



Green Electronics Council

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OUTCOMES REPORT

EPEAT VERIFICATION ROUND PC-2015-04

1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round PC-2015-04. This Round focused on two categories of criteria:

- **Targeted criteria:** This category included criteria for which, in a previous investigation, corrective actions did not fully address other registered products potentially impacted by the issue causing the non-conformance. Specific Manufacturers were targeted for Level 1 investigations of the following criteria: 4.1.4.1 (Optional – Elimination of intentionally added lead in certain applications); 4.1.7.1 (Optional – Batteries free of lead, cadmium, and mercury); and 4.3.1.9 (Optional – Minimum 90% reusable/recyclable).
- **Criteria not targeted in a Round in the previous 24 months:** This category investigated products declaring criteria 4.5.2.1 (Optional – Renewable energy accessory available) and 4.7.2.1 (Required – Self-certified environmental management system for design and manufacturing organizations). Verification activities for criterion 4.5.2.1 used Level 0 investigations, followed by Level 1 investigations where necessary. Verification activities for criterion 4.7.2.1 used Level 1 investigations only.

In Level 0 investigations, Auditors assess Conformance by examining publicly available information only – no products are dismantled or tested, 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 Level 1 investigations, Auditors assess Conformance by examining information submitted by a Manufacturer.

Products were selected for investigation as follows:

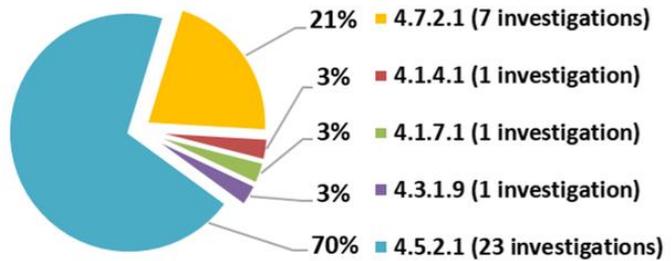
- **Targeted criteria:** The Green Electronics Council's Registry Services staff examined the number of investigations performed in the previous twelve months for which corrective actions did not address other potentially impacted products. After this initial filtering, three investigations were specifically targeted for 4.1.4.1, 4.1.7.1, and 4.3.1.9.
- **Criteria not targeted in a Round in the previous 24 months:** For each of 4.5.2.1 and 4.7.2.1, all products declaring the criterion were considered for inclusion with one exception. Products investigated against the criterion 4.5.2.1 within the previous six months were excluded from investigation against that criterion. Products were then randomly selected with consideration of the following:

- Only products declaring 4.5.2.1 were selected for investigation of 4.5.2.1. All Manufacturers declaring criterion 4.5.2.1 had one investigation performed.
- Only products declaring 4.7.2.1 and not 4.7.2.2 (Optional – Third-party certified environmental management system for design and manufacturing organizations) were selected for investigation of 4.7.2.1. All Manufacturers declaring 4.7.2.1 and not 4.7.2.2 had one investigation performed.
- No more than four investigations in total were performed for any one Manufacturer.

In total, thirty-three Level 1 investigations were completed, of which 7 investigations (roughly 21%) were for required criterion 4.7.2.1 and 26 investigations (roughly 79%) for the optional criteria 4.1.4.1, 4.1.7.1, 4.3.1.9 and 4.5.2.1.

Note that all Level 0 investigations for criterion 4.5.2.1 resulted in Inconclusive findings, and therefore proceeded to Level 1.

FIGURE 1: Criteria Investigated in PC-2015-04
(as percentages of 33 total investigations completed)



2. Summary of Outcomes

Highlights from this Verification Round are:

- **33** investigations completed
- **19** decisions of Conformance
- **14** decisions of Non-Conformance (*reasons identified in Figure 2 below*)

FIGURE 2: Overall Conformance Status for PC-2015-04
(as percentages of 33 total investigations completed)

