EPEAT, Inc.

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OUTCOMES REPORT
EPEAT VERIFICATION ROUND 2012-05

1. Summary and Details of Verification Round 2012-05

This report provides the detailed results of EPEAT Verification Round 2012-05. Round 2012-05 consisted of investigations on the two criteria listed below for 5 ultra-thin notebook products with non-user replaceable batteries.

- 4.3.1.3 Required – Easy disassembly of external enclosure
- 4.3.1.5 Required – Identification and removal of components containing hazardous materials

This Verification Round consisted of a total of 10 investigations for these two criteria. A review of ultra-thin notebooks on the EPEAT Registry was conducted prior to this round to determine if information on product disassembly and battery replacement was publicly available. Subscribers whose product information could not be found on their websites were included in this Verification Round. The verifications were performed using Level 2 investigations.

It is important to note that the criteria under investigation do not provide objective measures (e.g., disassembly time) for assessing conformance. Criterion 4.3.1.3, for example, states that external enclosures shall be "*easily removable by one person alone with commonly available tools."* The verification requirements define these terms further, stating that the design cannot "*unreasonably obstruct*" disassembly.

EPEAT Inc. purchased products on the retail market, and contracted with an independent test laboratory to perform these investigations. The test laboratory evaluated products based on the subjective terms in the criteria (e.g., easily removable by one person alone with commonly available tools.) In addition, the laboratory documented the disassembly time, which was factored into the laboratory and PVC assessment of conformance to the criteria.

2. Outcomes of Round 2012-05

The 10 investigations performed addressed two required criteria for 5 ultra-thin notebooks with non-user replaceable batteries from four manufacturers. Following are the specific highlights of Round 2012-05.

- 10 investigations were planned and completed for this round.
- There were 10 decisions of Conformance for these investigations.

3. Key Lessons of Round 2012-05

- This Verification Round identified no Non-Conformances for criterion 4.3.1.3- Easy disassembly of external enclosure. However, there are a couple of points worth emphasizing for Subscribers who were not selected in this Verification Round.
    - The criterion only states that external enclosures shall be "*easily removable by one person alone with commonly available tools."* Further, the verification requirements say that the design cannot "*unreasonably obstruct*" disassembly. It is the responsibility of the Subscriber to provide verification documentation that these requirements are met. See 1680.1 clarifications 14-1 through 14.3 for guidance.
    - *Message to Subscribers:*
        - *While considering disassembly techniques you may want to consider approaches that also facilitate serviceability.*

- *Message to Subscribers:*

  a. *IEEE 1680 and the EPEAT subscriber agreements require that Subscribers provide the information identified in Verification Requirements to prove the accuracy of their declarations within 30 days of EPEAT's request. Failure to provide that information is inconsistent with the agreement and may result in termination of the Subscriber from EPEAT.*

  b. *When contacted regarding participation in a Verification Round, EPEAT staff 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 to know they have a valid email address.*

4. Looking Forward

1. ***Plans for Future Verification Activities:*** There are 6 Verification Rounds planned for 2012. Investigations will include Level 1, Level 2 and Level 3 investigations.
2. ***Training:*** An expanded worldwide training schedule was been created for 2012. The last training session for this year will take place in *December in Tokyo, Japan*. For more information please contact Andrea Desimone.
3. ***Conformity Assessment Protocols:*** This and all future rounds will be conducted according to the Conformity Assessment Protocols posted on www.epeat.net.

5. 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 to demonstrate their conformance to each criterion of the standard in a timely manner that demonstrates Conformance, such as supply chain management records. In level two and three investigations EPEAT buys or borrows 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 5-person panel of independent technical experts (called the Product Verification Committee or PVC) who are also contractors free of conflicts of interest. Verification activities conducted by the Product Verification Committee are done 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, by un-declaring the criterion until Conformance is achieved, or by removing the product from the registry, 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.