Beyond Tools: A Design for Environment Process

DANIEL P. FITZGERALD, JEFFREY W. HERRMANN, PETER A. SANDBORN, and LINDA C. SCHMIDT
University of Maryland, College Park, MD 20742, USA

THORNTON H. GOGOLL
Director, Engineering Standards
Black & Decker Inc.
Towson, MD 21286 USA

Abstract: The greatest opportunity to reduce the environmental impact of a new product occurs during the design phase of its life cycle. Design for Environment (DfE) tools, when implemented, become part of the product development process. Often, however, the DfE tools are isolated from the other activities that comprise the product development process. To avoid this problem, tools must be situated in a DfE process that describes how the DfE tools will be used and links DfE activities with the rest of the product development process. This paper presents an innovative DfE process that is being incorporated into an existing product development process at a leading power tool manufacturing company, The Black & Decker Corporation. The DfE process includes DfE tools and activities that are specifically designed to help Black and Decker achieve their environmental objectives.

Key Words: design for environment, product development, engineering design

1. Introduction

Environmentally responsible product development (ERPD), also known as environmentally benign manufacturing, considers both environmental impacts and economic objectives during the numerous and diverse activities of product development and manufacturing. ERPD seeks to develop energy-efficient and environmentally benign products. Products generate environmental impacts throughout all stages (i.e. raw material extraction, manufacturing, assembly, distribution, and end of life) of their lifecycle. There are many ways to minimize these environmental impacts. Studies demonstrate the greatest opportunity for ERPD occurs during the product design phases [1]. The decisions that are made during these phases determine most of the product’s environmental impact. Although ERPD requires extra effort, it not only protects the environment but also provides a channel for the application of environmental policies determined at the corporate level.
Consequently, manufacturing companies have spent a great deal of effort developing tools to help designers create environmentally benign products. The two major classes of tools are life cycle assessment (LCA) [2] and design for environment (DfE) tools [3]. LCA provides a fundamental methodology that evaluates the environmental impact associated with a product during its complete life cycle. DfE tools are design decision support tools that help a designer reduce these impacts by improving the product design. DfE incorporates the consideration of national regulations, human health and safety, hazardous material minimization, disassembly, recovery, recycling, and disposal into the design process.

Many obstacles to the effective use of LCA and DfE tools have been noted [1]. Two of the most significant obstacles are the difficulties acquiring the needed data and the challenges developing realistic, appropriate metrics of environmental impact. Consequently, LCA and DfE tools are, generally, not integrated with the other activities and tools used in the product development process. That is, the information flow and decision-making required for existing LCA and DfE tools to be effective is inconsistent with the information flow and decision-making present in product development organizations. The result is often a post-design, standalone, environmental review of a product.

However, manufacturing firms need a tool to consider environmental objectives during the design of new products. Especially urgent is the need to comply with an ever-increasing number of environmental regulations and customer demands. To overcome the limitations of standalone DfE tools, manufacturing firms need to consider important environmental objectives in a systematic way during the design process. This paper describes such a DfE process for a leading worldwide power tool manufacturer, The Black & Decker Corporation. In close collaboration with Black & Decker, the authors developed this DfE process. Black & Decker is now working to implement this process.

The remainder of this paper is organized as follows. Section 2 presents an overview of Black & Decker’s environmental objectives. Section 3 presents the specific product-level metrics that product development teams can evaluate and describes how they are relevant to Black & Decker’s environmental objectives. Section 4 makes recommendations about the product development milestones when these metrics should be complete. Section 5 describes compares this innovative DfE process to traditional DfE and LCA tools. Section 6 concludes the paper.

