



**EPEAT Clarification #24  
Use of Certified Recyclers for Exempt Programs**

**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:**

This clarification applies to the definition of “components, scrap, and materials derived from equipment from these exempt programs” relative to 4.6.2.1. Provided that they are responsibly recycled, materials such as cardboard, plastic packaging, or wood pallets, are not considered to be “components, scrap, and materials derived from equipment” and may be recycled by recyclers that are not certified to a qualified recycler standard.

**Background information:**

4.6.2.1 reads in part “In addition, manufacturers shall ensure that any residual equipment and components (including un-repairable equipment/components with no reuse value or market), scrap, and materials derived from equipment that result from these exempt programs are processed by a recycler certified to a qualified standard ...”

A caller asked whether it is necessary that all fractions leaving a repair facility (for instance) would need to go to recyclers certified to a qualified standard. The apparent answer is “Yes”. However, many of the qualified e-waste recycler standards will only certify recyclers that handle e-waste. They will not certify a paper or ferrous metals recycler. So, in order to meet this requirement the subscriber repair facility (for example) is effectively prevented from sorting material fractions internally and sending each fraction to the appropriate recycler. They must send all “scrap and materials derived from equipment that result from these exempt programs” (cardboard, plastic packaging, wood pallets, etc.) to a certified electronics recycler.

It is reasonable to interpret this criterion such that “materials that derive from equipment” does not include materials that help to protect the electronic equipment from outer influences like the packaging. They may send these more common materials such as cardboard, plastic packaging, or wood pallets, to other appropriate recyclers, likely intermixed with other recyclable waste (but not e-waste) from the rest of the facility operation.

**Change History:**

Revision A approved by the PVC and effective on 05/10/13. Revision A published on 06/03/13.