EPEAT, Inc.

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VERIFICATION PLAN:
IMAGING EQUIPMENT – ROUND IE-2015-03
NOVEMBER 2015

I. PURPOSE AND CONTENTS OF THIS DOCUMENT

This document outlines the plan for a round of verification investigations to be performed in accordance with EPEAT process document QP-02, rev. 1, this verification plan, and other governing documents.

II. APPLICABLE STANDARDS

IEEE 1680.2™-2012

III. SELECTION OF CRITERIA AND PRODUCTS FOR VERIFICATION

Verification Round IE-2015-03 for the IEEE 1680.2™ Standard for the Environment Assessment of Imaging Equipment will focus on Level 0 and Level 1 investigations. The Verification Round will target four criteria: 4.6.1.2, 4.6.2.1, 4.6.2.2 and 4.9.3.2 plus randomly chosen criteria such that all Manufacturers are investigated at least once in this Verification Round. No Manufacturer will be involved in more than 3 investigations in this Verification Round.

The specific criteria to be investigated are as follows:

- 4.6.1.2 Optional – Provision of take-back service for broader scope of products
- 4.6.2.1 Required – End-of-life processing requirements
- 4.6.2.2 Optional – Certification of programs exempt from end-of-life processing requirements
- 4.9.3.2 Optional – Manufacturer recycles or reuses toner material collected through its cartridge and container take-back program
- Randomly chosen criteria.

Note: Clarifications have been issued for 4.6.1.2, 4.6.2.1 and 4.6.2.2. Since 4.6.2.2 has not yet been verified, GEC will not make the results of investigations for 4.6.2.2 public and instead will use the investigations as a way to ensure clarity around a very complex criterion.

This Round will include up to 28 Level 0 and 1 investigations. A Level 0 investigation involves the Auditor establishing Conformance based on publicly available information, as applicable. A Level 1 investigation involves a review of EPEAT Participating Manufacturer (Manufacturer) submissions. All active Conformity Assurance Bodies (CABs) and Manufacturers will be considered for selection in this Round. If a Manufacturer has already received a decision of Conformance during the past year for one of the criteria in a different Verification Round, they will not be verified again for the same criteria.

The Investigations will be chosen as follows:

- For 4.6.2.1, all Manufacturers claiming this point in Canada will be investigated. This investigation arises from known recycler closures in Canada.
- For the other criteria listed, products will be chosen randomly from all Manufacturers declaring to each criterion.
- After the above selections have been made, criteria and products for the remaining investigations will be chosen at random such that each Manufacturer is investigated at least once in this Verification Round.
- The Verification Round will proceed in accordance with the current procedures, as outlined below.

1. The Green Electronics Council (GEC) will take a "snapshot" of the Registry. Products will be selected as per this document.

<u>Level 0 Investigations:</u>

2. GEC will instruct CABs (if applicable – see Section IV) to proceed with the Level 0 investigations for criteria 4.6.1.2 and 4.9.3.2.
3. The CABs will instruct their Auditors to proceed with the assigned Level 0 investigations and to prepare Investigation Reports recommending Conformance, Non-conformance or Inconclusive. The CABs will ensure the Reports are clear, complete and where applicable, supported by evidence. The CABs will then forward the Reports to the GEC.
4. The Conformity Decision Panel will review the Level 0 Reports and provide a conformity decision. The products and Manufacturers will not be disclosed to the Conformity Decision Panel, as the Panel must be blind to the specific product and Manufacturer for which they are making conformity decisions.
   - For a decision of Conformance, no further Manufacturer action will be required.
   - For a decision of Non-conformance, the Manufacturer will move into the Corrective Action Phase and be required to take corrective action within 14 calendar days to restore the accuracy of the EPEAT Registry. The start of this Corrective Action Phase will coincide with the launch of Level 1 investigations for criteria 4.6.1.2 and 4.9.3.2 and other criteria target in the Round.
   - For a decision of Inconclusive, a Level 1 investigation will be launched. This will coincide with the launching of the Level 1 investigations for all other criteria in the Round.