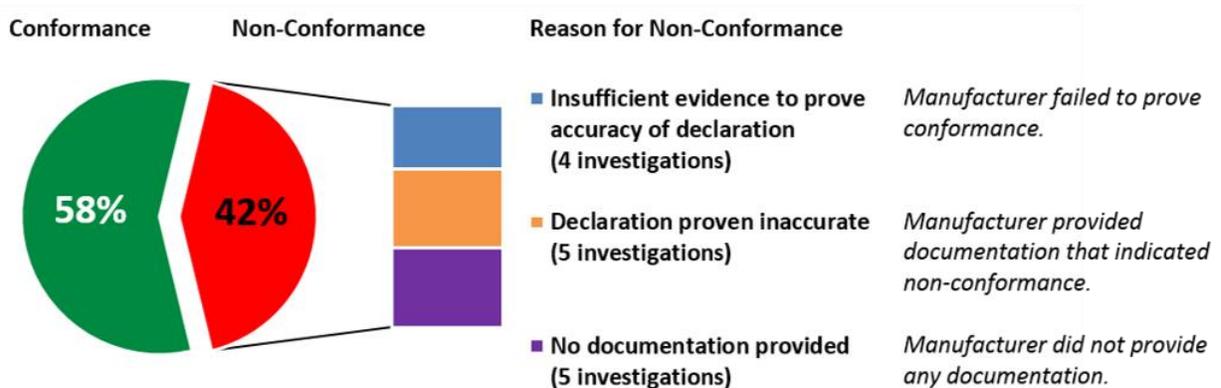


Table 1 summarizes the number of investigations performed and Non-Conformances by criterion.

TABLE 1: Summary of Non-Conformance Findings					
Criterion	Description		Completed Level 1 Investigations	Non-Conformances	Non-Conformance Rate
4.1.4.1	Optional	Elimination of intentionally added lead in certain applications	1	0	0%
4.1.7.1	Optional	Batteries free of lead, cadmium, and mercury	1	1	100%
4.3.1.9	Optional	Minimum 90% reusable/recyclable	1	1	100%
4.5.2.1	Optional	Renewable energy accessory available	23	8	35%
4.7.2.1	Required	Self-certified environmental management system for design and manufacturing organizations	7	4	57%

2.1 Summary of Outcomes: Further Examination of Non-Conformances

Looking more closely at the Non-Conformances in this Verification Round reveals the following:

- Approximately 36% of the Non-Conformances (five of the 14 Non-Conformances) resulted from the declaration in the Registry being proven inaccurate. Four of these were for criterion 4.5.2.1 and one for criterion 4.7.2.1.
- Approximately 36% of the Non-Conformances (five of the 14 Non-Conformances) resulted from the Manufacturer not providing any information. Two of these investigations were for criteria targeted due to suspected Non-Conformances (4.1.7.1 and 4.3.1.9). Another two were for a Manufacturer that subsequently left the Registry. The final investigation was for 4.7.2.1.
- Approximately 28% of the Non-Conformances (four of the 15 Non-Conformances) resulted from the Manufacturer providing insufficient information. One of these was for criterion 4.7.2.1 and the remaining three for criterion 4.5.2.1. In all three cases for 4.5.2.1, no information was provided to show the renewable energy accessory could be purchased at the same time as purchasing the product under investigation.

For further insights, see Section 3 on Key Lessons.

2.2 Summary of Outcomes: Actions to Restore Conformance

In Section 6, Table 2 presents further details on Non-Conformances including the identification of Manufacturers and products. Following the investigation phase, corrective actions were taken to resolve all identified Non-Conformances and restore the accuracy of the declarations:

- 3 products Additional information provided by Manufacturers, bringing the products into Conformance with the criterion as originally declared.
- 5 products Non-conformant declarations unselected by Manufacturers.
- 2 products Products archived by Manufacturer.
- 1 product Product archived by GEC.
- 1 products Product under investigation archived by Manufacturer, and all other active products in the EPEAT Registry archived by GEC.
- 2 products Manufacturer left the Registry before the Corrective Action Phase, therefore all products archived by GEC.

3. Key Lessons

Renewable energy accessory available for purchase with the product (criterion 4.5.2.1):

Criterion 4.5.2.1 states “Accessory for powering product using renewable energy shall be commercially available for purchase with the product.” Showing conformance requires that Manufacturers provide information to support that the renewable energy accessory: (1) is commercially available; (2) is capable of powering a typical duty cycle of the product type under investigation; and (3) can be purchased at the same time as purchasing the product.

For item (3), [Clarification 3-1](#) indicates that purchasers must be able to buy the accessory directly from the EPEAT-participating Manufacturer and not from a third party, although the accessory may actually be provided by a third-party. During a Verification Round, Manufacturers should be prepared to provide information supporting this.

