EPEAT Program
Continuous Monitoring Outcomes Report

Computers and Displays
CD-2021-02
November 17, 2021

1.0 Background

EPEAT® is a comprehensive voluntary sustainability Type 1 ecolabel that helps purchasers identify sustainable technology products and services. Central to EPEAT are conformity assurance activities that meet the technical rigor and credibility needs of the institutional purchasers who rely upon EPEAT. The EPEAT Program ensures the ongoing conformance of EPEAT-registered products through an ongoing surveillance process known as Continuous Monitoring. Continuous Monitoring activities occur throughout the year and test the ability of Participating Manufacturers to prove conformance with EPEAT Criteria on an ongoing basis.

Some Continuous Monitoring activities require that Investigations be conducted in discrete timeframes called Rounds. The EPEAT Program develops an individual plan for each Continuous Monitoring Round, which specifies the EPEAT Criteria to be investigated, the method of investigation that GEC-approved Conformity Assurance Bodies (CABs) must use and the specific dates when the Investigation activities must be completed. The EPEAT Program also selects the Participating Manufacturers and EPEAT-registered products and assigns Investigations to CABs, which must fully participate in and are responsible for implementing Continuous Monitoring Round activities with their Participating Manufacturer clients. Participating Manufacturers are required to cooperate fully with their GEC-approved CAB during Round activities.

To maintain the level of transparency relied on by purchasers, the EPEAT Program publishes an Outcomes Report at the conclusion of each Round to summarize the activities conducted and to identify the products and Participating Manufacturers that received major nonconformances and the actions taken to restore accuracy of the EPEAT Registry.

This document summarizes the activities and results of Continuous Monitoring Round CD-2021-02 conducted for the Computers and Displays product category.

2.0 Overview of Continuous Monitoring Round CD-2021-02

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round CD-2021-02 used Level 1 Investigations (documentation review activities to determine Participating Manufacturers' conformance with specific EPEAT Criteria). Participating Manufacturers had a discrete time period to provide their CABs with evidence supporting conformance with the selected EPEAT Criteria. GEC-approved CABs reviewed the documentation, made recommendations on conformity based solely on the evidence provided by Participating Manufacturers, and sent Investigation Reports to the EPEAT Program. The EPEAT Program made the final decisions on conformity for the Investigations.

2.2 Criteria Investigated

The products and Criteria selected for investigation in Continuous Monitoring Round CD-2021-02 were selected randomly using a random number generator.

Table 1: Criteria Investigated in Round CD-2021-02

Criteria Number	Criterion Title
4.1.1.1	Conformance with European Union RoHS Directive substance restrictions
4.1.3.1	Elimination of intentionally added mercury in light sources
4.1.4.1	Restriction of the use of beryllium
4.1.5.1	Reduction of bromine and chlorine content in plastic parts >25 g
4.1.5.2	Further reduction of bromine and chlorine content of plastic materials
4.1.6.2	Reduction of substances on the EU REACH Candidate List of SVHCs
4.1.7.1	Compliance with provisions of EU Battery Directive
4.1.9.1	IEC 62474 declarable substances
4.1.9.3	Acquiring substance inventory
4.1.10.2	Reduce fluorinated greenhouse gas emissions from semiconductor production
4.10.2.1	Public disclosure regarding conflict minerals in products
4.10.2.2	Participation in an in-region program that advances responsible sourcing of conflict minerals
4.2.1.1	Minimum post-consumer recycled plastic, ITE-derived post-consumer recycled plastic or bio based plastic content
4.3.1.1	Identification of materials and components requiring selective treatment
4.3.2.2	Plastic parts separable for recycling
4.4.1.1	Service support
4.4.2.1	Removal of external enclosure
4.4.2.3	Spare parts
4.4.2.4	Battery replacement information
4.5.1.1	Conformance to current ENERGY STAR® program requirements
4.5.1.2	Lowest power mode limit
4.6.1.1	Provision of product take-back services
4.6.2.1	Provision of a removable rechargeable battery take-back program
4.6.3.1	End-of-life processing
4.7.1.1	Elimination of intentionally added heavy metals in packaging
4.7.1.2	Elimination of elemental chlorine as a bleaching agent in packaging material
4.7.2.1	Separable packaging material
4.8.1.1	Product lifecycle assessment and public disclosure of analysis
4.8.1.2	Product specific greenhouse gas emissions - product carbon footprint
4.8.2.1	Corporate carbon footprint
4.8.2.2	Greenhouse gas emissions from product transport
4.9.1.1	Third party certified environmental management system (EMS) for design and manufacturing organizations
4.9.1.2	Third party certified environmental management system (EMS) for supplier manufacturing facilities
4.9.2.1	Corporate environmental performance reporting by manufacturer
4.9.2.2	Corporate environmental performance reporting by suppliers
4.9.3.1	Energy management system/energy performance improvement - manufacturers

