



**DELL**

5<sup>th</sup> position, 4.6/10

**Dell drops to 5th position, with 4.6 points. While Dell scores high overall, the company scores poorly on all Products criteria. Dell previously pushed back its commitment to eliminate polyvinyl chloride plastic (PVC) and brominated flame retardants (BFRs) from 2010 to 2011. Yet, Dell still hasn't removed these chemicals from all of its products as promised, and still has no phase-out date for hazardous substances.**

Elsewhere in the **Products** criteria, Dell scores poorly on several transparency issues, including failing to disclose its percentage of total post-consumer recycled plastics or a timeline to improve in that area. Dell also lacks transparency on warranty and spare parts information and the percentage of its products that meet and exceed the latest Energy Star standard.

On the **Energy** criteria, Dell scores top marks for both its disclosure of externally verified greenhouse gas (GHG) emissions from its own operations and for committing to reduce global absolute emissions of GHGs from facilities by 40% by 2015, from a baseline year of 2007. The company still needs to set a goal to increase its use of renewable energy to 100% by 2020. The amount of renewable energy used decreased again from 21% in fiscal year 2011, to 19% in fiscal year 2012. Dell's overall energy score could increase with specific examples of advocacy to promote clean energy policy.

Dell performs well on the **Sustainable Operations** criteria, including supply chain management. Dell receives maximum points for paper procurement policy. Dell also scores high for working with 1<sup>st</sup>-tier suppliers on the issue of conflict minerals. Although Dell has a relatively comprehensive take-back programme, and provides good information to its customers on how to recycle discarded electronics, with the exception of its India customers it no longer provides data on recycling rates based on past sales. Dell must continue working with its suppliers to report and publish data on GHG emissions of all its products.

		ZERO	LOW	MEDIUM	HIGH
<b>ENERGY</b>	Disclose and set targets for operational GHG emissions and RE supply			YELLOW	
	Disclose and set targets for supply chain GHG emissions and RE supply			YELLOW	
	Clean Electricity Plan (CEP)			YELLOW	
	Clean Energy Policy Advocacy		ORANGE		
<b>PRODUCTS</b>	Product energy efficiency		ORANGE		
	Avoidance of hazardous substances in products		ORANGE		
	Use of recycled plastic in products		ORANGE		
	Product life cycle	RED			
<b>OPERATIONS</b>	Chemicals management and advocacy			YELLOW	
	Policy and practice on sustainable sourcing of fibres for paper				GREEN
	Policy and practice on avoidance of conflict minerals			YELLOW	
	Provides effective voluntary take-back where there are no EPR laws			YELLOW	

