



OUTCOMES REPORT EPEAT VERIFICATION ROUND IE-2019-03

1. Overview of Verification Round

IE-2019-03 included fifty-four (54) Level 0 and 1 investigations on sixteen (16) criteria. The selected criteria were those that lent themselves well to Level 0 investigations or those for which demonstration of conformance is difficult. All geographies and manufacturers with products active on the EPEAT Registry were eligible for inclusion in this Round. Criteria investigated during this Round include:

- 4.3.3.1 Required - Notification of identification of hazardous materials with special handling needs
- 4.3.4.1 Required - End of life characterization report
- 4.4.1.1 Required - Early failure process
- 4.4.2.1 Optional - Product upgradeability
- 4.5.1.1 Required - ENERGY STAR
- 4.5.2.2 Optional - LCA publicly available
- 4.5.3.2 Optional - Auto standby capability
- 4.5.4.1 Optional - Default to auto duplex printing
- 4.7.2.1 Required - Public disclosure of key environmental aspects
- 4.7.2.2 Optional - Public disclosure of supply chain toxics
- 4.7.3.1 Optional - Product LCA assessment and public disclosure of analyses
- 4.8.4.1 Optional - Provision of take-back service for packaging
- 4.9.1.1 Required - Allow use of general office paper with renewable content, recycled content, and that is chlorine free
- 4.9.2.1 Required - Documentation that product does not prevent the use of non-manufacturer cartridges and non-manufacturer containers
- 4.9.3.1 Required - Provision of take-back and end-of-life management for cartridges and containers
- 4.9.4.1 Required - Documentation that the cartridges or container is not designed to prevent its reuse and recycling

All criteria were investigated via Level 0 investigation. 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 was inconclusive (i.e. was not available, could not be found from public sources, or did not provide enough details to determine conformance), the Auditor was instructed to proceed with a Level 1 investigation.

2. Summary of Outcomes

- 54 investigations were completed during this verification round
- 52 findings of Conformance
- 2 findings of Non-Conformance
 - Both findings of Non-Conformance were Demonstrated Non-Conformances.

Figure 1: Overall Conformance Status for IE-2019-03 (as % of total investigations)

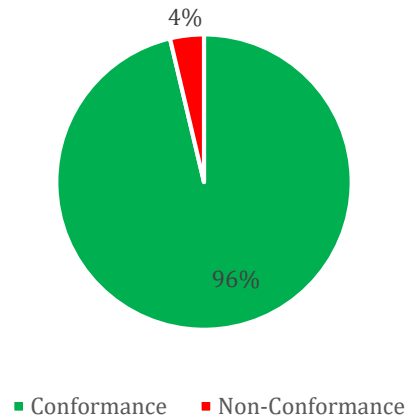
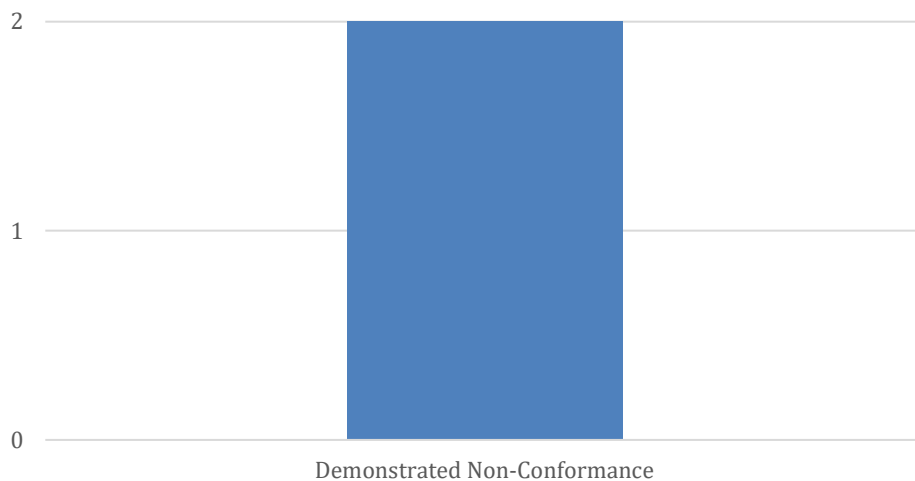


Figure 2: Reason for Non-Conformance



3. Key Lessons

4.9.2.1 – Required - Documentation that product does not prevent the use of non-manufacturer cartridges and non-manufacturer containers

Manufacturers need to ensure that information from different sources (website, product manual, service documentation) matches when there are specific requirements for documentation.

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

Manufacturers need to have a process in place to ensure that reported volume numbers are updated annually per the criterion.

4. General Message to Manufacturers

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:

The annual Verification Plan has been published and can be found [here](#).

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 “Help & FAQ” 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
Undisclosed due to Minor NC	Undisclosed due to Minor NC	United States	Multifunction Device	4.9.2.1	Required	Documentation that product does not prevent the use of non-manufacturer cartridges and non-manufacturer containers	Demonstrated non-conformance	Manufacturer in process of updating manuals for all affected products.
Undisclosed due to Minor NC	Undisclosed due to Minor NC	United States	Multifunction Device	4.9.3.1	Required	Provision of take-back and end-of-life management for cartridges and containers	Demonstrated non-conformance	Manufacturer added updated recycling volume numbers to their website.

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 the Conformity Assurance staff of GEC. Decisions of conformity 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 Major 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.