



## **OUTCOMES REPORT EPEAT VERIFICATION ROUND 2010-05**

### **1. Summary and Details of Verification Round 2010-05**

This report provides the detailed results of EPEAT Verification Round 2010-05. Round 2010-05 investigated two criteria in the area of reduction/elimination of environmentally sensitive materials with a focus on mercury, specifically:

- Required criterion 4.1.3.1 -- Reporting on amount of mercury used in light sources.
- Optional criterion 4.1.3.2 -- Low threshold for amount of mercury used in light sources.

These criteria were chosen because they have never been verified. Criterion 4.1.3.1 is required and criterion 4.1.3.2 is optional.

This Round was conducted under the revised IEEE 1680.1 standard including the new international registry representing 41 countries. The criteria were investigated on randomly selected products for which these criteria were applicable from each of the subscribers with the exception of the 5 Subscribers that were still involved in Verification Round 2010-04 at the beginning of this round. Products were chosen randomly from among the countries in which the Subscriber had products declared. All aspects of the requirements of these criteria were investigated using level one investigations.

### **2. Outcomes of Round 2010-05**

Criterion 4.1.3.1 is required and criterion 4.1.3.2 is optional. It quickly became evident that there are only a few suppliers of mercury bulbs.

Following are the specific highlights of Round 2010-05.

- 33 investigations were launched and completed:
  - 17 investigations looked at required criterion 4.1.3.1
  - 16 investigations looked at optional criterion 4.1.3.2
- There were 29 decisions of conformance for these investigations.
- There was one decision of non-conformance for required criterion 4.1.3.1 and three decisions of non-conformance for optional criterion 4.1.3.2. See the non-conformances identified in Table 1 and the details and identification of the subscribers and products in Table 2.
  - The single decision of non-conformance for criterion 4.1.3.1 resulted in Subscriber correcting the declaration on the EPEAT Registry.
  - The three decisions of non-conformance for criterion 4.1.3.2 resulted in Subscribers undeclaring the criterion in two cases and archiving the product in the third case. The overall impact on the Registry was:
    - Subscribers made changes to the declarations of all investigated non-conformant products.



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- One Subscriber archived their product.
- No products changed EPEAT level.

### **3. Key Lessons of Round 2010-05**

- Required criterion 4.1.3.1 Reporting on amount of mercury used in light sources.
  - Verification requirements:
    - Declaration from manufacturer
    - Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance
  - 17 investigations looked at this criterion.
    - In one investigation, the declaration of the number of lamps and mercury content of the lamps was incorrect.
    - In this same investigation, the product chosen from the EPEAT Registry was identified by the Subscriber as no longer being sold.
  - *Message to Subscribers:*
    - *If mercury lamps are used, Subscribers must report on how many lamps are used and the mercury content per lamp. Take the time to review your entry for criterion 4.1.3.1 (if applicable) and make sure it is correct. Changes in how this criterion is declared on the EPEAT Registry are currently being proposed in order to achieve more consistent declarations across the board.*
    - *Place obsolete products in “archive” status. They are still visible to in the EPEAT Registry database via the “archive” status but they are excluded from Verification Rounds.*
- Required criterion 4.1.3.2 -- Low threshold for amount of mercury used in light sources
  - Verification requirements:
    - Declaration from manufacturer
    - Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance
  - 16 investigations looked at this criterion.
    - Three Subscribers were found to have products out of conformance with this criterion. In two cases the criterion was undeclared and in the other case the criterion was undeclared and then the product was archived.
  - *Message to Subscribers:*
    - *Make sure you have data (empirical or analytical test data) as required in the second verification requirement for this criterion.*



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- *Products that don't contain intentionally added mercury are eligible to declare criteria 4.1.3.2 and 4.1.3.3.*
- Other Key Lessons
  - *Message to Subscribers:*
    - *One of the investigations was held up because the primary contact for the Subscriber was incorrect. Subscribers need to review the primary contacts and make changes to ensure they are correct.*

#### 4. Looking Forward

1. **Plans for Future Verification Activities:** There are 6 verification rounds planned for 2011. They will include Level 1, Level 2 and Level 3 investigations as needed.
2. **International Training:** We have a tentative training schedule for 2011. Please contact EPEAT staff 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: Non-Conformance Findings**

Criterion	Description	Total # of Investigations	# of NCs
4.1.3.1	Reporting on amount of mercury used in light sources	17	1
4.1.3.2	Low threshold for amount of mercury used in light sources	16	3
	Total	33	4



**TABLE 2: Non-Conformance Findings: Corrective Actions Taken**

Subscriber	Product	Verification Criterion	Criterion Description	Description of NC Finding	Corrective Actions Taken
Hewlett-Packard	6735b Notebook PC	4.1.3.1	Reporting on amount of mercury used in light sources	The declaration on the EPEAT Registry was inaccurate.	Subscriber corrected the mercury declaration – it now indicates 1 bulb at 3mg/bulb maximum. In addition, since this was a discontinued product, the Subscriber archived it.
NEC Display Solutions, Inc.	EA261WM-BK(Rev1a)	4.1.3.2	Low threshold for amount of mercury used in light sources	The test results submitted did not meet criterion requirement.	Subscriber undeclared this criterion.
Tangent, Inc.	Vita 454	4.1.3.2	Low threshold for amount of mercury used in light sources	Subscriber did not provide any information to prove conformance.	Subscriber undeclared this criterion.
Transource	RoadRunner NB-M15A	4.1.3.2	Low threshold for amount of mercury used in light sources	Subscriber claimed that criterion had been declared in error.	Subscriber undeclared criterion and then archived the product since it was already at end of life.

**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 / country is archived by EPEAT staff. If the declaration or product is later changed to resolve the non-conformance, the product / country 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 undeclaring 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.