



OUTCOMES REPORT

EPEAT VERIFICATION ROUND PC-2014-04

1. Overview of Verification Round

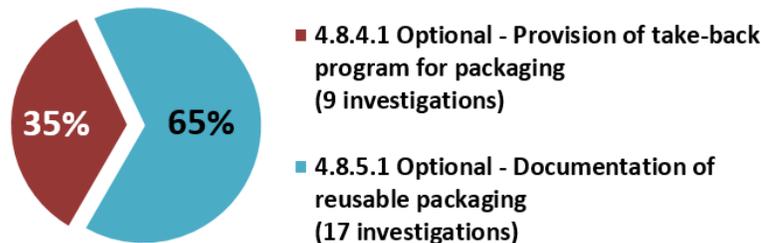
This report provides the detailed results of EPEAT Verification Round PC-2014-04. This Round focused on packaging take-back and reuse, and examined two optional criteria from IEEE 1680.1-2009™ – 4.8.4.1 (Provision of take-back program for packaging) and 4.8.5.1 (Documentation of reusable packaging).

Prior to the beginning of this Round, EPEAT staff examined the number of investigations performed against these two criteria in the six months prior to the start of the Round and the number of Subscribers with products declaring one of the optional criteria. Products were then selected as follows:

- All Subscribers and products were considered for inclusion, with one exception. Products that were investigated in the six months prior to the start of the Round for a target criterion were excluded from selection against that criterion.
- Only products declaring optional criteria 4.8.4.1 and/or 4.8.5.1 were selected for investigation of 4.8.4.1 and/or 4.8.5.1.
- All Subscribers declaring criterion 4.8.5.1 were investigated for that criterion.
- For any single criterion, a Subscriber only had one investigation performed and no Subscriber was subject to more than two investigations during the Round.

In total, 26 Level 1 investigations were completed in Verification Round PC-2014-04 (see Figure 1).

FIGURE 1: Criteria Investigated in PC-2014-04
(as percentages of total investigations completed)



2. Summary of Outcomes

Highlights from this Verification Round are:

- 26 investigations completed
- 13 decisions of Conformance
- 13 decisions of Non-Conformance (*reasons identified in Figure 2*)

FIGURE 2: Overall Conformance Status for PC-2014-04
(as percentages of total investigations completed)

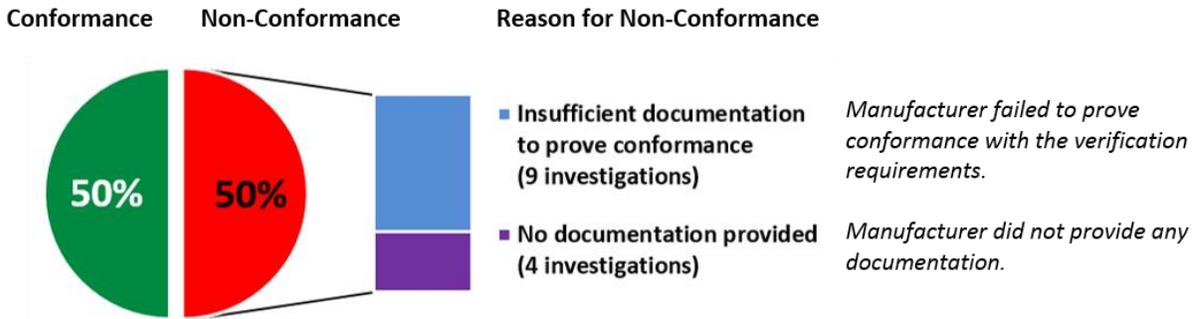


Table 1 illustrates the number of investigations performed and non-conformance rates by criterion. Of particular note is the 71% non-conformance rate for criteria 4.8.5.1, which may indicate a misunderstanding of the criterion itself or the criterion's verification requirements. In fact, twelve of the thirteen Non-Conformances (or 91% of all Non-Conformances) are for criterion 4.8.5.1.

