



**EPEAT Clarification #18
EOL Processing Requirements and WEEE Systems**

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):

- 4.6.2.1
- 4.6.2.1

PVC Determination:

In countries where there are existing laws and/or regulations to collect and recycle registered products, and where a manufacturer may comply with those laws and/or regulations by joining a collective WEEE Compliance Scheme; a subscriber may demonstrate that they conform with 4.6.2.1 by producing records showing that all the Scheme's participating initial service providers in that country are certified to a qualified recycling standard.

Background information:

Certain WEEE Compliance Schemes and their member manufacturers have asked for clarification regarding how participation in their scheme relates to conformance with Required Criterion 4.6.2.1. Specifically, if a WEEE Compliance scheme has records to demonstrate that all its recyclers are certified to a qualified standard, do its member manufacturers meet 4.6.2.1?

4.6.1.1 requires that manufacturers "... provide a nationwide take-back service for ... registered products..." and allows that "In jurisdictions where there are existing laws and/or regulations specifically to collect and recycle ... products, demonstration of compliance with those legal requirements will fulfill this requirement." In the EU most manufacturers of Imaging Equipment and TVs meet their WEEE obligation by voluntarily participating in a "WEEE Compliance Scheme" in which manufacturers collectively fund a network of recyclers to collect and recycle their products. Because these schemes are funded by the member manufacturers, and participation meets the regulatory requirement, it is reasonable to construe their participation as "providing a ... take-back service" for their products.

4.6.2.1 reads "... manufacturer shall ensure that all equipment collected pursuant to 4.6.1.1 is managed by recyclers that are certified ... to a qualified recycling standard ..." and goes on to describe the mechanism for qualifying a recycling standard. Because the manufacturer can meet 4.6.1.1 by participating in a WEEE Compliance Scheme it is reasonable to interpret this as "... manufacturer shall ensure that all equipment collected" in their chosen WEEE compliance Scheme "... is managed by recyclers that are certified ... to a qualified recycling standard ..."

Change History:

Revision A approved by the PVC and effective on January 18, 2013.