



Verification Round 2012-05 Context

Questions were raised in July 2012 about the conformance of some particular EPEAT registered products. A series of investigations have been undertaken to address these questions, including Verification Round 2012-05.

1. **Clarification of conformity requirements:** First, EPEAT staff requested that the independent Product Verification Committee (PVC) provide a "Clarification" of ambiguities in the wording of the IEEE 1680.1 criteria addressed in the public discussion - 4.3.1.3 (*Easy Disassembly of External Enclosure*) 4.3.1.5 (*Identification and removal of components containing hazardous materials*) and 4.4.2.1 (*Upgradeable with common tools*).

The Product Verification Committee (PVC) is the independent panel of experts that determines product conformity in EPEAT. A Clarification is guidance produced through a formal review of the standard by the PVC. On July 30, EPEAT received and published clarification #14 addressing the above criteria (see <http://www.epeat.net/verification-clarifications#clarification14>)

The Clarification indicated that some of the issues raised do not represent non-conformances. For example, criterion 4.4.2.1 - *Upgradeable with Common Tools* explicitly allows product upgrades by use of a high-speed serial bus, so physical replacement of components for upgrade is not required.

The Clarification also made clear that products using multiple design and assembly strategies can meet criteria 4.3.1.3 – requiring ‘easy’ disassembly of products’ external enclosure, and 4.3.1.5 – requiring safe and easy removal of hazardous materials including batteries. However, the Clarification did not fully resolve all questions related to these criteria.

2. **Surveillance investigation:** EPEAT staff began by investigating what physical attributes were most likely to create risk of notebooks having an issue with criteria 4.3.1.3 and 4.3.1.5. Light product weight and integrated batteries were identified as two such attributes. Staff then searched the Registry for notebooks under a certain weight, reviewed publicly available information to determine which of those did not have user-replaceable batteries, and conducted market research to identify additional registered notebooks that had similar integrated batteries. From this list, a group of registered products representing five product lines from four manufacturers were selected for verification, based on their lack of publicly available documentation on disassembly.
3. **Verification Investigation:** In early August, EPEAT staff initiated a formal verification investigation for conformance with criteria 4.3.1.3 and 4.3.1.5, to further investigate the registered products whose batteries are not user replaceable, and for which no disassembly instructions were available.

The Verification Round Plan for this investigation was published on Aug. 13 and investigation is currently under way based on a snapshot of the registry prior to that date. EPEAT has engaged a leading global test lab to purchase the subject products on the open market and investigate their conformance with these criteria.

Following standard process, EPEAT will not identify the specific products during the investigation, but when a Verification investigation determines any non-conformances, the nonconforming product and manufacturer are identified in the Verification Outcomes Report. The Outcomes Report should be published in 6-8 weeks.