

EPEAT Program

Continuous Monitoring Outcomes Report



Computers and Displays
CD-2021-03
April 29, 2022

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-2021-03 conducted for the Computers and Displays category.

2.0 Overview of Continuous Monitoring Round CD-2021-03

2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round CD-2021-03 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

Continuous Monitoring Round CD-2021-03 focused on three Criteria the EPEAT Program identified as having verification requirements that may be misunderstood. Manufacturers were assigned one investigation per Criteria (if they had selected the Criteria), and the products were selected randomly using a random number generator. Since two of the selected Criteria are Optional and one is Required, Participating Manufacturers received up to three investigations. Participating Manufacturers that received a Major Nonconformance in any 2020 Continuous Monitoring Round were then also assigned an additional investigation in this Round. The additional investigation assigned was an extra investigation for one of the three targeted Criteria.

While this Round focused primarily on three targeted Criteria, there were also a series of additional Criteria investigated due to investigations that were deferred from Continuous Monitoring Round CD-2021-02, which were then reassigned in CD-2021-03. For these investigations, a random number generator was used to randomly select new products and Criteria for investigation, since products and Criteria were randomly selected in CD-2021-02.

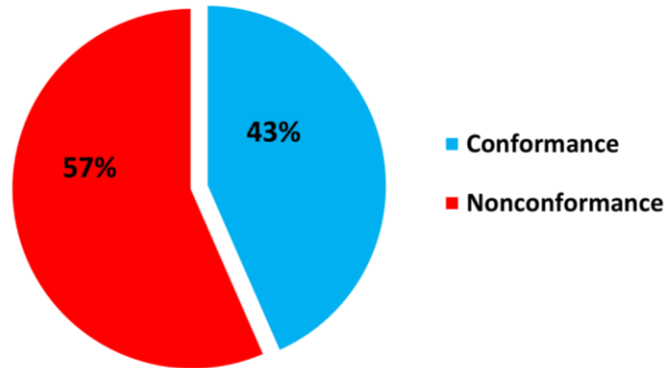
| Table 1: Criteria Investigated in Round CD-2021-03 | |
|---|--|
| Criteria Number | Criterion Title |
| Targeted Criteria | |
| 4.1.8.1 | Chemical assessment and selection |
| 4.3.1.1 | Identification of materials and components requiring selective treatment |
| 4.9.4.1 | Renewable energy use by manufacturer |
| Randomly Selected Criteria (to replace deferred CD-2021-02 Investigations) | |
| 4.2.1.1 | Minimum post-consumer recycling plastic, ITE-derived post-consumer recycled plastic or bio-based plastic content |
| 4.4.1.1 | Service support |
| 4.4.2.3 | Spare parts |
| 4.9.1.1 | Thirty-party certified environmental management system (EMS) for design and manufacturing organizations |
| 4.10.2.1 | Public disclosure regarding conflict minerals in products |

3.0 Summary of Investigations and Final Decisions on Conformity for CD-2021-03

Highlights from this Continuous Monitoring Round are:

- **76** investigations completed
- **33** decisions of Conformance
- **43** decisions of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for CD-2021-03
(shown as percentage of total investigations)



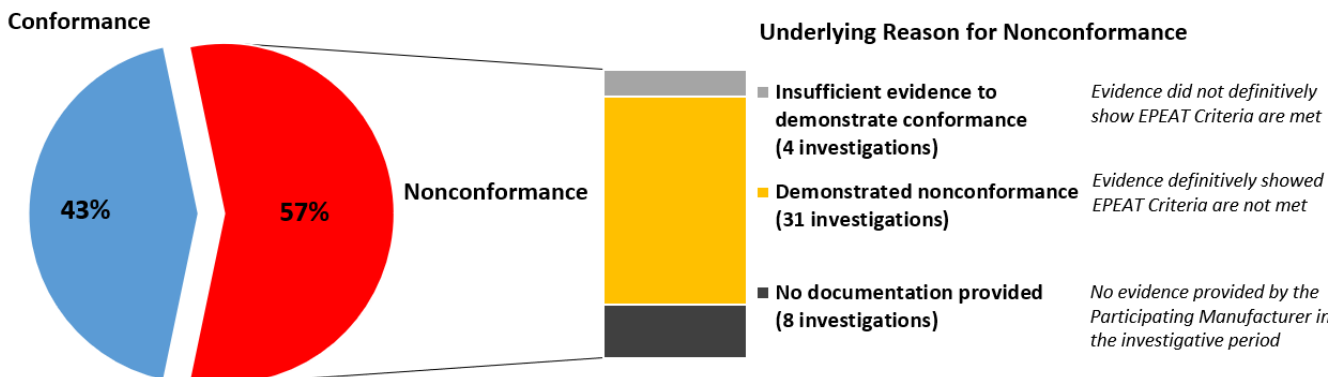
4.0 Further Details on Nonconformances for CD-2021-03

