

Product Category Rules (PCR)
for preparing an Environmental Product
Declaration (EPD) for
USB Flash Drive
PCR 2011:1.0

Transcend Information, Inc.

Version 1.0

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1. General Information

This document is to be used as the product category rules (PCR) for the manufacturing of USB Flash Drive. The requirements specified in this PCR are intended to be used for EPDs certified in accordance with ISO 14025 standard. This document shall be valid until Mar. 31, 2014.

This PCR was prepared by the Transcend Information, Inc. Representatives from main Taiwanese manufacturers of similar products and stakeholders were invited by the Taiwan Electrical and Electronic Manufacturers Association (TEEMA) to the open consultation meeting on Feb. 23, 2011, to participate in the discussion and review of this PCR. EDF then reviewed and approved this PCR.

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2. Company and product description

The EPD shall include information about the manufacturing company/organization. The information may include manufacturing process related information, and environmental related information, such as the environmental management system information. The information may also include special issues which the company/organization would like to emphasize, such as the products meeting certain environmental criteria, or environmental safety and health related information.

This PCR covers all life-cycle phases of the USB Flash Drive products. This PCR is applicable to communications between business to business (B2B) and business to consumers (B2C). When certification of product environmental impacts is conducted, the product accessories and packaging shall also be included in the certification scope.

2.1 Product function

The USB flash drive is a device which uses flash memory and USB interface to interact with computers or other multimedia devices for data exchange. Common applications of the USB flash drive include storing and exchanging files for data, pictures and images. The USB flash drive can also be used for computer repair and system management, or bringing application directly for use on the computer.

The USB flash drives are typically small-size, light weight, hot-swappable and rewritable. Depending on the capacity of the flash memory used, the capacity of the USB flash drives currently on the market ranges from 32MB to 64GB. In accordance with the standards established by the USB Implementers Forum (USB-IF), the transfer rates of the USB flash drives vary for USB 1.1 (500Kbps-10Mbps), USB 2.0 (25Mbps -400Mbps) and USB 3.0 (> 4.8Gbps), and are backwards compatible.

USB flash drives typically use plastic or metal housing, and mostly adopted the standard Type-A USB connector, so that they can be plugged directly into a PC's USB port. In order to access a USB flash drive's stored data, the drive needs to be connected to the computer, either directly connected to a computer's built-in USB controller/port or a USB hub. The flash drive will only start when inserted into a USB port, as it draws the needed electricity from a computer or other multimedia device.

2.2 Product group and components

The main components of the USB flash drive include:

1. Controller: A component which provides interface for communication between USB device and flash memory. The controller contains a RISC microprocessor, and some ROM (Read-Only Memory) and RAM (Random Access Memory).
2. NAND Flash: A device used to store data, in the form of Electrically-Erasable Programmable Read-Only Memory (EEPROM), which allows for repeated erasure and writing operations.
3. Printed Circuit Board (PCB): A support for electronic components which is used to connect the circuits of on-board electronic components.
4. Resistor: An electronic component used to control the ratio of electrical voltage and current in a circuit.

5. Capacitor: An electronic component consisted of a dielectric layer between two metal plates which is capable of storing electrical energy in the electric field between two conductors.
6. Crystal: An electronic component which supplies the timing signals necessary for the operation of the device and control of data output.
7. USB Plug: An interface which provides connectivity to computer and other multimedia devices.
8. Housing: Enclosure or cap of a USB flash drive, usually made of plastic or metal material.

Accessories and Packing: External packaging, Product manual or driver CD, etc. of a USB flash drive.

Other components: Optional components adopted due to customer demand or specific product features, such as light-emitting diode (LED), fuse, inductor, regulator, diode or fingerprint sensor.

