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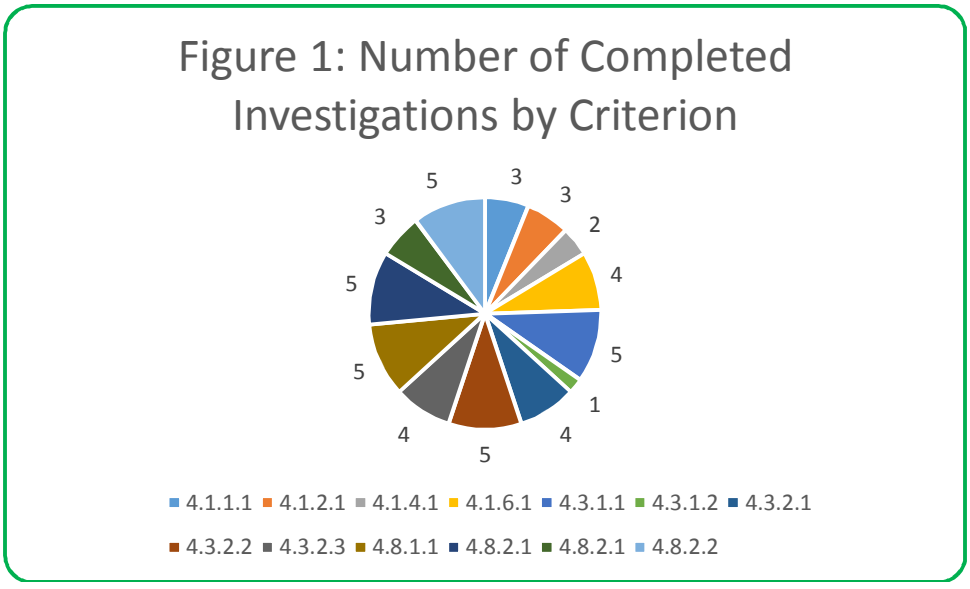
OUTCOMES REPORT
EPEAT VERIFICATION ROUND IE-2013-03

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round IE-2013-03. This Round consisted of a total of 65 investigations of the IEEE 1680.2™ criteria listed below:

- 4.1.1.1 – Required - Compliance with provisions of European Union RoHS Directive
- 4.1.2.1 – Optional - Further reduction of the use of EU RoHS Directive hazardous substances (cadmium)
- 4.1.4.1 – Optional - Reduction of substances on the EU REACH Candidate List of SVHCs
- 4.1.6.1 – Required - Reducing BFR/CFR/PVC content of external plastic casings
- 4.3.1.1 – Required - Ease of disassembly of product
- 4.3.1.2 – Optional - Ease of disassembly of consumer products
- 4.3.2.1 – Required - Use of single recyclable plastic type per part
- 4.3.2.2 – Required - Restriction on materials not compatible with reuse and recycling
- 4.3.2.3 – Required - Manual separation and marking of plastics
- 4.8.1.1 – Required - Elimination of intentionally added heavy metals in packaging
- 4.8.2.1 – Required - Separable packing materials
- 4.8.2.2 – Optional - Packaging 90% compostable / recyclable
- 4.8.2.3 – Required - Plastics marked in packaging materials



This Round was intended to assure baseline conformance for imaging equipment products, focusing on lower cost products. The Round involved laboratory evaluation of 5 low-end imaging equipment products. Sixty-five Level 2 and 3 investigations were planned. For these Level 2 and 3 investigations EPEAT acquired products without the Subscriber's knowledge, disassembled them, and conducted analytical testing if needed to demonstrate conformance to the criterion. In some cases, the Level 2 and

3 investigations were augmented with Level 1 investigations, which involved a review of Subscriber submissions. All PREs with active imaging equipment products were involved in the Round. From a list of all active products, a Subset of 5 Subscribers was chosen based on the cost of the product. Not all Subscribers were chosen during this Round.

The Investigations were chosen as follows:

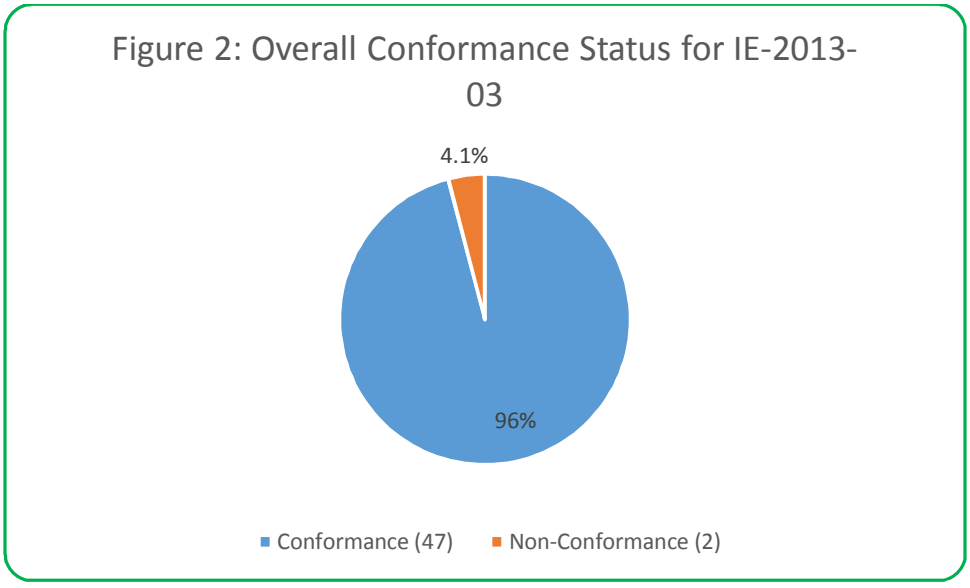
- For the nine required criteria each chosen Subscriber was investigated.
- For the four optional criteria all chosen Subscribers declaring the particular criterion were investigated.

