Green Electronics Council

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PLAN FOR VERIFICATION ROUND IE-2016-03

IMAGING EQUIPMENT

AUGUST 2016

I. PURPOSE AND CONTENTS OF THIS DOCUMENT

This document outlines the plan for a Verification Round of Investigations to be performed in accordance P15 Verification Procedure, this Verification Plan, and EPEAT scheme rules.

II. SELECTION OF CRITERIA AND PRODUCTS FOR VERIFICATION

Verification Round IE-2016-03 will investigate four criteria that have not yet been investigated:

- 4.4.2.1 - Optional—Product upgradeability
- 4.5.2.1 - Optional—Product specific greenhouse gas emissions—life-cycle assessment
- 4.8.4.1 - Optional—Provision of take-back service for packaging
- 4.9.2.1 - Required—Documentation that product does not prevent the use of non-manufacturer cartridges and non-manufacturer containers

All Manufacturers claiming any of these criteria will be included in this Verification Round. Additionally, from a complete list of all manufacturers, criteria and products will be chosen at random until the total number of investigations reaches 51.

The four chosen criteria, plus any applicable randomly chosen criteria, will be 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 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.

All randomly selected criteria not chosen for Level 0 investigation will be investigated via Level 1 investigation after the Level 0 portion of the Verification Round has closed. In a Level 1 investigation, 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 timely manner.

The products and criteria will be selected via the process below:

	Selection Process:	***Notes:***
	⬇	
Step 1	A list of all products will be pulled from the EPEAT Registry.	*All active products on the Registry will be included.*
	⬇	

Step 2	Select only products claiming all four chosen criteria. From this list, GEC will randomly select a product from each Manufacturer.	*All manufacturers claiming any of the four criteria will be investigated in the Verification Round.*
	⬇	
Step 3	For Manufacturers not chosen in the previous step, narrow down list to only products claiming three of chosen criteria. From this list, GEC will randomly select a product from each Manufacturer remaining.	*All manufacturers claiming any of the four criteria will be investigated in this Verification Round.*
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Step 4	For Manufacturers not chosen in the previous step, narrow down list to only products claiming two of chosen criteria. From this list, GEC will randomly select a product from each Manufacturer remaining.	*All manufacturers claiming any of the four criteria will be investigated in this Verification Round.*
	⬇	
Step 5	For Manufacturers not chosen in the previous step, narrow down list to only products claiming one of chosen criteria. From this list, GEC will randomly select a product from each Manufacturer remaining.	*All manufacturers claiming any of the four criteria will be investigated in this Verification Round.*
	⬇	
Step 6	For Manufacturers not claiming any of the four chosen criteria, the EPEAT Scheme will randomly select a product from each Manufacturer. GEC will continue selecting random criteria / products until a total of 53 is reached.	*All manufacturers with active products on the EPEAT Registry are subject to investigation during this Round. This step will not be taken investigations identified in steps 1-5 add up to 53 investigations.*

- All geographies and Manufacturers with active products on the EPEAT Registry are eligible for inclusion.
- No Manufacturer will have more than 4 investigations in this Verification Round.
- Exception is as follows: If a criterion is randomly selected for a product and that product has been investigated against that criterion in the last six months, a new criterion will be randomly selected for the product.

III. VERIFICATION PROCESSS

The Verification Round will proceed in accordance with current procedures, as outlined below.

Level 0 Investigations - Targeted and Random Criteria:

The Level 0 portion of the Verification Round will proceed in accordance with current procedures, as outlined below.

1. The EPEAT Scheme will take a "snapshot" of the Registry, from which products will be selected for investigation.

2. The EPEAT Scheme will instruct Conformity Assurance Bodies (if applicable – see Section V) to proceed with the investigations.

3. Conformity Assurance Bodies will assign investigations to (an) Auditor(s). The Auditor(s) will NOT notify the subject Manufacturers that their products are being investigated at this time.

4. The Auditors will perform the investigations as assigned within the allotted time, and prepare an Investigation Report for each investigation, recommending conformance or inconclusive based on publicly available data.

5. Conformity Assurance Bodies will review all Investigation Reports to ensure they are clear and complete and the evidence supports the recommendation, and will forward the Report and supporting evidence to the EPEAT Scheme. At the same time, Conformity Assurance Body will forward the draft Reports (without the final Conformity Decision Panel decision) to the subject Manufacturers.

