



## Green Electronics Council

227 SW Pine Street, Suite 300 • Portland, OR 97204 • V: (503) 279-9382 • F: (503) 279-9381 • www.epeat.net

# OUTCOMES REPORT

## EPEAT VERIFICATION ROUND PC-2017-02

### 1. Overview of Verification Round

Verification Round PC-2017-02 investigated criteria from IEEE 1680.1 which had high rates of Non-Conformance during the last four Verification Rounds or which had not been recently investigated. Six (6) targeted Level 0 investigations were planned for this round. At the conclusion of the Level 0 phase, fifty (50) Level 1 investigations were conducted.

The criteria for investigation included the following:

Table 1: Summary of Criteria to be Investigated		
Criterion	Required or Optional	Criterion Description
4.1.5.1	Optional	Higher content of postconsumer recycled plastic
4.2.1.3	Optional	Higher content of postconsumer recycled plastic
4.5.2.1	Optional	Renewable energy accessory available
4.5.2.2	Optional	Renewable energy accessory standard
4.6.1.2	Optional	Auditing of recycling vendors
4.7.1.1	Required	Demonstration of corporate environmental policy consistent with ISO 14001
4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled

In total 55 investigations were planned, one was cancelled, and 54 investigations were completed. One (1) Required criterion and six (6) Optional criteria were investigated. Thirty-two (32) Manufacturers were investigated in fifteen (15) countries.

### 2. Summary of Outcomes

Highlights from this Verification Round:

- 55 investigations planned
- 54 investigations completed
- 40 decisions of Conformance
- 14 decisions of Non-Conformance

- 1 investigation was cancelled because the Manufacturer left the EPEAT Registry during the Verification Round

Figure 1: Overall Conformance Status for PC-2017-02 (by number of investigations)

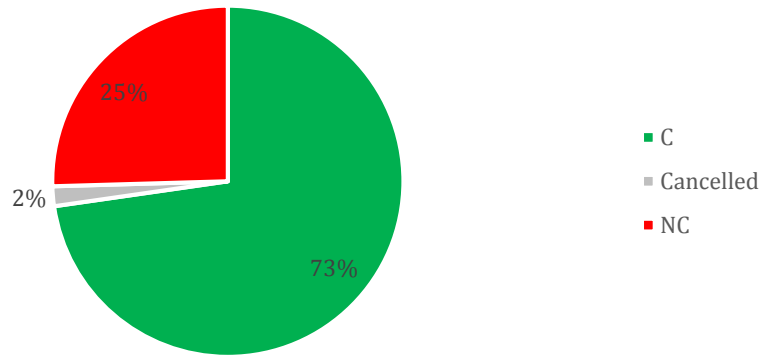


Figure 2: Reasons for Non-Conformance

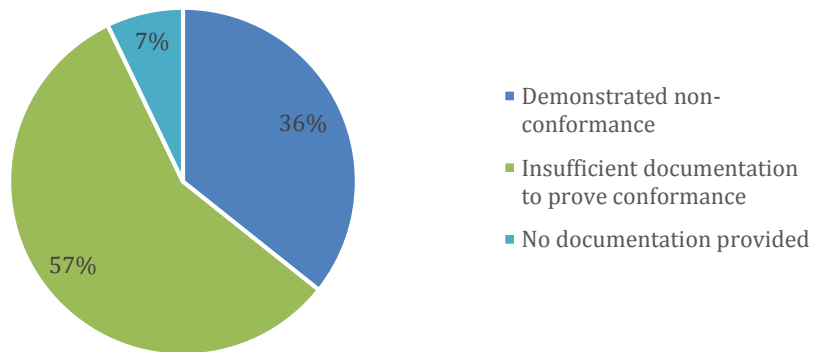


Table 1 below summarizes the number of investigations that were Planned, Non-Conformant and Cancelled.

TABLE 1: Summary of Non-Conformance Findings					
Criterion	Required or Optional	Description	Total Investigations	Non-Conformances	Cancelled
4.1.5.1	Optional	Elimination of intentionally added hexavalent chromium	11	2	0
4.2.1.3	Optional	Higher content of postconsumer recycled plastic	12	2	1
4.5.2.1	Optional	Renewable energy accessory available	6	2	0
4.5.2.2	Optional	Renewable energy accessory standard	1	1	0
4.6.1.2	Optional	Auditing of recycling vendors	1	0	0
4.7.1.1	Required	Demonstration of corporate environmental policy consistent with ISO 14001	11	3	0
4.8.2.2	Optional	Packaging 90% recyclable (only, not plastics labeled)	13	4	0

### 3. Key Lessons

#### **Criterion 4.1.5.1: Elimination of intentionally added hexavalent chromium:**

The verification requirements for criteria in Section 4.1 of IEEE 1680.1-2009 call for “*Evidence of certification from component manufacturers that is based on either empirical data demonstrating compliance or analytical test data demonstrating compliance.*”

Interpretation 1-6 indicates: “*Empirical data may include supplier assurance of conformance, and must include component sampling or data collection that is evaluated within a quality control system that demonstrates conformance.*” Therefore, whether empirical or analytical, results from laboratory testing are required for these criteria. Manufacturers are encouraged to be prepared with this information for Verification Rounds.

