



EPEAT Clarification #25 Inclusion of Specific Recycling Vendors in 4.6.1.2 of 1680.1

This Clarification applies to the following IEEE Standards and criteria:

Applicable Standards:

- IEEE 1680.1 – Personal Computers and Displays
- IEEE 1680.2 – Imaging Equipment
- IEEE 1680.3 – Televisions

Applicable Criteria:

4.6.1.2

PVC Determination:

Criterion 4.6.1.2 of standard 1680.1 requires annual audits of all first, second, and third tier recyclers to the EPA’s Plug-In to eCycling Guidelines and with all applicable regulations and laws. Should smelters fall within the first through third recycling tiers, the criterion’s requirements apply to these operations. Plastics recyclers in general are not included in the scope of criterion 4.6.1.2. However, the criterion’s requirements do apply to plastics recyclers, if the operation is processing plastics that contain “designated materials” (as defined in the EPA’s Plug-In to eCycling Guidelines).

Background Information:

In a recent EPEAT verification round focusing on criterion 4.6.1.2 of 1680.1, questions arose about whether smelters and plastics recyclers should be included in the annual audit requirements of the criterion. To inform their determination, the PVC examined the requirements of the EPA’s Plug-In to e-Cycling Guidelines (the “Guidelines”).

The Guidelines indicate that “...the level of due diligence is commensurate with the risk of the activities involved...” If the activities present greater risk of hazards to human health or the environment, a higher level of due diligence is required by the recycling operation. In this regard, the Guidelines identify the level of due diligence required for specific downstream operations receiving and/or treating electronic products and/or components:

- Guidelines 1 to 4 pertain to incineration or land disposal (and minimizing these activities where possible);
- Guideline 5 pertains to “designated materials” destined for reuse and refurbishment; and
- Guideline 6 pertains to “designated materials” destined for recycling.

The Guidelines also clearly define “designated materials”:

“Designated materials” means any electronic products and components containing or consisting of circuit boards, shredded circuit boards, CRTs, batteries, and mercury- and PCB-containing lamps and devices. However, this definition does not include circuit boards that have been processed to the point where they no longer are readily identifiable as circuit boards or shredded circuit boards (such as after burning/melting), as well as CRT glass that has been adequately processed for use as an industrial feedstock material. In these cases, the economic value of the material has been enhanced significantly through processing; thus, commodities of value have been created and concern for the subsequent environmental mismanagement of this material is greatly decreased.

Based on the approach to due diligence, the level of due diligence required in guideline 6 and the definition of “designated materials”, smelters are included in the Plug-In to e-Cycling Guidelines requirements for “due diligence”, and hence the requirements of criterion 4.6.1.2 of 1680.1. Using this same logic, plastic recyclers in general are not included in these requirements. However, if the plastics contain any of the designated materials identified by the Guidelines, operations treating these plastics are included in the due diligence requirements and in criterion 4.6.1.2’s requirements.

Change History:

Initial version approved by the PVC and effective on August 19, 2013.