



**EPEAT Clarification #1-7**  
**Provision of rechargeable battery take-back service**

**This Clarification applies to the following IEEE Standards and criteria:**

| <b>Applicable Standards:</b>   | <b>Applicable Criteria</b> |
|--|----------------------------|
| <input checked="" type="checkbox"/> IEEE 1680.1 – Computers and Displays | 4.6.2.1                    |
| <input type="checkbox"/> IEEE 1680.2 – Imaging Equipment                 |                            |
| <input type="checkbox"/> IEEE 1680.3 – Televisions                       |                            |

**PVC Determination:**

The Verification Requirement b) requires that the subscriber provide “Documentation of battery take-back service”. If the subscriber is a licensee of RBRC then demonstration of such is adequate to meet this verification requirement. Of course, they must also meet Verification Requirement c) to provide “Documentation of notification of user of battery take-back service”.

If the subscriber is not a licensee of RBRC, then they must provide documentation that demonstrates that the service is provided at a “competitive price” and that it is “equivalent to or better than that provided by the RBRC”. This guidance is intended to provide a yardstick by which it will measure “equivalence” based on wording in the 4.6.2.1 criterion.

As outlined in the Verification Requirements and References and Details, the following is required for “equivalent” programs:

- Demonstration that the take back service is equivalent in cost or less expensive for the user (i.e. purchasers of products) as RBRC and is equivalently convenient as RBRC for the user
- Documentation of notification of users of battery take-back service by making information available on the web site, in product literature, or other equivalent means
- Affixing of recycling system notification to rechargeable batteries used in the registered product
- Documentation of amounts returned.

Since the criterion is explicit about being an RBRC licensee, being a “free rider” does not demonstrate conformance with the criterion. If not an RBRC licensee, the subscriber must provide an equivalent service.

**Background analysis:**

*The criterion does not require a subscriber to be a licensee of RBRC, but being a licensee would automatically meet the criterion. A couple of subscribers have claimed this criterion not as RBRC*

*licensees. If not a licensee, conformance would be tested according to a yardstick of equivalence ("equivalent to or better than that provided by RBRC").*

One complication to consider is that the RBRC program is available for all rechargeable batteries and applies to all purchasers of products. So, in one possible interpretation, a subscriber may be able to meet the criterion by being a 'free rider' on the RBRC system. That is, they would simply direct their customers to use RBRC to recycle rechargeable batteries from their products.

**Change History:**

Created: January 2007