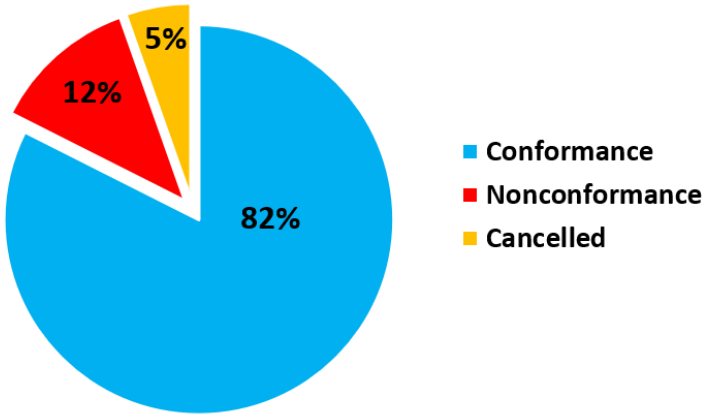
Table 1: Criteria Investigated in Round CD-2021-02	
Criteria Number	**Criterion Title**
4.9.3.2	Energy management system/energy performance improvement for suppliers

3.0 Summary of Investigations and Final Decisions on Conformity for CD-2021-02

Highlights from this Continuous Monitoring Round are:

- **61** investigations completed
- **52** decisions of Conformance
- **9** decisions of Nonconformance *Further details provided in Section 4*
- **7** investigations cancelled *[Due to CAB transfers, or product archival before start of Round]*

Figure 1: Final Conformity Decisions for CD-2021-02
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for CD-2021-02

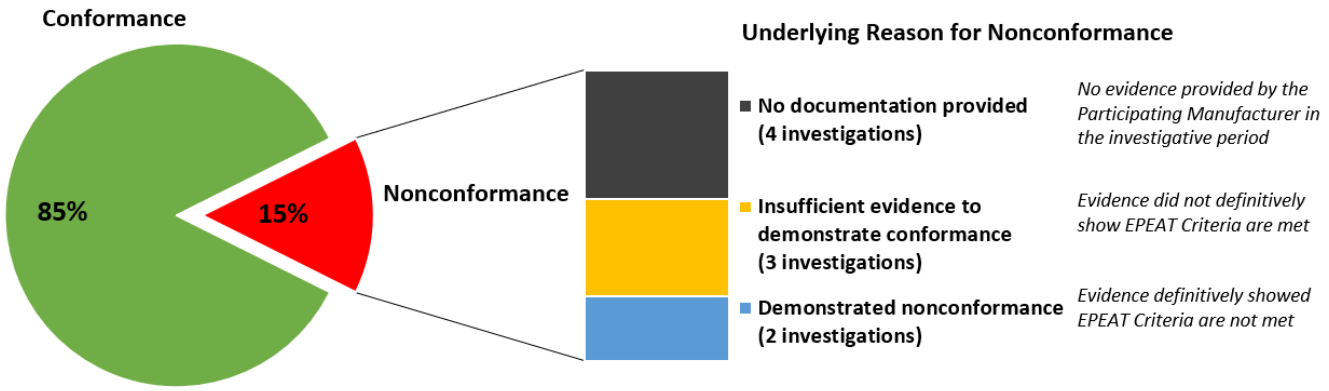
Table 2 below provides a further breakdown of the nonconformances by Criterion.

