



Electronic Products Environmental Assessment Tool

Frequently Asked Questions

2/15/06

What is EPEAT?

EPEAT, the “Electronic Product Environmental Assessment Tool,” is a procurement tool designed to help institutional purchasers in the public and private sectors evaluate, compare and select desktop computers, laptops and monitors based on their environmental attributes.

Why is a “green” procurement tool for electronics needed?

The development of EPEAT was prompted by a growing demand by institutional purchasers for an easy-to-use evaluation tool that allows the comparison and selection of electronic products based on environmental performance. The electronics industry welcomed EPEAT as a tool to provide a clear and consistent set of performance criteria for the design of products, and provide an opportunity to secure market recognition for efforts to reduce the environmental impacts of its products.

How did the EPEAT project come about?

The participants in the Western Electronic Product Stewardship Initiative (WEPSI), which took place in 2001 through 2002 (<http://www.wepsi.org>), proposed that methods be explored to provide a marketplace reward for products that embody superior environmental attributes. A WEPSI subcommittee suggested that a credible method to assess the environmental attributes of electronic products could help public procurement officials select the most environmentally preferable products and could, thereby, provide a market incentive for their development. That recommendation formed the basis for a grant (in the form of a cooperative agreement) to Zero Waste Alliance from the U.S. Environmental Protection Agency’s Region 10 office to develop the assessment tool.

What are the goals of EPEAT?

EPEAT was designed to:

- Provide marketplace rewards for innovation by clearly recognizing products that reduce environmental and health impacts;
- Be low cost and without delay in time-to-market for manufacturers;
- Be transparent and allow flexibility to product designers;
- Be voluntary but inviting for manufacturers;
- Address end-of-life issues faced by the reuse and recycling community;
- Effectively measure products with preferred environmental design; and
- Be simple and clear to purchasing officials.

Why should manufacturers use EPEAT?

EPEAT will provide manufacturers with:

- One clear set of performance criteria for the design of products;
- Performance criteria that are harmonized, where possible, with existing international and national requirements;
- Flexibility as to how they meet higher levels of EPEAT qualification;
- A market advantage for environmentally preferable products; and
- A low cost, user-friendly system that will not delay the process for getting a new product to market.

Why should government and other institutional purchasers use EPEAT?

EPEAT will provide government and institutional purchasers with:

- An easy way to specify and purchase computer products that meet challenging yet realistic environmental criteria simply by requiring that the equipment be EPEAT-qualified;
- An efficient and credible means for verifying that equipment meets the criteria;
- Flexibility to select equipment that meets the minimum performance criteria or to give preference to models with more environmental attributes by specifying a higher EPEAT qualification level;
- Credibility for procurement decisions since the EPEAT criteria were developed through a consensus process that balanced the concerns of purchasers, industry, environmental groups and other stakeholders; and
- Assurance that the same set of criteria is used by purchasers nationwide to ensure competitive product pricing, consistent availability and significant impact on the industry and the environment.

Why do environmental groups support EPEAT

EPEAT brings a comprehensive set of environmental requirements into action in the US market for the first time. EPEAT:

- Provides a credible assessment of electronic products based on agreed upon criteria;
- Brings international environmental requirements into the US market;
- Promotes continuous improvement in the design of electronic products;
- Considers environmental impact throughout the product life cycle; and
- Leads to improved human and environmental health.

What is the EPEAT Development Team?

EPEAT is the product of over 18 months of work conducted by the Development Team of expert stakeholders. The Development Team included representatives of the following groups:

- Public & Private Institutional Purchasers
- Manufacturers
- Trade Associations
- Non-Profit and Advocacy Organizations
- Government
- Electronics Recyclers
- Academics

Who was on the EPEAT Development Team?

Please see the website for the list of the EPEAT Development Team members.

(<http://www.epeat.net/development.htm#dmembers>)

What process was used to develop the criteria?

The Development Team met five times between November 2003 and November 2004 and participated in over a hundred conference calls as a whole and in various subcommittees to develop a draft tool. The subcommittees included those dealing with the structure, the criteria, the funding and the selection of the Host Organization for the tool. The resulting set of attributes and criteria laid out in the draft "*Voluntary Environmental Performance Criteria for Computers, Laptops and Monitors*" was accepted by unanimous agreement. One letter of dissention was received requesting more stringent

requirements in prison labor and the export of electronic waste. For a copy of the letter, see the Development section of the EPEAT website. (<http://www.epeat.net/development.htm>)

What categories of environmental attributes will EPEAT assess?

All criteria fall into eight categories, which reflect different environmental attributes.

