



## Green Electronics Council

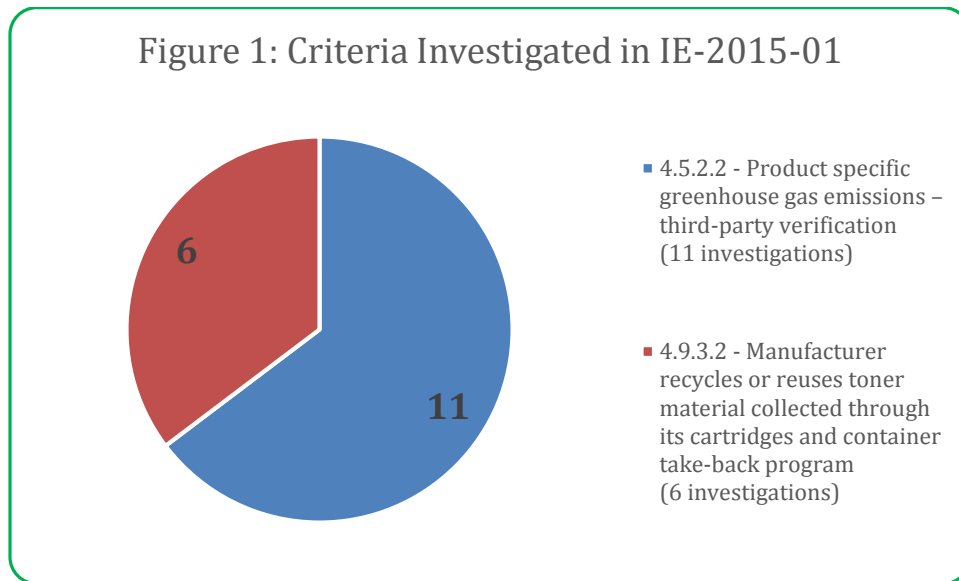
227 SW Pine Street, Suite 300 • Portland, OR 97204 • V: (503) 279-9382 • F: (503) 279-9381 • www.epeat.net

# OUTCOMES REPORT

## EPEAT VERIFICATION ROUND IE-2015-01

### 1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round IE-2015-01. This Round focused on two optional criteria: 4.5.2.2 - Product specific greenhouse gas emissions – third-party verification or making LCA assessment publicly available and 4.9.3.2 - Manufacturer recycles or reuses toner material collected through its cartridges and container take-back program. These criteria were chosen due to apparent confusion regarding these criteria. Figure 1 shows the number of investigations for the two criteria which were completed.



In total, 17 investigations were completed using Level 0 investigations. In cases where the result of the investigation was inconclusive, Level 1 investigations were completed. Products were chosen randomly using the following hierarchy:

- For the criteria listed, one product claiming both 4.5.2.2 and 4.9.3.2 was chosen randomly for all Manufacturers declaring to these criteria.
- If a Participating Manufacturer did not have a product claiming both Optional criteria, products were chosen randomly from lists of products claiming each individual criterion.
- No more than two investigations were performed for any one Manufacturer.

## 2. Summary of Outcomes

Highlights from this Verification Round are:

- 17 investigations completed
- 16 decisions of Conformance
- 1 decision of Non-Conformance (due to missing information on website)

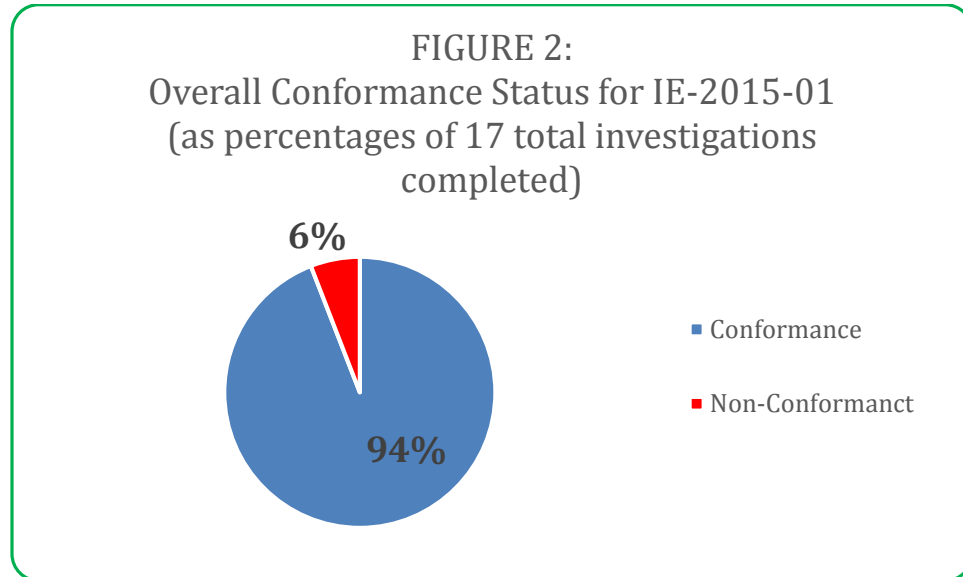


Table 1 summarizes the number of investigations performed and Non-Conformance by criterion.