Table 2: Breakdown of Nonconformances by Criterion for CD-2021-02		
Criteria Number	**Criterion Title**	**Total Nonconformances**
4.1.1.1	Conformance with European Union RoHS Directive substance restrictions	1
4.1.3.1	Elimination of intentionally added mercury in light sources	1
4.1.5.2	Further reduction of bromine and chlorine content of plastic materials	1
4.1.6.2	Reduction of substances on the EU REACH Candidate List of SVHC's	1
4.6.3.1	End-of-life processing	1
4.8.1.2	Product specific greenhouse gas emissions- product carbon footprint	1

Table 2: Breakdown of Nonconformances by Criterion for CD-2021-02		
Criteria Number	**Criterion Title**	**Total Nonconformances**
4.8.2.2	Greenhouse gas emissions from product transport	1
4.9.3.2	Energy management system/energy performance improvement for suppliers	1
4.10.2.2	Participation in an in-region program that advances responsible sourcing of conflict minerals	1

Figure 2 provides a further breakdown by the underlying reason for the nonconformances.

Figure 2: Underlying Reason for Nonconformances in CD-2021-02
(shown as a percentage of total nonconformances)



4.1 Major Versus Minor Nonconformances

All nonconformances must be categorized as either major or minor. Minor nonconformances are non-critical or clerical in nature and do not materially affect the validity of conformance with EPEAT Criteria. All nonconformances that do not meet the definition of minor are categorized as major.

All nonconformances for Continuous Monitoring Round CD-2021-02 were major nonconformances.

4.2 Minor Nonconformances

For Level 1 Investigations, nonconformances may be categorized as minor for the following reasons:

- Minor human error in data entry (e.g., value cited for EPEAT-product registration is insignificantly above or below the actual value).
- Minor administrative errors (e.g., broken URLs, reports/certificates marginally outdated).
- No documentation provided by a Participating Manufacturer where the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market.

There were no minor nonconformances found in Continuous Monitoring Round CD-2021-02.

4.3 Major Nonconformances

Major nonconformances may be due to a demonstrated nonconformance, insufficient evidence provided to demonstrate conformance, or because no documentation was provided. All nine nonconformances found in this Round were major nonconformances. Four of the major nonconformances were due to no documentation being provided; three of the major nonconformances were due to insufficient evidence provided; and two of the major nonconformances were demonstrated nonconformances. Due to the fact that this was a Continuous Monitoring Round where Criteria were randomly selected, the nonconformances were all for different Criteria.

During Continuous Monitoring Rounds, Participating Manufacturers are responsible for compiling documentation and submitting it to their CAB in an organized and timely manner. Evidence must be submitted before the end of the Investigation Phase. If a Participating Manufacturer does not provide documentation during the Investigation Period, this will always result in a major nonconformance due to no documentation provided, unless the product is end-of-life and no longer available on the market.

The remaining nonconformances in this Round were due to a demonstrated nonconformance or insufficient evidence provided.

Criterion 4.1.1.1 (Conformance with European Union ROHS Directive substance restrictions) requires Participating Manufacturers to provide evidence of the implementation of their conformance assurance process or technical documentation that is used ensure the investigated product complies with the substance restriction requirements of the European Union (EU) RoHS Directive and its amendments.

Criterion 4.1.3.1 (Elimination of intentionally added mercury in light sources) requires Participating Manufacturers to provide evidence that all light sources in the investigated product do not contain intentionally added mercury.

Criterion 4.6.3.1 (End-of-life processing) requires manufacturers to ensure all equipment collected as part of their take-back program pursuant to 4.6.1.1 is recycled by recyclers meeting all requirements outlined in the Criterion and that products returned through the following programs meet transboundary requirements and are processed by a recycler meeting all Criterion requirements:

