



## 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 PC-2016-02

### 1. Overview of Verification Round

This report provides the detailed results of EPEAT Verification Round PC-2016-02. This round focused on two types of investigation:

- 1) Level 1 investigations: targeted criteria from IEEE 1680.1. These targeted investigations include criteria and manufacturers where, in previous investigations, corrective actions did not fully address other products potentially impacted by the issue causing a non-conformance. They also included criteria which have not been targeted in the last 12 months and criteria for which Non-Conformances are more likely. Products were chosen as follows:
  - i. All Active products were included.
  - ii. All manufacturers claiming 4.2.2.1, 4.2.2.2, 4.3.1.9, 4.8.2.2 were investigated.
  - iii. For one manufacturer, a product was randomly chosen from a list of all their products due to a suspicion of Non-Conformance.
  - iv. All geographies and all Manufacturers were included.
  - v. Manufacturers participated in no more than five investigations in this round.
- 2) Level 2/3 investigations: targeting two products which the GEC CAB was unable to purchase in the marketplace in 2015. These products were investigated for all criteria listed in the table below which were currently being claimed.

Criterion	Description of Criterion	Level 2	Level 3
4.1.8.1	Optional – Large parts free of PVC	X	X
4.3.1.3	Required – Easy disassembly of external enclosures	X	
4.3.1.5	Required – Identification and removal of components containing hazardous materials	X	
4.3.1.7	Optional – Molded/glued in metal eliminated or removable	X	
4.3.2.2	Optional – Marking of plastics	X	X
4.8.2.1	Required – Separable packing materials	X	
4.8.2.2	Optional – Packaging 90% recyclable and plastics labeled	X	

In total, 103 investigations were performed on 11 criteria where 10 of the investigations were Required criteria and 93 of the investigations were Optional criteria. Round PC-2016-02 touched the following areas of the EPEAT Registry:

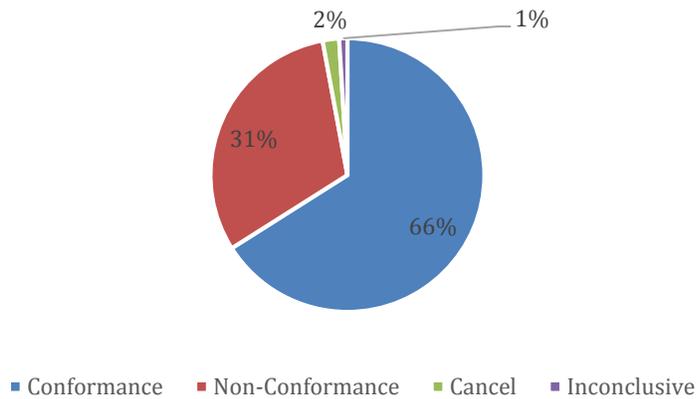
- Forty-four Manufacturers were investigated in 19 countries in the Round. See Figure 1 for countries involved in the Round.
- Eleven criteria out of 51 criteria in IEEE 1680.1-2009.

## 2. Summary of Outcomes

Highlights from this Verification Round:

- 103 investigations completed
- 68 decisions of Conformance
- 32 decisions of Non-Conformance
- 1 decision of Inconclusive
- 2 investigations were cancelled

**Figure 2: Overall Conformance Status for PC-2016-02  
(as percentages of total investigations)**



**Figure 1:  
Countries in  
PC-2016-02**

Australia  
Austria  
Belgium  
Brazil  
Canada  
France  
Germany  
Hungary  
Italy  
Latvia  
Lithuania  
Mexico  
Netherlands  
Poland  
Spain  
Sweden  
Switzerland  
United Kingdom  
United States