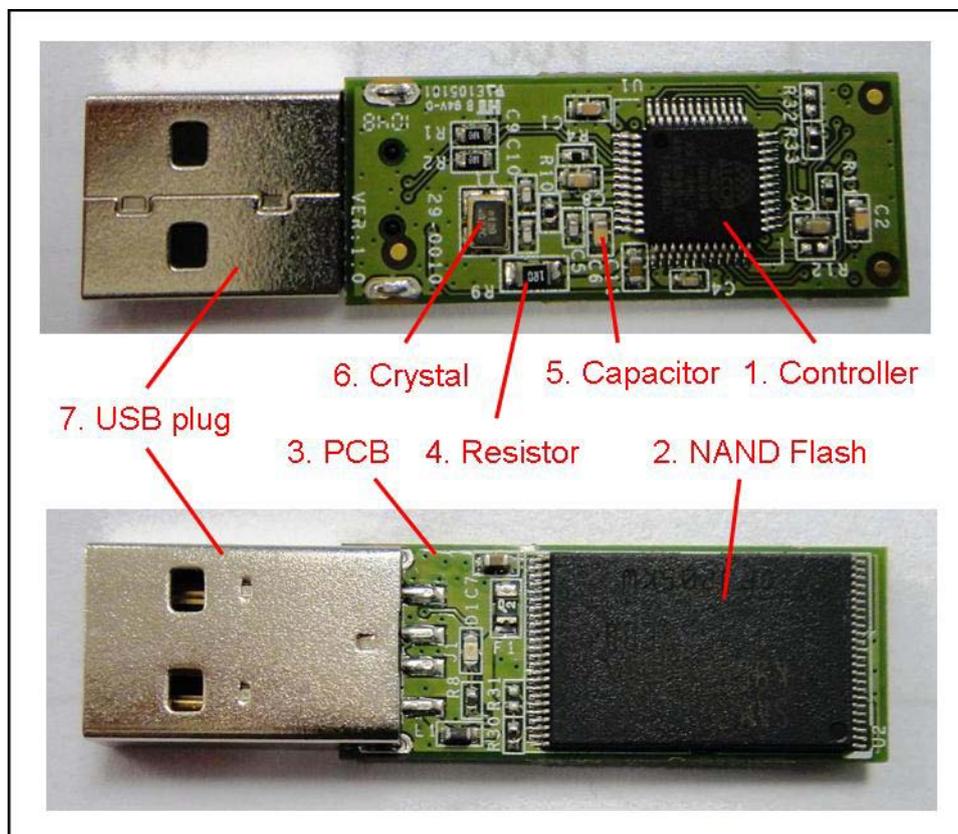


Figure 1 Schematic of a USB Flash Drive's Main Components

2.3 Product technical description

The product technical description part of the EPD shall include the following information:

1. Storage Capacity: e.g., 8GB.
2. Data Retention: The period which stored data (without replication) can be retained, e.g., 10 years.
3. Erase Cycles: The number of repeated reading and writing which the drive can endure, e.g., > 10,000.
4. Transmission Interface: e.g., USB 2.0 specification.
5. System Performance: e.g., Read up to 21MB/s, Write up to 10MB/s.
6. Operation Voltage: e.g., DC 5V \pm 10%, maximum current 500 mA.
7. Temperature Range: e.g., working temperature 0^o ~ 70^oC, non-working temperature 20^o ~ 75^oC.
8. Dimensions: e.g., 63.1mm \times 21mm \times 8.8mm.
9. Weight: Product net weight (not including accessories and packaging materials), e.g., 10g.

3. List of parts and banned substances

The contents of the following parts and substances in the product shall be declared:

- List of all main components and other components with weight ratio (part weight/product weight) \geq 0.5%;
- All banned substances regulated by legal and customer requirements;
- The following materials in the main components: flame retardants, lead content in solder, lead and flame retardant content in solder masking agent, and substances regulated by RoHS Directive (the latest version).

The declaration of halogen-free flame retardants, lead-free solders and no RoHS-regulated substances may only be made when appropriate evidences are available (for example, test reports from accredited laboratories/testing facilities). The following organizations may provide accreditation for testing facilities: Taiwan Accreditation Foundation (TAF), (Asia Pacific Laboratory Accreditation Cooperation (APLAC), International Laboratory Accreditation Cooperation (ILAC) or ILAC Mutual Recognition Arrangement (ILAC MRA). For definitions of testing

methodology and confirmations of regulated hazardous substances based on the accredited laboratories' product testing methods, please refer to IEC 62321 Standard.

