



EPEAT, Inc.

One World Trade Center
121 SW Salmon St., Suite 210
Portland OR 97204

www.epeat.net
Voice: (503) 279-9382
Fax: (503) 279-9381

DRAFT VERIFICATION PLAN – ROUND 2010-1 January 2010

Product Verification Committee

I. PURPOSE AND CONTENTS OF THIS DOCUMENT

This Plan describes the verification process to be used in the first EPEAT Verification Round for 2010, 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 2010-1

Round 2010-1 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.

This Round is the first conducted under the revised IEEE 1680.1 standard including the new international registry representing 40 countries. The Round will utilize the Conformity Assessment Protocols that have been revised according to the revised Standard.

V. SELECTION OF PRODUCTS AND CRITERIA FOR VERIFICATION

Selection Process

1. A snapshot was taken of the Registry as the product declarations existed on 1/14/2010.

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.

Selection Principles

Round 2010-1 will test certain aspects of the Registry:

- Products that have been declared to difficult to meet Materials Selection criteria, specifically for recycled content and for biobased materials. Recently numerous questions have been raised regarding these declarations. An analysis was conducted in the course of the previous verification round for several products regarding the methods of calculation for 4.2.1.2 Minimum content of postconsumer recycled plastic. A detailed calculation spreadsheet was developed and included in the Conformity Assessment Protocols. All subscribers were communicated with regarding this calculation, and given notice that information had been provided to staff that suggests that achieving higher levels of recycled plastic, especially in products with display devices, is very difficult due to the inherent materials. In spite of these notifications, several products continue to claim high levels of recycled plastic.
 - Note that in this round any manufacturer that was verified to criterion 4.2.1.2 will not be verified to that criterion again, though they may be verified to other Material Selection criteria
- In addition several products have declared to both postconsumer recycled plastic and biobased plastic criteria. This seems questionable, and the presence of biobased and recycled plastic in the same product will be investigated.
- One criterion will be investigated for which a stakeholder raised a doubt regarding whether products are, in fact, conformant.
- With an increasing number of products coming onto the Registry by new subscribers as Gold, the desk review process often raises questions about a product declaration that should be further investigated. Desk review is not a verification of conformance with criteria, but rather an examination of a product declaration by a new subscriber to determine if they understand the requirements of the criteria. Occasionally open questions remain, and these will be subject to verification.

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 2010-1 is in progress. If the PVC determines that such investigation should be included as a part of Round 2010-1, this Verification Round 2010-1 Plan will be amended and reissued without disrupting the timing of the other verification investigations.

VI. REGISTRY STATISTICS AT THE BEGINNING OF ROUND 2010-1 (as of 1/14/2010)

Number of active subscribers: 42

Products on the Registry: U.S. – 1059; Worldwide - 9498

Gold products on the Registry: U.S. – 482; Worldwide – 3582

Note – the count of products worldwide includes much repetition because a single product can be declared in several countries or regions.

VII. ROUND 2010-1 INVESTIGATIONS

Criterion		Verification Selection and Process	Invstgs
4.2.1.3	Optional—Higher content of postconsumer recycled plastic – 25%	<ul style="list-style-type: none"> 2 manufacturers declared 7 products in the U.S., and 5 manufacturers declared 190 products worldwide (note that this double counts many products that are declared in multiple countries) <ul style="list-style-type: none"> These level one investigations will examine both the method of calculation of the recycled content and the sourcing of that material 	5
4.2.1.2	Optional—Minimum content of postconsumer recycled plastic – 10%	<ul style="list-style-type: none"> 12 manufacturers declared 86 products in the U.S., and 15 manufacturers declared 1173 products worldwide (note that this double counts many products that are declared in multiple countries) to this criterion. <ul style="list-style-type: none"> Of those, 7 manufacturers representing 15 products had not been verified in the previous round to this criterion nor included in the verification of 4.2.1.3 in this round. These level one investigations will examine both the method of calculation of the recycled content and the sourcing of that material 	7
4.2.2.2	Optional—Minimum content of renewable/biobased plastic material – 10%	<ul style="list-style-type: none"> 2 manufacturers declared 2 products in the U.S., and 5 manufacturers declared 17 products worldwide. All of these manufacturers but one also declare to recycled plastic content, either or both 4.2.1.2 or 4.2.1.3 <ul style="list-style-type: none"> These level one investigations will examine both the method of calculation of the recycled content and the sourcing of that material 	5
4.5.1.1	Required—ENERGY STAR®	<ul style="list-style-type: none"> A question was posed to staff by an energy conservation expert as to a subscriber who declares to EPEAT but is not registered, nor declares its products to ENERGY STAR. <ul style="list-style-type: none"> This is permitted in 1680.1. However, in that case the manufacturer must be prepared to demonstrate that its products comply with the ENERGY STAR specifications. The Level one investigation will ask the subscriber to provide the technical data to demonstrate that its products pass all requirements in the ENERGY STAR specification. 	1
4.8.4.1	Optional—Provision of take-back program for packaging	<ul style="list-style-type: none"> The desk review process has identified a few products for which questions were raised, and not satisfactorily answered, regarding declaration to certain difficult to meet criteria. <ul style="list-style-type: none"> These level one investigations will examine a single product declaration to this criterion by each of two manufacturers, which represent a total of 27 product declarations worldwide to this criterion. 	2
4.5.2.2	Optional—Renewable energy accessory standard	<ul style="list-style-type: none"> The desk review process has identified a few products for which questions were raised, and not satisfactorily answered, regarding declaration to certain difficult to meet criteria. <ul style="list-style-type: none"> This level one investigation will examine a single product declaration to this criterion – the only declaration to this criterion on the Registry. 	1
Total number of investigations			21

Investigation Assignments

QV #	Criterion		No. of Invstgtns
2 Assist from 1	4.2.1.3	Optional—Higher content of postconsumer recycled plastic – 25%	5
2 Assist from 1	4.2.1.2	Optional—Minimum content of postconsumer recycled plastic – 10%	7
2 Assist from 1	4.2.2.2	Optional—Minimum content of renewable/biobased plastic material – 10%	5
3	4.5.1.1	Required—ENERGY STAR®	1
3	4.8.4.1	Optional—Provision of take-back program for packaging	2
3	4.5.2.2	Optional—Renewable energy accessory standard	1

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