Figure 3: Reasons for Non-Conformance

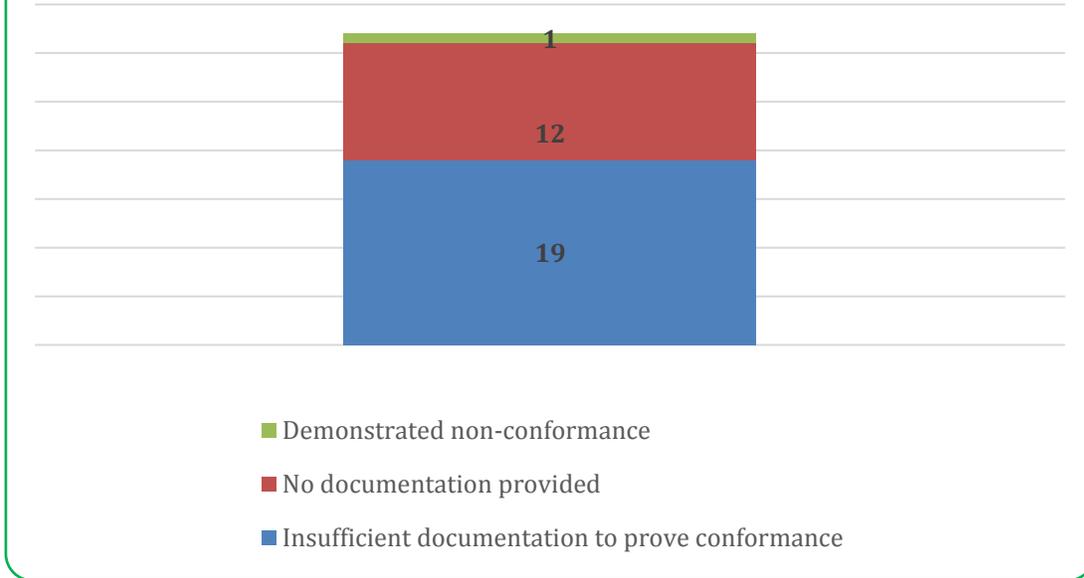


Table 1 below summarizes the number of investigations that were planned, inconclusive and which investigations resulted in a decision of Non-Conformance.

TABLE 1: Summary of Non-Conformance Findings					
Criterion	Description		Planned	Non-Conformances	Inconclusive
4.1.8.1	Optional	Large plastic parts free of PVC	2	0	0
4.2.2.1	Required	Declaration of renewable / biobased plastic materials content	4	4	0
4.2.2.2	Optional	Minimum content of renewable / biobased plastic material	1	1	0
4.3.1.3	Required	Easy disassembly of external enclosure	2	0	0
4.3.1.5	Required	Identification and removal of components containing hazardous materials	2	0	0
4.3.1.7	Optional	Molded/glued in metal eliminated or removable	2	0	0
4.3.1.9	Optional	Minimum 90% reusable/recyclable	43	12	0
4.3.2.2	Optional	Marking of plastics	2	1	0
4.8.2.1	Required	Separable packing materials	2	0	1
4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	42	14	0
4.8.5.1	Optional	Documentation of reusable packaging	1	0	0

### 3. Key Lessons

#### **Criterion 4.2.2.1: Declaration of renewable / biobased plastic materials content:**

Criterion 4.2.2.1 requires Manufacturers to declare the percentage of renewable/biobased plastic materials. The declaration should be calculated as a percentage of total plastic by weight for each product. Declarations of zero are acceptable. However, if the declaration is for a value greater than zero, supplier letter(s) must be provided as evidence in order to prove conformance. In addition, a documentation of the calculation must be provided. The calculated percentage should equal the declaration on the EPEAT Registry.

#### **Criterion 4.3.1.9: Minimum 90% reusable / recyclable:**

Criterion 4.3.1.9 requires manufacturers to provide information documenting and supporting the percentage recyclable/reusable for the product. While this information does not necessarily have to be the actual calculations used to determine the percentage, Manufacturers should ensure they are prepared to support:

- The inclusion of external power cords, external power adapters and input cables for displays;
- The percentage being based on the total product weight (including the items above); and
- The recycling technologies used for all components and materials, and how these are “demonstrated”.

