



## **OUTCOMES REPORT - UPDATED EPEAT VERIFICATION ROUND IE-2017-02**

### **1. Overview of Verification Round**

Verification Round IE-2017-02 for the IEEE 1680.2™ Standard for the Environment Assessment of Imaging Equipment investigated the following 12 criteria:

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

This Round was intended to assure conformance for Imaging Equipment. This Round involved lab evaluation of 3 randomly chosen Imaging Equipment products from Manufacturers who had not yet had full Level 2 / 3 lab testing. The Round planned for no more than 36 investigations and finally included 32 Level 1, Level 2, and 3 investigations. Some chosen products didn't claim one or more of the optional criteria, so the total number of investigations completed was fewer than planned. In Level 2 and 3 investigations a lab chosen by the Conformity Assurance Body (CAB) acquires products without the Manufacturer's knowledge, if possible, disassembles them, and conducts detailed analytical testing, as needed.

CABs with active Imaging Equipment products and with Manufacturers whose products had not yet been involved in Level 2 and 3 investigations to date were eligible for inclusion in this Round. Each chosen CAB had lab testing completed on no more than 2 products. Each chosen Manufacturer had lab testing completed for no more than 1 product. Products were chosen from a list of active products.

The Investigations were chosen as follows:

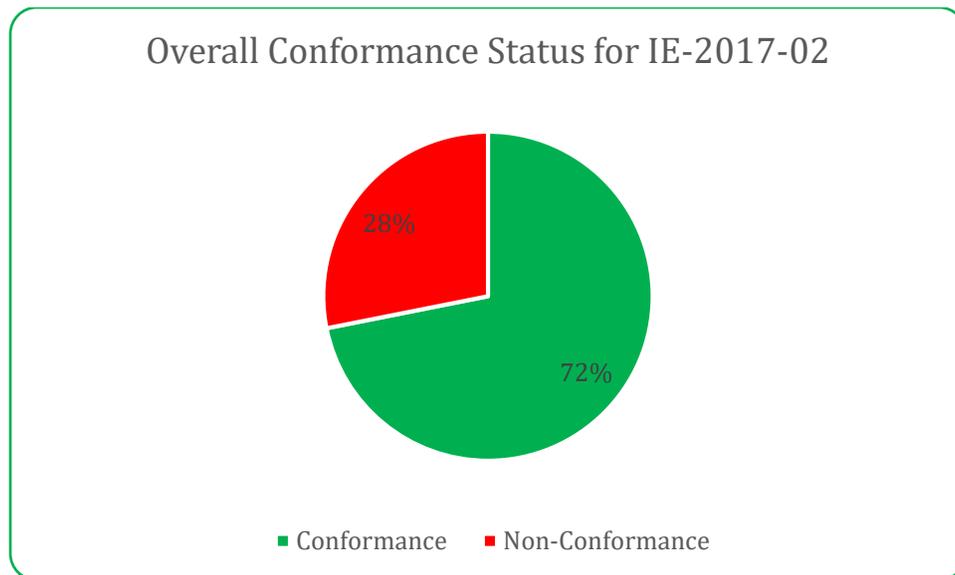
- The nine required criteria were investigated for the chosen products.
- For the four optional criteria, each chosen product was investigated for each optional criterion declared.

During this Verification Round, some of the chosen products cost more than \$10,000. Per GEC's policy, the scheme worked with the CABs to determine how to verify the product. Ten of the investigations in this round were changed to Level 1 due to the high cost of the chosen products.

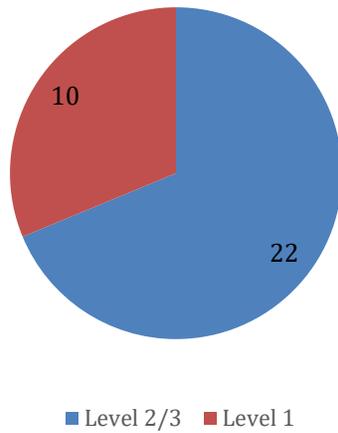
## 2. Summary of Outcomes

Highlights from this Verification Round:

- 32 investigations completed
- 23 decisions of Conformance
- 9 decisions of Non-Conformance



### Number of each type of investigation



### Reasons for Non-Conformances

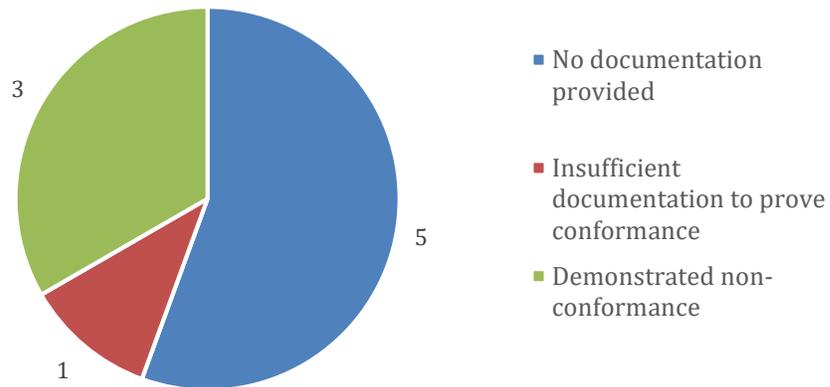


Table 1 below summarizes the number of investigations that were planned and which investigations resulted in a decision of Non-Conformance.

