



EPEAT Clarification #16

The applicability of packaging take-back to products sold to consumers vs. institutions

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 (enter here):

- 4.8.4.1
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PVC Determination:

Criterion 4.8.4.1 is intended to apply to all products that are marketed and sold directly to institutions, regardless of whether individual products are identified as consumer or institutional products. This determination is based on the text of the product criterion, “Applies To” section, as follows:

“All manufacturers with products declared to conform to this standard that are marketed and sold directly to institutions, regardless of whether the product is classified as commercial or consumer.”

4.8.4.1 is an Annual Corporate Declaration Criterion and may be declared differently in different countries or regions. The IEEE 1680 Standard states that Annual Corporate Declaration Criteria “are not exclusive” to the specific product. Therefore, if this Optional criterion is declared it must apply to all the subscriber’s products registered in the subject country that are marketed and sold directly to institutions (regardless of whether individual products are identified as consumer or institutional).

Further, the criterion text states that manufacturers that do not sell products to institutions shall declare “Not applicable”. Declaring NA to this criterion reduces the number of optional points available to the subscriber in the country, which may reduce the number of points needed to achieve Silver or Gold.

Therefore, declarations will be interpreted as follows:

If 4.8.4.1 is declared in a country then the subscriber must offer to take back packaging of registered products marketed and sold to institutions in that country (regardless of whether products are identified as institutional or consumer). Failing to offer packaging take back to an institutional customer would be nonconformant.

If 4.8.4.1 is declared NA in a country then the subscriber is declaring that they do not sell registered products to institutions in that country. Because declaring NA may affect the rating of products, declarations of NA are subject to verification. If NA is declared in a country then selling a registered product to an institution in that country would be nonconformant.

If 4.8.4.1 is not declared in a country then the subscriber is making no assertions regarding the criterion in that country. There is nothing to verify and no potential for nonconformance to this criterion in that country. 4.8.4.1 is considered to be available to the subscriber in that country when calculating product ratings.

When registering individual products the subscriber must identify whether the product is an institutional product or a consumer product based on the definitions in section 3.2 of IEEE 1680.2. If the subscriber claims NA to 4.8.4.1 in a country (i.e. they do not sell products to institutions in that country) it would be inconsistent to register a product in that country that is identified as institutional. However, if 4.8.4.1 is claimed (or is not claimed) in a country then the subscriber may register both institutional and consumer products in that country because either type of product may be sold to an institution.

Background information:

PREs and subscribers requested clarification on the applicability of Optional Criterion 4.8.4.1, Provision of take-back service for packaging.

The “Applies To” section of Optional Annual Corporate Declaration Criterion 4.8.4.1 reads as follows:

“All manufacturers with products declared to conform to this standard that are marketed and sold directly to institutions, regardless of whether the product is classified as commercial or consumer.”

This wording, and the fact that it is an Annual Corporate Declaration Criterion, make it unclear as to whether this corporate criterion is intended to apply to *all products* of “... manufacturers with products declared to conform to this standard that” have products that “are marketed and sold directly to institutions ...”. Or rather, is it intended to apply only to their products that are marketed and sold directly to institutions?

Further, certain other criteria of IEEE 1680.2 apply differently to institutional or consumer products as defined in section 3.2 of IEEE 1680.2, so EPEAT requires the subscriber to identify during product registration each product’s intended market. However, a consumer could buy a product identified as institutional, and an institution could buy a consumer product. Does 4.8.4.1 apply to products registered as institutional products, or to all products sold to institutions regardless of their intended market?

Finally, this corporate criterion states that manufacturers that do not sell products to institutions shall declare “Not applicable” on the registry. This criterion can be declared differently in different countries, and as a corporate criterion it must apply to all products registered in that country. Also, typically an NA declaration removes that point from the pool of possible or available points for purposes of calculating the Bronze/Silver/Gold rating. How does an NA declaration for 4.8.4.1 in a country relate to the identification of an individual product’s intended market as consumer or institutional (which applies across all countries), and how does it relate to the number of available optional points when determining a product’s Bronze/Silver/Gold rating in a country?

Change History:

Effective on: January 4, 2013
Revised on: