



OUTCOMES REPORT EPEAT VERIFICATION ROUND IE-2017-01

1. Overview of Verification Round

This report provides detailed results of Verification Round IE-2017-01. Sixty one (61) total investigations were completed during this round. Verification Round IE-2017-01 investigated the following criteria which had either been infrequently verified or had questionable declarations in previous Verification Rounds:

- 4.1.6.2: Eliminating or reducing BFR/CFR content of printed circuit board laminates
- 4.1.8.1: Inventory of intentionally added chemicals residing in the product
- 4.2.1.1: Declaration of postconsumer recycled plastic content
- 4.2.1.2: Minimum content of postconsumer recycled plastic
- 4.2.1.3: Minimum 5% to 10% content of postconsumer recycled plastic
- 4.2.1.4: Minimum 25% content of postconsumer recycled plastic
- 4.2.2.1: Declaration of biobased plastic materials content
- 4.2.3.1 Declaration of product weight
- 4.3.3.1 Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs
- 4.3.4.3: Minimum 90% reusable/recyclable
- 4.8.3.1: Recovered content in select fiber-based packaging materials
- 4.9.3.3: Manufacturer recycles or reuses plastics collected through its cartridge and container take-back program

Additionally, the following Criteria were investigated for specific manufacturers:

- 4.9.2.1: Documentation that product does not prevent the use of non-manufacturer cartridges and non-manufacturer containers
- 4.9.3.1: Provision of take-back and end-of-life management for cartridges and containers

Products were selected from a list of all active products on the registry, and all manufacturers and geographies were eligible for inclusion. Each criterion was investigated at Level 1.

2. Summary of Outcomes

Highlights from this Round:

- 61 total investigations completed
- 51 decisions of Conformance
- 10 decisions of Nonconformance

Figure 1: Overall Conformance Status for IE-2017-01 (as a percentage of total investigations)

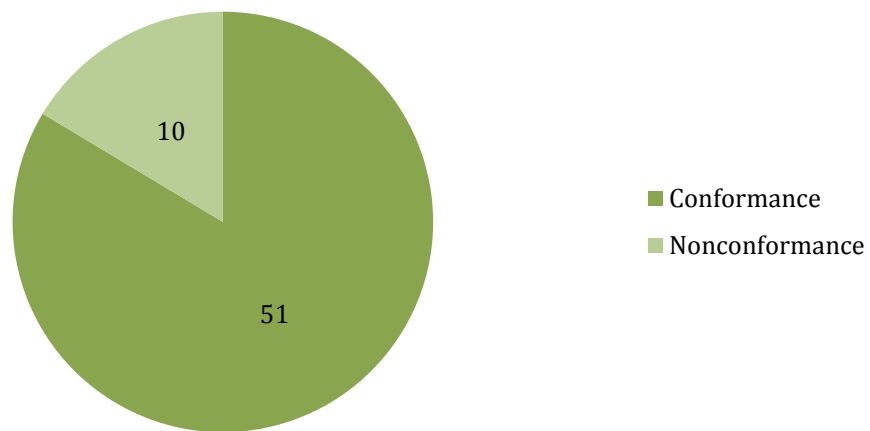
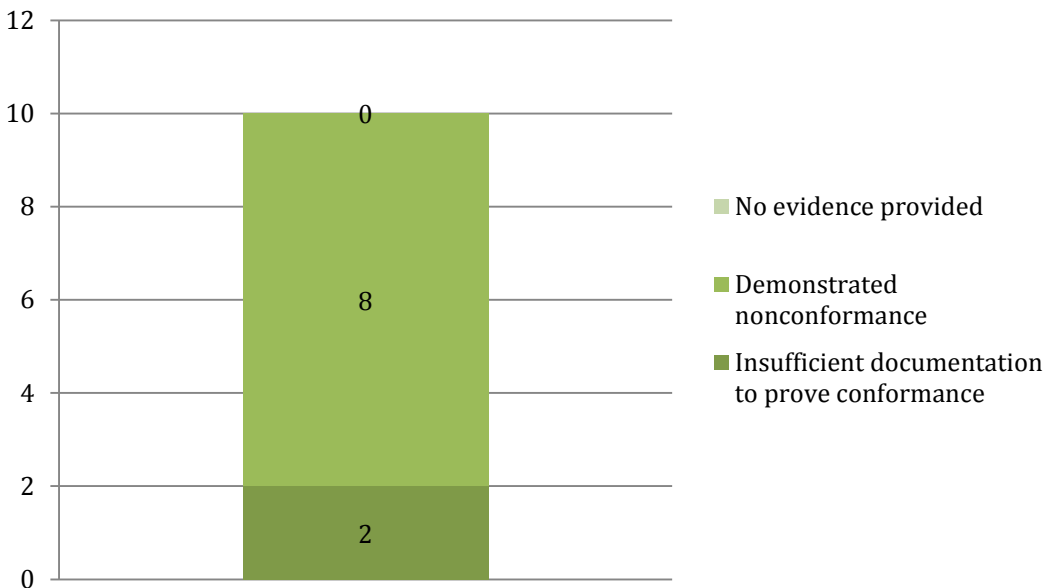


