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OUTCOMES REPORT EPEAT VERIFICATION ROUND PC-2017-01

1. Overview of Verification Round

Verification Round PC-2017-01 was a Level 2 / 3 testing round. Eight products were randomly chosen from a list of manufacturers that had not yet been Level 2 / 3 tested. Each product was purchased and investigated for all criteria listed in the table below which were being claimed.

Criterion	Description of Criterion	Level 2	Level 3
4.1.1.1	Required – Compliance with provisions of European RoHS Directive	Х	Х
4.1.5.1	Optional – Elimination of intentionally added hexavalent chromium	Х	Х
4.1.8.1	Optional – Large parts free of PVC	Х	Х
4.3.1.3	Required – Easy disassembly of external enclosures	Х	
4.3.1.5	Required – Identification and removal of components containing hazardous materials	Х	
4.3.1.7	Optional – Molded/glued in metal eliminated or removable	Х	
4.3.1.9	Optional – Minimum 90% reusable / recyclable	Х	
4.8.2.1	Required – Separable packing materials	Х	
4.8.2.2	Optional – Packaging 90% recyclable and plastics labeled	Х	

In total, 58 investigations were performed on nine criteria where 32 investigations were on Required criteria and 26 were on Optional criteria. Verification Round PC-2017-01 touched the following areas of the EPEAT Registry:

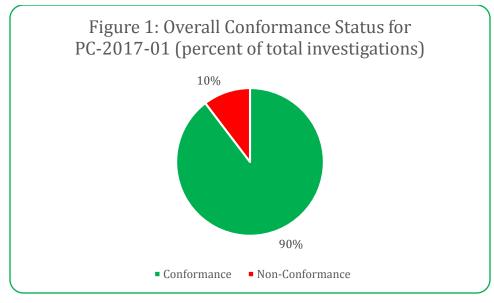
- Eight Manufacturers had products investigated from three countries: United States, Canada, and Germany.
- Nine criteria out of the 51 criteria contained in IEEE 1680.1-2009 were investigated.

2. Summary of Outcomes

Highlights from this Verification Round:

- 58 investigations completed
- 52 decisions of Conformance
- 6 decisions of Non-Conformance

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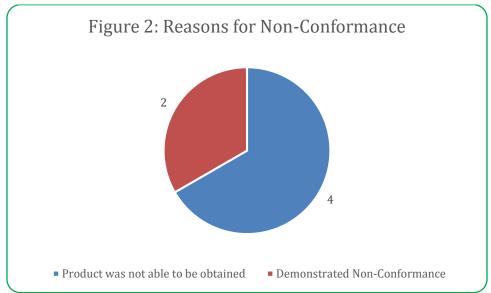


Table 1 below summarizes the number of investigations that were planned and which investigations resulted in a decision of Non-Conformance.

TABLE 1: Summary of Non-Conformance Findings						
Criterion		Description	Investigations	Non-Conformant		
4.1.1.1	Required	Compliance with provisions of European RoHS Directive	8	1		
4.1.5.1	Optional	Elimination of intentionally added hexavalent chromium	6	0		
4.1.8.1	Optional	Large parts free of PVC	6	0		

4.3.1.3	Required	Easy disassembly of external enclosure	8	1
4.3.1.5	Required	Identification and removal of components containing hazardous materials	8	1
4.3.1.7	Optional	Molded/glued in metal eliminated or removable	6	1
4.3.1.9	Optional	Minimum 90% reusable/recyclable	4	0
4.8.2.1	Required	Separable packing materials	8	1
4.8.2.2	4.8.2.2 Optional Packaging 90% recyclable and plastics labeled		4	1

3. Key Lessons

In one case, a product was unable to be obtained by the Auditor / Lab which resulted in four Non-Conformances. If a product is chosen from the EPEAT Registry to be Level 2 / 3 tested, the Auditor and / or Manufacturer must make every effort to procure the product for testing. Failure to do so will result in Non-Conformances for all criteria planned for investigation and removal of the product from the EPEAT Registry.

Criterion 4.3.1.7 Optional – Molded/glued in metal eliminated or removable

If molded or glued in metal is used with plastic, in order to facilitate recycling, it must be able to be removed by one person with common tools. Inability to remove the metal will result in a Non-Conformance.

Criterion 4.8.2.2 Optional – Packaging 90% recyclable and plastics labeled

This criterion requires that plastics be labeled appropriately. Failure to label the plastics hinders recycling and will result in a Non-Conformance. In addition, although the 90% recyclability of the packaging is not required to be calculated during Level 2 / 3 investigations, Polystyrene foam is not considered recyclable in the United States. Use of non-recyclable materials over 10% of the total weigh of the packaging will result in a Non-Conformance when this aspect of the criterion is investigated.

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.

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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:

An EPEAT Auditor training will be held in March 2018 in Portland, Oregon. While the EPEAT Auditor training was created for Conformity Assurance Auditors, Manufacturers may also find this training useful to better understand how to efficiently meet Verification Requirements of the standards. For more information please contact Erin Gately at erin.gately@greenelectronicscouncil.org.

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.

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6. Investigations Table

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
Cybertron International, Inc.	CSDI3	United States	Desktops	4.1.1.1	Required	Required – Compliance with provisions of European RoHS Directive	Product was not able to be obtained	Product Archived by Manufacturer
Cybertron International, Inc.	CSDI3	United States	Desktops	4.3.1.3	Required	Required – Easy disassembly of external enclosures	Product was not able to be obtained	Product Archived by Manufacturer
Cybertron International, Inc.	CSDI3	United States	Desktops	4.3.1.5	Required	Required – Identification and removal of components containing hazardous materials	Product was not able to be obtained	Product Archived by Manufacturer
Cybertron International, Inc.	CSDI3	United States	Desktops	4.8.2.1	Required	Required – Separable packing materials	Product was not able to be obtained	Product Archived by Manufacturer
Gammatech Computer Corporation	R11	United States	Tablets/Slates	4.3.1.7	Optional	Optional – Molded/glued in metal eliminated or removable	Demonstrated non-conformance - glued in metal not easily removable	Criterion undeclared by Manufacturer
Ace Computers	Vision XIQ170TS	United States	Desktops	4.8.2.2	Optional	Optional – Packaging 90% recyclable and plastics labeled	Demonstrated non-conformance - plastic bag not marked	Product Archived by Manufacturer

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.