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

| Table 2: Breakdown of Nonconformances by Criterion for CD-2021-03 | | |
|---|--|-----------------------|
| Criteria Number | Criterion Title | Total Nonconformances |
| 4.1.8.1 | Chemical assessment and selection | 10 |
| 4.3.1.1 | Identification of materials and components requiring selective treatment | 29 |
| 4.9.1.1 | Third party certified environmental management system (EMS) for design and manufacturing organizations | 1 |
| 4.9.4.1 | Renewable energy use by manufacturer | 3 |

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

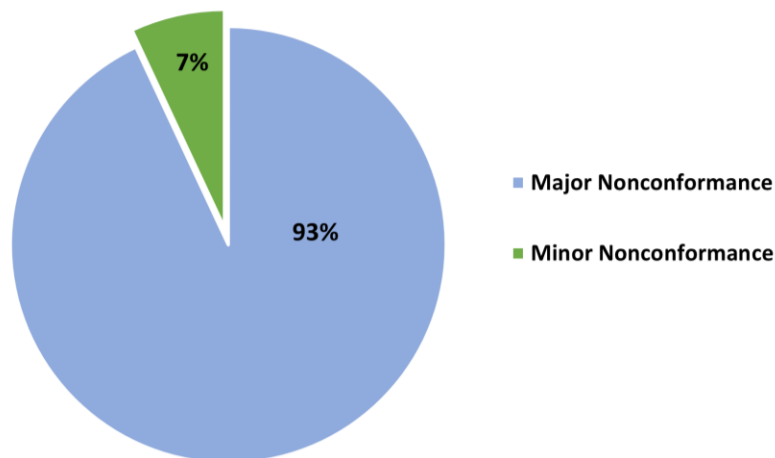
Figure 2: Underlying Reason for Nonconformances in CD-2021-03
(shown as a percentage of total nonconformances)



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.

Figure 3: Major versus Minor Nonconformances for CD-2021-03
(shown as a percentage of total nonconformances)



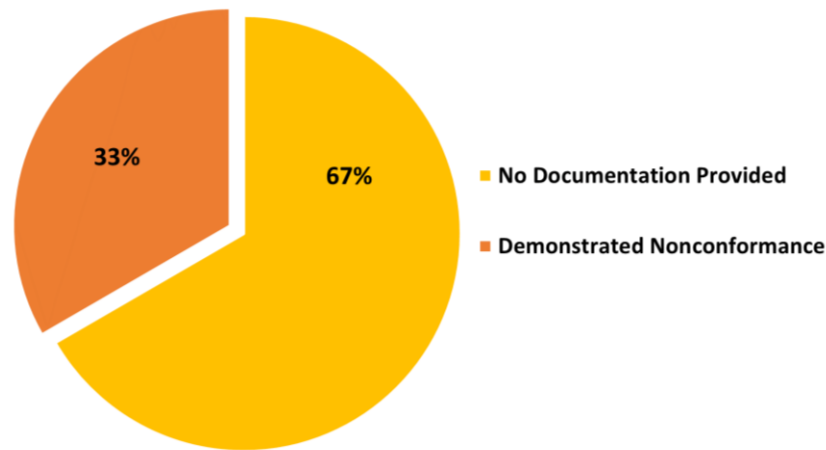
4.2 Minor Nonconformances

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.

Figure 4 provides a breakdown of the minor nonconformances found in Round CD-2021-03.

Figure 4: Reasons for Minor Nonconformances for CD-2021-03
(shown as a percentage of total minor nonconformances)



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.