4. Declared unit

The declared unit for the USB flash drive is one “unit” of USB flash drive, as the USB flash drives are marketed and sold in such a unit.

5. System boundaries

The main system boundaries for the declared product system are presented as follows:

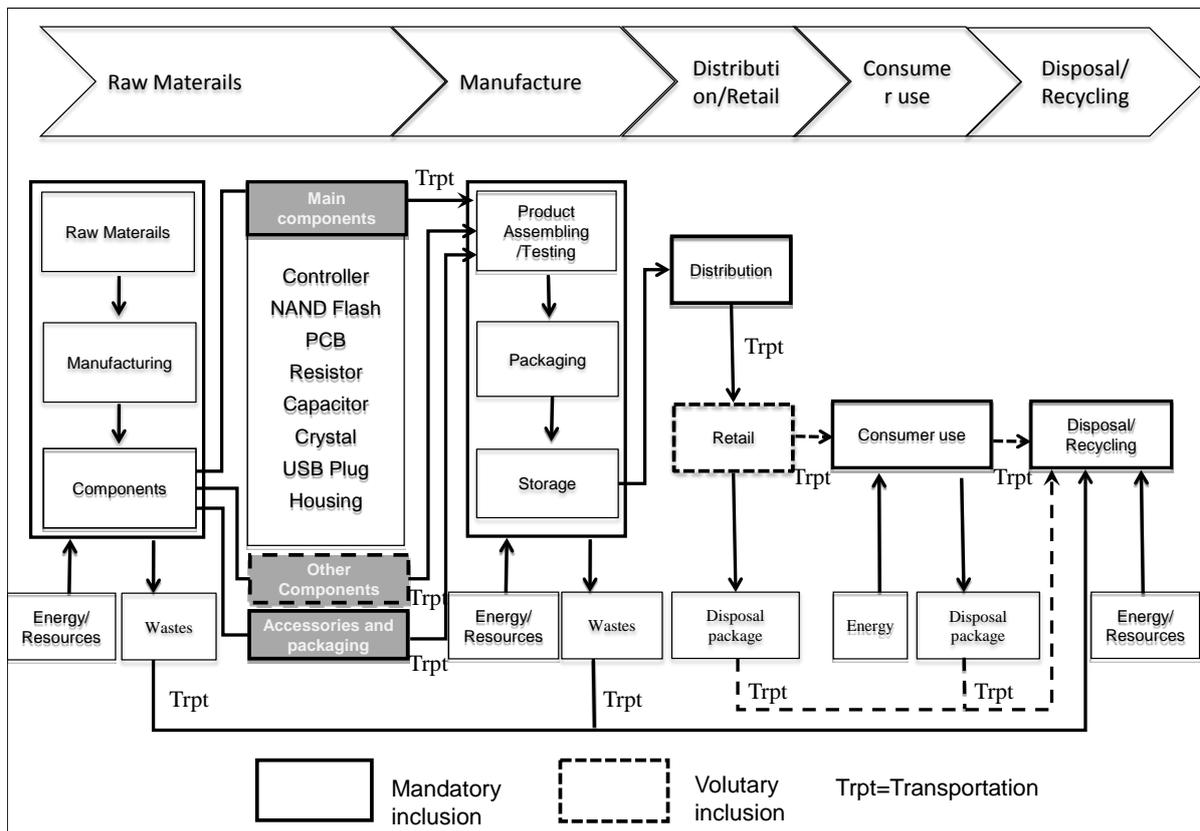


Figure 2 System boundary of the main product system

Note:

1. The life cycle of a B2B product only includes the raw material acquisition, product

manufacturing and transportation to downstream client phases.

