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OUTCOMES REPORT EPEAT VERIFICATION ROUND IE-2018-02

1. Overview of Verification Round

In this Verification Round, four criteria were investigated in forty (40) investigations either because they had not been verified recently or they were targeted for investigation during EPEAT's annual planning process. The four criteria were as follows:

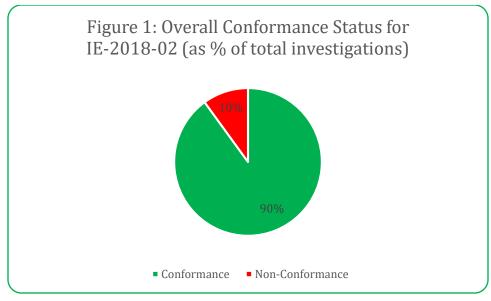
- 4.3.4.2 Required Minimum reusable/recyclable rate based on requirement of EU WEEE Directive
- 4.4.1.1 Required Early failure process
- 4.7.2.1 Required Public disclosure of key environmental aspects
- 4.9.3.3 Optional Manufacturer recycles or reuses plastics collected through its cartridge and container take-back program

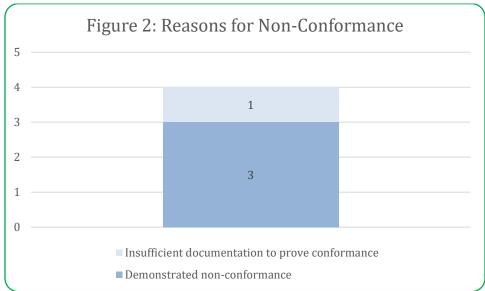
All products and all geographies were eligible for inclusion in this Verification Round.

2. Summary of Outcomes

Highlights from this Verification Round:

- 40 total investigations assigned
- 36 decisions of Conformance
- 4 decisions of Non-Conformance





3. Key Lessons

4.7.2.1 Required: Public disclosure of key environmental aspects

This criterion requires a large amount of disparate information to be made publicly available. The criterion requires specific information to be reported and if Manufacturers to do not report on the exact information required, they will receive a Non-Conformance. Manufacturers should review their publicly available information to ensure that all required information is available.

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

This criterion has reporting requirements and the data must be reported annually. Manufacturers should review the reporting requirements to ensure that all required information is up to date.

4. General Message to Manufacturers

Understanding documentation requirements for Verification Rounds:

You can find more guidance and examples of conformance documents in the Conformity Sample Packets located in "Key Documents" under My Account. Go to epeat.net to log in.

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:

A total of four Verification Rounds have been planned for Imaging Equipment products in 2018.

Conformity Sample Packets:

This and all future Verification Rounds have and will be conducted according to the guidance provided in the Conformity Sample Packets posted on www.epeat.net under "Key Documents" in My Account.

6. 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
Dell, Inc.	S5830dn	United States	Printer	4.7.2.1	Required	Public disclosure of key environmental aspects	Demonstrated non-conformance	If NC due to demonstrated non- conformance, Manufacturer provided evidence of changes made resulting in conformance.
Toshiba	eStudio 2809A	United States	Multifunction Device (MFD)	4.7.2.1	Required	Public disclosure of key environmental aspects	Demonstrated non- conformance	If NC due to demonstrated non- conformance, Manufacturer provided evidence of changes made resulting in conformance.
Kodak Alaris	i940	United States	Scanner	4.7.2.1	Required	Public disclosure of key environmental aspects	Insufficient documentation to prove conformance	If NC due to insufficient evidence, Manufacturer provided additional evidence to demonstrate conformance.
Konica Minolta	bizhub C3851	Australia	Multifunction Device (MFD)	4.9.3.3	Required	Manufacturer recycles or reuses plastics collected through its cartridge and container take back program	Demonstrated non- conformance	If NC due to insufficient evidence, Manufacturer provided additional evidence to demonstrate conformance.

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 four-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.