2. Environmental Objectives

Based on discussions with Black & Decker staff, such as the Director of Engineering Standards and the Senior Manager of Environmental Affairs, and documents provided by Black & Decker, we identified six primary environmental objectives based on the corporation’s environmental policy:

1. Practice environmental stewardship,
2. Comply with environmental regulations,
3. Address customer concerns,
4. Mitigate environmental risks,
5. Limit financial liability, and

This section describes these in more detail.
2.1 **Practice Environmental Stewardship.** Black & Decker seeks to demonstrate environmental awareness through creating an environmental policy and publishing it on their website, including information about recycled content on packaging, and its Design for Environment program. In addition, Black & Decker belongs to environmental organizations such as the World Environmental Center which contributes to sustainable development worldwide by strengthening industrial and urban environment, health, and safety policy and practices. It is also member of the Rechargeable Battery Recycling Corporation (RBRC) and RECHARGE which promote the recycling of rechargeable batteries.

2.2 **Comply with Environmental Regulations.** As a global corporation that manufactures, purchases, and sells goods, Black & Decker must comply with all applicable regulations of countries where its products are manufactured or sold. Currently, the European Union exerts significant influence on addressing environmental issues through regulations and directives. Listed below are examples of important U.S. and European environmental regulations.

There are many regulations that apply to U.S. and European workers and these are set by both Federal and state agencies. The Occupational Safety & Health Administration (OSHA) limits the concentration of certain chemicals to which workers may be exposed. The Environmental Protection Agency (EPA) regulates management of waste and emissions to the environment. Black & Decker provides employees with training on handling hazardous wastes, which is required by the Resource Conservation and Recovery Act and the Hazardous Materials Transportation Act [4]. California’s Proposition 65 requires a warning before potentially exposing a consumer to chemicals known to the State of California to cause cancer or reproductive toxicity. The legislation explicitly lists chemicals known to cause cancer and reproductive toxicity.

The EU Battery Directive (91/157/EEC) places restrictions on the use of certain batteries. The EU Packaging Directive [5] seeks to prevent packaging waste by requiring packaging re-use and recycling. In the future, countries in the European Union will require Black & Decker to adhere to certain laws so that the state achieves the goals of the EU Packaging Directive. Thus, Black & Decker will be interested in increasing the recyclability of its packaging. The new EU directives on waste electrical and electronic equipment (WEEE) and on the restriction of the use of certain hazardous substances in electrical and electronic components (RoHS) address issues of product take-back and bans on hazardous materials respectively. Thus, Black & Decker must provide information about the material content of its products.

2.3 **Address Customer Concerns.** Black & Decker’s retail customers are concerned about the environmental impacts of the products they sell. Examples of customer concerns are: ensuring timber comes from appropriate forests, increasing the recyclability and recycled content in packaging, using cadmium in batteries, and using lead in printed wiring boards and electrical cords. More specifically, some retailers require that Black & Decker’s products be free of lead-based surface coatings.

2.4 **Mitigate Environmental Risks.** An activity’s environmental risk is the potential that the activity will adversely affect living organisms through its effluents, emissions, wastes, accidental chemical releases, energy use, and resource consumption [6]. Black & Decker seeks to mitigate environmental risks through monitoring chemical emissions from
manufacturing plants, reducing waste produced by its operations, ensuring safe use of chemicals in the workplace, and ensuring proper off-site waste management.

2.5 Reduce Financial Liability. There are different types of environmental liabilities [7]:

- Compliance obligations are the costs of coming into compliance with laws and regulations.
- Remediation obligations are the costs of cleaning up pollution posing a risk to human health and the environment.
- Fines and penalties are the costs of being non-compliant.
- Compensation obligations are the costs of compensating “damages” suffered by individuals, their property, and businesses due to use or release of toxic substances or other pollutants.
- Punitive damages are the costs of environmental negligence.
- Natural resource damages are the costs of compensating damages to federal, state, local, foreign, or tribal land.

Some of which may be a concern to Black & Decker.

2.6 Reporting environmental performance. Black & Decker reports environmental performance to many different organizations with local, national or global influence and authority. An example of an organization is the Investor Responsibility Research Center (IRRC).

Consistent with its policy, Black & Decker’s environmental objectives will evolve. New regulations will be promulgated in the years to come. Stakeholders will ask for additional environmental information. Black & Decker must be flexible enough to comply. The need for a DfE process that is robust and can adapt to the constantly changing nature of environmental regulations and requirements is great.

