



OUTCOMES REPORT EPEAT VERIFICATION ROUND PC-2018-03

1. Overview of Verification Round

PC-2018-03 included 65 Level 0 and 1 investigations on 9 criteria. The selected criteria were either those that lent 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 were eligible for inclusion in this Round. Criteria which were investigated during this Round included:

- 4.1.3.1- Required- Reporting on amount of mercury used in light sources
- 4.1.3.3- Optional- Elimination of intentionally added mercury used in light sources
- 4.3.1.1- Required- Identification of materials with special handling needs
- 4.4.1.1- Required- Availability of additional 3 year warranty or service agreement
- 4.5.2.1- Optional- Renewable energy accessory available
- 4.6.1.1- Required- Provision of product take back service
- 4.7.1.1- Required- Demonstration of corporate environmental policy consistent with ISO 14001
- 4.7.3.1- Required- Corporate report consistent with Performance Track or GRI
- 4.7.3.2- Optional- Corporate report based on GRI

Note: Criterion 4.5.2.2, Renewable energy accessory standard, was planned to be investigated during this round; however it was dropped from the round as no manufacturers were claiming it.

Criteria 4.4.1.1, 4.5.2.1, and 4.7.3.2 were 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. In this round, 15 Level 0 investigations were assigned, and 12 proceeded to Level 1 investigations following completion of the Level 0 portion of the round.

Criteria 4.1.3.1, 4.1.3.3, 4.3.1.1, 4.6.1.1, 4.7.1.1, and 4.7.3.1 were investigated via Level 1 investigation after completion of the Level 0 portion of the round. 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.

2. Summary of Outcomes

The following is a summary of Outcomes from this round:

65 investigations assigned

4 investigations cancelled

15 investigations at Level 0

12 Level 0 investigations Inconclusive and moved to Level 1

39 decisions of Conformance

22 decisions of Nonconformance

Chart 1. Overall Conformance Status for PC-2018-03 (as a percentage of total investigations)

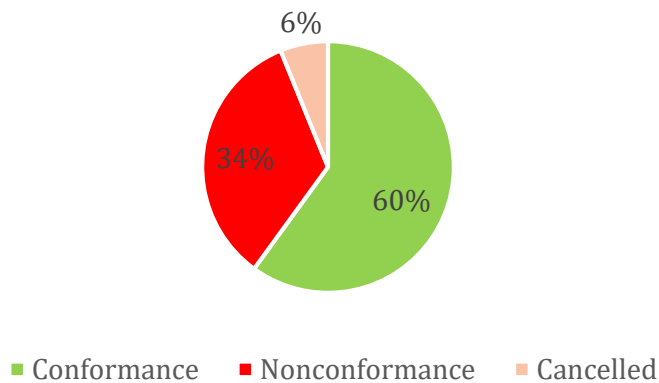
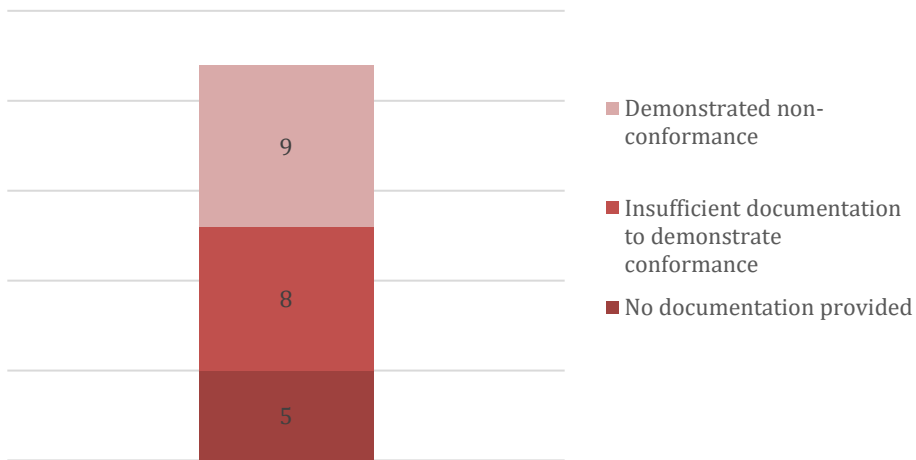


Chart 2. Reasons for Nonconformance



3. Key Lessons

Criterion 4.3.1.1 Required—Identification of materials with special handling needs

This criterion requires manufacturers to identify the presence and location of materials with special handling needs (typically, those that appear in the EU WEEE Directive). Manufacturers are advised to keep their disassembly reports for products up-to-date, and ensure that any materials submitted as evidence can demonstrate both the presence and location of such materials.

Criterion 4.6.1.1 Required—Provision of product take-back service

This is a complex criterion with many requirements to demonstrate conformance. Manufacturers should be able to identify any recyclers associated with the take back program and demonstrate a business relationship with them. Any costs to the consumer associated with the take back program should also be disclosed.

