



## OUTCOMES REPORT EPEAT VERIFICATION ROUND 2010-02

### 1. Summary and Details of Verification Round 2010-02

This report provides the detailed results of EPEAT Verification Round 2010-02. This Verification Round focused specifically on the following:

- Optional criterion 4.1.2.1 – Elimination of intentionally added cadmium
- Optional criterion 4.8.2.2 – Packaging 90% recyclable and plastics labeled. This investigation looked only at the “Packaging 90% recyclable” portion of the criteria as the “plastics labeled” was addressed in a previous Verification Round.
- Optional criterion 4.5.2.2 – Renewable energy accessory standard.

Round 2010-02 verified two optional criteria that have been very widely claimed, but for which questions have been raised by stakeholders as to the potential for either misunderstandings or oversight by subscribers of the requirements of the criteria. 44 investigations were conducted between criteria 4.1.2.1 and 4.8.2.2. This number reflects the number of subscribers that have claimed at least one of these optional criteria. One additional investigation focused on a single declaration.

As in previous rounds, Round 2010-02 involved focused investigations that are not statistically representative of a random sampling of the full Registry. In future rounds the PVC may choose to conduct a random sampling of the products and subscribers on the Registry.

### 2. Outcomes of Round 2010-02

Due to the fact that Criterion 4.1.2.1 – Elimination of intentionally added cadmium has a more restrictive limit for cadmium than the EU Restriction of Hazardous Substances directive (RoHS), there was concern that a verification would yield a high rate of non-conformance. This was found to be true with 5 out of 22 or 23% investigations found to be non-conformant.

Within Criterion 4.8.2.2, only “packaging 90% recyclable” was verified as the “plastics labeled” portion of the criterion was verified in a previous round. There was some evidence in advance of non-conformances in this case also. This criterion was verified for one product for each of the subscribers chosen in a single country. Out of 22 investigations, 7 or 32% were found to be non-conformant.

One subscriber was scheduled to be investigated for claiming conformance with Criterion 4.5.2.2. The investigation revealed that the criterion had been undeclared; due to the subscriber having him/herself found the erroneous declaration in the days *after* the snapshot of the registry was taken but *before* the subscriber was notified of the investigation. Therefore, this investigation was withdrawn since the subscriber was actually in conformance when they received word of the investigation.

Following are the specific highlights of Round 2010-02.

- 45 investigations were launched and completed.



- 22 investigations addressed optional criterion 4.1.2.1 – Elimination of intentionally added cadmium
- 22 investigations addressed optional criterion 4.8.2.2 – Packaging 90% recyclable portion of the criterion
- 1 investigation addressed optional criterion 4.5.2.2 – Renewable energy accessory standard – this investigation was withdrawn as noted above, and so is not included in the counts below.
- There were 12 decisions of non-conformance all for optional criteria. See the list of criteria for which non-conformances were identified in Table 1 and the details and identification of subscribers and products in Table 2.
  - Seven decisions of non-conformance resulted in subscribers making changes in order to recover the accuracy of the declaration.
    - In four cases, the subscriber provided additional information which brought them into conformance.
    - In two cases, the subscribers undeclared the criterion.
    - In one case, the subscriber made a change to their website which moved them into conformance.
  - Five decision of non-conformance were not corrected by the subscribers by the close of the Verification Round. Affected products were archived.
- The overall impact on the Registry was:
  - 2 products lost optional points.
    - 2 points were undeclared by the subscriber.
    - No products changed EPEAT level.
  - 5 products were archived by EPEAT.<sup>1</sup>

### 3. Key Lessons of Round 2010-02

- **Elimination of intentionally added cadmium:** Twenty-two investigations in this Verification Round (2010-02) looked at criterion 4.1.2.1. This criterion requires intentionally added cadmium to be at a level of less than 50 ppm. This limit is less than the RoHS limit of 100 ppm and therefore meeting this criterion must be done intentionally. RoHS test results are only able to be used in cases where results clearly show that cadmium levels are less than 50 ppm.
- Several subscribers received a non-conformance to this point because the provided test results were inconclusive regarding whether the amount of cadmium was under the 50 ppm limit.

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<sup>1</sup> Non-conformance decisions may have more than one impact on the Registry; for example, losing an optional point may result in a drop from Gold to Silver rating.



- *Message to Subscribers:*
  - Test reports should include a Method Detection Limit (MDL) and must clearly show that the amount of cadmium is less than 50 ppm.
- **Packaging 90% recyclable:** Twenty-two investigations looked at criterion 4.8.2.2. This criterion requires packaging to be 90% recyclable. This criterion also contains a requirement for labeling plastic packaging, which was **not** investigated in this round.
- *Message to Subscribers:*
  - Any subscribers currently claiming this Optional point must ensure that recycling options are normally available in each region where this criterion is declared. If they are not normally available, this criterion can still be met by providing a recycling vendor option that meets the verification requirements of the criterion.
- **Problems with preparation by subscribers for verification:** Note from section 2 that 4 non-conformances were found, and are reported as non-conformances in this report, due to the fact that adequate demonstration of conformance was not provided to the Verifier in the allotted time. This is a strong indication that subscribers are not attending to having available in advance, or readily accessible, the evidence needed to demonstrate conformance. Such advance preparation for verification is essential for the viability of the EPEAT after-market verification system. Subscribers will receive reminders to this effect.

#### 4. Looking Forward

1. **Plans for Future Verification Activities:** Verification Round 2010-03 started on June 28, 2010. EPEAT's goal is a total of 6 Verification Rounds in 2010.
2. **International Training:** Plans are underway to deliver international training at the Going Green conference in Austria preceding that conference and in London. Stay tuned for more information.
3. **Conformity Assessment Protocols:** This and all future rounds will be conducted according to the Conformity Assessment Protocols posted on [www.epeat.net](http://www.epeat.net).