TABLE 1: Summary of Non-Conformance Findings					
Criterion	Description		Completed Investigations	Non-Conformances	Non-Conformance Rate
4.5.2.2	Optional	Product specific greenhouse gas emissions – third-party verification or making LCA assessment publicly available	11	0	100%
4.9.3.2	Optional	Manufacturer recycles or reuses toner material collected through its cartridges and container take-back program	6	1	16.6%

### 2.1. Summary of Outcomes: Action to Restore Conformance

In Section 6, Table 2 presents further details on the Non-Conformance. Normally, this

information would include the identification of Manufacturer and product. However, since this was the first time the Non-Conforming criterion has ever been verified, the Manufacturer and product will not be shared. Following the investigation phase, corrective action was taken to resolve the identified Non-Conformance and restore the accuracy of the declaration:

- 1 product Website updated by Manufacturer, bringing the products into Conformance with the criterion as originally declared.

### 3. Key Lessons

#### **Specific requirements for Criterion 4.5.2.2:**

In the declaration software, criterion 4.5.2.2 requires manufacturers to claim whether they meet the third-party verification requirement or the requirement to make the LCA assessment summary publicly available and submitted to a national database or both. Manufacturers should only claim the applicable requirement(s). Verification of this criterion is done against whichever requirements are chosen in the declaration. In the future, if both requirements are claimed to be met, both requirements will be verified and both must be proven in order to receive a Conformance. Please check your declaration for criterion 4.5.2.2 to ensure that it is correct. Refer to Clarification 32 for more information on meeting this criterion.

#### **Specific requirements for Criterion 4.9.3.2:**

Information required to prove Criterion 4.9.3.2 includes all of the following:

- Definitive statement that toner material collected is reused or recycled
- Definitive statement that no toner is disposed of via landfill or incineration
- Definitive statement of how much disposal happens through waste to energy and, if greater than 25% waste to energy, documentation supporting this exception
- Tonnage information regarding disposition of toner material
- Definitive publicly available statement on manufacturer's website confirming conformance with the requirements of this criterion.

#### **Provision of information during Verification Rounds:**

The IEEE 1680 standard and the EPEAT Manufacturer agreement require that Manufacturers provide the information identified in Verification Requirements to prove the accuracy of their declarations within 30 days of EPEAT's request. Manufacturers are reminded that failure to provide this information is inconsistent with the agreement and may result in termination of the Manufacturer from EPEAT.

### 4. General Message to Manufacturers

#### **Understanding documentation requirements for Verification Rounds:**

[EPEAT's Online Learning Center](#) has pre-recorded training modules for every criterion in the 1680.2 standard. These modules are designed to de-mystify the standard's requirements, and to illustrate the types of information needed during a Verification Round. Manufacturers 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](#).

**Initial response to Auditors:**

When contacted regarding participation in a Verification Round, Manufacturers should respond to the Auditor 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 Auditor know that the e-mail address is valid.

**Archiving products that are no longer being manufactured:**

All products active on the EPEAT Registry are eligible for inclusion in a Verification Round at any time. If a product is no longer being manufactured and the Manufacturer is no longer actively working with suppliers on maintaining information related to conformance, the Manufacturer is strongly encouraged to archive this product. Please note that archived products still appear in the Registry (listed under archived products for each Manufacturer) 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, Manufacturers 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.

## **5. Looking Forward**

**Plans for Future Verification Activities:**

There are three Verification Rounds planned for 2016 for 1680.2 (Imaging Equipment). 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](http://www.epeat.net).

## 6. Investigations Table

**TABLE 2: Specific Non-Conformance Finding and Corrective Action Taken**

Participating Manufacturer	Product	Country	Product Type	Criterion	Required or Optional	Criterion Description	NC Finding Description	Corrective Action Taken
Since this is the first time this criterion has ever been verified, the manufacturer will not be shared.	Since this is the first time this criterion has ever been verified, the product will not be shared.	United States	Multifunction Device (MFD)	4.9.3.2	Optional	Manufacturer recycles or reuses toner material collected through its cartridges and container take-back program	Required information was not publicly available.	Manufacturer updated publicly available website to include all required information.

## 7. Background

To assure the credibility of the EPEAT Registry, verification of the claims by Participating Manufacturers 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). Manufacturers 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.

Investigations are performed by expert technical contractors called Auditors working for a Conformity Assurance Body approved by the Green Electronics Council (GEC). Auditors 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 Conformity Decision Panel) who are also contractors free of conflicts of interest. Decisions of conformity by the Conformity Decision Panel are made blind to the identity of the products and companies they are judging, based only on evidence collected and analyzed by Auditors. 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.

- In a Level 0 investigation, an Auditor assesses Conformance to a criterion by examining publicly available information only – no products are obtained for inspection or testing, and the Manufacturer is not asked to submit documentation. If the publicly available information is inconclusive (i.e. was not available, could not be found from public sources, or did not provide enough details to determine conformance), the Auditor may be instructed to proceed with a Level 1 investigation.
- In a Level 1 investigation, an Auditor assesses Conformance to a criterion by examining information submitted by a Manufacturer. The Manufacturer is required to provide detailed and accurate information in a timely manner.
- In Level 2 investigations, the Conformity Assurance Body obtains a product without the Manufacturer's knowledge or involvement, and has the product disassembled and inspected to assess conformance with one or more criteria.
- In Level 3 investigations, the Conformity Assurance Body obtains a product without the Manufacturer's knowledge or involvement, and has the product analytically tested to assess conformance with one or more criteria.

Manufacturers 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. The Green Electronics Council also requires that Manufacturers examine other registered products to determine if their declarations should be corrected as well. If a Manufacturer 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.