3. Product-Level Environmental Metrics

Incorporating a DfE process that fits into the existing product development process has significant potential to help manufacturing firms achieve their environmental objectives. This section briefly describes eight product-level environmental metrics developed by the authors and Black & Decker staff that product development teams can evaluate during the product development process. These metrics were chosen because they relate directly to a particular product (they are not plant or corporate metrics). In addition, the measures concern attributes that are relevant to Black & Decker’s primary environmental objectives (described in Section 2). A summary chart that shows the metrics related to each environmental objective is included in Appendix A.

Description of the metrics

There are eight product-level environmental metrics:

1. Flagged material use in product
2. Total Product Mass
3. Flagged material generated in the manufacturing process
4. Recyclability/Disassembly rating
5. Disassembly time
6. Energy use
7. Innovation statement
8. Application of DfE approach
Flagged Material Use in Product. This measures the mass of each flagged material contained in the product. A material is considered flagged if it is banned, restricted or being watched with respect to regulations or customers. A consulting firm has provided Black & Decker with a list of materials that are banned, restricted and being watched.

Total Product/Packaging Mass. This measures the mass of the product and packaging separately.

Flagged Material generated in Manufacturing Process. This is a list of each flagged material generated during the manufacturing process. A material is considered flagged if it is banned, restricted or being watched with respect to regulations or customers.

Recyclability/Disassembly Rating. This metric is the degree to which each component and subassembly in the product is recyclable. Recyclability and separability ratings can be calculated for each component based on qualitative rankings. Design engineers are provided with a list of statements that describe the degree to which a component is recyclable or separable and a value from 1 to 6 is associated with each statement. Low ratings for both recyclability and separability facilitate disassembly and recycling. The design engineer rates the recyclability and separability of each component, subassembly, and final assembly. If both ratings for an item are less than ‘3’, than the item is recyclable [8].

Disassembly Time: A measure of the time it will take to disassemble the product. Research has been conducted on how long it typically takes to perform certain actions. Charts with estimates for typical disassembly actions are provided to the design engineers who can then estimate how long it would take to disassemble a product [8].

Energy Consumption. The total expected energy usage of a product during its lifetime. This metric can be calculated by multiplying the total expected lifetime hours by the energy use per hour the product consumes. This metric needs to be calculated only for large energy consumers such as compressors, generators, and battery chargers.

Innovation Statement. A brief paragraph describing the ways a product development team reduced the negative environmental impact of their product. The product development team should write this after the product is launched. All environmental aspects considered should be included as well.

Application of DfE approach. This binary measure (yes or no) is the answer to the following question: did the product development team follow the DfE approach during the product development process? Following the DfE approach requires the team to review the DfE guidelines and evaluate the product-level environmental metrics.

While this list of metrics cannot completely measure every environmental impact, the metrics provide designers with a simple way to compare different designs on an environmental level. Black & Decker plans to track the trends of these metrics as the products advance through future redesigns. Furthermore, each product will have environmental targets set at the beginning of the project, and the metrics provide a way to track how well the product development team performed with respect to attaining the targets. The Corporate Environmental Affairs group will also use the metrics to respond to retailers requests for environmental information.
Scorecard Model

A scorecard was created in Microsoft Excel in order to ensure that the metrics above could be used more effectively during the product development process. There is a single worksheet with inputs and outputs specifically related to most of the aforementioned metrics. Calculations for each metric are carried out on a hidden calculations worksheet. Separate worksheets contain the most important outputs from each metric and appropriate graphs. The specific inputs and outputs for each metric are listed in Table 1.

