



## **AMENDED OUTCOMES REPORT EPEAT VERIFICATION ROUND 2011-02**

The PVC has cancelled the “Amended Verification Plan 2011-02” after an investigation which resulted in the determination that the European Commission Directive 2006/66/EC for Batteries and Accumulators does not establish a threshold limit on the amount of lead in batteries. It was not possible to investigate “technically unavoidable impurities” for lead due to the lack of a threshold limit. The 7 frozen investigations pertaining to notebook batteries mentioned below have been cancelled. The conclusion is that the PVC cannot rule on the content of lead due to inconsistencies in the criterion. Therefore, Optional Criterion 4.1.7.1 cannot be evaluated for lead in notebook batteries.

### **1. Summary and Details of Verification Round 2011-02**

This report provides the detailed results of EPEAT Verification Round 2011-02. Round 2011-02 investigated two optional criteria:

- Optional criterion 4.1.7.1 -- Batteries free of lead, cadmium, and mercury.
- Optional criterion 4.5.2.1 -- Renewable energy accessory available.

Optional criterion 4.1.7.1 was chosen because it had never been verified. Criterion 4.5.2.1 was chosen due to an increasing number of Subscribers claiming it. A new technology for renewable energy accessories was chosen specifically to see if it met the requirements.

This Round was conducted under the revised IEEE 1680.1 standard including the international registry representing 41 countries. A total of 14 investigations were conducted. Ten products were randomly selected for verification out of a list of all Subscribers claiming “Yes” to 4.1.7.1. A single product was randomly selected from each of four Subscribers who recently claimed 4.5.2.1. All aspects of the requirements of these criteria were investigated using level one investigations.

### **2. Outcomes of Round 2011-02**

Criterion 4.1.7.1 and 4.5.2.1 are optional.

Following are the specific highlights of Round 2011-02.

- 14 investigations were launched.
  - 10 investigations looked at optional criterion 4.1.7.1
  - 4 investigations looked at optional criterion 4.5.1.2
- 7 investigations of criterion 4.1.7.1 were frozen due to a need for more information.
  - Lead was found in notebook battery packs. Subscribers claimed the lead was technically unavoidable. Criterion 4.1.7.1 allows the use of “technically unavoidable impurities.”



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The PVC has requested further investigation into this claim to see if the use of lead is technically unavoidable. The frozen investigations will be reopened once this question has been addressed.

- 7 investigations were completed, including 3 investigations of criterion 4.1.7.1 and 4 investigations of criterion 4.5.1.2.
- There were 5 decisions of Conformance for these investigations.
- There was one decision of non-conformance for required criterion 4.1.7.1 and one decision of non-conformance for optional criterion 4.5.2.1. The non-conformances are identified in Table 1 and the details and identification of the subscribers and products in Table 2.
  - After being advised of the non-conformance for criterion 4.1.7.1, the subscriber provided additional information which brought them into conformance.
  - The Subscriber who received a non-conformance for criterion 4.5.2.1 made changes to their website for all products claiming this criterion which brought their products into conformance.
  - The overall impact on the Registry was:
    - There was no impact to the registry.

### 3. Key Lessons of Round 2011-02

- Optional criterion 4.1.7.1 -- Batteries free of lead, cadmium, and mercury.
  - There appeared to be some confusion among Subscribers that RoHS exemptions apply to criterion 4.1.7.1. Subscribers should note: there is no mention of RoHS exemptions in criterion 4.1.7.1 and therefore RoHS exemptions are not valid for this optional criterion.
- Optional criterion 4.5.2.1 -- Renewable energy accessory available.
  - A new fuel cell option was found to meet the requirements of a renewable energy accessory.
  - *Message to Subscribers:*
    - *Ensure that your renewable energy accessory, per criterion 4.5.2.1, is “commercially available for purchase with the product.”*
- Other Key Lessons
  - *Message to Subscribers:*
    - *Earlier this year, all Subscribers were asked to update their contacts. If you have not already done so, take the time to review the primary contacts on [www.EPEAT.net](http://www.EPEAT.net) and make changes to ensure all information is correct.*
    - *When you are contacted regarding your participation in a Verification Round, we request that you respond to the Qualified Verifier quickly to let them know they are communicating with the correct person or to inform them who they should be communicating with. This also helps the Qualified Verifier know that they have a valid*



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#### **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. **Training:** We are planning a training session in North America in Fall, 2011. The location is planned for Chicago, IL. Is your company able to host? Let us know if your company is willing and able to host the North American training session.
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).

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**5. Investigation Tables****TABLE 1: Non-Conformance Findings**

Criterion	Description	Total # of Investigations	# of frozen investigations	# of completed investigations	# of NCs
4.1.7.1	Batteries free of lead, cadmium, and mercury.	10	7	3	1
4.5.12.1	Renewable energy accessory available.	4	0	4	1
	Total	14	7	7	2



TABLE 2: Non-Conformance Findings (for non-frozen investigations): Corrective Actions Taken

Subscriber	Product	Country	Verification Criteria	Criterion Description	Description of NC Finding	Corrective Actions Taken
CIARA-TECH	DISCOVERY DQ57TM	Does not vary by country	4.1.7.1	Batteries free of lead, cadmium, and mercury.	Incomplete information was provided.	Subscriber provided missing information.
GETAC	B300	United States	4.5.2.1	Renewable energy accessory available.	Accessory was available on the Subscriber's website but not with the product information.	Subscriber added accessory information to all product pages.

**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.