



OUTCOMES REPORT EPEAT VERIFICATION ROUND IE-2017-03

1. Overview of Verification Round

This report provides detailed results for Verification Round IE-2017-03. This round included forty-seven (47) Level 1 investigations on randomly chosen criteria and products. All manufacturers and all geographies were eligible for inclusion. Criteria investigated during this round included:

- 4.1.1.1 Required: Compliance with provisions of European Union RoHS Directive
- 4.1.4.1 Optional: Reduction of substances on the EU REACH Candidate List of SVHCs
- 4.1.5.1 Required: Compliance with provisions of EU Battery Directive
- 4.1.6.1 Required: Reducing BFR/CFR/PVC content of external plastic casings
- 4.2.1.1 Required: Declaration of postconsumer recycled plastic content
- 4.2.1.2 Required: Minimum content of postconsumer recycled plastic
- 4.2.2.1 Required: Declaration of biobased plastic materials content
- 4.3.1.1 Required: Ease of disassembly of product
- 4.3.1.2 Optional: Ease of disassembly of consumer products
- 4.3.3.1 Required: Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs.
- 4.3.4.1 Required: Preparation of product end-of-life characterization report
- 4.5.1.1 Required: ENERGY STAR
- 4.5.3.1 Required: Standby power level ≤ 1 W and disclosure
- 4.5.3.2 Optional: Auto standby capability
- 4.5.4.1 Optional: Default to automatic duplex printing
- 4.6.1.2 Optional: Provision of take-back service for broader scope of products
- 4.6.2.1 Required: End-of-life processing requirements
- 4.7.1.1 Required: Self-declared environmental management system for design and manufacturing organizations
- 4.7.1.2 Optional: Third-party certified environmental management system for design and manufacturing organizations
- 4.7.2.1 Required: Public disclosure of key environmental aspects
- 4.7.2.2 Optional: Public disclosure of supply chain toxics
- 4.7.3.1 Optional: Product life-cycle assessment and public disclosure of analyses
- 4.8.2.1 Required: Separable packing materials
- 4.8.3.1 Required: Recovered content in select fiber-based packaging materials
- 4.9.3.1 Required: Provision of take-back and end-of-life management for cartridges and containers
- 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

2. Summary of Outcomes

Highlights from this Round:

- 47 total investigations assigned
- 44 decisions of Conformance
- 2 decisions of Nonconformance
- 1 investigation cancelled

Figure 1: Overall Conformance Status for IE-2017-03 (as a percentage of total investigations)

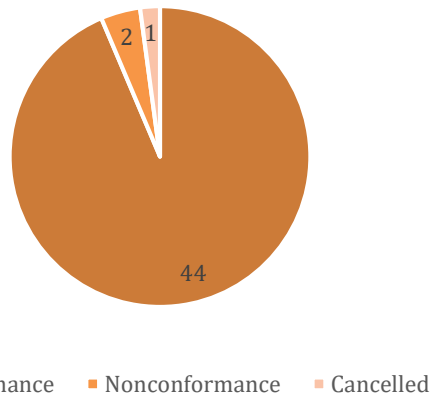
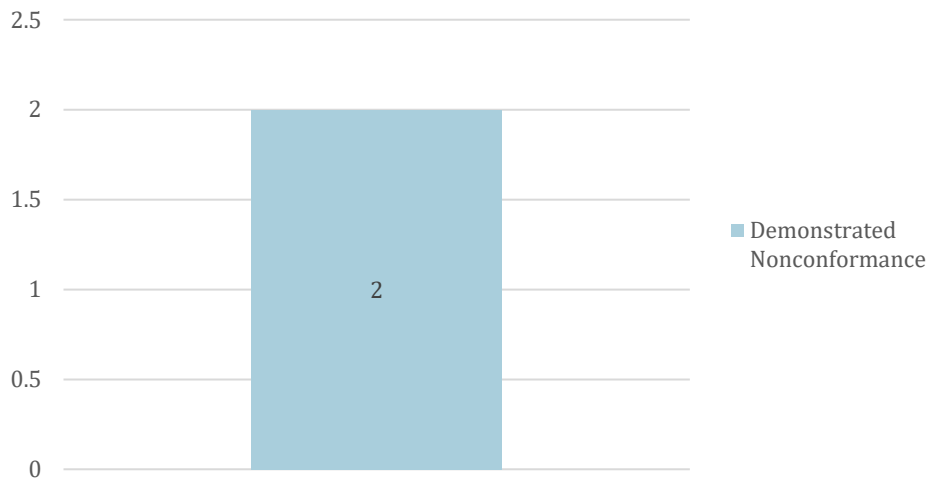


Figure 2: Reasons for nonconformance



3. Key Lessons

4.3.3.1 Required: Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs

This criterion requires that manufacturers provide information to reuse and recycling facilities regarding the presence and location of any materials or components in the product which require special handling, in accordance with the most recent version of the EU WEEE Directive. A list of materials and components for which this information must be provided is available in Annex VII of the WEEE Directive (2012).

4.1.5.1 Required—Compliance with provisions of EU Battery Directive

This criterion requires compliance with the material content limits in the most recent version of the EU Battery Directive for all batteries in the product. If the product does not contain batteries, please declare “N/A” in the EPEAT Registry, rather than “Yes”.

4. General Message to Manufacturers

Active Products:

Products “Active” on the EPEAT Registry: All Active products on the EPEAT Registry are subject to Verification. When products reach their end of life, Manufacturers should remove the products from the EPEAT Registry. If a product which is Active on the EPEAT Registry has reached end of life and a Manufacturer cannot obtain required evidence for verification due to the age of the product, it would still be considered a Non-Conformance.

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:

Four (4) Verification Rounds are planned for Imaging Equipment products in 2018.

Conformity Packets:

This and all future Verification Rounds have and will be conducted according to the guidance provided in the Conformity Packets posted on www.epeat.net under “Key Documents” in My Account.

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
Lexmark International, Inc.	MX912 XM9165	Canada	Multifunction Device (MFD)	4.3.3.1	Required	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	Demonstrated Nonconformance	Manufacturer provided evidence of changes made resulting in conformance.
Brother International Corporation	HL-L2320D	United States	Printer	4.1.5.1	Required	Compliance with provisions of EU Battery Directive	Demonstrated Nonconformance	Manufacturer revised declaration for criterion

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.