

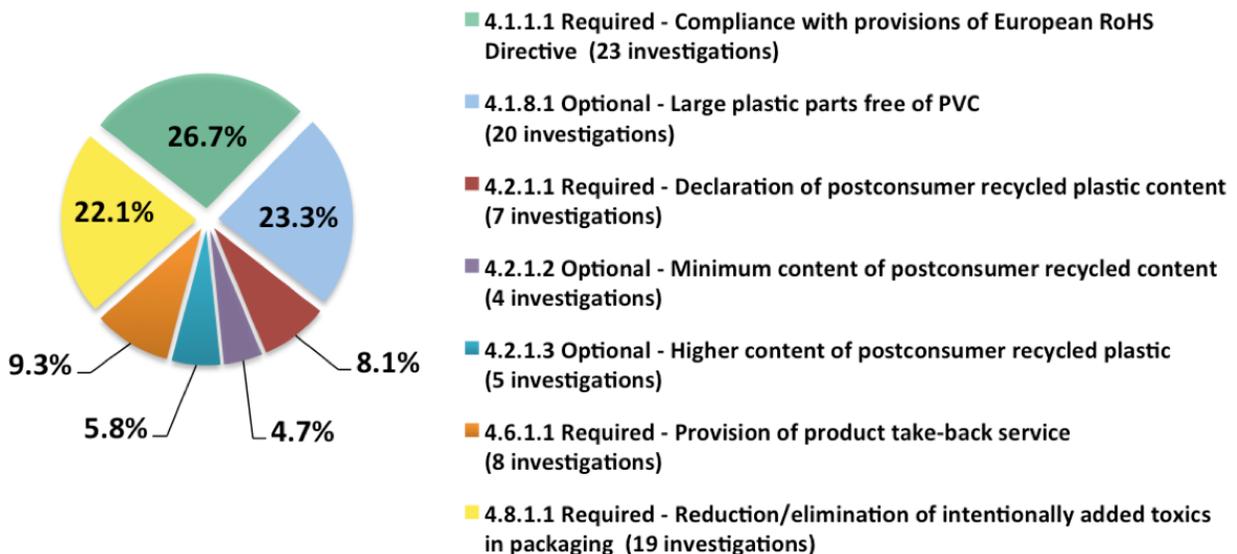


## OUTCOMES REPORT EPEAT VERIFICATION ROUND PC-2013-04

### 1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round PC-2013-04. This Round focused on seven criteria from IEEE 1680.1-2009™ for which Non-Conformances and/or other questions were found during Verification Round PC-2012-06. The Round consisted of a total of 86 investigations (all Level 1), of which 66% were for required criteria and 34% for optional criteria (see Figure 1).

**FIGURE 1: Criteria Investigated in PC-2013-04**  
(as percentages of total investigations completed)



Prior to the beginning of this Round, EPEAT staff examined the number of investigations performed against these criteria in the six months prior to the start of the Round, and the number of Subscribers declaring the optional criteria. A product was not investigated against a particular criterion if that same criterion was verified within the last six months. All remaining Subscribers and product-criterion combinations were considered for inclusion, with consideration of the following:

- All products were included in the selection process for required criteria 4.1.1.1, 4.2.1.1, 4.6.1.1 and 4.8.1.1.
- Only products declaring optional criteria 4.1.8.1, 4.2.1.2 and/or 4.2.1.3 were included in the selection for 4.1.8.1, 4.2.1.2 and/or 4.2.1.3, respectively.
- Only one of criteria 4.2.1.1, 4.2.1.2 and 4.2.1.3 were investigated as applicable for any given product, with a focus on the criterion with the highest percentage.