6. The Conformity Decision Panel will review the reports and make a decision regarding conformity. The identity of the products and Manufacturers will not be disclosed to the Conformity Decision Panel. The Conformity Decision Panel will be blind to the specific products and Manufacturers for which they are making conformity decisions.

7. In the case of a finding of inconclusive, the EPEAT Scheme will launch a Level 1 investigation. The Verification Process for Level 1 investigations can be seen below.

8. Conformity Assurance Bodies will inform the subject Manufacturers of the Conformity Decision Panel's conformity decision. For decisions of Non-Conformance, Manufacturers will be required to take corrective action within 14 calendar days to restore the accuracy of the declaration in the EPEAT Registry.

Level 1 Investigations - Targeted Criteria and Manufacturers:

The Level 1 portion of the Verification Round will proceed in accordance with current procedures, as outlined below.

1. The EPEAT Scheme will use the "snapshot" of the Registry taken for the Level 0 investigations.

2. The EPEAT Scheme will instruct Conformity Assurance Bodies (if applicable – see Section V) to proceed with the investigations.

3. Conformity Assurance Bodies will assign investigations to (an) Auditor(s), and will notify the subject Manufacturers that their products are being investigated.

4. The EPEAT Scheme will publish the Verification Round Plan on epeat.net.

5. The Auditors will perform the investigations as assigned within 60 calendar days, and prepare an Investigation Report for each investigation, recommending conformance or nonconformance.

6. Conformity Assurance Bodies will review all Investigation Reports to ensure they are clear and complete and the evidence supports the recommendation, and will forward the Report and supporting evidence to the EPEAT Scheme. At the same time, Conformity Assurance Body will forward the draft Reports (without the final Conformity Decision Panel decision) to the subject Manufacturers.

7. The Conformity Decision Panel will review the reports and make a decision regarding conformity. The identity of the products and Manufacturers will not be disclosed to the Conformity Decision Panel. The Conformity Decision Panel will be blind to the specific products and Manufacturers for which they are making conformity decisions.

8. In the case of a finding of inconclusive or Non-Conformant, the EPEAT Scheme may launch a Level 2 investigation at some future date.

9. Conformity Assurance Bodies will inform the subject Manufacturers of the Conformity Decision Panel's conformity decision. For decisions of Non-Conformance, Manufacturers will be required to take corrective action within 14 calendar days to restore the accuracy of the declaration in the EPEAT Registry.

10. The EPEAT Scheme will publish a "Verification Round Outcomes Report" identifying the nonconforming products and Manufacturers, as well as the action taken to restore accuracy of the declarations in the Registry.

IV. CONFORMITY DECISION PANEL

The following individuals are the members of the Conformity Decision Panel:

- Libby Chaplin, CEO, Arcadian Solutions
- Jack Geibig, President, Ecoform
- Robert Pfahl, Pfahl Consulting L.L.C.
- Annette Roesler, Ph.D., Independent Professional Chemist

V. PRODUCT REGISTRATION ENTITIES AND QUALIFIED VERIFIERS

All investigations will be conducted through Conformity Assurance Bodies approved by the Green Electronics Council. The following Conformity Assurance Bodies may be involved in Investigations for this Verification Round:

- DEKRA
- GEC
- Intertek
- ULE

VI. VERIFICATION ROUND PLAN APPROVAL

Members of the Conformity Decision Panel and the GEC Scheme approved the Verification Round Plan on August 17, 2016. This plan was updated with actual numbers on August 22, 2016.

VII. SUMMARY OF IE-2016-03 PLANNED INVESTIGATIONS

Criterion	Verification Selection and Process	# Planned Investigations
4.4.2.1	• Optional—Product upgradeability • Level 0 investigation, move to Level 1 in case of Inconclusive	**12**
4.5.2.1	• Optional—Product specific greenhouse gas emissions—life-cycle assessment • Level 0 investigation, move to Level 1 in case of Inconclusive	**14**
4.8.4.1	• Optional—Provision of take-back service for packaging • Level 0 investigation, move to Level 1 in case of Inconclusive	**12**
4.9.2.1	• Required—Documentation that product does not prevent the use of nonmanufacturer cartridges and non-manufacturer containers • Level 0 investigation, move to Level 1 in case of Inconclusive	**13**
Random	• Criteria and products chosen randomly from remaining manufacturers • Level 0 or Level 1 as applicable to criterion	**0**
	Total	**51**