



OUTCOMES REPORT EPEAT VERIFICATION ROUND IE-2019-02

1. Overview of Verification Round

Verification Round IE-2019-02 investigated the following nine (9) criteria which had been targeted during EPEAT's annual Verification Planning process or had not been recently investigated:

- 4.1.6.1 Required- Reducing BFR/CFR/PVC content of external plastic casings
- 4.1.7.1 Optional- Reduce fluorinated gas emissions resulting from flat panel display manufacturing
- 4.2.2.1 Required- Declaration of biobased plastic materials content
- 4.3.2.2 Required- Restriction on materials not compatible with reuse and recycling
- 4.4.2.1 Optional- Product upgradability
- 4.6.2.1 Required- End of life processing requirements
- 4.8.1.2 Required- Elimination of elemental chlorine as a bleaching agent in packing material
- 4.9.4.1 Required- Documentation that the cartridge or container is not designed to prevent its reuse and recycling
- 4.10.1.1 Required- Indoor air quality emission requirements

All products active in the Registry, all geographies and all manufacturers were eligible for inclusion.

Forty-Seven (47) Level 1 investigations were completed for this Verification round. A Level 1 investigation involves an Auditor review of Manufacturer submissions of evidence.

2. Summary of Outcomes

47 investigations were completed during this verification round.

45 findings of Conformance

2 findings of Nonconformance

Chart 1. Overall conformance rate for IE-2019-02 (as a percentage of overall investigations)

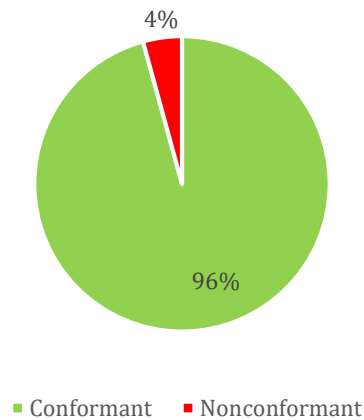
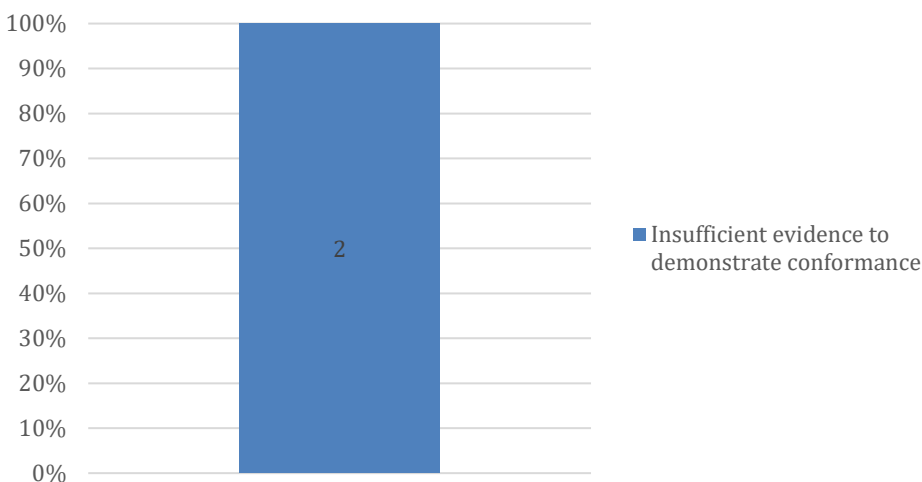


Chart 2. Reasons for Nonconformance



3. Key Lessons

4.1.6.1 Reducing BFR/CFR/PVC content of external plastic casings

The manufacturer should be prepared to demonstrate active implementation of a conformance assurance system (CAS) that assures substances are not present over the criterion thresholds. For this criterion, analytical test data are required to demonstrate the Check element of the CAS.

4.6.2.1 End-of-life processing

This is a complex criterion with multiple paths to conformance. The manufacturer should provide a list of their initial service providers for end of life processing and pay careful attention to which evidence to provide for different end of life processing situations.

4. General Message to Manufacturers

Understanding documentation requirements for Verification Rounds:

You can find more guidance and examples of conformance documents in the Conformity Guidance Packets located in “Help and FAQ”. 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:

Two more verification rounds (IE-2019-03 and IE-2019-04) are planned for the remainder of 2019.

Conformity Guidance Packets:

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

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
Panasonic	N/A (Corporate Criterion)	UK	N/A	4.6.2.1	Required	End of life processing requirements	Insufficient evidence to demonstrate conformance	If insufficient evidence to demonstrate conformance, manufacturer provided additional evidence resulting in conformance
Visioneer	Visioneer Patriot D40	United States	Scanner	4.1.6.1	Required	Reducing BFR/CFR/PVC content of external plastic casings	Insufficient evidence to demonstrate conformance	If insufficient evidence to demonstrate conformance, manufacturer provided additional evidence resulting in 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 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.