



EPEAT Clarification #31
Criterion 4.1.8.1 of 1680.1 – Data from Component Manufacturers

This Clarification applies to the following IEEE Standards and criteria:

Applicable Standards:

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

Applicable Criteria:

4.1.8.1

Product Verification Committee Determination:

The verification requirements for criterion 4.1.8.1 (Optional – Large parts free of PVC) include “*Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance.*” This evidence must show that the components themselves, components made from the same resin, or the resin received by the component manufacturer are being tested for the presence of PVC.

This may be accomplished by various methods, several of which are identified below:

- Laboratory test data on the resin received by the component manufacturer or part fabricator prior to part fabrication or use in the component manufacturing process;
- Empirical test data resulting from the analysis of the plastic material composition of fabricated parts or components coming off a production line, provided the part/component utilizes the same resin from the same resin supplier as the product under investigation;
- Analytical test data from the analysis of the plastic material in the component actually used in the product under investigation.

For any method used, the Product Verification Committee will make the final decision on the acceptance of data. This decision will consider whether actual components or the resin as received by the part fabricator or component manufacturer have been tested. Test data or material specifications from the resin supplier are insufficient as they do not demonstrate that the resin was actually used in the component/product under investigation.

Background Information:

Verification Round PC-2013-04 included a focus on criterion 4.1.8.1. During their review of the related investigation reports, the Product Verification Committee considered the following:

- The verification requirements for this criterion incorporate the terms “component manufacturers,” “data,” and “demonstrating.” Therefore, any evidence must be based on data (either empirical or analytical) AND the evidence must be related to components AND there must be evidence that demonstrates conformance. This evidence could be on components themselves, components made from the same resin, or the resin received by the component manufacturer.
- Generally, the properties of different plastics behave differently in the molding process. A plastic containing PVC theoretically would not behave the same as the same plastic without PVC. However, advances are being made in plastics that allow for the use of PVC as an additive to a base plastic (for example, as a flame retardant), while still maintaining most of the physical and mechanical properties of the base plastic. Therefore, reliance on a molding process specifically designed for a PVC-free plastic does not necessarily indicate the absence of PVC.

Change History:

Initial version approved by the Product Verification Committee and effective on March 17, 2014.