2. The declaration of system boundary shall be made in accordance with principles as stated in ISO 14025.

Raw Materials Acquisition Phase

Information from this phase shall include the inventory of information from upstream suppliers to calculate the environmental impacts of acquiring components for the products. The items to be inventoried shall include:

- The material composition weight information of all components, including secondary materials (manufacturing tools, auxiliary materials), and packaging materials;
- The energy and resource consumption information for producing various components (such as electricity and water consumption, and amount of refrigerant added, etc.);
- The transportation information of shipping components to product assembly plant (such as transportation vehicles used, distance traveled and number of shipment);
- The information on treatment of pollutants emitted during component product;
- Provision of appropriate information to be used for allocation (such as product yield, area or volume, etc.);

Components of the USB flash drives are categorized as follows:

- a. Main components: Controller, flash memory (NAND Flash), printed circuit board (PCB), resistor, capacitor, quartz oscillator (Crystal), USB connector, and housing.
- b. Other components: light-emitting diode (LED), fuse, inductor, regulator, diode, or fingerprint sensor, etc.
- c. Accessories and packaging materials.

The data quality requirements for the main components are described in Section 9 on calculation rules and data quality requirements. The EPD shall also include the other optional components and packaging material of the product, but their data quality requirements are different from those of the main components.

Manufacturing Phase

Information for this phase shall include the product assembly, testing, packaging and warehousing processes. The items to be inventoried shall include:

- The energy and resource consumption information during product manufacturing

process (such as electricity and water consumption, and amount of refrigerant added, etc.);

- The information on treatment of pollutants emitted during product manufacturing.

Distribution Phase

The product distribution phase can be divided into two parts:

- Distribution Transport: The transportation from the final assembly plant to the customer designated locations, logistics centers and sales offices, shall be of mandatory reporting. The items to be inventoried include the transportation information (such as types of transportation modes/vehicles, distance traveled and number of shipments) of flash drive products to the customer designated locations, logistics centers and sales offices.

- Sales Transportation: The transportation from the end of the distribution to the acquisition of the product by the end user/consumer. This information is of the voluntary disclosure nature.

Use Phase

If the product is to be used by the end-users, the product manufacturer shall provide information regarding the product's power consumption to customers or consumers. In order to calculate the product energy consumption, the manufacturer may simulate the product's usage scenarios.

Currently, there is no international standard defining the energy consumption scenario of USB flash drive product. Therefore, this PCR simulates and assumes a USB flash drive's typical usage scenario and energy consumption calculation formula as follows:

Assumed usage scenario: Assume average USB flash drive service life of 3 years (about 1095 days), and daily 100 minutes of use. This scenario does not consider standby status and the power consumption difference between read and write states, only the design voltage and maximum current consumption is considered.

Use phase energy consumption calculation formula:

$$\text{Total energy consumption (kWh)} = \frac{\text{design voltage (V)} \times \text{maximum current (A)} \times 1095(\text{days}) \times 100(\text{min/day})}{1000(\text{W}) \times 60(\text{min/hr})}$$

Recycling/end of life

The reporting of recycling information (such as recycling and dis-assembly report and information on recycling channels) is mandatory in the EPD/CFP.

5.1 Specification of different boundary settings

Boundary in time

The validity period for the LCA results presented in the LCA report shall be defined.

Boundary towards nature

If the manufacturing processes are located within Taiwan, the solid waste categories as defined in Taiwan's Waste Disposal Act shall be adopted. If the processes are located in other countries, equivalent legal requirements shall be considered.

The natural boundary of the system shall describe the boundary where the materials and energy resources flow from nature into the system, and where the water and air emissions and waste are released out of the system.

Only the waste which is required to be disposed of needs to be considered; landfilling process does not need to be included. If the waste will be treated through water treatment or incineration, these processes need to be included.

Boundaries in the life cycle

The boundaries in the product life cycle are described in Figure 2. The construction of the site and infrastructure, as well as the production of manufacturing equipment and activities of the workers, does not need to be included.

Boundaries towards other technical systems

Boundaries towards other technical systems describe the inputs of material and other components towards other systems, as well as outputs of materials towards other systems. For the inputs of recycled materials and energy towards the product manufacturing phase, the transportation between the recycling process and use of recycled materials shall be included in the data set. For the production of recyclable products during the manufacturing phase, the transportation towards the recycling process shall be included.

