

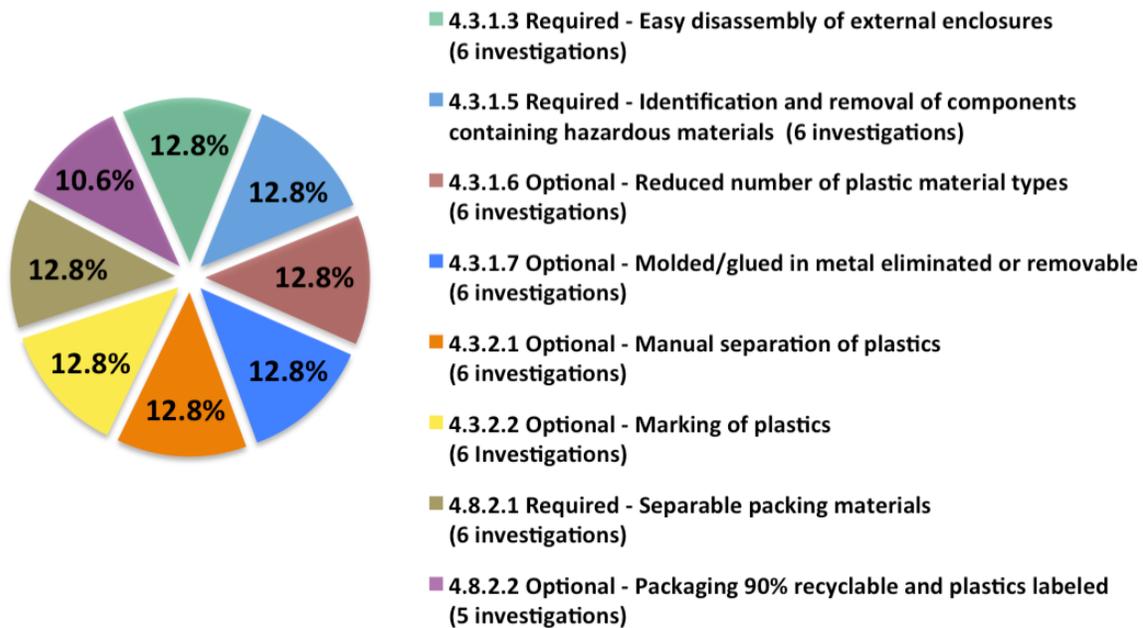


OUTCOMES REPORT EPEAT VERIFICATION ROUND PC-2013-05

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round PC-2013-05. This Round focused on eight criteria from IEEE 1680.1-2009™ for which Level 2 investigations could be performed. Products were purchased without the knowledge or participation of the Subscriber, and disassembled and inspected to verify conformance with the selected criteria. The Round consisted of a total of 47 investigations (all Level 2), of which 38% were for required criteria and 62% for optional criteria (see Figure 1).

FIGURE 1: Criteria Investigated in PC-2013-05
(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. Products that were investigated in the last six months for any of the target criteria were excluded from selection for this Round. All remaining products were considered for inclusion, with consideration of the following:

- EPEAT staff reviewed the Registry to determine which products were claiming at least four of the five optional criteria listed above. Products were then chosen for investigation from this list.
- A range of different product types were selected – two desktops, two notebooks, one integrated desktop and one display. All products must have been available from consumer retailers located in the United States. Only one product was chosen per Subscriber.

2. Summary of Outcomes

Highlights from this Verification Round are:

- **46** Investigations Planned
- **47** Investigations Completed
(One investigation was not launched due to a change in the declaration on the Registry after the Verification Round Plan was approved)
- **40** Decisions of Conformance
- **7** Decisions of Non-Conformance
(Reasons identified in Figure 2)

FIGURE 2: Overall Conformance Status for PC-2013-05
(as percentages of total investigations completed)

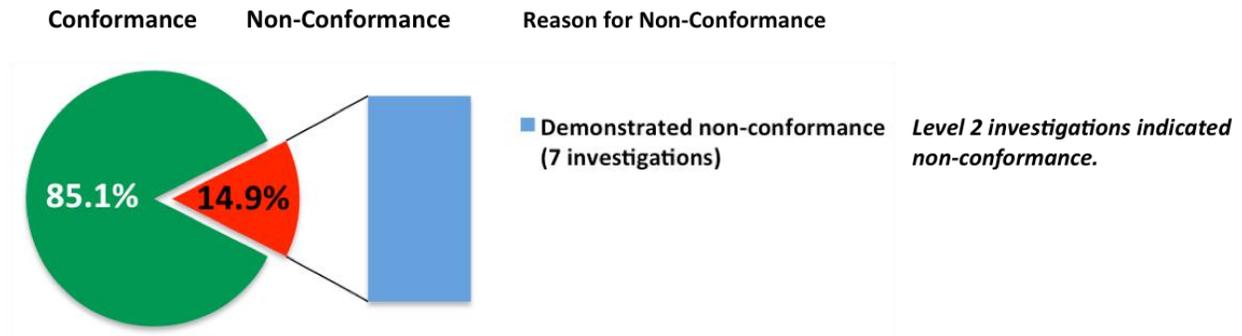


Table 1 illustrates the Non-Conformances by criterion.

