



**EPEAT Clarification #22  
Public disclosure of supply chain toxics**

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

**Applicable Standards:**

**Applicable Criteria:**

- |   |         |
|---|---------|
| <input type="checkbox"/> IEEE 1680.1 – Computers and Displays       |         |
| <input checked="" type="checkbox"/> IEEE 1680.2 – Imaging Equipment | 4.7.2.2 |
| <input checked="" type="checkbox"/> IEEE 1680.3 – Televisions       | 4.7.2.2 |

**PVC Determination:**

This determination applies to subscribers that have fewer than 3 suppliers for any of the parts/components the subscriber chooses to use to conform to criterion 4.7.2.2. When a subscriber has fewer than 3 suppliers for a chosen component, they may conform to criterion 4.7.2.2 by making public the required toxics release data from all of the suppliers they use for that component. This information must be maintained current at all times. That is, when there are fewer than 3 suppliers for a component, if those suppliers change the subscriber must maintain conformance by making public the toxics data from the new or additional suppliers.

When required, a subscriber may demonstrate conformance by providing both the “Verification Requirements” and a recent and up-to-date assurance that they have made public data from all of their current suppliers for that component. The assurance may be in the form of a declaration signed by a responsible executive of the subscriber stating that they have made public the specified toxics release data for *all* of their current suppliers of the chosen part/component. The assurance must be provided and be up-to-date at the time that conformance is demonstrated (desk review or verification).

If the toxics release data that is made public is from a specific manufacturing facility, it must be from the facility that manufactures the components used by the subscriber to demonstrate compliance. For example, if the same supplier company manufactures two of the chosen components and they are made in two separate facilities, and the toxics release data that is made public is at the facility level, the subscriber must make public the toxics release data from both facilities.

The maximum number of sets of toxics release data that must be made public, and for which Verification Requirements must be provided when asked, is 9 (3 suppliers x 3 components). Fewer sets may be provided in two cases – when the subscriber uses fewer than three suppliers for a component and when the same supplier (or facility, if toxics data is reported at the facility level) supplies more than one component.

The table below summarizes some possible scenarios for data submission.

<b>Component Type</b> <i>[Subscribers must choose three of the following component types: (1) display, (2) external power supply (EPS), (3) unpopulated printed circuit board, (4) lamp, (5) motor, (6) integrated circuit/semiconductor]</i>	<b>Number of Suppliers or Manufacturing Locations</b>	<b>Number of Required Data Submissions</b>	<b>Total Number of Required Data Submissions</b>
Integrated circuit/semiconductor	1	1	<b>3</b>
Unpopulated printed circuit board	1	1	
Display	1	1	
Integrated circuit/semiconductor	2	2	<b>6</b>
Unpopulated printed circuit board	1	1	
External power supply (EPS)	5	3	
Integrated circuit/semiconductor	2	2	<b>7</b>
Unpopulated printed circuit board	2	2	
Lamp	3	3	
Integrated circuit/semiconductor	5	3	<b>9</b>
Unpopulated printed circuit board	3	3	
Motor	7	3	

**Background information:**

Criterion 4.7.2.2 states that “Manufacturers shall obtain and publicly disclose for at least one (1) registered product, the toxics release data...” for “... at least three (3) major suppliers for three (3) of the six (6) below listed parts/component suppliers.”

PREs and subscribers have asked: What if the subscriber does not have 3 suppliers of the chosen components? Must the subscriber engage additional suppliers in order to claim this optional point?

The intent of the criterion is to make public the toxics release data for major suppliers of key components. If the subscriber has fewer than 3 suppliers for a chosen part/component it is unreasonable to expect them to engage additional suppliers in order to meet this criterion. In the case that a subscriber has fewer than 3 suppliers of a chosen component, they may conform to this criterion by making public the required toxics release data from all current suppliers of the component provided that they provide assurance that they have fewer than three (3) suppliers of the component. If, in the future, the subscriber acquires additional suppliers, they must provide the toxics release data for the new supplier(s), up to a total of three (3) suppliers, for that component.

In addition, there were questions regarding the total number of toxic release data reports that must be made public in different supplier scenarios. For instance, what if the same supplier supplies two different types of listed components? What if components are manufactured in different facilities of a supplier, and the toxics release report is specific to a facility rather than the supplier company?

**Change History:**

Revision A approved by the PVC, published, and effective on 4/2/2013.