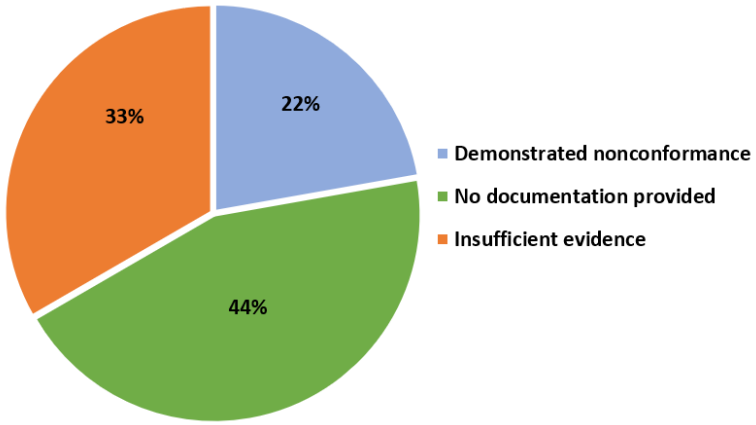
- Management of leased products where the manufacturer (or their contractual agent) retains legal ownership.
- Trade-in/exchange programs where the customer surrenders the product to the manufacturer (or their contractual agent) in return for compensation or replacement product.
- Product servicing and/or warranty programs, operated by the manufacturer, or their contractual agent, where a product (or similar product) is returned to a customer.

Criterion 4.8.2.2 (Greenhouse gas emissions from product transport) requires the Participating Manufacturer to conduct an annual assessment of greenhouse gas emissions resulting from product transport and make a summary of the results and their goals and progress publicly available.

Criterion 4.10.2.2 requires Participating Manufacturers to support and/or participate in a responsible sourcing program that meets all objectives identified in the Criterion.

Figure 3 provides a breakdown of the major nonconformances found in Round CD-2021-02.

Figure 3: Reasons for Major Nonconformances for CD-2021-02
(shown as a percentage of total major nonconformances)



5.0 Actions to Restore Conformance

Where the final conformity decision is nonconformance (whether major or minor), Participating Manufacturers must make corrections to restore the accuracy of the EPEAT Registry during the Corrective Action Phase. These activities may include providing additional evidence to demonstrate conformance with the criterion or unselecting the criteria in the EPEAT Registry. Where the product was found nonconformant and is no longer available in the marketplace, the product must be archived.

During the Corrective Action Phase, Participating Manufacturers must also develop Corrective Action Plans for other EPEAT-registered products that may be affected by the same underlying issue causing the nonconformance but were not the subject of investigation (called "similarly affected products").

The following actions were taken to restore accuracy to the EPEAT Registry as a result of Continuous Monitoring Round CD-2021-02:

- **4** investigations — Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- **5** investigations — Criterion unselected by Participating Manufacturer

Table 3 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round CD-2021-02.

6.0 Key Findings

6.1 Conformity Against All Elements of a Criterion (4.6.3.1)

Criterion 4.6.3.1 has multiple elements against which conformance must be shown, including verification requirement d), which applies to the following programs operated by the manufacturer (or their contractual agent):

- Management of leased products where the manufacturer (or their contractual agent) retains legal ownership.

- Trade-in/exchange programs where the customer surrenders the product to the manufacturer (or their contractual agent) in return for compensation or replacement product.
- Product servicing and/or warranty programs, operated by the manufacturer, or their contractual agent, where a product (or similar product) is returned to a customer.

6.2 Conformity Against All Elements of a Criterion (4.10.2.2)

Criterion 4.10.2.2 requires Participating Manufacturers to support and/or participate in an in-region conflict minerals responsible sourcing program in a covered country or conflict-affected and high-risk regions. The responsible sourcing program must include, at the mine level, one or more of the following objectives: improved governance, capacity building, traceability, and/or conflict and human rights risks. A description of the program's commitment to engage local stakeholders must also be provided and the program must identify and address risks or gaps according to the program scope.

6.3 Implementation of Procedures for Reduction of Use of Hazardous Substances

For criteria that require conformance assurance processes, technical documentation, or other reductions of use of hazardous substances, Participating Manufacturers must show implementation of their procedures for the investigated product.

6.4 Evidence for Accreditation Requirements

Several Criteria in the Computers and Displays category, (e.g., 4.9.1.1 Required - Third party certified environmental management system (EMS) for design and manufacturing organizations), require the EMS certification to come from a certification body accredited by an accreditation body that is a signatory to the IAF MLA with the appropriate scope of accreditation. Participating Manufacturers are reminded to submit information alongside other evidence.