TABLE 1: Summary of Non-Conformance Findings					
Criterion	Required or Optional	Description	Total Completed Investigations	Non-Conformances	Non-Conformance Rate by Criterion
4.3.1.3	Required	Easy disassembly of external enclosures	6	0	0%
4.3.1.5	Required	Identification and removal of components containing hazardous materials	6	0	0%
4.3.1.6	Optional	Reduced number of plastic material types	6	1	16.7%
4.3.1.7	Optional	Molded/glued in metal eliminated or removable	6	0	0%
4.3.2.1	Optional	Manual separation of plastics	6	0	0%
4.3.2.2	Optional	Marking of plastics	6	4	66.7%
4.8.2.1	Required	Separable packing materials	6	0	0%
4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	5	2	40%

Looking at the Non-Conformances through a different lens – by the reason for the Non-Conformance – reveals the following trends:

- Four of the seven Non-Conformances found in this Verification Round (representing approximately 57% of all Non-Conformances) were for optional criterion 4.3.2.2, which requires material marking codes in accordance with ISO 11469 on all plastic parts greater than 25 grams. This may indicate a misunderstanding of the criterion itself or the criterion’s verification requirements.
- Two of the Non-Conformances (approximately 29% of all Non-Conformances) were for optional criterion 4.8.2.2. Part of this criterion requires that 90% by weight of packaging materials be either readily recyclable or capable of being composted / disposed in municipal sewage programs.

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:

- **3** investigations Products archived by Subscribers.
- **4** investigations Subscriber undeclared the non-conformant criterion.

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

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.

Marking of plastic components (criterion 4.3.2.2):

Criterion 4.3.2.2 requires the marking of plastic components greater than 25 grams in accordance with the provisions of ISO 11469. This is an optional criterion, and Subscribers are encouraged to work closely with their suppliers to determine if the verification requirements can be met. In particular, ISO 11469 requires reverse angled brackets (the marks “>” and “<”) around the material marking code and designated abbreviations for specific polymers, copolymers and polymer blends.

Packaging materials 90% by weight recyclable (criterion 4.8.2.2):

Criterion 4.8.2.2, in part, requires that 90% by weight of packaging materials be either readily recyclable or compostable/disposable in a municipal waste system. The term “recyclable” is defined as per the U.S. Federal Trade Commission’s *Guides for the Use of Environmental Marketing Claims*, which states that recycling facilities must be available to a substantial majority (i.e., 60%) of consumers or communities.

In order to claim this criterion, the product packaging must meet this requirement for all countries in which the product is registered. During a Verification Round, Subscribers should be prepared to provide country-specific evidence supporting either access to a substantial majority of consumers or existence of a market/use.

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 IEEE 1680 standard 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.

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.

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
Dell, Inc.	OptiPlex 9020 SFF	United States	Desktop	4.3.2.2	Optional	Marking of plastics	Demonstrated non-conformance	Subscriber provided evidence demonstrating conformance (and archived the product until in-store products were depleted)
Sony Electronics Inc.	SVL2414	United States	Desktop	4.3.2.2	Optional	Marking of plastics	Demonstrated non-conformance	Subscriber archived the product
				4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	Demonstrated non-conformance	Subscriber archived the product
Toshiba	TOSHIBA PX35t-A PQQ30U	United States	Integrated Desktop	4.3.2.2	Optional	Marking of plastics	Demonstrated non-conformance	Subscriber undeclared the Non-Conformant criterion
				4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	Demonstrated non-conformance	Subscriber undeclared the Non-Conformant criterion
ViewSonic	ViewSonic VG2239-LED, VG2239m-LED, VG2239m-TAA/VS14768	United States	Display	4.3.1.6	Optional	Reduced number of plastic material types	Demonstrated non-conformance	Subscriber undeclared the Non-Conformant criterion
				4.3.2.2	Optional	Marking of plastics	Demonstrated non-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. 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 other registered products to determine if their 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.