<table>
<thead>
<tr>
<th>Metric</th>
<th>Input</th>
<th>Output</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flagged Material Use in Product</td>
<td>• Component containing flagged material</td>
<td>• Mass of flagged material in each component</td>
</tr>
<tr>
<td></td>
<td>• Mass of component</td>
<td>• Total mass of each flagged material within each product</td>
</tr>
<tr>
<td></td>
<td>• Flagged material contained within component</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Percent of the component that is hazardous</td>
<td></td>
</tr>
<tr>
<td>Total Product/Packaging Mass</td>
<td>• Product weight</td>
<td>• Product mass</td>
</tr>
<tr>
<td></td>
<td>• Packaging weight</td>
<td>• Mass of packaging</td>
</tr>
<tr>
<td>Flagged Material generated in Manufacturing Process</td>
<td>• Flagged material generated</td>
<td>• List of flagged materials generated for product</td>
</tr>
<tr>
<td></td>
<td>• Manufacturing process</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Component being made</td>
<td></td>
</tr>
<tr>
<td>Recyclability/Disassembly Rating</td>
<td>• Assembly name</td>
<td>• Total mass of product for each recyclability rating</td>
</tr>
<tr>
<td></td>
<td>• Component name</td>
<td>• Total mass of product for each disassembly rating</td>
</tr>
<tr>
<td></td>
<td>• Quantity</td>
<td>• Pie charts for both sets of outputs</td>
</tr>
<tr>
<td></td>
<td>• Material the component is made of</td>
<td>• Percent of the Product that is recyclable</td>
</tr>
<tr>
<td></td>
<td>• Total mass</td>
<td>• Whether a particular component is recyclable</td>
</tr>
<tr>
<td></td>
<td>• Recyclability rating</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Separability rating</td>
<td></td>
</tr>
<tr>
<td>Disassembly Time</td>
<td>• Disassembly Step</td>
<td>• Total time for each step</td>
</tr>
<tr>
<td></td>
<td>• Fastener Used</td>
<td>• Total time for disassembly</td>
</tr>
<tr>
<td></td>
<td>• Removal Method</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Time per fastener</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Number of Jobs</td>
<td></td>
</tr>
<tr>
<td>Energy Consumption</td>
<td>• Expected Lifetime of Product</td>
<td>• Total energy used by product over lifetime</td>
</tr>
<tr>
<td></td>
<td>• Total power rating</td>
<td></td>
</tr>
</tbody>
</table>
The innovation statement and application of DfE approach metrics are not included in the spreadsheet because they do not involve numbers or calculations. The final output page highlights key environmental metrics and is calculated with the spreadsheet based on the designer inputs listed in Table 1. The key environmental metrics are: Amount of Flagged Material in Product (g), Total Product Mass (g), Number of Manufacturing Processes that Generate Flagged Materials, Percent Product Recyclable, Total Disassembly Time (s), and Total Energy Consumed (kJ).

Guidelines and Checklist Document

To ensure that design teams at Black & Decker address appropriate environmental concerns during the product development process, a guidelines and checklist document has been created. The checklist portion of the document lists items that must be addressed before the product is released to the market. The document contains references which are links to additional information about the requirements and guidelines. The guidelines section of the document lists issues that engineers should try to address to make the product more environmentally friendly. Not addressing an item in the guideline section would not prevent a product from going to the market however. The guidelines and checklist document is located in Appendix B. (Note that the links in the “Reference” column which point to documents on Black & Decker’s intranet, are not shown here.)

4. The new DfE Process

Ideally, every product and process design decision should consider environmental concerns. However, this is not feasible because some designers are unfamiliar with DfE principles. Therefore, we defined a DfE process that naturally integrates environmental issues into the existing product development process with little extra effort or time. Black & Decker uses a stage-gate product development process that has eight stages. Every stage requires certain tasks to be completed before management signs off giving permission to proceed to the next stage. This signoff procedure is known as the gate.

Currently, Black & Decker has safety reviews during stages 2, 3, 4, and 6. Safety reviews are meetings intended for reviewers to evaluate the assessment, actions, and process of the design team in addressing product safety. The DfE process adds an environmental review to the agenda of the safety reviews held during Stages 2, 4, and 6. A separate environmental review will be held during Stage 3, an important design stage, in order to focus specifically on the environmental issues for the particular product. The environmental reviews will require design teams to review the checklist of key requirements and to consider guidelines for reducing environmental impact. When the DfE process is first implemented, design teams will have to fill out the Environmental Scorecard only during Stage 6 after the product design is complete. Doing this begins the process of recording environmental data and allows design teams to adapt gradually to the new process. When design teams become more familiar with the process, the scorecard will be completed two or more times during the stage-gate process in order to track design changes that effect environmental metrics during the development process.