<b>Energy</b>		<b>13/32</b>
<b>Disclose and set targets for operational GHG emissions and RE supply</b>	<p>The latest FY2012 figures for scope 1, 2 &amp; 3 (that are attributed to employee business air travel) are summarised and compared to previous years. Dell follows GHG Protocol Corporate Standard and EPA Climate Leaders reporting protocols. See p.5, 26 -29, <b>Corporate Responsibility Report 2012</b>. A breakdown of emissions as well as methodologies and disclosures and procedures is in Dell's GRI Index (EN16 &amp; 17). Third-party verification is by TruCost (at a AA1000AS (2008) Type 2 moderate-level assurance) <b>see 3.13</b>.</p> <p>In 2007, Dell announced a goal to reduce its total direct and indirect emissions intensity by 15% by 2012, using FY08 as the base year. Intensity measures emissions against revenue. Dell is committed to reduce global absolute emissions of GHGs from its worldwide facilities by 40% by 2015, from a baseline year of 2007. Dell reports that progress needs improvement for both these goals. See. p.11 2012 <b>Corporate Responsibility Report</b>. Dell reports that as of FY12, it has reduced its net absolute Scope 1 and Scope 2 emissions by approximately 16% compared to the base year of FY08, which has been adjusted to reflect both acquisitions and divestitures. Its energy intensity has <b>increased slightly from FY2011</b>, although it is 14.2% lower compared to FY08. Dell's previous aim was to use energy that is 100% generated by clean and renewable sources, although there was no timeline for this goal. Dell needs to set a goal to increase its use of renewable energy to 100% by 2020. <b>More information.</b></p>	<b>4/8</b>
<b>Disclose and set targets for supply chain GHG emissions and RE supply</b>	<p>Dell joined the CDP's Supply Chain Leadership Collaboration Project in 2007, working with suppliers to report their emissions and formulate climate change strategies. All Tier 1 suppliers are required to publish a corporate responsibility report. p.4 <b>Corporate Responsibility Report 2012</b>.</p> <p>Dell aims to complete current Scope 3 pilot programmes and assess its capability to measure, report and act on the resulting data. Dell reports to the CDP that primary suppliers are expected to: (1) Publicly disclose annual GHG emissions by participating in the CDP; (2) Establish a public goal for reducing operational GHG impacts; and (3) Set expectations for 2<sup>nd</sup>-tier suppliers to manage and publicly disclose emissions. GHG emissions data and reduction goals are taken into consideration when awarding business. However, the data on Scope 3 emissions from the supply chain is not available. See <b>CDC website</b>. Dell has tracked the carbon footprint of some products, starting with the Latitude E6400 laptop. <b>More information.</b></p> <p>The breakdown shows that the GHG emissions from use and manufacturing are roughly equal. 95% of emissions associated with manufacturing are from the motherboard, the display, the chassis and the battery. <b>More information.</b> Dell fails to score more points as data on GHG emissions from its supply chain has not yet been published.</p>	<b>4/8</b>
<b>Clean Electricity Plan (CEP)</b>	<p>A <b>breakdown</b> of Dell's initiatives to reduce greenhouse gas emissions and the reductions already achieved is given in the GRI Index (EN18). Dell states that during FY2012 renewable electricity purchases and on-site solar generation accounted for 19% of the total electricity used (which makes up 88% of energy used by Dell), down from 21% in FY2011. Dell "continues to be committed to using electricity produced from clean, renewable sources like wind, solar and hydro". "Eight of its global facilities use 100% non-fossil fuel, renewable power."</p> <p>Dell is constantly looking for ways to improve its energy efficiency, paying particular attention to reducing electricity use and to data centres that consume much more electricity per area than any other type of building space; techniques such as hot and cold aisle containment to boost cooling efficiency, fresh air cooling (using outside air to cool the IT equipment) and the latest IT equipment configurations are used. Location of new facilities is also considered.</p> <p>Dell aims to measure energy consumption at a more detailed level to achieve further energy efficiency savings and increase the number of Dell facilities purchasing renewably generated electricity from their local utility. See p.24, <b>2012 Corporate Responsibility Report</b>. Dell has decided to end its Renewable Energy Credits programme for the purpose of achieving carbon neutral operations, but will continue to purchase as much renewable energy as practical. See p.12 <b>2011 Corporate Responsibility Report</b>. Dell needs to provide more details on how much of its renewable energy is from renewable energy credits.</p>	<b>4/8</b>
<b>Clean Energy Policy Advocacy</b>	<p>Dell sets out the measures that it has identified that need to be taken in its Principles for Global Climate Change Policy. Dell believes that a combination of global emissions reductions, efficiency improvements, and a transition to renewable energy sources are necessary to significantly reduce atmospheric GHG levels. The transition to a lower-carbon economy requires participation of governments, businesses, universities, non-governmental organisations, communities, and individuals. <b>More information.</b></p>	<b>1/8</b>