(Note: Further explanations are provided in Section 7 on open-loop recycling)

Boundaries regarding geographical coverage

The manufacturing phase may cover manufacturing processes located on any sites around the world. For processes located in a specific region, the data used should be representative of the region. The data for the main components shall be the specific regional data for the region where the process takes place (see Section 9). For ease of comparison, no matter where the emissions are generated, the same parameters should be used for life cycle impact assessment (see Section 10).

6. Cut-off rules

For any impact category, if the sum of various impacts from a specific process/activity is less than 1% of the impact equivalent in that category, such a process/activity may be neglected during the inventory analysis. Nonetheless, the accumulated impact of neglected process/activity may not exceed 5%. Components and materials omitted from the LCA shall be documented.

(Note: This judgment for this “1% Rule” is based on the environment relevance assessment of material input to the system, and does not consider special and exceptional environmental impacts.)

7. Allocation rules

The main allocation rules shall be valid for the entire product system. For other secondary processes, other allocation rules may be defined; however, the use of these rules should be justified. Product-specific information should be preferentially collected in order to avoid the need for allocation. While selecting allocation rules, the following principles are recommended.

- Multi-output: The allocations are based on the changes in the resource consumption and pollutant emissions (for example, adopted quantity allocation for some main component, or surface allocation for some components), following the changes in the studied system’s output product or function or economical relationship.
- Multi-input: The allocation is based on actual relationship. For example, the manufacturing process’s emissions may be affected by the change in waste flow input.
- Open loop recycling: For the input of recycled materials or energy during the manufacturing phase of the product system, the transportation between the recycling process and the recycling to material use shall be included in the dataset. For the product which shall be recycled during the manufacturing phase, the

transportation towards the recycling process shall be included.

Notes:

- *Allocation may be avoided through avoidance of dividing processes, for example as described in Section 6.3 of ISO/TR 14049; or through expansion of system boundary (for example as described in Section 6.4), so that the amended system shares the same product exchanges as the original system.*

8. Units

The base units and derived units of the International System of Units (SI, *Système International d'unités*) shall be used preferentially.

The following units shall be used:

Power & energy units:

- power unit: W
- energy unit: J

Specification units:

- length unit: m
- capacity unit: m³
- area unit: m²
- weight unit: kg

If necessary, prefixes may be used before the SI units.

10⁹ = giga, symbol “G”

10⁶ = mega, symbol “M”

10³ = kilo, symbol “k”

10⁻² = centi, symbol “c”

10⁻³ = milli, symbol “m”

10⁻⁶ = micro, symbol “μ”

10⁻⁹ = nano, symbol “n”

9. Calculation rules and data quality requirements

Date quality requirements for raw material acquisition phase and manufacturing phase:

- Generic data may be used for the acquisition, production, forming and refining of raw materials used for the components of the USB flash drive product. Please refer to Appendix I for the common sources of generic data. The date of the generic data used can not be older than 1990.
- Site specific data (for example, specific factory data or transportation data for a specific manufacturing process) shall be used for the manufacturing of components and assembly of the USB flash drive product. If other types of information are used, description of the information and rationale for using the information shall be provided.
- Generic data may be used for the manufacturing process for the packaging material and optionally included components of the USB flash drive products. Please refer to Appendix I for the common sources of generic data.
- When generic data are used, the equivalence between the chemical and/or physical process of referred systems shall be considered. The system referred in the generic data shall have equivalent technology and system boundaries with the declared product system.
- Generic data may also be used when suppliers refuse to provide specific data, or when even if generic data are used in place of specific data, there is only minor impact to the results. The general rule is that if generic data are used in place of specific data, their combined contribution for all life cycle phases shall not be greater than 10% of total impacts for each impact category. But there may be certain exception to specific products.
- The data shall be representative for the average of a specific year.
- The electricity mix for the manufacturing phase should be site specific data. If site specific data cannot be obtained, the official electricity mix for the country where the site is located may be used as approximate value. The electricity mix should be documented.
- For the definition of hazardous waste, the definition as defined in Taiwan's Waste Disposal Act shall be used for sites located in Taiwan. For sites located outside Taiwan, legal requirements for the host country shall be observed.
- For the transportation of main components to the assembly plant, the actual transportation modes used and distances shall be considered.