<u>Level 1 Investigations and Corrective Action Phase for Applicable Level 0 Investigations:</u>

5. GEC will publish the Verification Round Plan on epeat.net, and launch the Level 1 portion of the Verification Round. GEC will instruct the participating CABs to proceed with Level 1 investigations – both those arising from Level 0 investigations and those pre-planned Level 1 investigations.

6. The CABs will notify subject Manufacturers that their product is being investigated in a Level 1 investigation and, if applicable, send the Level 0 Investigation Report. Where appropriate, the CABs will proceed with the Level 1 investigations and/or the Corrective Action Phase as applicable.
7. As per the Manufacturer's Agreement for Level 1 investigations, Manufacturers will have 30 days to provide required documentation supporting their declarations, and GEC will strictly adhere to this schedule.
8. The Auditors will perform the Level 1 investigations as assigned within 30 calendar days, and prepare an Investigation Report for each investigation, recommending conformance or nonconformance. Where applicable, these Reports will also incorporate a description of the Level 0 activities.
9. CABs will review all Level 1 Investigation Reports to ensure they are clear and complete and the evidence supports the recommendation, and will forward the Reports and supporting evidence to GEC. At the same time, CABs will forward the Reports (without the final Conformity Decision Panel's decision) to the subject Manufacturers.
10. The Conformity Decision Panel will review the reports and make a decision regarding conformity. The products and Manufacturers will not be disclosed to the Conformity Decision Panel, as the Panel must be blind to the specific product and Manufacturer for which they are making conformity decisions.
11. CABs will inform the subject Manufacturers of the Conformity Decision Panel's conformity decision. For decisions of Non-Conformance, Manufacturers are required to take corrective action within 14 calendar days to restore the accuracy of the EPEAT Registry.
12. GEC will publish a "Verification Round Outcomes Report" identifying the nonconforming products and Manufacturers, as well as the action taken to restore accuracy of the Registry.

IV. CONFORMITY DECISION PANEL

Following are the members of the Conformity Decision Panel:

- Libby Chaplin, CEO, Arcadian Solutions
- Patty Dillon, Dillon Environmental Associates
- Jack Geibig, President, Ecoform
- Robert Pfahl, Pfahl Consulting L.L.C.
- Annette Roesler, Ph.D., Independent Professional Chemist

V. CONFORMITY ASSURANCE BODIES AND AUDITORS

All investigations will be conducted by Auditors working for their respective Conformity Assurance Body (CAB). The following Conformity Assurance Bodies will be included in this plan's investigations:

- DEKRA CAB

- Intertek CAB
- Green Electronics Council CAB
- ULE CAB

VI. VERIFICATION ROUND PLAN APPROVAL

Round Plan approved by Conformity Decision Panel via e-mail and CDP meeting on November 6, 2015.

VII. IMAGING EQUIPMENT PRODUCTS VERIFICATION ROUND IE-2015-03 INVESTIGATIONS

	Criterion		Verification Selection and Process	# Planned Investigations
1	4.6.1.2	Optional – Provision of take-back service for broader scope of products	• Corporate criterion. • Level 0 investigation: Auditor checks publicly available information to determine Conformance. • If Conformance cannot be verified via Level 0 investigation, Verification Round will also include Level 1 investigation.	Up to 12
2	4.6.2.1	Required – End-of-life processing requirements	• Corporate criterion. • Criterion verified using Level 1 investigation. • Canada only.	3
3	4.6.2.2	Optional – Certifications of programs exempt from end-of-life processing	• Corporate criterion. • Criterion verified using Level 1 investigation.	1
4	4.9.3.2	Optional – Manufacturer recycles or reuses toner material collected through its cartridge and container take-back program	• Corporate criterion. • Level 0 investigation: Auditor checks publicly available information to determine Conformance. • If Conformance cannot be verified via Level 0 investigation, Verification Round will also include Level 1 investigation.	8
5	Random	Required or Optional	• Criteria chosen at random.	Up to 4
			Total	**Up to 28**