



OUTCOMES REPORT EPEAT VERIFICATION ROUND PC-2019-01

1. Overview of Verification Round

Verification Round PC-2019-01 investigated targeted criteria from the PC & Display: 2018 criteria. Forty-two (42) Level 1 investigations were completed. In Level 1 investigations, an Auditor assesses Conformance to a criterion by examining information submitted by a Manufacturer. The Manufacturer is required to provide detailed and accurate information in a 60-day period.

NOTE: The PC and Display criteria are in the process of being updated via an amendment process. Since this process is not yet complete, criteria involved in that amendment process were not included in this Verification Round.

The products and criteria were selected as follows:

- All products currently active on the Registry were eligible for inclusion and were chosen first through a random selection process.
- All geographies and Manufacturers were eligible for inclusion.
- Each Manufacturer was assigned at least one investigation. No Manufacturer was subject to more than 13 investigations during this Round.

The following is a list of criteria which were included in this Verification Round:

- 4.1.1.1 Required - Conformance with European Union ROHS Directive substance restrictions
- 4.1.3.1 Required - Elimination of intentionally added mercury in light sources
- 4.1.4.1 Optional - Restriction of the use of beryllium
- 4.1.7.1 Required - Compliance with provisions of EU Battery Directive
- 4.3.2.1 Required - Plastic parts compatible with recycling
- 4.4.1.1 Required - Service support
- 4.4.2.1 Required - Removal of external enclosure
- 4.4.2.4 Required - Battery replacement and information
- 4.4.2.5 Optional - Product upgradeability and repairability
- 4.4.2.6 Optional - Removal of lithium ion batteries
- 4.5.1.2 Required - Lowest Power Mode limit
- 4.7.1.1 Required – Elimination of intentionally added heavy metals in packaging
- 4.7.1.2 Required - Elimination of elemental chlorine as a bleaching agent in packaging material
- 4.7.2.1 Required - Separable packaging material
- 4.7.2.2 Required - Plastics marked in packaging materials
- 4.7.3.1 Required - Recycled content in wood-based fiber packaging
- 4.9.1.1 Required - Third party certified environmental management system (EMS) for design and manufacturing organizations

- 4.9.2.1 Required - Corporate environmental performance reporting by manufacturer
- 4.10.2.1 Required - Public Disclosure regarding conflict minerals in products

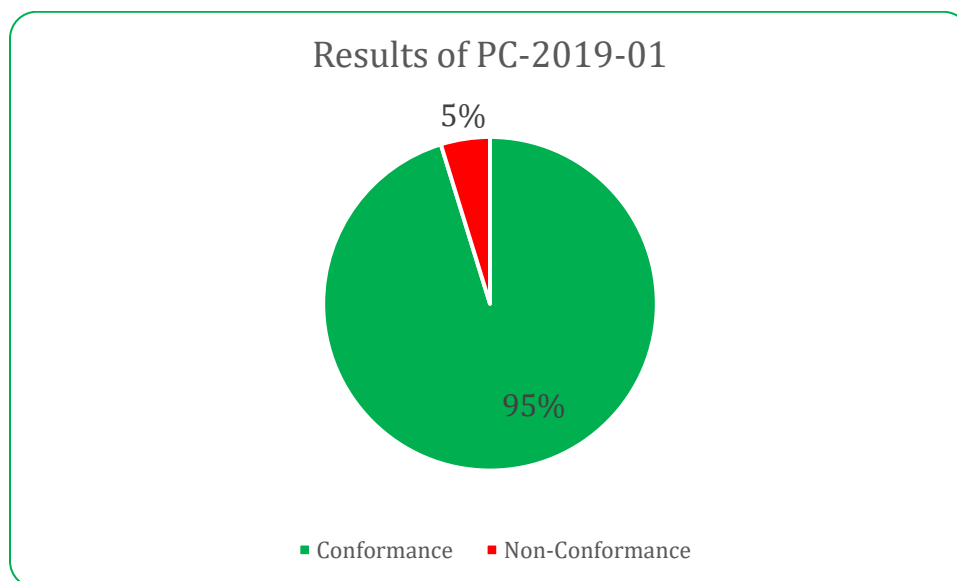
Since this is the first ever Verification Round for the updated version of the PC and Display criteria, the Manufacturer's name will not be published for any Non-Conformances found.

2. Summary of Outcomes

The results from the first PC and Display Verification Round PC-2019-01 are:

- 42 Investigations were completed
- 40 Decisions of Conformance
- 2 Decisions of Non-Conformance

Of the 2 Decisions of Non-Conformance, one was considered a Major Non-Conformance and one was considered a Minor Non-Conformance. Major Non-Conformances must be corrected within 30 days while Minor Non-Conformances must have a plan created within 30 days and the correction must be complete within 1 year. In both cases the Non-Conformances have already been corrected. Major non-conformances are raised for a complete breakdown or absence of a process, control, or aspect of the management system. Minor non-conformances are raised for non-critical instances where a process is not followed, or a control is not effective.



3. Key Lessons

4.3.2.1 – Plastic parts compatible with recycling

This criterion requires plastic parts to be marked in accordance with ISO 11469/1043. All discrete parts greater than 25 grams must be marked appropriately in order to be conformant to this Required criterion.

4.7.3.1 – Recycled content in wood-based fiber packaging

This criterion requires a declaration of the recycled content. If the declaration of recycled content is greater than the actual content shown by the evidence provided, the declaration would not be conformant. While it is acceptable for the declared recycled content to be less than the actual recycled content, declaring a recycled content greater than the actual recycled content is unacceptable. Additionally, rounding should not be used when making a declaration of recycled content.

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 “Help & FAQ” 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:

All Verification Round have been launched for 2019. During 2020, four Verification Rounds are expected to be launched for PCs and Displays.

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

NOTE: Manufacturer names and product names not disclosed because this is the first Verification Round for the new criteria.

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
[Not disclosed]	[Not disclosed]	Mexico	Integrated Desktop Computer	4.3.2.1	Required	Plastic parts compatible with recycling	Demonstrated non-conformance	Markings were corrected to be in accordance with ISO 11469/1043
[Not disclosed]	[Not disclosed]	United States	Monitors	4.7.3.1	Required	Recycled content in wood-based fiber packaging	Demonstrated non-conformance	Declaration of recycled content was corrected on EPEAT Registry for all affected products

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.

Major Non-Conformances are raised for a complete breakdown or absence of a process, control, or aspect of the management system.

Minor Non-Conformances are raised for non-critical instances where a process is not followed, or a control is not effective.