TABLE 1: Summary of Non-Conformance Findings				
Criterion	Description		Investigations	Non-Conformant
4.1.1.1	Required	Compliance with provisions of European Union RoHS Directive	3	1
4.1.2.1	Optional	Further reduction of the use of EU RoHS Directive hazardous substances (cadmium)	3	1
4.1.4.1	Optional	Reduction of substances on the EU REACH Candidate List of SVHCs	2	1
4.1.6.1	Required	Reducing BFR/CFR/CDP content of external plastic casings	3	1
4.3.1.1	Required	Ease of disassembly of product	3	1
4.3.1.2	Optional	Ease of disassembly of consumer products	3	0
4.3.2.1	Required	Use of single recyclable plastic type per plastic part	3	1
4.3.2.2	Required	Restriction on materials not compatible with reuse and recycling	3	1
4.8.1.1	Required	Elimination of intentionally added heavy metals in packaging	3	1
4.8.2.1	Required	Separable packing materials	3	1
4.8.2.2	Optional	Packaging 90% compostable/recyclable	3	0
4.8.2.3	Required	Plastics marked in packaging materials	3	0

### 3. Key Lessons

#### **Criterion 4.1.4.1: Reduction of substances on the EU REACH Candidate List of SVHCs**

Due to the controversy regarding the definition of an “article” in EU REACH, Manufacturers and Suppliers should err on the conservative side regarding what part they are claiming as an “article”. Failure to choose an article at the right level (assembly versus sub-assembly) may lead to a Non-Conformance.

#### **Acquiring Products for Lab Testing**

In one case, a product and / or spare parts were unable to be obtained by the Auditor / Lab which resulted in six Non-Conformances. If a product is chosen from the EPEAT Registry to be Level 2 / 3 tested, the Auditor and / or Manufacturer must make every effort to procure the product and / or spare parts for testing. Failure to do so will result in Non-Conformances for all criteria planned for investigation and removal of the product from the EPEAT Registry.

### **New Labs should be educated regarding EPEAT**

For one product, a new lab found two investigations to be Non-Conformant. However, upon further examination of the evidence and lab report, it was established that the product was not actually Non-Conformant to the two criteria. While lab testing is different than a desk review or a verification investigation, it is helpful to share information such as Conformity Guidance Packets with the labs, so they have the information needed to make informed decisions.

## **4. General Message to Manufacturers**

### **Understanding documentation requirements for Verification Rounds:**

You can find more guidance and examples of conformance documents in the Conformity Guidance Packets located in “Key Documents” under My Account. Go to [epeat.net](http://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.

## **5. Looking Forward**

### **Plans for Future Verification Activities:**

A full Auditor Training will be held in Portland, Oregon during the first half of July 2018. If you are interested in attending, please contact Rebecca Hawkins at [rhawkins@greenelectronicscouncil.org](mailto:rhawkins@greenelectronicscouncil.org).

### **Conformity Guidance Packets:**

This and all future Verification Rounds have and will be conducted according to the guidance provided in the Conformity Sample Packets posted on [www.epeat.net](http://www.epeat.net) under “Key Documents” in My Account.

## 6. Investigation Table – Summary of Non-Conformance Findings

**TABLE 2: 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
Toshiba	eStudio6570c parts chosen by EPEAT	United States	Multifunction Device (MFD)	4.1.1.1	Required	Required – Compliance with provisions of European Union RoHS Directive	No documentation provided / No product acquired	Product archived by Manufacturer.
Toshiba	eStudio6570c parts chosen by EPEAT	United States	Multifunction Device (MFD)	4.1.2.1	Optional	Optional – Further reduction of the use of EU RoHS Directive hazardous substances (cadmium)	No documentation provided / No product acquired	Product archived by Manufacturer.
Toshiba	eStudio6570c case parts chosen by EPEAT	United States	Multifunction Device (MFD)	4.1.6.1	Required	Required – Reducing BFR/CFR/CDP content of external plastic casings	No documentation provided / No product acquired	Product archived by Manufacturer.
Toshiba	eStudio6570c parts over 100 g chosen by EPEAT	United States	Multifunction Device (MFD)	4.3.2.1	Required	Required – Use of single recyclable plastic type per plastic part	No documentation provided / No product acquired	Product archived by Manufacturer.
Toshiba	eStudio6570c case parts chosen by EPEAT	United States	Multifunction Device (MFD)	4.3.2.2	Required	Required – Restriction on materials not compatible with reuse and recycling	No documentation provided / No product acquired	Product archived by Manufacturer.
Toshiba	eStudio6570c case parts chosen by EPEAT	United States	Multifunction Device (MFD)	4.8.1.1	Required	Required – Elimination of intentionally added heavy metals in packaging	Insufficient documentation to prove conformance	Product archived by Manufacturer.

**TABLE 2: 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
Konica Minolta	bizhub C754e parts chosen by EPEAT	Australia	Multifunction Device (MFD)	4.1.4.1	Optional	Optional – Reduction of substances on the EU REACH Candidate List of SVHCs	Demonstrated non-conformance	Criterion undeclared by Manufacturer.
Sharp	MX-M266N	United States	Multifunction Device (MFD)	4.3.1.1	Required	Required – Ease of disassembly of product	Demonstrated non-conformance	If NC due to demonstrated non-conformance, Manufacturer provided evidence of changes made resulting in conformance.
Sharp	MX-M266N	United States	Multifunction Device (MFD)	4.8.2.1	Required	Required – Separable packing materials	Demonstrated non-conformance	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](http://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.