In addition to the environmental reviews, environmental targets will be set during Stage 1 as goals for the new product. The design team will write a lessons learned summary during Stage 8 to highlight innovative environmental design changes. The lessons learned summary will provide the innovation statement metric. Figure 2 shows the Safety Review Process and Environmental Review Process running in parallel.
The sections below discuss the aforementioned environmental activities in more detail. Note that, throughout this process, many other product development activities are occurring, causing changes to the product design.

### 4.1. Product Initiation Document

The Product Initiation document is a document that Black & Decker uses to benchmark competitors, define performance targets, and predict profitability and market share. In addition to these issues, the product initiation document will also address environmental regulations and trends and opportunities to create environmental advantage. Targets for environmental improvement will also be included.

#### Initial Environmental Review

The first environmental review is coupled with a safety review. During this meeting, the design team should discuss current environmental regulations, design guidelines, and environmental metrics. A list of regulations and design guidelines can be found in the guidelines and checklist document. The environmental metrics are located in the environmental scorecard. Old lessons learned documents from similar products will be reviewed during this meeting to facilitate environmental design ideas. The result of the meeting is an initial assessment plan that includes the tests to be conducted and the analysis to be performed. The reliability representative will write the assessment plan. Also, a list of brainstormed ideas for environmental improvement and any other minutes will be included in the assessment plan.

---

**Figure 2 – Combined Safety and Environmental Review Process**

The sections below discuss the aforementioned environmental activities in more detail. Note that, throughout this process, many other product development activities are occurring, causing changes to the product design.

#### 4.1. Product Initiation Document

The Product Initiation document is a document that Black & Decker uses to benchmark competitors, define performance targets, and predict profitability and market share. In addition to these issues, the product initiation document will also address environmental regulations and trends and opportunities to create environmental advantage. Targets for environmental improvement will also be included.

**Initial Environmental Review**

The first environmental review is coupled with a safety review. During this meeting, the design team should discuss current environmental regulations, design guidelines, and environmental metrics. A list of regulations and design guidelines can be found in the guidelines and checklist document. The environmental metrics are located in the environmental scorecard. Old lessons learned documents from similar products will be reviewed during this meeting to facilitate environmental design ideas. The result of the meeting is an initial assessment plan that includes the tests to be conducted and the analysis to be performed. The reliability representative will write the assessment plan. Also, a list of brainstormed ideas for environmental improvement and any other minutes will be included in the assessment plan.
Conceptual Design Environmental Review

The second environmental review is held separately from the safety hazard review. During this meeting, the project team will check compliance regulations, fill in the guidelines and checklist document, discuss the metrics in the scorecard, and review opportunities and additional environmental issues. The result of this meeting is an updated guidelines and checklist document and meeting minutes. The reliability representative will update the guidelines and checklist document and write the minutes. The lead engineer will update the scorecard for the next meeting.

Detailed Design Environmental Review

The third environmental review is coupled with a safety review. During this meeting, the project team should ensure that all environmental compliance issues are resolved. There should be no further changes to the design due to environmental reasons after this meeting. The result of the meeting is an updated guidelines and checklist document and meeting minutes. The reliability representative will update the guidelines and checklist document and write the minutes. The lead engineer will update the scorecard for the next meeting.

Final Environmental Review

The fourth and final environmental review is coupled with a safety review. During this meeting, all environmental compliance issues must be resolved. Optimally, no design changes due to environmental reasons would have been made between the last meeting and this meeting. The result of the meeting is a final guidelines and checklist document and meeting minutes. The reliability representative will finalize the guidelines and checklist document and write the minutes. The lead engineer will finalize the scorecard and create a Material Declaration Statement (MDS) packet for the product.