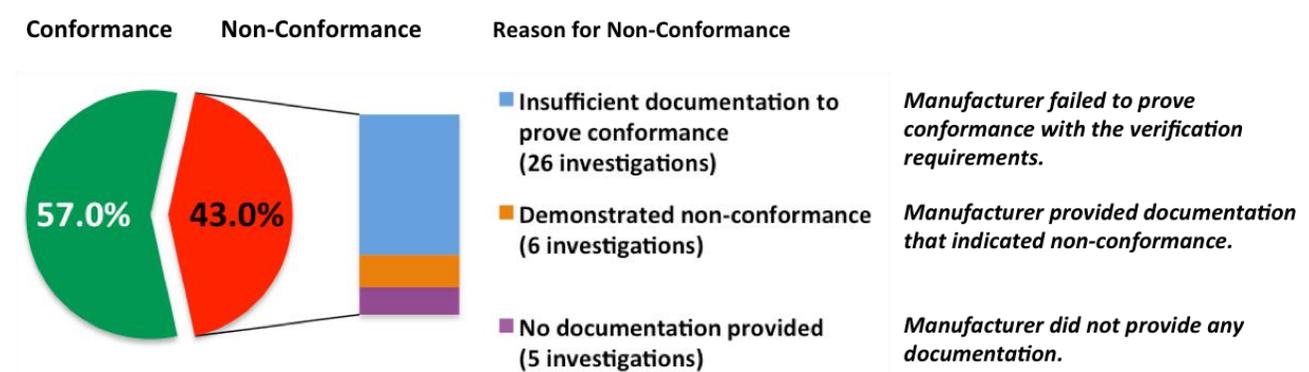
- Subscribers investigated for criterion 4.6.1.2 in Verification Round PC-2013-02 were excluded from investigation of required criterion 4.6.1.1. All remaining Subscribers and product-criterion combinations were considered for inclusion for 4.6.1.1.
- No more than four investigations were performed for each Subscriber.

## 2. Summary of Outcomes

Highlights from this Verification Round are:

- **92** Investigations Planned
- **86** Investigations Completed
- **49** Decisions of Conformance
- **37** Decisions of Non-Conformance  
*(reasons identified in Figure 2)*

**FIGURE 2: Overall Conformance Status for PC-2013-04**  
(as percentages of total investigations completed)



Five investigations were not completed in this Verification Round.

- Two were cancelled because official notice of the round was never received by the Subscriber.
- One was cancelled due to changes in the Registry declaration between when the snapshot was taken and when the Round started.
- Two were cancelled due to a change in Product Registration Entity.

During their review of investigation reports, the Product Verification Committee suspended all investigations against criterion 4.1.8.1 (Optional – Large parts free of PVC) to further examine the verification requirements and data needs to demonstrate conformance. After this deliberation period, the investigations were resumed and Subscribers notified of the Product Verification Committee’s decision. The Product Verification Committee also issued a Clarification on the data requirements for criterion 4.1.8.1. While this Clarification had no impact on the Committee’s decisions, it was issued to provide further guidance for future Verification Rounds.

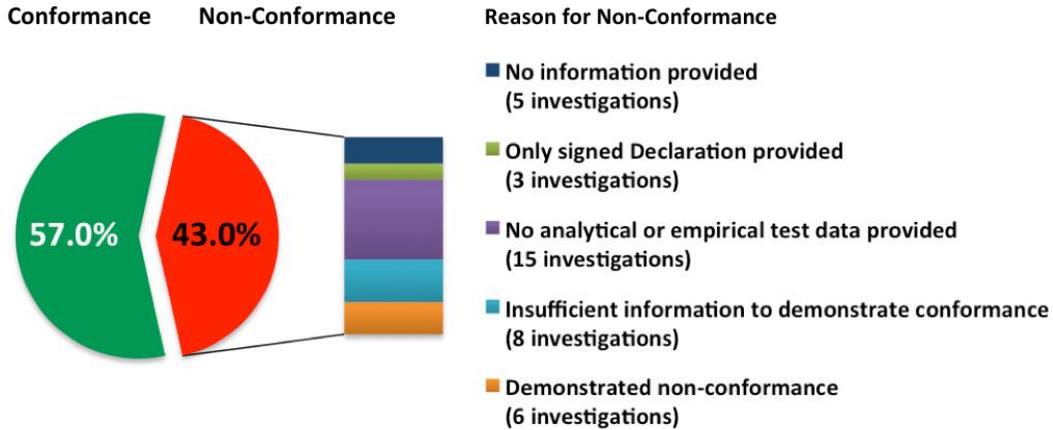
Table 1 illustrates the Non-Conformances by criterion. Of particular note are the higher non-conformance rates for criteria 4.1.8.1, 4.2.1.1 and 4.6.1.1, which may indicate a misunderstanding of the criterion itself or the criterion’s verification requirements.