#### **Criterion 4.2.1.3: Higher content of postconsumer recycled plastic:**

Criterion 4.2.1.3 is a declaration that a product contains a minimum average of 25% postconsumer recycled plastic. This declaration must be supported with a calculation and evidence from suppliers proving the minimum average is at least 25%. In a case where evidence is provided showing that the product contains on average a minimum of **less than 25%**, criterion 4.2.1.3 should not be claimed.

#### **Criteria 4.5.2.1 and 4.5.2.2: Renewable energy accessory available or standard:**

Criterion 4.5.2.1 is a declaration that a renewable energy accessory is available at the time of purchase. While the Manufacturer does not need to make the accessory, it must be available for purchase on the Manufacturer’s website. The accessory must also be able to power the product for an entire duty cycle. Since this criterion is country specific, Manufacturers should ensure that the renewable energy accessory is available in each country where it is being claimed.

Criterion 4.5.2.2 is a declaration that the renewable energy accessory comes standard with a product. This means that a bundle must be available on the Manufacturer's website which has both the product and the accessory as a standard offering and must be available in the country where it is being declared.

**Criterion 4.7.1.1: Demonstration of corporate environmental policy consistent with ISO 14001:**

Criterion 4.7.1.1 requires Manufacturers to have a written corporate environmental policy that is both publicly available and is consistent with the requirements in the section regarding environmental policy in ISO 14001. Therefore, the Manufacturer must not only have a publicly available environmental policy but they must also provide an index of the policy to the requirements in ISO 14001.

**Criterion 4.8.2.2: Packaging 90% recyclable and plastics labeled:**

In the case of this criterion, Manufacturers provided insufficient evidence to prove that 90% or more of the packaging components were recyclable. In the references and details section of this criterion, it shows that the definition for "recyclable" comes from FTC Guides for the Use of Environmental Marketing Claims. The guide spells out exactly what requirements must be met to be able to claim that a material is recyclable. Manufacturers claiming 4.8.2.2 should review this guide to ensure they can provide evidence to support this claim for all recycling components included in the 90%.

#### **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.

**Understanding documentation requirements for Verification Rounds:**

Please refer to the Conformity Assessment Packets which can be found on the My Account page of EPEAT.net for more information about what evidence is required to prove each criterion. From the My Account page go to Key Documents for a list of the Conformity Assessment Packets.

#### **5. Looking Forward**

**Plans for Future Verification Activities:**

There are no additional Verification Rounds for 1680.1 products planned for 2017.

## 6. Investigations Table

TABLE 2: Specific Non-Conformance Findings and Corrective Action Taken								
Participating Manufacturer	Product	Country	Product Type	Criterion	Required	Criterion Description	NC Finding Description	Corrective Action Taken
					or Optional			
HP Inc.	Stream 11 Pro G3 Notebook PC	France	Notebooks	4.5.2.1	Optional	Renewable energy accessory available	Demonstrated non-conformance	Product archived by Manufacturer.
Lenovo	ThinkPad E560	United States	Notebooks	4.5.2.1	Optional	Renewable energy accessory available	No documentation provided	Product archived by Manufacturer.
GETAC	S400	United States	Notebooks	4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer.
Inida	M500 2000 AN500.01	Lithuania	Desktops	4.5.2.2	Optional	Renewable energy accessory standard	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer.
Komparsa UAB	T8700	Latvia	Desktops	4.1.5.1	Optional	Elimination of intentionally added hexavalent chromium	Insufficient documentation to prove conformance	Product archived by Manufacturer.
Komparsa UAB	IS11F	Lithuania	Desktops	4.7.1.1	Required	Demonstration of corporate environmental policy consistent with ISO 14001	Insufficient documentation to prove conformance	Manufacturer provided additional evidence to demonstrate conformance.
MMD-Monitors & Displays Taiwan Ltd.	242B7Q	Germany	Monitors	4.2.1.3	Optional	Higher content of postconsumer recycled plastic	Demonstrated non-conformance	Manufacturer provided evidence of changes made resulting in conformance.
MMD-Monitors & Displays Taiwan Ltd.	243V5L	Netherlands	Monitors	4.7.1.1	Required	Demonstration of corporate environmental policy consistent with ISO 14001	Demonstrated non-conformance	The investigated Manufacturer is a marketing and distribution division of a larger company, which is also an EPEAT participating manufacturer. EPEAT and GEC CAB are in the process of transferring all of the investigated Manufacturer's products to the larger EPEAT participating manufacturer's product listing.

Onyx Healthcare Inc.	ONYX-BE182DT-F1-1010	United States	Integrated Desktop Computers	4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
Samsung Electronics	S22E200N	Sweden	Monitors	4.1.5.1	Optional	Elimination of intentionally added hexavalent chromium	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer.
Samsung Electronics	S22E200BW	Netherlands	Monitors	4.2.1.3	Optional	Higher content of postconsumer recycled plastic	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer.
Samsung Electronics	S27E650D	France	Monitors	4.7.1.1	Required	Demonstration of corporate environmental policy consistent with ISO 14001	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
Transource	MIR-B900U	United States	Desktops	4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer.
ViewSonic Corporation	VS15835 SC-T47	United States	Thin Clients	4.8.2.2	Optional	Packaging 90% recyclable and plastics labeled	Insufficient documentation to prove conformance	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](http://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.