6.5 Annual Reporting

Several corporate Criteria in the Computers and Displays category have annual reporting requirements (e.g., 4.10.2.1 Required—Public disclosure regarding conflict minerals in products). Annual reporting means that updated data is released once every 12-month period. The 12-month period itself can vary, for example, it may be disclosed on a calendar year or a fiscal year. The 12-month reporting period can be changed, but there cannot be a gap in the disclosure, (e.g., cannot skip reporting for a period of time). In these cases, we expect manufacturers to inform their CABs of changes to reporting schedules.

6.6 Auditor Credentials

Several corporate Criteria in the Computers and Displays category require third party verification of the assessment (e.g., 4.8.2.2 Optional — Greenhouse gas emissions from product transport). Often these criteria require the third-party verification documentation to include contact information, credentials, and qualifications of the third-party verifier. Participating Manufacturers are reminded to ensure these third-party verification documents contain all necessary information.

6.7 Selecting Criteria in EPEAT Registry

Participating Manufacturers are reminded they are responsible for only selecting EPEAT Criteria to which they can prove conformance.

7.0 Identification of Major Nonconformances and Corrections Made by Participating Manufacturers

In the interest of transparency, the EPEAT Program identifies the Participating Manufacturers and products that received major nonconformances and the actions taken to restore accuracy of the EPEAT Registry. Minor nonconformances are generally clerical in nature and do not materially affect the validity of products in the EPEAT Registry. As such, these are not identified in the table below.

Table 3: Summary of Major Nonconformances and Corrections Made by Participating Manufacturers

Participating Manufacturer	Product	Product Type	Country	Criterion Number	Criterion Title	Required or Optional	Underlying Reason for Nonconformance	Corrective Action Taken
Ace Computers	Ace Mustang W640	Notebook	United States	4.1.1.1	Conformance with European Union RoHS Directive substances restrictions	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
Algoritmos Procesos y Disenos, S.A.	APD ALDA PRO	Desktop	Spain	4.8.1.2	Product specific greenhouse gas emissions – product carbon footprint	Optional	No documentation provided	Manufacturer unselected the Criterion
Ciara TECH	Kronos 540	Desktop	Canada	4.1.5.2	Further reduction of bromine and chlorine content of plastic parts	Optional	No documentation provided	Manufacturer unselected the Criterion
IGEL Technology GmbH	UD3 M350C	Thin client	United States	4.6.3.1	End-of-life processing	Required	Insufficient evidence to demonstrate conformance	Manufacturer provided evidence demonstrating conformance
Positivo Tecnologia S.A.	MASTER A2200	Integrated Desktop	Brazil	4.1.6.2	Reduction of substances on the EU REACH Candidate List of SVHCs	Optional	No documentation provided	Manufacturer unselected the Criterion
TRANSOURCE SERVICES CORP.	SCORCH 1050	Desktop	United States	4.1.3.1	Elimination of intentionally added mercury in light sources	Required	Insufficient evidence to demonstrate conformance	Manufacturer provided evidence demonstrating conformance
ViewSonic	ViewSonic / VS16503 / VP2771	Monitor	Canada	4.8.2.2	Greenhouse gas emissions from product transport	Optional	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
Zebra Technologies	Zebra ET51 Enterprise Rugged Tablet WLAN (8”)	Tablet/Slate	United States	4.10.2.2	Participation in an in-region program that advances responsible sourcing of conflict minerals	Optional	Insufficient evidence to demonstrate conformance	Manufacturer unselected the Criterion
Zebra Technologies	Zebra L10 Rugged Tablets (XPAD, XSLATE, XBOOK)	Tablet/Slate	United States	4.9.3.2	Energy management system/energy performance improvement for suppliers	Optional	No documentation provided	Manufacturer unselected the Criterion

Document Control and Change History						
Issue	***Revision***	***Owner***	***Approver***	***Description***	***Approval Date***	***Effective Date***
1	*0*	*EPEAT Conformity Assurance Manager*	*Director, EPEAT Program*	*Initial release*		
1	*1*	*EPEAT Conformity Assurance Manager*	*Director, EPEAT Program*		*2018 Dec 11*	*2018 Dec 11*
2	*0*	*Senior Manager, Ecolabels and Resources*	*Senior Director, Ecolabels and Manufacturer Resources*	*Reformatting of document. Addition of standardized text.*	*2021 Mar 25*	*2021 Mar 30*