Greener Products		5/16
Product energy efficiency	<p>Dell <b>states</b> that “the majority of our products can be configured to be Energy Star-certified — including virtually every business system, consumer laptop, and rack and tower server”. All Latitude, Dell Precision and OptiPlex systems can be configured for Energy Star compliance and are among the most energy-efficient in the industry. Virtually every Dell rack and tower server also comes with the Energy Star option. <b>More information.</b></p> <p>However, Dell does not provide figures on the percentage of their products that meet and exceed the latest Energy Star standard. It does provide a list of laptops and desktops with Energy Star certification. (PCs need to leave the factory with the most energy efficient settings, which should not go out of ES compliance when consumers tweak power management settings.) <b>More information. Product Energy Star data sheets for certified products.</b> Dell laptops and desktops are 25% more efficient today than in 2008, meeting a commitment that it made in 2008. <b>More information.</b></p> <p>Dell <b>states</b> that it leads the market with its 96% efficient power supply. See p. 14 &amp; 15 of the 2011 Corporate Responsibility Report. Dell offers tools to optimise energy efficiency – it estimates that customers using desktop power management features and settings have saved more than \$4 billion in energy costs. <b>More information.</b></p>	2/5
Avoidance of hazardous substances in products	<p>Dell has BFR/CFR/PVC-free standard offerings of all Latitude notebook and XPS 13 Ultrabook products, and is continually adding others. Dell provides a list of 19 whole product systems that are PVC/BFR free. All removable media storage devices, memory and hard disk drives became BFR/CFR/PVC-free in 2011. Dell made a commitment that by the end of 2011, all newly introduced Dell personal computing products will be BFR/CFR/PVC-free, as acceptable alternatives are identified.</p> <p>However, it no longer commits to removing these substances from all products (just computing ones) as per its previous commitment, and the timeline is unreasonable. Dell states that: “while we have not yet fully achieved our goal of making all newly introduced Dell personal computing products BFR- and PVC-free, we have reduced these materials across all our consumer products and many can be configured to be BFR and PVC-free”. Dell has completed its phase out of arsenic and mercury. <b>More information.</b></p> <p>Dell provides a <b>list of products with reduced hazardous chemicals</b>, and their date of introduction. An update to Dell’s January 2009 version of its Materials Restricted for Use Specification (6T198) restricts 3 phthalates (DEHP, BBP, DBP) as from July 1 2010 for newly launched parts and products and by July 2012 for sustaining products; DIBP is to be restricted by 2014 ( in response to its inclusion on the EU REACH list for authorisation). Other phthalates, antimony and beryllium are identified as substances of concern, but they are not currently restricted. Instead they are listed in a table entitled: Future Material Declaration Requirements. See p. 12 <b>Guidance Document on Restricted Materials.</b></p>	2/5
Use of recycled plastic in products	<p>Dell used 7.4 million pounds of <b>recycled-content plastics</b> in FY2012, in Dell OptiPlex desktops and flat-panel monitors, but gives no information on the percentage of total plastics sourced. The enclosures of the OptiPlex 980 and XE can be configured to include up to 25% post-consumer recycled plastic (up from 10%). The enclosures of numerous flat-panel monitors contain 25% post-consumer recycled plastic. These include the E190S, E170S, G2410H, P2011H, P2211H, P2311H and many more. <b>More information.</b> Dell has no public target for increasing use of post consumer recycled plastic.</p>	1/3
Product life cycle	<p>Dell informs Greenpeace that its standard warranty is 1 to 3 years for defects in materials and workmanship, depending on the product type and that extended warranties are available for certain products. However, this information is not presented on its website. Dell needs to publicly disclose the length of warranty and spare parts availability for its main product lines and show some innovative measures that increase lifespan and durability of whole product systems, rather than only individual parts.</p> <p>Dell integrates environmental considerations into product designs and development processes to improve the environmental performance of products during their entire life cycle. <b>More information.</b> Products, parts and components are designed to be upgraded extending the technological life of the product. <b>More information.</b></p>	0/3