Post-launch Review

Black & Decker includes a lessons learned summary in their product development process. This document discusses what went well with the project, what didn’t go well with the project, and reasons why the product didn’t meet targets set in the trigger document. The lessons learned summary will include environmental design innovations realized during the product development process for publicity and customer questionnaires. An example of an item to be included in the lessons learned summary is a materials selection decision. Details should include what materials were considered and the rationale of the decision. The lessons learned summary is a very important part of the DfE process because it provides future design teams with the environmental knowledge gained by the previous designers.

Feedback Loop

The completed checklist and guidelines documents and lessons learned summaries create a feedback loop for the DfE process. Design engineers working on similar products can use this information to make better decisions immediately and the information is also valuable when the next generation of the product is designed years down the road. Design engineers will record what environmental decisions were made and why they were made. The decision information, scorecards and comments on the guideline document will be archived permanently. The goal is to save the right things so the information is there in
the future when more feedback activities, such as a product tear-down to verify scorecard metrics, can be introduced.

5. Analysis of DfE Process

Black & Decker’s new DfE process described above is innovative and has many advantages compared to traditional DfE tools. There are many standalone DfE tools available to designers. Otto and Wood [8] provide an overview of some of the DfE tools currently used. Two examples cited are general guideline/checklist documents and Life Cycle Assessments (LCAs).

A general guideline/checklist document is a simple DfE tool that forces designers to consider environmental issues when designing products. Integrating a guideline/checklist within a new DfE process is simple and effective way to highlight environmental concerns. However, it should be noted that the guideline/checklist document needs to be company specific and integrated systematically into the product development process. Using an existing generic, standalone guideline/checklist document will most likely be ineffective. First, the point of a guideline/checklist document is to ensure that designers are taking the proper steps towards achieving environmental objectives. Another organization’s guideline/checklist document was designed to obtain their own objectives which may not coincide with another company’s objectives. Second, obtaining a guideline/checklist document and simply handing it to designers will lead to confusion as to when and how to use the list. Specific procedures need to be implemented to ensure the designers are exposed to the guideline/checklist document early in the product development process to promote environmental design decisions.

LCAs are time-consuming projects that research a product’s environmental impacts and conduct tests to produce environmental impact quantities. The problem with LCAs is they take a long time, are very expensive, and provide information only after the design is complete. LCAs do not help designers improve a current product’s environmental impact. Our DfE process, however, provides guidelines that help achieve Black & Decker’s environmental objectives, and it contains a lessons learned summaries that provide a design engineer with helpful information about previously used decisions and techniques.

Klein and Sorra [9] argue that successfully implementing an innovation depends upon “the extent to which targeted users perceive that use of the innovation will foster the fulfillment of their values.” The DfE process contains values that coincide with the organization’s values. Within the Corporation’s Code of Ethics and Standards of Conduct [10], there is a section titled Environmental Matters which “places responsibility on every business unit for compliance with applicable laws of the country in which it is located, and…expects all of its employees to abide by established environmental policies and procedures.” Black & Decker’s environmental objectives were taken into account and consequently the DfE process requires designers to track related metrics. The process leverages existing processes hence minimizing time-to-market and requiring little extra effort from the designers. Black & Decker’s product development process was studied to ensure information availability. A DfE process that is customized for Black & Decker is much more likely to be implemented than standalone tools. By researching any organization’s product development process and understanding the decision-making processes, information flow, and organizational and group values, it is possible to construct a DfE process that is customized and easy to implement.
6. Conclusions

This paper describes an innovative DfE process in which a design team repeatedly considers key product-level environmental metrics. These metrics are directly related to the corporation’s environmental objectives. These metrics do not require excessive time or effort. The iterative nature of the DfE process means that design teams consider different aspects of DfE at the most appropriate time, when information is available and key decisions must be made. The DfE process was created specifically for Black & Decker through studying their product development process and incorporating DfE activities with similar existing activities. Environmental regulations are treated in a systematic and formal way so that the design teams can document the new product’s compliance. Finally, this report includes guidelines and an environmental scorecard that the product development teams can use to improve the product’s environmental performance. The research team is now assisting with the implementation and planning assessment activities such as material declaration forms and upgrading service bill of material lists to include material identification for recycling. The assessment of this approach remains for future work. Such an assessment would need to involve performance metrics such as: the time required for DfE reviews, the number of additional tasks required, the improvement in product environmental metrics, and the percentage of questions that can be accurately answered in customer questionnaires. Further research using this methodology will establish its usefulness for improving product development.