- Reduction/Elimination of Environmentally Sensitive Materials
- Material Selection
- Design for End of Life
- Product Longevity/Life Extension
- Energy Conservation
- End of Life Management
- Corporate Performance
- Packaging

What principles guided the selection of criteria?

The EPEAT Development Team spent a significant amount of time developing the criteria with the recognition that:

- The development of the criteria should consider all stages of a product's life cycle,
- Whenever possible, existing international, federal or state criteria should be used to avoid duplication and possible conflict, and that
- The criteria should be meaningful and achievable, but should also promote enhanced environmental performance.

How does EPEAT evaluate products?

EPEAT will evaluate electronic products according to three tiers of environmental performance – Bronze, Silver and Gold. The complete set of criteria includes 23 required criteria (i.e. all criteria must be met to achieve the Bronze, or “baseline”, EPEAT ranking) and 28 optional criteria (i.e. producers can pick and choose among these criteria to boost their EPEAT baseline “score” to achieve a higher ranking level).

Bronze: Product meets all required criteria

Silver: Product meets all required criteria plus at least 14 optional criteria.

Gold: Product meets all required criteria plus at least 21 optional criteria.

Why is EPEAT a self-declaration tool? Why isn't certification required?

Stakeholders agreed that, due to the time-sensitive nature of electronic product development, EPEAT should not be a tool that required a lengthy application, review and approval process. In order to ensure that self-declarations would be credible, a rigorous validation process was developed that would include spot checks and random testing. Before listing products on EPEAT, manufacturers will also sign a formal Memorandum of Understanding (MOU) that commits them to provide accurate product and company information and that provides remedies should inaccuracies be discovered.

What is the EPEAT Implementation Team?

In November 2004, the EPEAT Development Team completed its work. In December 2004, a smaller multi-stakeholder Implementation Team was formed and worked over a year to put the tool into operation. One of the goals of the Implementation Team was to help select the EPEAT Host Organization.

Who is on the EPEAT Implementation Team?

Please see the website for the list of the EPEAT Implementation Team members.
(<http://www.epeat.net/development.htm#imembers>)

What is the EPEAT Host Organization?

As part of EPEAT implementation, EPA announced on February 14, 2006 that it had selected an organization – The Green Electronics Council – to host and operate the assessment tool. The Green Electronics Council's (GEC) activities will include but not be limited to making product ratings and information available on a web site, conducting outreach to procurement officials nationwide to encourage them to use the tool, and compiling and spot-checking manufacturer self-declaration claims. Information on GEC may be found at <http://www.greenelectronicscouncil.org>.

What is the EPEAT timeline?

EPEAT has moved from the development to the implementation phase and, with the development of an ANSI standard based on the EPEAT criteria and the selection of the Host Organization, the charter of the Implementation Team is complete. The Zero Waste Alliance will continue to work with the Green Electronics Council as the Host Organization to bring the EPEAT system to a "live" status as quickly as possible. The full system is expected to be available in mid 2006.

Which electronic products does EPEAT cover?

Currently EPEAT applies to desktop system units, laptop/notebooks and monitors. Future editions may cover other electronic product categories.

Did EPEAT consider a criterion that would not allow use of prison labor in recycling programs offered by manufacturers of EPEAT qualified products, and, if they did, why is one not included?

The Development Team (DT) and the Criteria Subgroup had several discussions about the prison labor issue, developed an issue paper, and voted on a proposal to include such a criterion. The DT decided against including this criterion.

A primary consideration was that representatives of federal agencies reported to the DT that if this criterion was included, it would make it difficult, or perhaps impossible, for federal agencies to use the EPEAT tool for purchasing. Prison labor is a federally sponsored program. The Federal Prison Industries was created by an Act of Congress (Pub. L. No. 73-461, 48 Stat. 1211), on June 23, 1934. On December 11, 1934, President Roosevelt issued Executive Order 6917, which formally created Federal Prison Industries (trade name UNICOR). Subpart 8.6, item (e) of the Federal Acquisition Regulations states that "Agencies are encouraged to purchase FPI supplies and services to the maximum extent practicable." Banning the use of prison labor for recycling of EPEAT-qualified products would thus seriously impair the ability of federal purchasers to use the EPEAT tool. This would undermine one of the central purposes and strengths of the tool, which is to enable federal government purchasers to move the electronics market toward environmentally preferable products through exercise of their tremendous buying power.

The DT noted that prison labor in recycling programs may be considered for future EPEAT versions.

Did EPEAT consider a criterion that manufacturers of EPEAT-qualified products provide domestic recycling services for all electronic materials, disallowing export to non-OECD countries?