#### 5. Investigation Tables

**TABLE 1: Criteria Involving Non-Conformance Findings**

Criterion	Description	Total # of Investigations	# of NCs
4.1.2.1	Elimination of intentionally added cadmium	22	5
4.2.1.3	Packaging 90% recyclable	22	7
4.5.2.2	Renewable energy accessory standard	1	0
	Total	45	12



**TABLE 2: Non-Conformance Findings Showing Corrective Actions Taken and Outcomes**

Subscriber	Product	Verification Criterion	Country	Criterion Description	Description of NC Finding	Corrective Actions (CA) Taken and Outcomes	Final Decision
Ace Computers	Mustang_Q5 5	4.1.2.1	United States	Elimination of intentionally added cadmium	Test results did not support claim.	Undeclared criterion.	C
Arquimedes Automacao e Informatica Ltda	Corporativo B N01	4.1.2.1	Brazil	Elimination of intentionally added cadmium	Incomplete information provided.	Archived product.	NC
Cybernet Manufacturing, Inc.	iOne-GX31 17"	4.1.2.1	United States	Elimination of intentionally added cadmium	Incomplete information provided.	Additional information provided via the CA Plan.	C
Login Informatica	L4200	4.1.2.1	Brazil	Elimination of intentionally added cadmium	No information provided.	Archived product.	NC
M&A Technology, Inc.	MANDA g-PC Ultra Lite	4.1.2.1	United States	Elimination of intentionally added cadmium	Incomplete information provided.	Archived product.	NC
EIZO NANAO Corporation	ColorEdge CG303W	4.8.2.2	United States	Packaging 90% recyclable (plastics labeling was not verified in this round)	Packaging for this product not included in free packaging take back program.	Added product to free packaging take back program.	C
MMD Taiwan Ltd.	220B1	4.8.2.2	Canada	Packaging 90% recyclable (plastics labeling was not verified in this round)	EPS recycling program not available in Canada.	Undeclared criterion. Note: This Subscriber is actively working to get this program in place.	C
NEC Display Solutions, Inc.	EA241WM - BK	4.8.2.2	Germany	Packaging 90% recyclable (plastics labeling was not verified in this round)	Incomplete information provided.	Additional information provided via the CA Plan.	C



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Subscriber	Product	Verification Criterion	Country	Criterion Description	Description of NC Finding	Corrective Actions (CA) Taken and Outcomes	Final Decision
NTT System S.A.	BUSINESS W988G	4.8.2.2	Lithuania	Packaging 90% recyclable (plastics labeling was not Verified in this round)	No information provided.	Archived product.	NC
PC Factory S.A.	PC2 MB Toro2 840045E HD4350	4.8.2.2	Poland	Packaging 90% recyclable (plastics labeling was not Verified in this round)	No information provided.	Archived product.	NC
Samsung Electronics America	SyncMaster EX2220X	4.8.2.2	Canada	Packaging 90% recyclable (plastics labeling was not Verified in this round)	Incomplete information provided.	Additional information provided via the CA Plan.	C
Toshiba	Satellite L510 PSLGJL	4.8.2.2	Singapore	Packaging 90% recyclable (plastics labeling was not Verified in this round)	Incomplete information provided.	Additional information provided via the CA Plan.	C

**Explanation of Table 2** – The findings are based on the product declaration on the Registry when the round is begun. Nothing prevents subscribers from changing their declaration or even removing the product during the round, but verification decisions reference the declaration as it stood when the round began. When a declaration is found to be in non-conformance the subscriber is required to take corrective action to return their declaration to conformance. They may undeclare the non-conforming criterion or may change the product to bring it into conformance with the declaration.

**Product archiving** – If the non-conformance is not corrected by a given date, the product is archived by EPEAT staff. If the declaration or product is later changed to resolve the non-conformance, the product can be reactivated on the EPEAT Registry.

EPEAT policy is that the subscriber, not EPEAT staff, performs edits on product declarations by changing a criterion declaration, even when non-conformances must be corrected. If such edits are not performed by the deadline, EPEAT staff archive the product.



## 6. Background

To assure the credibility of the EPEAT Registry, verification of the claims by participating manufacturers (called “Subscribers”) must be rigorous, independent and transparent. Verification is conducted strictly according to policies and procedures described in the IEEE 1680 Standard and in documents provided on [www.epeat.net](http://www.epeat.net). Subscribers have no forewarning that their products will be verified and verification proceeds against the declarations as they are in the database at the time the round begins.

In level one verification investigations, subscribers are required to provide detailed and accurate information in a timely manner that demonstrates conformance, such as supply chain management records. In level two and three investigations EPEAT buys products without the manufacturer’s knowledge and disassembles them, and possibly conducts detailed analytical testing if needed. Investigations are performed by expert technical contractors who are free of conflicts of interest, and their recommended decisions are reviewed and finalized by a 3-person panel of independent technical experts (called the Product Verification Committee or PVC) who are also contractors free of conflicts of interest and are blind to the identity of the products and companies they are judging. This panel makes a conformance/non-conformance decision on each investigation, based on evidence collected and analyzed by Qualified Verifiers. A serious consequence of receiving a non-conformance is that it is published publicly in this report, for purchasers, competitors, and others to see.

Subscribers must correct findings of non-conformance, either by bringing the product into conformance or by un-declaring the criterion until conformance is recovered, and they must do so for all products that are similarly incorrectly declared, not only the product(s) that were investigated. If they correct the non-conformance by un-declaring the criterion and the criterion is an optional criterion, they lose a point, and possibly the product drops a tier. If it is a required criterion, they must archive the product. If it is a required corporate criterion, all their products must be archived.