Criterion 4.7.1.1 Required—Demonstration of corporate environmental policy consistent with ISO 14001

This criterion requires the manufacturer to demonstrate that their written corporate environmental policy is consistent with all aspects of the requirements laid out in the environmental policy section of ISO 14001. Manufacturers should ensure that they are able demonstrate how their written environmental policy meets the requirements of the environmental policy section of ISO 14001.

3. 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 “Key Documents” 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.

4. Looking Forward

Plans for Future Verification Activities:

The EPEAT Program will begin verification to IEEE 1680.1 2018 in the first half of 2019.

Conformity Sample Packets:

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

5. 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
Action S.A.	SIERRA 500X ES01	Poland	Desktops	4.7.3.2	Optional	Corporate report based on GRI	Insufficient documentation to prove conformance	Criterion undeclared by Manufacturer.
digital computer	Ascent Desktop - D-XXXX	Brazil	Desktops	4.5.2.1	Optional	Renewable energy accessory available	No documentation provided	Other - Description: Administrative error
HP Inc.	ProDisplay P232 23-inch Monitor	Taiwan	Monitors	4.5.2.1	Optional	Renewable energy accessory available	No documentation provided	Other - Description: Manufacturer corrected registry declaration
HP Inc.	24w 23.8-inch Display	United States	Monitors	4.4.1.1	Required	Availability of additional 3 year warranty or service agreement	Insufficient documentation to prove conformance	Product archived by Manufacturer.
Inida	M500 2000 IN500.01	Lithuania	Desktops	4.7.3.2	Optional	Corporate report based on GRI	No documentation provided	Other - Description: Administrative error
NTT System S.A.	NTT Business W 504M	Poland	Desktops	4.4.1.1	Required	Availability of additional 3 year warranty or service agreement	Insufficient documentation to prove conformance	If NC due to insufficient evidence, Manufacturer provided additional evidence to demonstrate conformance.
Positivo Tecnologia S.A.	Positivo Master A2100	Brazil	Integrated Desktop Computers	4.7.3.2	Optional	Corporate report based on GRI	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
Algoritmos Procesos y Diseños, S.A.	ALDA CE	Spain	Desktops	4.7.1.1	Required	Demonstration of corporate environmental policy consistent with ISO 14001	Insufficient documentation to prove conformance	If NC due to insufficient evidence, Manufacturer provided additional evidence to demonstrate conformance.
Arquimedes Automacao e Informatica Ltda	Corporativo A	Brazil	Desktops	4.3.1.1	Required	Identification of materials with special handling needs	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.

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CIARA-TECH	ASUS UN45	Canada	Desktops	4.3.1.1	Required	Identification of materials with special handling needs	Demonstrated non-conformance	Product archived by Manufacturer.
Corporativo Lanix, S.A. de C.V	Neuron R II	Mexico	Notebooks	4.1.3.3	Optional	Elimination of intentionally added mercury used in light sources	No documentation provided	Other - Description: Manufacturer did not take corrective action, and CAB archived the product
Corporativo Lanix, S.A. de C.V	LX900T	Mexico	Monitors	4.7.3.1	Required	Corporate report consistent with Performance Track or GRI	No documentation provided	Other - Description: Insufficient evidence was provided to re-establish conformance. CAB archived the Manufacturer's products.
Dell, Inc.	XPS 13-9365	Sweden	Notebooks	4.3.1.1	Required	Identification of materials with special handling needs	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
Durabook Americas Inc.	S15AB	United States	Notebooks	4.7.3.1	Required	Corporate report consistent with Performance Track or GRI	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
Howard Technology Solutions	H11AKB	United States	Desktops	4.3.1.1	Required	Identification of materials with special handling needs	Demonstrated non-conformance	Other - Description: Product was archived as a result of an earlier corrective action
Komparsa UAB	S1700F	Latvia	Desktops	4.7.3.1	Required	Corporate report consistent with Performance Track or GRI	Insufficient documentation to prove conformance	If NC due to insufficient evidence, Manufacturer provided additional evidence to demonstrate conformance.
Login Informatica	Login L4500	Brazil	Desktops	4.7.3.1	Required	Corporate report consistent with Performance Track or GRI	Insufficient documentation to prove conformance	If NC due to insufficient evidence, Manufacturer provided additional evidence to demonstrate conformance.
TH ALPLAST	S27	Poland	Desktops	4.7.3.1	Required	Corporate report consistent with Performance Track or GRI	Insufficient documentation to prove conformance	Other - Description: Manufacturer did not take corrective action, and CAB archived all active products

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Toshiba	Tecra X40-D PT472C	Canada	Notebooks	4.3.1.1	Required	Identification of materials with special handling needs	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
TPV Technology Limited	E2475SWQE	Netherlands	Monitors	4.6.1.1	Required	Provision of product take back service	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
Transource	MIR-Q900S	United States	Desktops	4.6.1.1	Required	Provision of product take back service	Insufficient documentation to prove conformance	If NC due to insufficient evidence, Manufacturer provided additional evidence to demonstrate conformance.
ViewSonic Corporation	CDX5552 VS16172	Canada	Monitors	4.3.1.1	Required	Identification of materials with special handling needs	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.

6. 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.