This was an issue of considerable discussion during the development of the criteria. Several options were considered, an issue paper was developed, advocates of export restrictions made presentations to the Development Team (DT), and the DT voted on a proposal to address export related issues. The DT decided to address export issues via the parameters put forward in the EPA Plug-In To eCycling Guidelines for Materials Management

(<http://www.epa.gov/epaoswer/osw/consERVE/plugin/pdf/guide.pdf>).

The DT further decided to adopt the EPA's Plug-In To eCycling Guidelines for Materials Management as the required criterion for end-of-life management services. These Guidelines prescribe processing requirements and restrictions on exports as summarized on the website as follows:

(<http://www.epa.gov/epaoswer/osw/consERVE/plugin/guide.htm>):

- Maximize reuse, refurbishment, and recycling over disposal and incineration.
- Ensure that exported electronic products are being sent for legitimate reuse, recycling, or refurbishment, and provide for special handling of components that may contain substances of concern.
- Make sure that collection, recycling, refurbishing, and disposal facilities follow management practices that are consistent with the Guidelines.

In addition, the Guidelines explicitly restrict the export of batteries, mercury- or PCB-containing materials, circuit boards, and CRTs and CRT glass. Under the guidelines, these materials may only be exported to OECD countries where the exporter has regularly monitored controls to ensure disassembly will occur within the OECD country.

Members of the DT expressed varying opinions on the export issue and use of the Guidelines, including:

- EPEAT should align with international definitions and guidelines on hazardous wastes from the Basel Convention even though the U.S. has not ratified it.
- There is some ambiguity in the EPA Guidelines for Materials Management. The Guidelines fail to point out to recyclers that most countries would restrict the importation of hazardous wastes, under the Basel Convention, without a special agreement, and to address the issue either the EPA Guidelines should be fixed, or EPEAT should disallow export.
- On the other hand, in order to get secondary materials from U.S. recycling companies into new products manufactured in Asia, export is necessary.

An additional concern that some purchasing authorities would wish to have all exports prohibited was expressed. Interviews suggested that purchasing officials also have mixed opinions on the issue.

Since the Plug-In To eCycling Guidelines for Materials Management were still in the process of revision, the DT decided to send a letter to the EPA asking for clarification on export issues in the Guidelines, specifically:

1. That the definition of hazardous wastes be clarified to ensure that potential exporters understood they must comply with importing countries' definitions, not simply with US definitions; and
2. That EPA provide clarification to recyclers about how importing countries that are signatories to the Basel Convention and OECD agreements may place restrictions on the importation of hazardous wastes.

The DT noted that further addressing export issues around hazardous waste definitions and restrictions may be considered for future EPEAT versions.

Did EPEAT consider criteria to specifically address worker health and safety?

EPEAT's environmentally sensitive materials criteria address many of the toxic constituents that may pose a health risk to manufacturing workers, users and recycling workers. Also the requirement that manufacturers have an Environmental Management System in place will tend to reduce worker exposures.

However, EPEAT is intended to be a product environmental assessment tool and though environmental issues include the public health impacts of products and manufacturing processes, the issue of worker health and safety is not directly environmental in nature, nor directly linked to a single product, and the Development Team recognized that it might be better addressed through worker safety criteria outside EPEAT.

A proposal was made to the Development Team (DT) that an optional criterion be added to the end-of-life handling criteria that would require that all recyclers, including downstream recyclers, comply with OHSAS 18000 – an international occupational health and safety management system specification (<http://www.ohsas-18001-occupational-health-and-safety.com/>).

Though this would not eliminate export, it would be protective of workers in foreign countries. Concerns over the cost of certification, difficulty of verification, and as a result exclusion of smaller recyclers were raised. Finally, the proposal to include OHSAS certification in EPEAT was made during the very last phase of the decision-making process. The Development Team members (even those who supported the idea) felt that a more thorough review and assessment of the various international labor safety standards would be needed to credibly address this issue. As a result, the DT decided not to include the OHSAS standard in the current criteria.

The DT noted that additional health and safety criteria may be considered for future EPEAT versions.

How is EPEAT funded?

Development and Implementation: The US Environmental Protection Agency provided funding through a cooperative agreement to Zero Waste Alliance (ZWA) for project management services for developing and implementing the EPEAT criteria and application. In addition, numerous organizations & companies contributed countless hours of in-kind support as participants in the Development and Implementation Team processes and sub teams.

Operation: The US Environmental Protection Agency will provide \$375,000 over three years to the Green Electronics Council to help jumpstart EPEAT operations. The system will be self-funding through product registrations in the long term.

Who are the key EPEAT contacts?

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