

DRAFT EPEAT Clarification #37

Applicability of the JEMAI Carbon Footprint of Product Communication Program to criteria 4.5.2.1, 4.5.2.2 and 4.7.3.1

This Clarification applies to the following IEEE Standards and criteria:

Applicable Standards:

- IEEE 1680.1 – Personal Computers and Displays
- IEEE 1680.2 – Imaging Equipment
- IEEE 1680.3 – Televisions

Applicable Criteria:

4.5.2.1, 4.5.2.2, 4.7.3.1
4.7.3.1

CDP Determination:

1680.2: 4.5.2.1

The JEMAI Carbon Footprint of Product Communication Program¹ (JEMAI CFP program) may be used to demonstrate conformity to 1680.2 criterion 4.5.2.1 only if the assessment conforms to ISO/TS 14067; and covers a full “cradle-to-grave” scope.

1680.2: 4.5.2.2

The JEMAI CFP program may be used to demonstrate conformity to 4.5.2.2 only if the assessment conforms to ISO/TS 14067 and covers a full “cradle-to-grave” scope, and the assessment:

- Has been verified by a qualified third-party; and
- The third party verification report includes the credentials and contact information of the third party verifier.

JEMAI is the external third party verifying the CFP program. The names of the verifiers and the names of the organizations to which they belong are provided in the official CFP Verification Report however, these reports are not publicly disclosed due to confidentiality restrictions. While the verification information is not publicly available, this was deemed acceptable by the CDP because JEMAI has a robust set of publicly available criteria all reviewers must meet, and has a record of the name and contact information of the actual verifiers available to the public upon request.

1680.2 and 1680.3, 4.7.3.1

The JEMAI CFP program may be used to demonstrate conformity to 1680.2 criterion 4.7.3.1 only if:

- The assessment covers a full “cradle-to-grave” in its scope,
- The assessment has been verified by a third party to conform to ISO 14044; and
- The results of that assessment have been made available to the public.

¹ Published on the JEMAI CFP website

Note that LCAs under ISO 14044 must include a comprehensive set of environmental indicators, and so an assessment of carbon footprint alone would not be sufficient to meet the requirements of this standard. Additionally, the LCA must cover all other requirements of ISO 14044.

Background Analysis:

This Clarification details the findings of a review of the JEMAI CFP program to identify whether conforming to the standard under this program would by default result in a manufacturer achieving the requirements specified in the IEEE 1680.2 criteria 4.5.2.1, 4.5.2.2 and 4.7.3.1 and IEEE 1680.3 criterion 4.7.3.1.

JEMAI manages the JEMAI CFP program in conformance with ISO/TS 14067 on Product Carbon Footprint. The JEMAI CFP program maintains a set of Product Category Rules (PCRs), which contain additional category-specific guidance and requirements for the scoping and methodology of the carbon footprint assessment. Conforming to the JEMAI CFP program would require aligning with all relevant requirements of the appropriate CFP-PCR for that product category, as well as meeting the requirements of ISO/TS 14067, which are referenced directly as the relevant requirements for the JEMAI CFP program. Note that JEMAI manages an environmental product declarations (EPDs) program as well under the name EcoLeaf, aligned with the ISO 14044 standard on LCA and the ISO 14025 standard on environmental labels and declarations. The EcoLeaf program publishes its own set of PCRs, which are separate from those of the JEMAI CFP program.

Because LCAs will cover a range of environmental impact categories beyond greenhouse gasses, an assessment under the JEMAI CFP program might meet the requirements of the JEMAI CFP program without meeting all requirements of the EcoLeaf program. Therefore, although the EcoLeaf program is aligned with ISO 14044 and 14025, an assessment under the JEMAI CFP program does not by necessity meet all requirements of EcoLeaf and therefore of these ISO standards. It would, however, by necessity meet all requirements of the ISO/TS 14067 standard, as the requirements of this standard are directly adopted by the JEMAI CFP program. It is assumed here that the requirements of the CFP-PCRs do not conflict with the requirements of ISO/TS 14067.

Each of the criteria from IEEE 1680.3 mentioned above require that the scope of the carbon footprint or LCA cover a full “cradle-to-grave” scope of the product life cycle, which is not a necessary requirement of ISO 14044 (LCAs covering only “cradle to gate” for example are allowed) and many of the other standards referenced. Therefore, to satisfy these criteria, the carbon footprints, LCAs and EPDs must include the full cradle-to-grave life cycle of the product.

Change History:

Revision A approved by the Conformity Decision Panel on 05/25/20216.

Revision A sent to the 30 day comment period on 06/06/2016.

Revision B sent to commenting stakeholders on 07/14/2016.

Revision C sent to Conformity Decision Panel on 08/01/2016.

Revision E sent to Conformity Decision Panel on 11/08/2016.

Revision H sent to another 30-day comment period on 11/16/2016.