



OUTCOMES REPORT EPEAT VERIFICATION ROUND 2011-04

1. Summary and Details of Verification Round 2011-04

This report provides the detailed results of EPEAT Verification Round 2011-04. Round 2011-04 investigated one required criterion:

- Optional criterion 4.4.2.2 – Modular design.

Optional criterion 4.4.2.2 was investigated due to the likelihood that this criterion was being declared inappropriately in light of PVC Clarification 6-1. This Round was conducted under the revised IEEE 1680.1 standard. A total of 21 investigations were conducted. The round focused on notebooks with a screen size of less than 11 inches. One product from each Subscriber fitting into this category was chosen. This investigation focused on the modularity of the processor. The investigation was performed using level one investigations.

2. Outcomes of Round 2011-04

Criterion 4.4.2.2 is optional.

Following are the specific highlights of Round 2011-04.

- 21 investigations were launched.
 - All 21 investigations looked at required criterion 4.4.2.2.
- 21 investigations were completed.
- There were 5 decisions of Conformance for these investigations.
- There were 16 initial findings of Non-Conformance for these investigations.
- Non-conformances are identified in Table 1 and the details and identification of the subscribers and products in Table 2.
 - The overall impact on the Registry was¹:
 - There were no changes to product ratings in this Verification Round.
 - Five Subscribers undeclared criterion 4.4.2.2 to bring their products into conformance.
 - Five Subscribers archived their products
 - Two of the five provided missing information prior to archiving the product.
 - Eight Subscribers provided missing information.
 - Two of the eight subsequently archived their product.
 - EPEAT Staff archived one non-conforming product.

¹ Two Subscribers provided both missing data and archived their products, and therefore, are represented twice in the list of corrective actions.

3. Key Lessons of Round 2011-04

- Optional criterion 4.4.2.2 – Modular design

- Subscribers might have interpreted this criterion as allowing the Subscriber to specify which components in the product are designed for modularity. This is true with the exception of the processor. In Clarification 6-1, the PVC determined that “the criterion requires that the processor must be changeable independent of other components such as the circuit board to which it is attached.”

Product criterion: Product shall have a modular design; for example, major components/processor can be changed.

- This investigation focused on the ability of products with processors soldered to the motherboard to meet the Verification Requirements for modular design. The PVC issued Clarification 6-1 in response to Subscribers’ requests to allow motherboards with soldered processors to be considered a modular component for this criterion. The PVC determination (above) was based in part on the following rationale:

“While non-removable processors are supported by current design and recycling practices, EPEAT is intended to drive environmentally preferable change, not to adapt to industry practice. It’s not clear that removable processors are not technologically feasible. Rather, it is current industry practice. Couldn’t EPEAT drive a change in this practice if left as is?”

- Verification 2011-04 specifically targeted notebook computers with screens <11 inches as they were more likely to use processors soldered to boards that help enable slimmer, lighter form factors.
- The Product Verification Committee spent a great deal of time reviewing the evidence and understanding what was actually required to demonstrate conformance.
- While criterion 4.4.2.2 is included in the performance category, “Product Longevity/Life Cycle Extension, neither the product criterion, nor the Verification Requirements require the Subscriber to document that the processor is **actually** replaced, independent of the motherboard. Rather, the Verification Requirements for this optional criterion require only:
 - a) Declaration from manufacturer
 - b) Description of product modules
 - c) Description of module change method
- Subscribers had to only provide a description of how the processor **can** be changed to meet Verification Requirement “c”, not that this service is actually performed.
- Several Subscribers admitted that their processors were not able to be changed. Other Subscribers were able to document the change method, bringing their products into conformance.
- *Message to Subscribers:*
 - *According to the Subscriber agreement, Subscribers have 30 days to provide all Verification Requirements. If you cannot provide all Verification Requirements, you will receive a Non-Conformance.*
 - *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 email address. If you have any questions or concerns, contact Erin Gately at erin.gately@greenelectronicscouncil.org.

4. Looking Forward

1. **Plans for Future Verification Activities:** There were 6 verification rounds planned for 2011. Six verification rounds have been launched. Investigations have included Level 1, Level 2 and Level 3 investigations.
2. **Training:** A training session was held in San Paulo, Brazil from November 29 through December 3, 2011. Stay tuned for more training sessions in 2012.
3. **Conformity Assessment Protocols:** This and all future rounds will be conducted according to the Conformity Assessment Protocols posted on www.epeat.net.

5. Investigation Tables

TABLE 1: Non-Conformance Findings

Criterion	Description	Total # of Investigations	# of completed investigations	# of NCs
4.4.2.2	Modular Design	21	21	16
	Total	21	21	16



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TABLE 2: Non-Conformance Findings: Corrective Actions Taken

Subscriber	Product	Country	Verification Criteria	Criterion Description	Description of NC Finding	Corrective Actions Taken
Ace Computers	Nomad 10	United States	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	Subscriber undeclared criterion.
ASUSTeK Computer Inc.	Eee PC 1001HA	Canada	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber provided missing documentation and also archived the product.
Corporativo Lanix S.A. de C.V	Neuron LT	Mexico	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber undeclared criterion.
CTL Corporation	2go NL2	United States	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	Subscriber undeclared criterion.
Daten Tecnologia Ltda	DT02-M2	Brazil	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber provided missing documentation.
Dell Inc.	Latitude 2100	Canada	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	Subscriber provided missing documentation and also archived the product.
Fujitsu Limited	LifeBook MH380	United States	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	Subscriber archived product.
Gammatech Computer Corporation	N10L2	United States	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber provided missing documentation.
Grace Global Inc.	GDSU-10cH	United States	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	EPEAT Staff archived product.
Hewlett-Packard	311 ENERGY STAR	United States	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	Subscriber archived product.
Howard Technology Solutions A Division of Howard	2GoPCX2	United States	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	Subscriber undeclared criterion.
Itautec S.A. - Grupo Itautec	Infoway Net W7010	Brazil	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber provided missing documentation.
Lenovo	IdeaPad S10-2	United States	4.4.2.2	Optional - Modular design.	The declaration on the EPEAT Registry was inaccurate.	Subscriber undeclared criterion.
Panasonic	Toughbook CF-H1	United States	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber provided missing documentation.

Subscriber	Product	Country	Verification Criteria	Criterion Description	Description of NC Finding	Corrective Actions Taken
Positivo Informática S.A.	Mobo Black 4000	Brazil	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber provided missing documentation.
Samsung Electronics America	NP-N100	United States	4.4.2.2	Optional - Modular design.	Incomplete information was provided by the Subscriber.	Subscriber provided missing documentation.

6. Background

To assure the credibility of the EPEAT Registry, verification of the claims by participating manufacturers (called “Subscribers”) are 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. Subscribers are given no forewarning that their products will be verified and verification is performed based on 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 Subscriber’s knowledge, disassembles them, and conducts detailed analytical testing if needed. Level two investigations can also take the form of site visits. 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 an Outcomes 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 achieved, 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.