1. Overview of Verification Round

Verification Round IE-2018-04 investigated randomly chosen criteria from IEEE 1680.2 and randomly chosen products. Thirty-two (32) Level 1 investigations were completed for this Round. In Level 1 investigations, 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 60-day period.

The products and criteria were selected as follows:

- All products that were active in the Registry at the beginning of the Verification Round were eligible for inclusion, and were chosen through a random selection process.
- All criteria were eligible for inclusion, and were chosen randomly for each selected product.
- All geographies and Manufacturers were eligible for inclusion.
- Exception is as follows: If a criterion was randomly selected for a product and that product had been investigated against that criterion in the last six months, a new criterion was randomly selected for the product.
- No Manufacturer was subject to more than 8 investigations during this Round.

2. Summary of Outcomes

32 Investigations completed
29 Decisions of Conformance
3 Decisions of Nonconformance
3. **Key Lessons**

*Criterion 4.3.2.3 Manual separation and marking of plastics*

It is common for material codes to be incorrect due to the absence of brackets, and therefore advisable for manufacturers to follow up with component suppliers to ensure these codes are printed correctly.

*Criterion 4.8.4.1 Provision of take-back service for packaging*

This is multiple-part criterion; manufacturers should make sure they are addressing each component when providing evidence.
Criterion 4.9.3.2 Manufacturer recycles or reuses toner material collected through its cartridge and container take-back program

This criterion asks for a specific breakdown of reported information. Manufacturers should ensure their reporting aligns with the criterion’s reporting requirements.

4. General Message to Manufacturers

_Understanding documentation requirements for Verification Rounds:_

You can find more guidance and examples of conformance documents through your account on the EPEAT Registry.

_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:_

There are four Imaging Equipment verification rounds scheduled 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 available through the manufacturer’s account on the EPEAT Registry.
6. Investigations Table

<table>
<thead>
<tr>
<th>Participating Manufacturer</th>
<th>Product</th>
<th>Country</th>
<th>Product Type</th>
<th>Criterion</th>
<th>Required or Optional</th>
<th>Criterion Description</th>
<th>NC Finding Description</th>
<th>Corrective Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>HP Inc.</td>
<td>DesignJet T2530 PostScript Multifunction Printer (L2Y26A)</td>
<td>United States</td>
<td>Multifunction Device (MFD)</td>
<td>4.3.2.3</td>
<td>Required</td>
<td>Manual separation and marking of plastics</td>
<td>Demonstrated non-conformance</td>
<td>If NC due to demonstrated nonconformance, manufacturer provided evidence of changes resulting in conformance</td>
</tr>
<tr>
<td>Konica Minolta</td>
<td>bizhub C3350</td>
<td>Australia</td>
<td>Multifunction Device (MFD)</td>
<td>4.8.4.1</td>
<td>Optional</td>
<td>Provision of take-back service for packaging</td>
<td>Insufficient documentation to prove conformance</td>
<td>Criterion undeclared by manufacturer</td>
</tr>
<tr>
<td>Konica Minolta</td>
<td>bizhub 4052</td>
<td>Canada</td>
<td>Multifunction Device (MFD)</td>
<td>4.9.3.2</td>
<td>Optional</td>
<td>Manufacturer recycles or reuses toner material collected through its cartridge and container take-back program</td>
<td>Insufficient documentation to prove conformance</td>
<td>Criterion undeclared by manufacturer</td>
</tr>
</tbody>
</table>
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.