Date quality requirements for the use phase:

- The product electricity consumption during the use phase shall be confirmed in

accordance with the corresponding testing method for the region where the product is being use.

- For the electricity mix of the use phase, the generic data for the official electricity mix for the country/region where the product is being use may be used as approximate value. Please refer to Appendix I for the common sources of generic data used internationally. The date of the generic data used can not be older than 1990.

Date quality requirements for the waste disposal phase:

- Generic data may be used when site-specific data from the waste disposal and recycling system can not be obtained due to specific reason. Please refer to Appendix I for the common sources of generic data used internationally. The date of the generic data used can not be older than 1990.

10. Parameters to be declared in the EPD

For the manufacturing phase, the following parameters shall be declared:

1. Energy use

- The energy consumption during each phase shall be declared, especially the electricity consumption during the use phase when the product is being used by the end user.
- If the product is equipped with a main switch, the energy loss from the power supply when the product is turned off shall be considered.
- The following units shall be used preferentially:
kW or W for power; J or MJ for energy.

2. Resource use

The resource input during each phase shall be declared.

3. Impact equivalents expressed as potential environmental impacts

-Global warming	kg CO ₂ equivalent
-Acidification	kg SO ₂ equivalent
-Ozone depletion	kg CFC-11 equivalent
-Photochemical oxidant formation	kg C ₂ H ₄ equivalent
-Eutrophication	kg PO ₄ ³⁻ equivalent

4. Additional information

- Recyclable materials (optional)
- Information on secondary materials (optional)
- Waste (classification):
 - Hazardous waste as defined in Taiwan's Waste Disposal Act. Follow host countries' laws for sites outside Taiwan.
 - Other waste.
- Plastic packaging materials marking

The Plastic packaging materials must be labeled on the parts with SPI or other international standards for ease of sorting.

11. Recycling information

The recycling information shall include information such as dis-assembly instructions, which parts/components are suitable for recycling (such as metal casing) or not suitable for recycling. The information which the EU WEEE Directive requires the end product manufacturer to provide may also be included in the product declaration information for USB flash drive products.

If feasible, information for the parts which can not be recycled and therefore should be disposed of properly during the end-of-life phase may also be included.

12. Other environmental information (Optional)

The EPD may cover information including technology adopted, site of product manufacturing and assembly, as well as information on other working environment, health and risk-related aspects.

If this PCR is to be used for product carbon footprint declaration purpose, in the declaration, information regarding commitment on GHG reduction shall be included and shall ensure that the commitment is measurable, reportable and verifiable. The organization may also list environmental and energy management related information, such as awards, commendations and system certifications (e.g., QC08000 IECQ HSPM) etc.

13. Information about the certification

The information on PCR review, EPD verification and verification organization shall be included.

EPD Certification is valid until 20XX-__-__

According to the Requirements for the international EPD system. General Programme Instructions, Version 1 (2008) – www.environdec.com

The PCR review for _____ (PCR 201X:) was administered by the Environment and Development Foundation and carried out by an LCA expert panel chaired by Dr. Ning Yu (ningyu@edf.org.tw). Independent verification of the declaration, according to ISO 14025:2006

Internal External

Third party verifier: Environment and Development Foundation in Taiwan.

Accredited by :

Name:

Title:

Organization:

Signature:_____

Name:

Title:

Organization:

Signature:_____

Name:

Title:

Organization:

Signature:_____

Environmental declarations from different programmes may not be comparable.

14. References

The EPD shall make reference to the following documents:

- EPD General Program Instructions, Version 1.0 (2008-02-29), The International EPD Cooperation, downloadable from <http://www.environdec.com/>;
- Relevant PCR documents;
- The underlying LCA report.

