Green Electronics Council

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PLAN FOR VERIFICATION ROUND IE-2019-03

Imaging Equipment / IEEE 1680.2 and 1680.2(a)
April 2019

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

IE-2019-03 will include 54 Level 0 and 1 investigations on 16 criteria. The selected criteria are either those that lend themselves well to Level 0 investigations or those for which demonstration of conformance is difficult. All geographies and manufacturers with products active on the EPEAT Registry are eligible for inclusion in this Round. Criteria which will be investigated during this Round include:

- 4.3.3.1 Required - Notification of identification of hazardous materials with special handling needs
- 4.3.4.1 Required - End of life characterization report
- 4.4.1.1 Required - Early failure process
- 4.4.2.1 Optional - Product upgradeability
- 4.5.1.1 Required - ENERGY STAR
- 4.5.2.2 Optional - LCA publically available
- 4.5.3.2 Optional - Auto standby capability
- 4.5.4.1 Optional - Default to auto duplex printing
- 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 LCA assessment and public disclosure of analyses
- 4.8.4.1 Optional - Provision of take-back service for packaging
- 4.9.1.1 Required - Allow use of general office paper with renewable content, recycled content, and that is chlorine free
- 4.9.2.1 Required - Documentation that product does not prevent the use of non-manufacturer cartridges and non-manufacturer containers
- 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 cartridges or container is not designed to prevent its reuse and recycling

All 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.

Products will be selected via the following process:

	Selection Process: ⬇	***Notes:***
Step 1	A snapshot will be taken of the EPEAT registry by CA staff	*Snapshot will include all active products from all manufacturers and geographies*
Step 2	Snapshot will be sorted to include only criteria included in this round	
Step 3	Products and criteria will be randomly chosen from this shortened list until all investigations are assigned	*No manufacturer will be subject to more than 15 investigations during this round.*
Step 4	A check will be performed on the assigned products to ensure that they have not been investigated recently	*A specific criterion on a specific product may not be verified more than once every six months.*

III. VERIFICATION PROCESSS

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

Level 0 Investigations:

- GEC defines the start date of Verification Rounds using Level 0 Investigations, the length of the Investigation Period and date when Investigation Reports must be submitted to GEC.
- Manufacturers are not informed they have been selected for Level 0 Investigations.
- The CAB Auditor conducts the Investigation by searching publicly available information and makes a recommendation on conformity.
- If publicly available information does not demonstrate Conformance, the Auditor recommends Inconclusive.
- The Auditor completes the relevant sections of the Investigation Report.
- Investigation Reports are submitted by the CAB to GEC before or on the date defined.
- The CAB removes any information that may identify the Manufacturer being investigated before the Investigation Report is submitted to GEC.
- The Conformity Assurance staff member reviews the report.

- For decisions of Conformance, the Conformity Assurance staff member amends the Investigation Report to reflect the decision. The report is sent to the CAB, which is responsible for sending it to the Manufacturer. The Investigation is complete.
- For decisions of Inconclusive, the Conformity Assurance staff member amends the Investigation Report, sends the report to the CAB and a Level 1 Investigation is launched.

Level 1 investigations:

- GEC defines the start date of Verification Rounds using Level 1 Investigations. The Investigation Period for Level 1 Investigations is 60 days, and CABs have 60 days from the start of the date of Round to complete their Investigations. GEC defines the date that CABs must submit their Investigation Reports to GEC, typically two weeks after the end of the Investigation Period.
- Approximately 3-4 weeks prior to the start date of the Verification Round, the Conformity Assurance staff informs CABs of the products that have been selected, the official start date of the Round and the end date of the Investigation Period.
- On the start date of the round, CABs contact their client Manufactures to inform them they have been selected for Verification. CABs do not inform their client Manufacturers they are being targeted for an Investigation prior to the start date of the Round.
- In instances where the CAB's client Manufacturer is unresponsive to the CAB's requests for information, the CAB may request that GEC intervene with their client Manufacturer directly.
- The CAB Auditor conducts the Investigation and completes the relevant sections of the Investigation Report.
- At the end of the Investigation Period the CAB must also provide a copy of the reviewed IR to their client Manufacturer, as a draft, so that the Manufacturer is informed of the CAB's recommendation on conformity.
- Investigation Reports are submitted to GEC before or on the date defined.
- A Conformity Assurance staff member will review the report. If the report clearly supports the CAB recommendation of conformance the Conformity Assurance staff may accept the CAB recommendation. In any instances where the report does not clearly support the CAB recommendation of conformance, the CA staff may send the report back to the CAB or overturn the CAB's recommendation.
- Conformity Assurance staff amends the Investigation Report to reflect the final decision and any comments. The report is sent to the CAB, which is responsible for sending it to their Manufacturer.
- For decisions of Conformance, the report is considered final and the Investigation is complete.
- For decisions of Non-Conformance, the corrective action phase is launched.

IV. CONFORMITY ASSURANCE BODIES AND AUDITORS

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
- Green Electronics Council CAB
- Intertek
- UL Environment

V. SUMMARY OF IE-2019-03 PLANNED INVESTIGATIONS

Criterion	Verification Selection and Process	# Planned Investigations
4.3.3.1	• Required - Notification of identification of hazardous materials with special handling needs	5
4.3.4.1	• Required - End of life characterization report	2
4.4.1.1	• Required - Early failure process	3
4.4.2.1	• Optional - Product upgradeability	4
4.5.1.1	• Required - ENERGY STAR	3
4.5.2.2	• Optional - LCA publically available	4
4.5.3.2	• Optional - Auto standby capability	4
4.5.4.1	• Optional - Default to auto duplex printing	2
4.7.2.1	• Required - Public disclosure of key environmental aspects	4
4.7.2.2	• Optional - Public disclosure of supply chain toxics	3
4.7.3.1	• Optional - Product LCA assessment and public disclosure of analyses	3
4.8.4.1	• Optional - Provision of take-back service for packaging	1
4.9.1.1	• Required - Allow use of general office paper with renewable content, recycled content, and that is chlorine free	3
4.9.2.1	• Required - Documentation that product does not prevent the use of non-manufacturer cartridges and non-manufacturer containers	6
4.9.3.1	• Required - Provision of take-back and end-of-life management for cartridges and containers	5
4.9.4.1	• Required - Documentation that the cartridges or container is not designed to prevent its reuse and recycle	2
	Total	**Up to 54 investigations**