Figure 2: Reasons for nonconformance



3. Key Lessons

4.2.1.1 Required: Declaration of postconsumer recycled plastic content

4.2.1.2 Required: Minimum content of postconsumer recycled plastic

4.2.2.1 Required: Declaration of biobased plastic content

4.2.3.1 Required: Declaration of product weight

Each of these criteria require manufacturers to make declarations of particular values in the EPEAT registry. When declaring specific values, manufacturers should ensure:

- The declared value matches what is supportable by evidence
- The declared value is accurate and not rounded
- The declared value is kept up-to-date when changes are made to the manufacturing process

4.1.6.2 Optional: Eliminating or reducing BFR/VFR content of printed circuit board laminates

To demonstrate conformance to this criterion, manufacturers must provide documentation of a conformance assurance system (CAS) which addresses the restricted substances. Manufacturers may use brominated and chlorinated substances other than BFRs and VFRs in the product; however if the concentrations exceed the criterion's thresholds, evidence must be provided which demonstrates the bromine or chlorine present is not the result of the use of BFRs or VFRs.

4.3.4.3 Optional: Minimum 90% reusable/recyclable

Manufacturers claiming this criterion should be prepared to provide evidence for each material or component in the product, demonstrating the recycling technology used or a reuse market. This information should clearly specify all recycling technologies used.

4.9.3.1 Required: Provision of take back and end of life management for cartridges and containers

The criterion specifies six end-of-life processing methods which must be publicly reported on the manufacturer's website. Each method must be reported, and no methods may be combined for the purposes of reporting.

4.9.3.3 Optional: Manufacturer reuses or recycles plastics collected through its cartridge and container take-back program

This criterion requires manufacturers to make publicly available on their website information related to the processing of plastics collected through their cartridge and container take back programs. This information should clearly indicate that these materials are reused or recycled and that none are sent to landfill or incineration facilities. Note that this is a corporate criterion, and that this information should be updated on an annual basis.

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 reached end of life and a Manufacturer cannot obtain required evidence for verification due to the age of the product, it would still be considered a Non-Conformance.

Understanding documentation requirements for Verification Rounds:

EPEAT has pre-recorded training modules for every criterion in the 1680.2 standard. To gain access to these modules, log in to EPEAT.net and go to the "My Account" page. From here click on "Key

Documents”. There you will find a link to “EPEAT Criteria Training Videos”. 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.

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:

Three (four?) investigation rounds are planned for imaging equipment in 2018.

Conformity Packets:

This and all future Verification Rounds have and will be conducted according to the guidance provided in the Conformity Packets posted on www.epeat.net.

1. Investigations Table

TABLE 1: 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
Lexmark International, Inc.	MS810	United States	Institutional	4.2.1.1	Required	Declaration of postconsumer recycled plastic content	Demonstrated non-conformance	Manufacturer corrected the declaration on the EPEAT Registry
Samsung Electronics	MultiXpress X7500GX	United States	Institutional	4.2.1.2	Required	Minimum content of postconsumer recycled plastic	Demonstrated non-conformance	Manufacturer corrected the declaration on the EPEAT Registry
Samsung Electronics	MultiXpress K7400GX	United States	Institutional	4.3.4.3	Optional	Minimum 90% reusable/recyclable	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer
Samsung Electronics	Xpress C1860FW	United States	Consumer	4.9.3.3	Optional	Manufacturer recycles or reuses plastics collected through its cartridge and container take-back program	Insufficient documentation to prove conformance	Manufacturer provided additional evidence to demonstrate conformance
HP Inc.	HP LaserJet Enterprise M506dn (F2A69A#AAZ)	United States	Institutional	4.1.6.2	Optional	Eliminating or reducing BFR/VFR content of printed circuit board laminates	Demonstrated non-conformance	Product archived by Manufacturer
HP Inc.	Officejet Enterprise Color SFP X555xh	Canada	Institutional	4.2.3.1	Required	Declaration of product weight	Demonstrated non-conformance	Manufacturer provided evidence of changes made resulting in conformance
Ricoh	MP CW2200SP	United States	Institutional	4.2.2.1	Required	Declaration of biobased plastic materials content	Demonstrated non-conformance	Product archived by Manufacturer

TABLE 1: 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
Ricoh	MP 3054SP	India	Institutional	4.9.3.1	Required	Provision of take-back and end-of-life management for cartridges and containers	Demonstrated non-conformance	Manufacturer provided evidence of changes made resulting in conformance
Ricoh	MP 5054	India	Institutional	4.9.3.1	Required	Provision of take-back and end-of-life management for cartridges and containers	Demonstrated non-conformance	Manufacturer provided evidence of changes made resulting in conformance
Ricoh	MP C8002SP	India	Institutional	4.9.3.1	Required	Provision of take-back and end-of-life management for cartridges and containers	Demonstrated non-conformance	Manufacturer provided evidence of changes made resulting in conformance

2. 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 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.