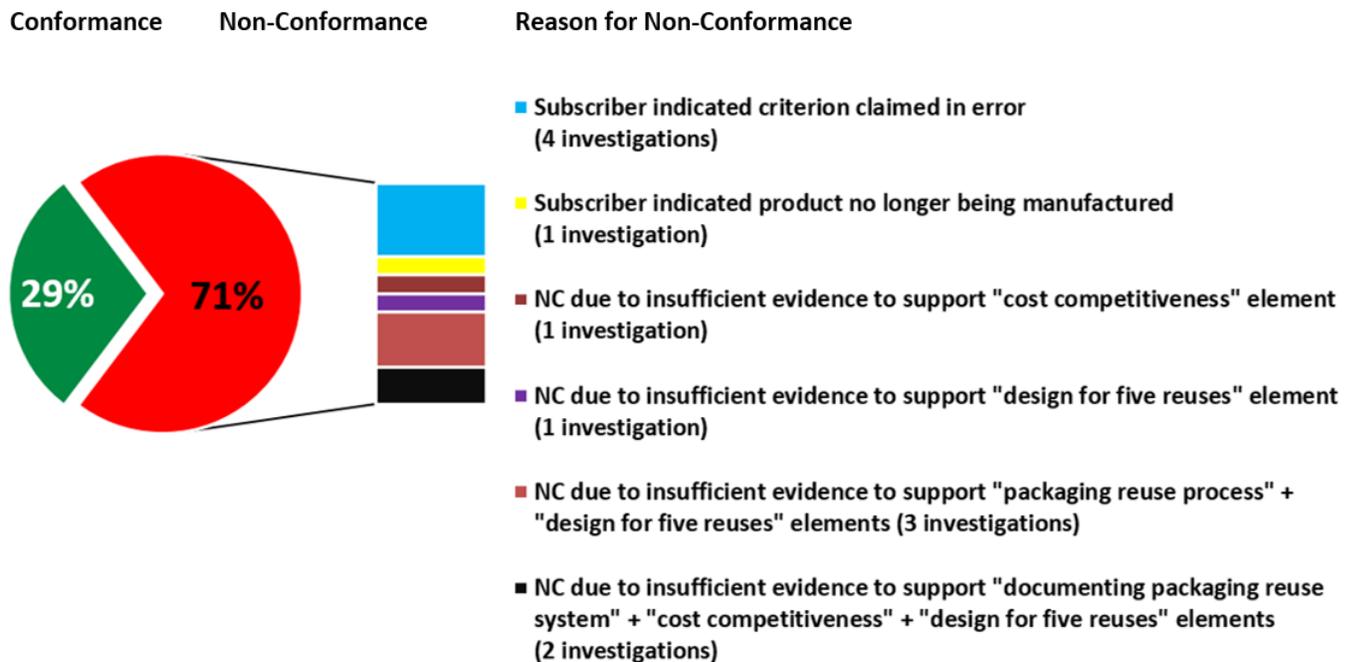
TABLE 1: Summary of Non-Conformance Findings					
Criterion	Required or Optional	Description	Total Completed Investigations	Non-Conformances	Non-Conformance Rate by Criterion
4.8.4.1	Optional	Provision of program for take-back of packaging	9	1	11%
4.8.5.1	Optional	Documentation of reusable packaging	17	12	71%

Examining the Non-Conformances for criterion 4.8.5.1 through a different lens reveals the following breakdown (see Figure 3).

- In four cases of Non-Conformance (or 30% of the Non-Conformances for 4.8.5.1), the Subscriber indicated that criterion 4.8.5.1 had been claimed in error. In three of these investigations, the Subscriber did not provide any information for the investigation.
- For one Non-Conformance, the Subscriber indicated the product was no longer being manufactured and did not provide any information for the investigation.

- Showing conformance with criterion 4.8.5.1 requires that Subscribers provide information that supports the following three key elements: (1) documenting the packaging reuse system or process, (2) the cost-competitiveness of the packaging reuse system, and (3) the packaging itself being designed for a minimum of five reuses. Sixty-four percent of the total Non-Conformances for criterion 4.8.5.1 (or seven of the 11 Non-Conformances) were due to insufficient evidence being provided to support one or more of these elements.
 - For one Non-Conformance, insufficient evidence was provided to support the “cost competitiveness” element.
 - For one Non-Conformance, insufficient evidence was provided to support the “packaging being design for five reuses” element.
 - For three Non-Conformances, insufficient evidence was provided to support the “packaging being designed for five reuses” and the “documenting the packaging reuse system” elements.
 - For two Non-Conformances, insufficient evidence was provided to support any of the three key element.

FIGURE 3: Breakdown of Non-Conformances for Criterion 4.8.5.1
(as percentages of total investigations performed against 4.8.5.1)



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

Following the investigation phase, the following corrective actions were taken to resolve all identified Non-Conformances and restore the accuracy of the declarations:

- **3 products** Additional data provided by Subscribers, bringing the products into Conformance with the criterion as originally declared.
- **9 products** Non-conformant criterion undeclared by Subscribers.
- **1 product** Archived by Subscriber.

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.

