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DRAFT VERIFICATION PLAN – ROUND FOUR

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Product Verification Committee

I. PURPOSE AND CONTENTS OF THIS DOCUMENT

This Plan describes the verification process to be used in the fourth EPEAT Verification Round, including the criteria that will be verified, the number of products to be verified for each criterion, and the method of verification for each.

The products and subscribers to be verified are not specifically identified. The intention is for the PVC to be blind to the specific product and subscriber about which they are making decisions. This information will be known by the staff and the Qualified Verifier, but will not be provided to the PVC until after completion of the initial conformance/non-conformance findings of the Round. However, when subscribers present specific information to the PVC regarding a decision, the subscriber and product will be revealed to the PVC in order to resolve any issues.

II. PRODUCT VERIFICATION COMMITTEE

Following are the members of the PVC:

Patty Dillon, Dillon Environmental Associates

Jack Geibig, Director, Center for Clean Products, University of Tennessee

Jim Arnold, Retired from Motorola Labs

III. QUALIFIED VERIFIERS

Following are the members of the Qualified Verifier (QV) team:

Pamela Brody-Heine
EcoStewardship Strategies

Stephen Greene, Principal
Howland Green Consulting

Ming-Shen Lai, President
LMS Consulting Ltd.

IV. CHARACTERISTICS OF ROUND FOUR

Rounds One and Two consisted of 79 and 61 product investigations, respectively. Because of the large number of investigations, and ensuing complexities and delays in getting the required information from subscribers, these rounds were inordinately lengthy. Round Three was therefore smaller and consisted of 21 investigations. This round will follow the model of Round Three, though with somewhat more investigations.

Round Four will select proportionately more products by subscribers that have not previously been subject to verification as much as others, and will target some of the more difficult-to-meet, but increasingly frequently declared criteria.

IEEE revisions to the 1680 standard are being developed simultaneously with this verification. Round Four will verify to the current wording of the criteria as found in IEEE 1680-2006.

V. SELECTION OF PRODUCTS AND CRITERIA FOR VERIFICATION

Selection Process

1. A snapshot was taken of the Registry as the product declarations existed on 4/23/09. This date preceded the process to add regional capability to the Registry, so this change process should not complicate the verification investigations.
2. This Verification Round Plan lists the criteria that will be verified, the rules for selecting the subscribers and products, and the method of verification that will be used.
3. Upon adoption of the Plan by the PVC, staff will select the subscribers and products according to the rules in the Plan. The Registry will be searched according to these rules and a spreadsheet will be created including the subset of qualifying products for each criterion. A random number generator will be used to select products for verification where random selection is desired.
4. In some cases the product selection will not be random, for example, when a specific concern has been received from a purchaser or other stakeholder.

Selection Principles

Round four will test certain aspects of the Registry:

- Products that are declared with an exception, in order to prevent the exceptions field being used incorrectly such that non-conformant products may appear to be registered, and that advertising may suggest that non-declared products are in fact conformant.
- One criterion for which a stakeholder raised a doubt regarding whether products are, in fact, conformant.

In addition to those Registry-specific aspects, individual subscribers and/or products will be selected that represent one or more of the following:

- Products by subscribers who have not previously been verified, or who have been verified substantially below average.
- Products that are declared to particularly difficult to achieve criteria.
- Products and criteria for which NCs were found and corrected in previous rounds to check that conformance has been maintained.
- Criteria where declared conformance has been questioned by other parties or observed by staff to be questionable.
- Products or subscribers for which issues have been raised by other parties.

Possible Out-of-Sequence Selections

In the event of special circumstances, the PVC may, at its prerogative, decide to schedule an additional investigation(s) at any time, including while Round Four is in progress. If the PVC determines that such investigation should be included as a part of Round Four, this Verification Round Four Plan will be amended and reissued without disrupting the timing of the other verification investigations.

VI. REGISTRY STATISTICS AT THE BEGINNING OF ROUND FOUR (as of 4/23/09)

Products on the Registry: 1168

Number of active subscribers: 33

Gold products on the Registry: 338

VII. ROUND FOUR INVESTIGATIONS

Criterion		Verification Selection and Process	Invstgs
Exceptions Field	Exceptions that specify certain physical configurations that cause either conformance or non-conformance. EStar “family” exceptions are not included due to evolving nature of that requirement.	<ul style="list-style-type: none"> • 77 products of 8 subscribers have been determined to have exceptions that describe a specific physical configuration (versus a software configuration) that either is necessary for the product to be conformant, or that is an exception that would cause the product to be non-conformant. • 10 products will be selected for investigation from the 8 subscribers. Note that 2 subscribers have registered products with different types of exceptions, such that two investigations will be selected for them. • The Level 2 investigations will explore the marketing of the selected product, or set of products, to determine if the marketing of the product is true to the declaration. <ul style="list-style-type: none"> • Are some non-conformant products incorrectly promoted as EPEAT conformant because they have the same name as other conformant configurations? • If the subscribers web site or other advertising material promote EPEAT conformance, does it make the distinction between configurations that are and are not conformant. • Do third-party listings (e.g. resellers) of the product make the distinction between configurations that are and are not conformant, and if not can the source of the confusion be identified. 	10
4.2.1.2	Optional–Minimum content of postconsumer recycled plastic	<ul style="list-style-type: none"> • 75 products (of 1168 total on the Registry) are declared to this criterion by 9 subscribers • Select one product from each of the subscribers that is declared to this criterion. • Level 1 investigation <ul style="list-style-type: none"> • Determine how the subscriber conducted the calculation of content. • Assess that the calculation considers all the plastic in the product, and that the mathematical calculation has been performed correctly. • This investigation will focus on the verification requirement “Documentation of calculation” and not on the “Supplier letter” which was addressed in rounds 1 & 2. 	9
4.4.3.1	Optional–Availability of replacement parts	<ul style="list-style-type: none"> • 1048 products (of 1168 total on the Registry) are declared to this criterion • Select a product from subscribers who have not previously been verified, or who have been verified substantially below average. Also randomly select 3 products from larger subscribers that are not included in the “Exceptions Field” investigation. • Level 1 investigation per draft protocols 	19
4.5.1.1	Required–Energy Star	<ul style="list-style-type: none"> • A stakeholder identified a possible NC in the listing of EStar compliance for one product. • Level 2 investigation <ul style="list-style-type: none"> • Examine EPEAT declaration, EStar listing and subscriber web site to assure that the identification of EStar 4.0 specification compliance is conformant with 1680 requirements and is accurately and consistently stated for purchasers. 	1
4.6.2.1	Required corporate–Provision of a rechargeable battery take-back service	<ul style="list-style-type: none"> • Select a product from one specific subscriber who has not previously been verified, or who has been verified substantially below average, and who has not declared to 4.4.3.1 so is not verified in the investigations of 4.4.3.1 above. 	1
Total number of investigations			40

Investigation Assignments

QV #	Criterion		No. of Invstgtns
2	Exceptions Field	Exceptions that specify certain physical configurations that cause either conformance or non-conformance.	10
1	4.2.1.2	Optional–Minimum content of postconsumer recycled plastic	9
3	4.4.3.1	Optional–Availability of replacement parts	19
2	4.5.1.1	Required–Energy Star	1
2	4.6.2.1	Required corporate–Provision of a rechargeable battery take-back service	1

#	Verifier
1	Pamela Brody-Heine
2	Stephen Greene
3	Ming-Shen Lai