TABLE 1: Summary of Non-Conformance Findings					
Criterion	Required or Optional	Description	Total Completed Investigations	Non-Conformances	Non-Conformance Rate by Criterion
4.1.1.1	Required	Compliance with provisions of European RoHS Directive upon its effective date	23	5	22%
4.1.8.1	Optional	Large plastic parts free of PVC	20	13	65%
4.2.1.1	Required	Declaration of postconsumer recycled plastic content	7	5	71%
4.2.1.2	Optional	Minimum content of postconsumer recycled plastic	4	1	25%
4.2.1.3	Optional	Higher content of postconsumer recycled plastic	5	1	20%
4.6.1.1	Required	Provision of product take-back service	8	4	50%
4.8.1.1	Required	Reduction/elimination of intentionally added toxics in packaging	19	8	42%

Looking at the Non-Conformances through a different lens reveals several trends (see Figure 3 on the following page).

- Eight of the 37 Non-Conformances found in this Verification Round (representing approximately 22% of all Non-Conformances) were due to the Subscriber either not responding to the request for information or only providing a signed Declaration form.
- Fifteen Non-Conformances (approximately 40% of all Non-Conformances, or approximately 17% of all investigations in the Round) were due to a lack of analytical or empirical test data being provided. Twelve of these were for criterion 4.1.8.1, representing 92% of the Non-Conformances for this criterion.
- Eight Non-Conformances (approximately 22% of all Non-Conformances) were due to the Subscriber providing insufficient information to prove conformance (other than a lack of analytical or empirical test data, as noted in the previous bullet).
- Six of the Non-Conformances (16% of all Non-Conformances) were due to the Subscriber providing evidence demonstrating the criterion’s verification requirements were not being met. Of these, four were related to postconsumer recycled content plastic in the product (criteria 4.2.1.1 and 4.2.1.3), and two related to the provision of a product take-back service (criterion 4.6.1.1).

**FIGURE 3: Further Breakdown of Non-Conformances for PC-2013-04**  
(as percentages of total investigations completed)



In Section 6, Table 2 presents further details on Non-Conformances including the identification of Subscribers and products.

Following the investigation phase, corrective actions were taken to resolve all identified Non-Conformances and restore the accuracy of the EPEAT Registry. The impacts of these corrective actions on the Registry were:

- **11 products** Additional data were provided by the Subscriber, bringing the product into Conformance with the criterion as originally declared.
- **10 products** Archived by EPEAT.
- **11 products** Archived by Subscribers (3 of which were archived prior to the end of the Verification Round).
- **2 products** Subscriber undeclared the non-conformant optional criterion.
- **1 products** Subscriber corrected the declaration on the Registry.
- **2 products** Subscriber became inactive, and all products were removed from the Registry.

### 3. Key Lessons

Listed below are key lessons from this Verification Round that may be useful for future Rounds. Additionally, Subscribers are encouraged to revisit the Conformity Assurance Protocols on their “My Account” page of the Registry to fully understand the information needed for the Product Verification Committee to determine conformance.

**Analytical and empirical test data as evidence of conformance (criteria 4.1.1.1 and 4.1.8.1):**

The verification requirements for criteria 4.1.1.1 and 4.1.8.1, as well as all other criteria in Section 4.1 of IEEE 1680.1-2009, call for “Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance.” Therefore, whether empirical or analytical, results from laboratory testing are required

for these criteria. Subscribers are encouraged to be prepared with this information for Verification Rounds.

Data from component manufacturers (criterion 4.1.8.1):

As identified above, the verification requirements for criterion 4.1.8.1 call for “Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance.” For criterion 4.1.8.1, Subscribers should ensure that evidence provided during a Verification Round shows that one of the following are being tested for the presence of PVC:

- The components themselves,
- Components made from the same resin, and/or
- The resin received by the component manufacturer.