Self-certified environmental management system (criterion 4.7.2.1):

Showing conformance with criterion 4.7.2.1 requires that Manufacturers provide evidence of “self-certification” to either ISO 14001 or the Eco-Management and Audit Scheme (EMAS). During a Verification Round, Manufacturers should be prepared to provide information such as:

- An ISO 14001 or EMAS certificate of accreditation, or
- An internal or independent audit report including any corrective actions and how these have been addressed, and/or
- Other detailed documentation indicating exactly how the requirements are met (e.g. copy of EMS, internal meeting minutes, corrective actions, internal auditor credentials, etc.).

Manufacturers are reminded that 4.7.2.1 is a required corporate criterion. Failure to show conformance to this criterion during a Verification Round may result in all products being removed from the EPEAT Registry.

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 1680.1 standard. These modules are designed to de-mystify the standard's requirements, and to illustrate the types of information needed during a Verification Round. 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 the e-mail address is valid.

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. Failure to provide such information may result in future targeted investigations.

5. Looking Forward

Plans for Future Verification Activities:

There are four Verification Rounds planned for 2016 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

Participating Manufacturer	Product	Country	Product Type	Criterion	Required or Optional	Criterion Description	NC Finding Description	Corrective Action Taken
Ace Computers	Vision 9B75SS	United States	Desktops	4.3.1.9	O	Minimum 90% reusable/recyclable	No documentation provided	Manufacturer archived the product
	LogiCAD 490	United States	Workstation	4.5.2.1	O	Renewable energy accessory available	Insufficient evidence to prove accuracy of declaration	GEC archived the product
Acer Inc.	B326HK	Canada	Display	4.5.2.1	O	Renewable energy accessory available	Insufficient evidence to prove accuracy of declaration	Manufacturer provided evidence demonstrating Conformance
Arquimedes Automação e Informática Ltda	Fortress Gold	Brazil	Desktop	4.7.2.1	R	Self-certified environmental management system for design and manufacturing organizations	Declaration proven inaccurate	Manufacturer provided evidence demonstrating Conformance
digital computer	Ascent Desktop - D-XXXX	Brazil	Desktop	4.7.2.1	R	Self-certified environmental management system for design and manufacturing organizations	Insufficient evidence to prove accuracy of declaration	Manufacturer provided evidence demonstrating Conformance
HP	Z27q 27-inch IPS 5K Display	Malta	Display	4.5.2.1	O	Renewable energy accessory available	Declaration proven inaccurate	Manufacturer archived the product
Howard Technology Solutions, A Division of Howard	H81N1	United States	Integrated Desktop Computer	4.5.2.1	O	Renewable energy accessory available	Declaration proven inaccurate	Manufacturer undeclared the Non-Conformant criterion
Ilhaservice Servicos de Informática Ltda.	IWP8007	Brazil	Desktop	4.5.2.1	O	Renewable energy accessory available	No documentation provided	Manufacturer left the Registry before the Corrective Action Phase and GEC archived all products
	IWQ9000	Brazil	Desktop	4.7.2.1	R	Self-certified environmental management system for design and manufacturing organizations	No documentation provided	
Panasonic	Toughbook 53	United States	Notebook	4.5.2.1	O	Renewable energy accessory available	Declaration proven inaccurate	Manufacturer undeclared the Non-Conformant criterion

TABLE 2: Specific Non-Conformance Findings and Corrective Action Taken

Participating Manufacturer	Product	Country	Product Type	Criterion	Required or Optional	Criterion Description	NC Finding Description	Corrective Action Taken
Positivo Informática S.A.	Master N350i	Brazil	Notebook	4.5.2.1	O	Renewable energy accessory available	Declaration proven inaccurate	Manufacturer undeclared the Non-Conformant criterion
TEKNOSERVICE, S.L.	Teknopack	Spain	Desktop	4.5.2.1	O	Renewable energy accessory available	Insufficient evidence to prove accuracy of declaration	Manufacturer undeclared the Non-Conformant criterion
Toshiba	Tecra Z40-B PT45FC	Canada	Notebook	4.1.7.1	O	Batteries free of lead, cadmium and mercury	No documentation provided	Manufacturer undeclared the Non-Conformant criterion
Xplore Technologies Corporation	iX101T1	United States	Tablet/Slate	4.7.2.1	R	Self-certified environmental management system for design and manufacturing organizations	No documentation provided	Manufacturer archived the product, and GEC archived all other active products in the Registry.

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. 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 Level 0 investigations, 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 Level 1 investigations, 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 30-day period.
- 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 unselecting 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 unselecting 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.