of “Market/Use”, which is central to meeting this criterion, is not addressed in the IEEE 1680.X set of standards.

Through its deliberations of this criterion, the CDP has determined that for a market/use for a material to be proven credible by a manufacturer, it should consider whether the market is robust, not overly dependent on a single company or use, be geographically relevant to the region for which the product is registered, and must be already established for a period of time.

**Change History:** Revision A approved by the Conformity Decision Panel and moves to 30 day comment period on 09/29/2016. Revision B approved by the Conformity Decision Panel and moves to 30 day comment period on 02/03/2017. Revision C approved by the Conformity Decision Panel and moves to 30 day comment period on 04/14/2017. Revision C published on 5/19/2017.