PLEASE NOTE: Due to the fact that one PRE was unable to obtain test results from their laboratory, **8** investigations from this Verification Round were **cancelled**. The associated criteria will be investigated by the PRE using a different laboratory in early 2014.

2. Summary of Outcomes

Highlights from this Verification Round were:

- 65 Investigations planned
  - 49 Investigations completed
    - 47 Decisions of Conformance
    - 2 Decisions of Non-Conformance
  - 8 Investigations not started (criteria in question were not declared)
  - 8 Investigations cancelled



3. Investigations Tables

TABLE 1: Summary of Non-Conformance Findings

Criterion	Required or Optional	Description	Total Investigations Planned	Completed Investigations	Cancelled Investigations	Investigations Not Started	Non-Conformances
4.1.1.1	Required	Compliance with provisions of European Union RoHS Directive	5	3	2	0	0
4.1.2.1	Optional	Further reduction of the use of EU RoHS Directive hazardous substances (cadmium)	5	3	2	0	0
4.1.4.1	Optional	Reduction of substances on the EU REACH Candidate List of SVHCs	5	2	1	2	0
4.1.6.1	Required	Reducing BFR/CFR/PVC content of external plastic casings	5	4	1	0	0
4.3.1.1	Required	Ease of disassembly of product	5	5	0	0	0
4.3.1.2	Optional	Ease of disassembly of consumer products	5	1	0	4	0
4.3.2.1	Required	Use of single recyclable plastic type per part	5	4	1	0	0
4.3.2.2	Required	Restriction on materials not compatible with reuse and recycling	5	5	0	0	0

TABLE 1: Summary of Non-Conformance Findings							
Criterion	Required or Optional	Description	Total Investigations Planned	Completed Investigations	Cancelled Investigations	Investigations Not Started	Non-Conformances
4.3.2.3	Required	Manual separation and marking of plastics	5	3	1	0	1
4.8.1.1	Required	Elimination of intentionally added heavy metals in packaging	5	5	0	0	0
4.8.2.1	Required	Elimination of intentionally added heavy metals in packaging	5	5	0	0	0
4.8.2.2	Optional	Packaging 90% compostable / recyclable	5	2	0	2	1
4.8.2.3	Required	Required - Plastics marked in packaging materials	5	5	0	0	0
		Totals	**65**	**47**	**8**	**8**	**2**

TABLE 2: Specific Non-Conformance Findings and Corrective Action Taken								
Subscriber	Product	Country	Product Type	Criterion	Required or Optional	Criterion Description	NC Finding Description	Corrective Action Taken
Eastman Kodak Company	i2400	United States	Scanner	4.3.2.3	Required	Manual separation and marking of plastics	Demonstrated non-conformance.	Subscriber archived product.
Eastman Kodak Company	i2400	United States	Scanner	4.8.2.2	Optional	Packaging 90% compostable/recyclable	Demonstrated non-conformance.	Subscriber archived product.

4. Key Lesson

1680.2: 4.3.2.3: This required criterion requires that plastics over 100 grams be manually separable and marked for resin identification. Plastics that are marked incorrectly are not in conformance.

1680.2: 4.8.2.2: In order to meet the requirements of this optional criterion, 90% of the packaging material (by weight) must be compostable, fiber based or recyclable. Please see Clarification #27 for more information on sources of data that are acceptable when determining if a packaging material is recyclable.

5. General Message to Subscribers

Provision of information for Verification Rounds: The IEEE 1680 standard and the EPEAT subscriber agreements require that Subscribers not only declare products conform to the requirements, but also 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.

Initial response to Qualified Verifiers: When contacted regarding participation in a Verification Round, EPEAT staff continue to request that Subscribers respond to the Qualified Verifier as soon as possible to let them know they are communicating with the correct person or to inform them of the correct contact. This also helps the Qualified Verifier know that s/he has a valid email address.

6. Looking Forward

Plans for Future Verification Activities: Imaging Equipment investigations in 2014 may include Level 1, Level 2 and/or Level 3 investigations.

Conformity Assessment Protocols: This and all future Verification Rounds have and will be conducted according to the guidance provided in the Conformity Assessment Protocols posted on www.epeat.net.

7. 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 1 verification investigations, Subscribers are required to provide detailed and accurate information to demonstrate conformance with selected criteria in the standard. In Levels 2 and 3 investigations, EPEAT buys or borrows products without the Subscriber's knowledge, disassembles them, and conducts analytical testing if needed to demonstrate conformance to selected criteria.

Investigations are performed by expert technical contractors who are free of conflicts of interest, and their recommended decisions are reviewed and finalized by a five-person panel of independent technical experts (called the Product Verification Committee) 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. The Committee 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 Non-Conformances, either by bringing the product into Conformance, by un-declaring the criterion until Conformance is achieved, or by removing the product from the Registry. (EPEAT recommends that Subscribers also examine other products to determine if these declarations should be corrected as well.) If a Subscriber corrects the Non-Conformance by un-declaring the criterion and the criterion is an optional criterion, they lose that point, and possibly the product drops a rating 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.