<b>Sustainable Operations</b>		14/21
<b>Chemicals management and advocacy</b>	<p>Definition of precautionary principle reflects need to eliminate potentially harmful chemicals even without full scientific certainty of cause and effect. Dell supports restrictions of PVC and BFRs as a focus for the restriction of chlorine and bromine from electrical and electronic products, and supports restriction under the current RoHS recast provided that some critical technical and supply chain issues can be overcome or addressed by specific exemptions. More information <a href="#">here</a> and <a href="#">here</a>. It has not submitted any case studies on substituting phthalates or BFRs to the substitution portal subpart, although there is a <b>case study on eliminating mercury</b> in backlighting for LCD; Dell scores a point for this and for its previous positive advocacy on RoHS, which will be important again in the future.</p> <p>Dell's chemicals management programme lists substances targeted for substitution and explains how it manages its supply chain to achieve its substitution goals. However, the substance restrictions do not apply to manufacturing processes for most substances, with the exception of fluorinated greenhouse gases. <b>Guidance Document on Restricted Materials 2011</b>.</p>	<b>3/5</b>
<b>Policy and practice on sustainable sourcing of fibres for paper</b>	<p>Dell recognises the need to protect the Earth's forests and takes a four-pronged approach: (1) Reduce the amount of paper it uses; (2) Reduce the use of virgin tree fibre; (3) Increase the use of forest-friendly paper; and (4) Support forests directly through initiatives. Dell has established baseline starting points and time-bound goals and benchmarks in its Forest Products Stewardship Mode (established in 2004) to reduce the use of virgin fibre and eliminate the purchase of wood and fibre from endangered forests. This policy increases the use of recycled and alternative fibre and the use of wood and fibre independently certified as sustainable. <b>More information</b>.</p> <p>Dell's policy is not to source paper from companies that are known to log endangered forests. It explains its strategy for implementing this policy through its supply chain. Dell's long-term goal is to have all of its forest product suppliers certified to FSC or similarly recognised standards. Detailed goals are set out, however, many of these are out of date as they were set in 2004. <b>More information</b>. For data on quantities of recycled paper used see <b>GRI Index, EN2</b>.</p>	<b>3/3</b>
<b>Policy and practice on avoidance of conflict minerals</b>	<p>Dell states that it is its policy "to refrain from purchasing from any known conflict sources and we expect that our suppliers adhere to the same standards. We have notified all our suppliers of our policy on conflict minerals and have asked each supplier to provide us with a confirmation of their conflict-free status". <b>More information</b>.</p> <p>Dell reports on the Conflict-Free Smelter (CFS) assessment programme that was launched in 2011 by the GeSI/EICC and aims for preliminary list of conflict free smelters for tin, tantalum, tungsten and gold by the end of the calendar year; this programme provides independent third-party evaluation. <b>More information</b>. It <b>supported the goals of the Conflict Free Minerals Act</b>. Dell is active in the EICC conflict-free smelter programme but has not yet published a list of smelters or suppliers, as several companies have already done. It is active in the EICC smelter audit process, has a new internal policy for suppliers on conflict minerals, but this does not yet have third party monitoring.</p> <p>Dell has signed up to the Public Private Alliance but has not made statements on the need for a multi-stakeholder certification process or publicly committed to implement the OECD due diligence guidelines. Dell did not issue a statement against the Chamber of Commerce lawsuit but it did join the multi-stakeholder submission to the SEC on conflict minerals. It participated in the OECD due diligence drafting and has actively reached out to NGOs and organised several outreach panels on conflict minerals.</p>	<b>4/5</b>
<b>Provides effective voluntary take-back where there are no EPR laws</b>	<p>Dell's goal is to increase take-back volume totals to a worldwide cumulative 1 billion pounds of collected equipment by 2014. p.13 CRR 2012. Dell offers free recycling in most places where it does direct business. It has expanded its global programme and now offers recycling of used electronics in 79 countries worldwide (although only 69 appear to be available via its website). P.40 – 47 <b>Corporate Responsibility Report 2012</b>. Countries where Dell offers recycling without take-back legislation include Columbia, Chile, South Africa, Ghana, Morocco, Russia, Thailand, Malaysia and China. More information <a href="#">here</a> and <a href="#">here</a>.</p> <p>Dell received the highest rank from the Electronics Take Back Coalition in their latest report card, for its take-back programme in the US. <b>More information</b>. The Reconnect Program, which Dell runs in partnership with Goodwill, is now available throughout the US and in selected communities in Canada. <b>More information</b>. Information is provided to Dell's individual customers, although there are still gaps, particularly in Africa and Central &amp; South America. <b>Dell's US programme</b>. In FY12, Dell recycled more than 192.3 million pounds of electronics. Globally, an increase of 29% from FY11, see. p.40 <b>Corporate Responsibility Report 2012</b>. Dell no longer reports its recycling data as a percentage of sales 7 years ago. Instead, it is using a new system for reporting recycling and take-back information.</p>	<b>4/8</b>