Documenting the packaging reuse process/system (criterion 4.8.5.1):

Criterion 4.8.5.1 is focused on packaging reuse and the associated process/system, as opposed to packaging take-back (which is specifically addressed by criterion 4.8.4.1). A packaging reuse system may rely on purchasers returning their packaging materials for reuse; however, documentation supporting 4.8.5.1 must also include details on the packaging reuse process itself. This could include, but is not limited to: a description of the packaging reuse system; internal packaging reuse procedures; photographs illustrating packaging reuse activities; description of how a purchaser can participate in the system. Subscribers should be prepared with this type of information for a Verification Round.

Packaging designed for a minimum of five reuses (criterion 4.8.5.1):

A key element of criterion 4.8.5.1 is “*Manufacturer designs packaging for a minimum of five reuses.*” While this implies that the packaging materials must be strong and durable, the statement specifically identifies the “design” of the packaging. Documentation (e.g. material composition specifications, dimensional strength records, results of compression and crush test analyses, supplier declarations, etc.) will only be sufficient if it addresses this design element. Subscribers are encouraged to work with their packaging supplier and be prepared with this information for Verification Rounds.

Cost-competitiveness of packaging reuse system (criterion 4.8.5.1):

Criterion 4.8.5.1 requires that the packaging reuse system be provided at a competitive price to users. During a Verification Round, Subscribers should be prepared to provide documentation that supports at least one of the following:

- A product with reusable packaging is sold at no additional cost or at a competitive cost when compared with the same product in non-reusable packaging.
- The packaging reuse system is competitively priced with similar systems offered by other organizations.
- The packaging reuse system is offered at no additional cost (i.e. a free offering).

4. General Message to Subscribers

Understanding documentation requirements for Verification Rounds:

[EPEAT's Online Learning Center](#) has pre-recorded training modules for every criterion in the 1680.1 standard. These modules are designed to de-mystify the standard's requirements, and to illustrate the types of information needed during a Verification Round. Subscribers are encouraged to access these modules on EPEAT's Online Learning Center. If you do not yet have access to the Learning Center, please contact [Andrea Desimone](#).

Provision of information during Verification Rounds:

The IEEE 1680 standard and the EPEAT Subscriber agreement require that Subscribers provide the information identified in Verification Requirements to prove the accuracy of their declarations within 30 days of EPEAT's request. Subscribers are reminded that 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 procedure also helps the Qualified Verifier know that s/he has a valid email address.

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.

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 strongly 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.

5. Looking Forward

Plans for Future Verification Activities:

There are four Verification Rounds planned for 2015 for 1680.1 (Computers and Displays). These Rounds 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
Ace Computers	Vision 9H77SS	United States	Desktops	4.8.5.1	O	Documentation of reusable packaging	No documentation provided	Subscriber archived the product
Acer Inc.	TravelMate P455	France	Notebooks	4.8.4.1	O	Provision of take-back program for packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
Action S.A.	SIERRA 300G	Poland	Desktops	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
CIARA-TECH	CIARATECH DISCOVERY H81M-DA	Canada	Desktops	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
Ilhaservice Servicos de Informatica Ltda.	IWQ9000	Brazil	Desktops	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
Komparsa UAB	IS85	Lithuania	Desktops	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
Lenovo	ThinkCentre M73z	Sweden	Integrated Desktop Computers	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
MMD-Monitors & Displays Taiwan Ltd.	241B4L	Luxembourg	Displays	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
NEC Display Solutions, Inc.	EA294WMI (Black)	Lithuania	Displays	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber undeclared the Non-Conformant criterion
Samsung Electronics	S32D850T	United States	Displays	4.8.5.1	O	Documentation of reusable packaging	No documentation provided	Subscriber undeclared the Non-Conformant criterion
TH ALPLAST	S25	Poland	Desktops	4.8.5.1	O	Documentation of reusable packaging	Insufficient documentation to prove conformance	Subscriber provided evidence demonstrating Conformance
TPV Technology Limited	e1621Swb	Brazil	Displays	4.8.5.1	O	Documentation of reusable packaging	No documentation provided	Subscriber undeclared the Non-Conformant criterion
Transource	MIR-Q900U	United States	Desktops	4.8.5.1	O	Documentation of reusable packaging	No documentation provided	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 Registry at the time the Verification Round begins.

In Level 0 investigations, Qualified Verifiers attempt to establish Conformance by examining publicly available information only – no products are obtained and Subscribers are not asked to submit documentation. If a Qualified Verifier is unable to establish conformance based on publicly available information, the investigation proceeds to Level 1. In Level 1 investigations, Subscribers are required to provide detailed and accurate information to demonstrate their conformance to a selected criterion in a timely manner. In Levels 2 and 3 investigations, EPEAT buys or borrows products without the Subscriber’s knowledge, disassembles them, and has detailed analytical testing conducted, 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.