EPEAT Clarification #2-1
Use of the exceptions field

This Clarification applies to the following IEEE Standards and criteria:

Applicable Standards: **Applicable Criteria**

☒ IEEE 1680.1 – Computers and Displays

☒ IEEE 1680.2 – Imaging Equipment

☒ IEEE 1680.3 – Televisions

PVC Determination:

The exceptions field on www.epeat.net implements the IEEE 1680 provision for subscribers to report to EPEAT "special configurations that do not conform to the Standard". Though the term "configurations" is not defined in the Standard, the examples of "configuration", and the obvious intent of the Standard, are that "special configurations" are specific hardware or software variations of the product that can be specified by a customer at time of order. The use of the exceptions field for other than customer specifiable hardware or software configurations of the product is not in conformance with the Standard. Such non-conformant uses include conditions on the sale of the product such as geographic limitations on the availability of certain required services or features, conditions on the quantity of products included in a sale in order to receive services required by a criterion, or conditions on the type of customer.

Moreover, it is expected that the exceptions field will "report such special configurations that do not conform to the standard". In other words, it will not be considered conformant for the exceptions field to simply state that un-specified configurations may, or may not, conform to the standard, nor that purchasers must specify that they wish to purchase EPEAT-conformant configurations. It is the intention that all units of the product defined by the product name meet the criteria as declared with few and narrowly and clearly defined exceptions, if any. The intention is that if a customer orders the product name listed in the registry, they will receive a product that meets the criteria as declared unless they have specified some special hardware or software configuration that is clearly described as an exception. That is, conformance with the declared criteria is the default – it need not be specified.

The PVC issues this Verification Clarification because the EPEAT Registry's exceptions field has apparently been used by some subscribers in ways not intended in the 1680 Standard.

Background analysis:

The exceptions field is intended to implement the provisions of 1680 regarding reporting to EPEAT Inc. on "configurations" that do not meet the Standard. The Standard reads:

"Different configurations of a product, as defined in 3.1, may include options for processors, memory, hard disks, etc. A product, for the purpose of this Standard, is every configuration that could be offered in a specific marketing model and chassis type. If there is a specific configuration within a marketing model and chassis type that would change the environmental performance substantially, especially if that configuration would no longer meet a criterion, then the manufacturer could not claim conformance to this Standard for that configuration, even if the same model in other configurations did conform to this Standard. The manufacturer shall report such special configurations that do not conform to the Standard to the Product Registration Entity."

In section 3.1 "product" is defined as: "A marketing model and chassis type (and all its peripherals) versus a singular configuration of the product." "Configuration" is not defined.

The exceptions field is now being used in ways that seem to diverge substantially from the wording of the Standard. Following are examples of how the exceptions field is being used by some subscribers:

- To identify geographic limitations of an offering of certain services that are required by a criterion. For example, product or packaging take-back, or the availability of components such as a renewable energy source.
- To identify conditions of a sale for which certain services are offered. For example, the availability of reusable packaging based on the number of units purchased.
- To state that certain un-specified product configurations would not conform. These are defined merely by the fact that they do (or do not) conform. For example, "pre-configured models meeting ENERGY STAR® 4.0 requirements" or "Certain exceptional configurations may fall outside E-star 4.0 requirements. Please specify E-star 4.0 compliance when ordering".

Purchasers and other subscribers have expressed concern about this use of the exceptions field. Several subscribers are working hard to gain every optional point they can to achieve higher tier levels. They have examined the use of the exceptions field and state that either they must use similar exceptions to those now being used or face a competitive disadvantage.

Clear policy direction has been provided to interpret the Standard strictly. EPEAT staff and the PVC are deeply concerned that this apparently non-conformant use of the exceptions field is a very slippery slope. It could evolve into a very confusing set of qualifications about registered products that do not conform with the Standard. This could seriously undermine the utility and credibility of the Registry.

The following Clarification is intended to limit the use of the exceptions field to a strict reading of the Standard. All subscribers are asked to check their use of the exceptions field to bring it into conformance with this Clarification. Staff will review the Registry in two weeks following the issuance of this Clarification. If at that time there are exceptions that don't appear to

conform with this guidance then EPEAT staff and the PVC will consider the option of initiating a single-issue Verification.

Staff and the PVC are aware that the exceptions field is not explicitly included in the verification scope of the standard. However, because it is not explicitly included the PVC apparently has the option of ignoring information in the exceptions field during verification. While this is not intended, it should defuse the potential argument that the exceptions field is not subject to verification. It is either to be considered during verification or it is not.

Change History:

Created: July 2007
Updated: February 2013