This may be accomplished by various methods, several of which are identified below:

- Laboratory test data on the resin received by the component manufacturer or part fabricator prior to part fabrication or use in the component manufacturing process;
- Empirical test data resulting from the analysis of the plastic material composition of fabricated parts or components coming off a production line, provided the part/component utilizes the same resin from the same resin supplier as the product under investigation;
- Analytical test data from the analysis of the plastic material in the component actually used in the product under investigation.

Packaging materials and printing inks (criterion 4.8.1.1):

Criterion 4.8.1.1 addresses all packaging components, which includes any inks used to print on the packaging materials. During a Verification Round, Subscribers should be prepared to provide evidence (e.g. supplier letters as per the verification requirements, or other information such as analytical test reports) supporting any inks used on a product’s packaging materials.

#### **4. General Message to Subscribers**

Archiving products that are no longer being manufactured:

All products active on the Registry are eligible for inclusion in a Verification Round at any time. If products are no longer being manufactured and the Subscriber is no longer actively working with suppliers on maintaining information related to conformance, Subscribers are encouraged to archive these products. Please note that archived products still appear in the Registry (listed under archived products for each Subscriber) should purchasers or other stakeholders want to access details regarding the product’s previously active registration.

Conformance of products that may share similar traits and/or supply chains:

If a Non-Conformance is found for a particular criterion and product, Subscribers should be prepared to determine if other products on the EPEAT Registry are similarly impacted due to use of similar materials and/or supply chains, and develop corrective action plans to address the future conformance of these other products.

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.

Provision of information for Verification Rounds:

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.

## **5. Looking Forward**

Plans for Future Verification Activities:

Verification Rounds planned for 2014 for 1680.1 (Computers and Displays) 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](http://www.epeat.net).

## 6. Investigations Table

**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
Ace Computers	Vision 8HQTa	United States	Desktops	4.1.1.1	R	Compliance with provisions of European RoHS Directive	Insufficient documentation to prove conformance	Subscriber archived the product
	Vision 8HQSi	United States	Desktops	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	Insufficient documentation to prove conformance	Subscriber archived the product (prior to the end of the Round)
Arquimedes Automacao e Informatica Ltda	Corporativo - B	Brazil	Integrated Desktop Computers	4.2.1.1	R	Declaration of postconsumer recycled plastic content	Demonstrated non-conformance	Subscriber corrected the declaration on the Registry
CIARA-TECH	ENTERPRISE Q87M-EG	Canada	Desktops	4.2.1.2	O	Minimum content of postconsumer recycled content	Insufficient documentation to prove conformance	EPEAT archived the product
	DISCOVERY Q87M	Canada	Desktops	4.6.1.1	R	Provision of product take-back service	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Corporativo Lanix, S.A. de C.V	LX185	Mexico	Displays	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Daten Tecnologia Ltda	DCM1B-4	Brazil	Notebooks	4.6.1.1	R	Provision of product take-back service	Demonstrated non-conformance	Subscriber provided evidence demonstrating Conformance
Dell, Inc.	Dell Precision T1600	Switzerland	Workstation Desktops	4.2.1.1	R	Declaration of postconsumer recycled plastic content	Demonstrated non-conformance	Subscriber archived the product
EIZO Corporation	FlexScan EV2336W	United States	Displays	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	EPEAT archived the product
Fujitsu Limited	ESPRIMO C720	Norway	Desktops	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
	LifeBook P1630	Canada	Notebooks	4.2.1.1	R	Declaration of postconsumer recycled plastic content	Demonstrated non-conformance	Subscriber archived the product (prior to the end of the Round)