When available, the following documents shall also be referenced:

- Other documents and recycling instructions which verify and complement the EPD.

Appendix I – Generic Data Sources to Refer to

For processes located within Taiwan, Taiwan generic data or the data published by the commercial, industrial and energy competent authorities of the Republic of China (ROC) government, may be used. However, for other regions (such as EU), if there are more relevant generic data available, these data should be used instead.

When data from the following generic databases are used, the most current and updated data should be used:

Material	Database	Published
Aluminum	EAA (European Aluminum Association)	2000
Copper	ICA (International Copper Association)	1998
Copper semi products	ICA (International Copper Association) + IME (Institut für Metallhüttenwesen und Elektrometallurgi, Aachen)	1998 1995
Electricity	ETH (Eidgenössische Technische Hochschule) Data combined with IEA (International Energy Agency) statistics 1998	1996
Electronic components	EIME (Environmental Information and Management Explorer) EcoBilan	1998-2000
Energy	Boustead model 5.0	2007
Energy	ETH ESU 96	2004
Industrial processes	Ecoinvent 2nd edition	2007
Packaging materials, transport, waste treatments	BUwAL 250, 2nd edition	2004
Plastics (and some chemicals)	APME (Association of Plastics Manufacturers in Europe)	1993-1998
Steel	IISI (International Iron and Steel Institute)	1998
Taiwan LCA Database	DoITPro	2010

Appendix II – Reporting Format for the EPD

This appendix provides guidance information for the titles of sections, types of data and required information to be reported in the mandatory reporting part of the EPD. As a generic reporting template, the following titles and sub-titles are recommended:

(Refer to the PCR manual for the section numbering, the information in Italics are the recommended data/information for inclusion)

Introductory part

Each EPD should have an introduction part on the top part of the EPD which includes the following information:

- *Company/organization name*
- *Product name*
- *EPD registration number*

Description of the company/organization and product/service

Company/Organization

- *Description of company/organization*
- *Description of overall working environment, existing quality system and environmental management system*

Product and services (see Section 2)

- *Product's main applications*
- *Description of product specification, manufacturing process, manufacturing sites (if there are several sites)*
- *For product's environmental performance aspects, characteristics which may improve the usefulness of product*
- *Other types of relevant information, for example, special manufacturing processes with special advantages to the environment*

List of materials and chemical substances

- *Content declaration (see Section 3)*

Presentation of the environmental performance

- *Outline of the LCA methodology, for example, period of LCA, declared units, system boundaries (graphical presentation), cut-off and allocation rules, and data sources.*

Manufacturing phase (see Section 10)

Use phase (see Section 10)

- Geographical region for product delivery
- Transportation data
- End-of-life information

Information about Company and Certification Organization

Recycling information (see Section 11)

Other environmental information (see Section 12)

Information regarding certification

- Names of certification and verification organizations
- Validity of certification certificates
- Compliance with legal and relevant requirements

References (see Section 13)

- relevant PCR documents
- EPD General Program Instructions, Version 1.0 (2008-02-29)
- underlying LCA study
- other supporting documents for LCA information
- other relevant documents regarding company/organization's environmental activities

Appendix III Abbreviated Terms

Acronyms	Common Name
APLAC	Asia Laboratory Accreditation Cooperation
CFP	Carbon Footprint of Product
EPD	Environmental Product Declaration
ErP	Energy Related Product
ILAC	International Laboratory Accreditation Cooperation
ILAC MAR	International Laboratory Accreditation Cooperation Mutual Recognition Arrangement
ISO	International Organization for Standardization
LCA	Life Cycle Assessment
PCR	Product Category Rule
RoHS	The Restriction of the use of certain Hazardous Substances in electrical and electronic equipment
SPI	Society of the Plastics Industry
TAF	Taiwan Accreditation Foundation
TEC	Typical Energy Consumption
Trpt	Transportation
WEEE	The Waste Electrical and Electronic Equipment Directive