#### **Criterion 4.3.2.2: Material marking codes on plastic components greater than 25 grams:**

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 a required criterion, and Manufacturers 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 polymers, flame retardants, fillers and/or plasticizers. Additionally, Subscribers are encouraged to revisit the Conformity Assurance Protocols to identify the types of information sought by the Conformity Decision Panel to determine conformance.

#### **Criterion 4.8.2.2: Packaging 90% recyclable and plastics labeled:**

This criterion has two parts. The first is that 90% of the packaging materials by weight 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. The second part of the criterion is that all applicable plastic packaging must be labeled. While the labeling of plastic packaging is often straightforward, proving that the packaging is at least 90% recyclable remains challenging for Manufacturers.

In order to claim this criterion, the packaging materials 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. Additionally, Clarification 13 applies to this criterion and should be reviewed. The CDP has not found acceptable evidence that EPS is recyclable in the United States. A Clarification for “market/use” for this criterion is in the process of being developed and should be published in the next two months.

#### **4. General Message to Manufacturers**

##### **Products “Active” on the EPEAT Registry:**

All Active products on the EPEAT Registry are subject to Verification. When products reach their end of life, Manufacturers should remove the products from the EPEAT Registry. If a product which is Active on the EPEAT Registry has gone end of life and a Manufacturer cannot obtain required evidence due to the age of the product, it would still be considered a Non-Conformance.

##### **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.

##### **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:**

All 2016 Verification Rounds for PCs and Displays have been kicked off. Planning for 2017 Verification Rounds has not yet begun.

## 6. Investigations Tabl

**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
Action S.A.	SIERRA 300G	Poland	Desktops	4.2.2.1	R	Declaration of renewable / biobased plastic materials content	No documentation provided	Manufacturer corrected the declaration in the Registry to 0%.
Transource	Roadrunner Tablet	United States	Desktops	4.3.2.2	O	Marking of plastics	Demonstrated non-conformance	Criterion undeclared by Manufacturer
Daten Tecnologia Ltda	DC1D-S	Brazil	Desktops	4.3.1.9	O	Minimum 90% reusable/ recyclable	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer
digital computer	Ascent Desktop - D-XXXX	Brazil	Integrated Desktop Computers	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer
Gammatech Computer Corporation	U12C	United States	Desktops	4.3.1.9	O	Minimum 90% reusable/ recyclable	No documentation provided	Product archived by Manufacturer
GETAC	V100	United States	Integrated Desktop Computers	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	No documentation provided	Product archived by Manufacturer
Howard Technology Solutions, A Division of Howard	IQ2X	United States	Monitors	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Manufacturer did not take corrective action so CAB archived the product.
Hyundai IT America Corp.	P277DP	United States	Desktops	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer
Inida	M500/2000 AN500.01	Lithuania	Desktops	4.3.1.9	O	Minimum 90% reusable/ recyclable	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer
Intelligent Decisions	Ultra-Small Desktop	United States	Notebooks	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	No documentation provided	Criterion undeclared by Manufacturer
MMD-Monitors & Displays Taiwan Ltd.	226V3L (226V3LSB)	Hungary	Desktops	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	No documentation provided	Product archived by Manufacturer
NTT System S.A.	NTT Business W 910M	Poland	Monitors	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer

**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
Panasonic	Toughpad R1	United States	Desktops	4.3.1.9	O	Minimum 90% reusable/ recyclable	Insufficient documentation to prove conformance	Provided additional information to prove conformance.
Toshiba	Tecra Z40-C PT461U, PT463U, PT465U	United States	Monitors	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Manufacturer provided additional information to prove conformance.
Transource	MIR-Q900M	United States	Thin Clients	4.8.2.2	O	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer
ViewSonic Corporation	VS14886 / VX2770Smh-LED, VX2770Sml-LED, VX2770S-LED	United States	Tablets/ Slates	4.3.1.9	O	Minimum 90% reusable/ recyclable	Insufficient documentation to prove conformance	Manufacturer did not take corrective action so CAB archived the product.

## 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 assess 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.