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Subscriber	Product	Country	Product Type	Criterion	Required or Optional	Criterion Description	NC Finding Description	Corrective Action Taken
Gammatech Computer Corporation	S15C	United States	Notebooks	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Grace Global, Inc.	Grace Explorer Q2300	United States	Workstation Desktops	4.6.1.1	R	Provision of product take-back service	Insufficient documentation to prove conformance	Subscriber became inactive, and all products removed from the Registry
Inida	M500/2000 AN500.01	Lithuania	Desktops	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Itautec S.A. - Grupo Itautec	Infoway ST 4262 Mini-Tower	Brazil	Desktops	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	EPEAT archived the product
	Infoway Note W7430	Brazil	Notebooks	4.2.1.1	R	Declaration of postconsumer recycled plastic content	No documentation provided	EPEAT archived the product
Komparsa UAB	IS77	Lithuania	Desktops	4.1.1.1	R	Compliance with provisions of European RoHS Directive	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
	S7700	Lithuania	Desktops	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber archived the product
Lenovo	ThinkVision LT2323p Wide	Austria	Displays	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Login Informatica	L4900	Brazil	Desktops	4.6.1.1	R	Provision of product take-back service	Demonstrated non-conformance	Subscriber provided evidence demonstrating Conformance
MMD-Monitors & Displays Taiwan Ltd.	247E3L	Spain	Displays	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
NCS Technologies, Inc.	FOUR4 SFF-I399	United States	Desktops	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber archived the product
NEC Display Solutions, Inc.	MultiSync EX231W	Netherlands	Displays	4.1.1.1	R	Compliance with provisions of European RoHS Directive	Insufficient documentation to prove conformance	Subscriber archived the product

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	EA244WMI-BK (Black)	United States	Displays	4.1.8.1	O	Large plastic parts free of PVC	No documentation provided	EPEAT archived the product
	AS192WM-BK	Canada	Displays	4.2.1.3	O	Higher content of postconsumer recycled plastic	Demonstrated non-conformance	EPEAT archived the product
Panasonic	Toughbook 52	United States	Notebooks	4.1.1.1	R	Compliance with provisions of European RoHS Directive	Insufficient documentation to prove conformance	EPEAT archived the product
Positivo Informática S.A.	POSITIVO ULTRA X8600I	Brazil	Notebooks	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	Insufficient documentation to prove conformance	Subscriber archived the product
Samsung Electronics	Syncmaster S27C650D	Czech Republic	Displays	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
	S20C300BL	Canada	Displays	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	Insufficient documentation to prove conformance	EPEAT archived the product
Semp Toshiba Informatica Ltda.	CS 5248	Brazil	Desktops	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	No documentation provided	EPEAT archived the product
Sony Electronics Inc.	VPCL223FX/B	United States	Integrated Desktop Computers	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber archived the product
TEKNOSERVICE, S.L.	TeknoSlim	Spain	Desktops	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber archived the product
TH ALPLAST	ADS S12	Poland	Desktops	4.1.1.1	R	Compliance with provisions of European RoHS Directive	No documentation provided	Subscriber became inactive, and all products removed from the Registry
Toshiba	Satellite S875 PSKBGC	Canada	Notebooks	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
TPV Technology Limited	E2270SWN	Brazil	Displays	4.2.1.1	R	Declaration of postconsumer recycled plastic content	Insufficient documentation to prove conformance	EPEAT archived the product

**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
Transource	RoadRunner PV10	United States	Notebooks	4.8.1.1	R	Reduction/elimination of intentionally added toxics in packaging	No documentation provided	Subscriber archived the product (prior to the end of the Round)
ViewSonic Corporation	VA916a-LED,VA926m-LED,VG932m-LED/VS15103	Canada	Displays	4.1.8.1	O	Large plastic parts free of PVC	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion

## 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 according to policies and procedures described in documents provided on [www.epeat.net](http://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 their conformance to each criterion of the standard in a timely manner that demonstrates Conformance, such as supply chain management records. In Levels 2 and 3 investigations, EPEAT buys or borrows products without the Subscriber’s knowledge, disassembles them, and conducts detailed analytical testing if needed.

Investigations are performed by expert technical contractors called “Qualified Verifiers” working for an EPEAT approved Product Verification Entity (PRE). Qualified Verifiers 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. Decisions of conformity by the Product Verification Committee are made blind to the identity of the products and companies they are judging, based only 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 also requires that Subscribers examine their other registered 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 tier. If it is a required criterion, they must archive the product. If it is a required corporate criterion, they must archive all of their registered products.