Green Electronics Council
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OUTCOMES REPORT
EPEAT VERIFICATION ROUND IE-2018-01

1. Overview of Verification Round

Verification Round IE-2018-01 included 21 Level 2 / 3 lab tests on 3 products. These products were randomly chosen from a list of manufacturers that had not yet had products Level 2 / 3 lab tested. Criteria were chosen from the list below.

Criterion	Description of Criterion	Level 2	Level 3
4.1.1.1	Required – Compliance with provisions of European Union RoHS Directive	X	X
4.1.2.1	Optional – Further reduction of the use of EU RoHS Directive hazardous substances (cadmium)	X	X
4.1.4.1	Optional – Reduction of substances on the EU REACH Candidate List of SVHCs	X	X
4.1.6.1	Required – Reducing BFR/CFR/CDP content of external plastic casings	X	X
4.3.1.1	Required – Ease of disassembly of product	X	
4.3.1.2	Optional – Ease of disassembly of consumer products	X	
4.3.2.1	Required – Use of single recyclable plastic type per plastic part	X	
4.3.2.2	Required – Restriction on materials not compatible with reuse and recycling	X	
4.8.1.1	Required – Elimination of intentionally added heavy metals in packaging	X	X
4.8.2.1	Required – Separable packing materials	X	
4.8.2.2	Optional – Packaging 90% compostable/recyclable	X	

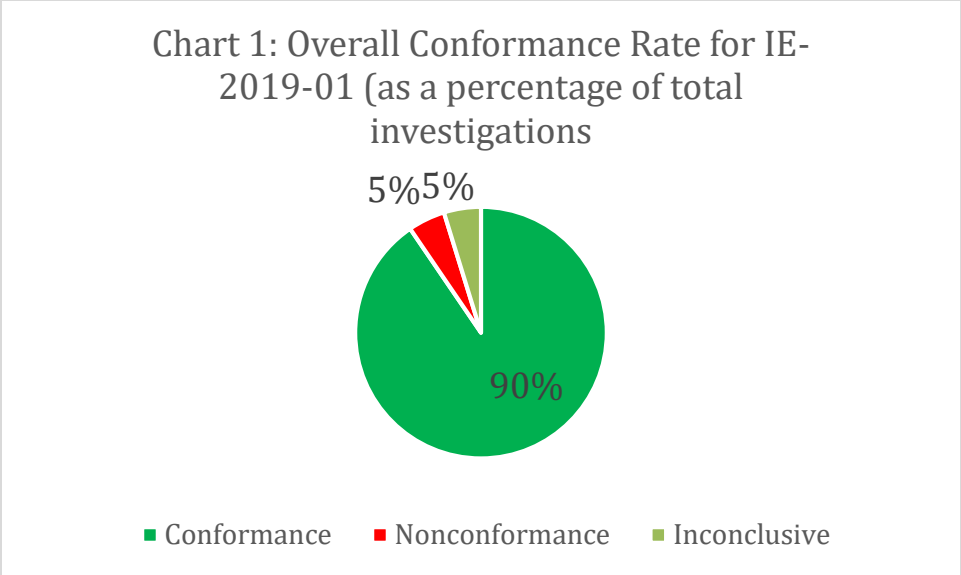
2. Summary of Outcomes

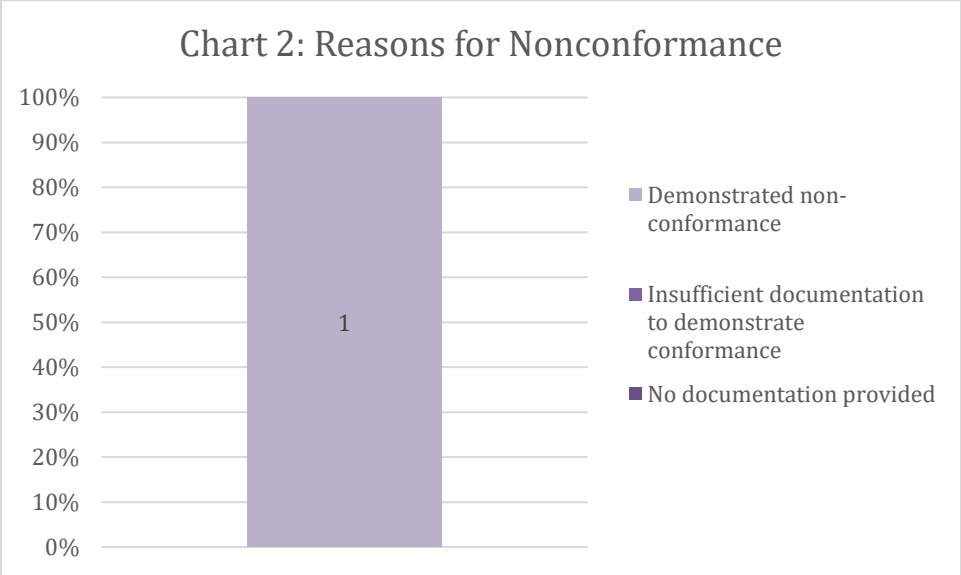
21 investigations completed

1 Decision of Nonconformance

19 Decisions of Conformance

1 Decision of Inconclusive





3. Key Lessons

4.1.1.1 Required – Compliance with provisions of European Union RoHS Directive

This criterion requires compliance the European Union RoHS Directive, which lists several exemptions. Manufacturers must ensure that components do not exceed RoHS thresholds for restricted substances unless an exemption can be claimed.

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 under "Help and FAQ" in your EPEAT Registry Account.

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 verification rounds for Imaging Equipment are planned for 2019.

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 under “Help and FAQ” in your EPEAT Registry 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**
Brother International Corporation	DCP-L2540DW	United States	Multifunction Device (MFD)	4.1.1.1	Required	Compliance with provisions of European Union RoHS Directive	Demonstrated NC	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made 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.