Acknowledgements

The authors greatly appreciate the help provided by Black & Decker employees, especially Mike Justice. This material is based upon work supported by the National Science Foundation under grant DMI-0225863. Any opinions, findings, and conclusions or recommendations expressed in this material are those of the authors and do not necessarily reflect the views of the National Science Foundation.

References


# Appendix A - Environmental Objective/Metric Summary Chart

<table>
<thead>
<tr>
<th>Corporate Environmental Objectives</th>
<th>Addressed by Metrics?</th>
<th>Which Metrics?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Practice Environmental Stewardship</td>
<td>Yes</td>
<td>D,E,F,G,H</td>
</tr>
<tr>
<td>Complying with Environmental Regulations</td>
<td>Yes</td>
<td>A,B,C,D,F</td>
</tr>
<tr>
<td>Addressing Customer Concerns</td>
<td>Yes</td>
<td>A,B,C,D,F</td>
</tr>
<tr>
<td>Mitigating Environmental Risks</td>
<td>Yes</td>
<td>C,D,E,F</td>
</tr>
<tr>
<td>Limiting Financial Liability</td>
<td>Yes</td>
<td>A,C,F</td>
</tr>
<tr>
<td>Reporting Environmental Performance</td>
<td>Yes</td>
<td>A,B,C,D,G,H</td>
</tr>
</tbody>
</table>

**Legend**

- A - Flagged Material Use in Product
- B – Total Product/Packaging Mass
- C - Flagged Material Generated in Manufacturing Process
- D - Recyclability/Disassembly Rating
- E - Disassembly Time
- F - Energy Consumption (some products)
- G - Innovation Statement
- H - Application of DfE Approach
Appendix B – Black & Decker’s Design for Environment Guidelines and Checklist


Products must satisfy the following regulatory and policy requirements. For more details about the requirements, refer to the reference column.

<table>
<thead>
<tr>
<th>Requirement Number and Description</th>
<th>Status: Compliance, Non-compliance. (If non-compliance, explain.)</th>
<th>Person responsible and date</th>
<th>Reference(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. No material restricted by Black &amp; Decker is used in the product or manufacturing process.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. All materials restricted in the RoHS directive are under the respective threshold limit within the product.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. All special lead applications are under the respective threshold limit within the product.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Product manual contains appropriate Proposition 65 warning if necessary.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Product and manual contain appropriate markings for products with batteries.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Product and manual contain appropriate markings for products with respect to the WEEE directive.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Prohibited manufactured processes are not used.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Part II. Design for Environment Guidelines.

To reduce the product’s environmental impact, comply with the following guidelines when feasible (with respect to cost, quality, and performance considerations). For more details about the guidelines, refer to the reference column.

<table>
<thead>
<tr>
<th>Guideline Number and Description</th>
<th>Corresponding actions and person responsible</th>
<th>Date completed</th>
<th>General Metric Values</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Reduce the amount of flagged materials in the product by using materials not included on Black &amp; Decker’s <strong>should not use</strong> list.</td>
<td># of Hazmats?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Reduce raw material used in product by eliminating or reducing components.</td>
<td>Product weight?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Reduce the amount of flagged material released in manufacturing by choosing materials and processes that are less harmful.</td>
<td># of harmful processes?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Increase the recyclability and separability of the product’s components</td>
<td>Recyclability rating?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Reduce the product’s disassembly time.</td>
<td>Disassembly time?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Reduce the amount of energy the product uses.</td>
<td>Lifetime Energy consumed?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>