40 of 43 nonconformances found in this Round were major nonconformances. 30 of the major nonconformances were due to demonstrated nonconformances; four of the major nonconformances were due to insufficient evidence provided; and six of the major nonconformances were because no documentation was provided.

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 major nonconformances in this Round were due to a demonstrated nonconformance or insufficient evidence provided for the following Criteria: 4.1.8.1 chemical assessment and selection, 4.3.1.1 identification of materials and components requiring selective treatment, and 4.9.4.1 renewable energy use by manufacturer.

Criterion 4.1.8.1 requires flame retardants and plasticizers used in plastics in scope of the Criterion to meet certain assessment scores. The assessments must come from assessors with all qualifications required by the Criterion. If plastics in scope do not contain flame retardants or plasticizers, the Participating Manufacturer must also provide evidence of this. Because this is an optional Criterion worth two optional points, the Participating Manufacturer must ensure their Registry selections are correct.

Computers and Displays Criterion 4.3.1.1 has multiple elements that must all be met. The Participating Manufacturer must declare the central information source or the website URL where they make information available to reuse and recycling facilities.

The information made available to reuse and recycling facilities must include:

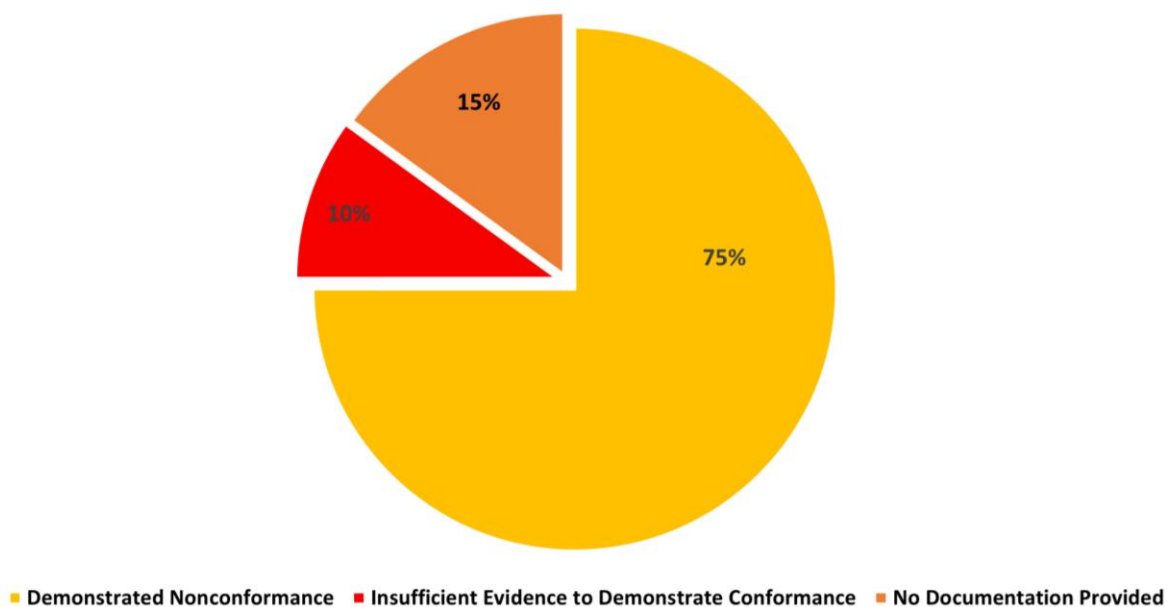
- Information identifying the presence and location of all materials and components that require selective treatment.
 - This must identify all applicable EU WEEE Annex VII components present in the product.
- Information regarding lithium-ion battery(ies):
 - Indicating the method of attachment to the product.
 - Describing how to remove from the product.
 - Listing the tools required for removal and, if they are not commonly available, how to obtain them.

The Participating Manufacturer must also make an accurate declaration in the EPEAT Registry regarding whether the product contains a mass storage device(s), and if so, whether one or more is soldered to a circuit board.

Criterion 4.9.4.1 requires specific evidence to demonstrate that renewable energy is being used. In countries where third-party certification is available for renewable energy, evidence of this third-party certification must be provided (e.g., Green-e). In countries where third-party certification is not available, appropriate evidence per Table 15 of the Criterion must be provided. In addition, if hydroelectric power is used to meet the Criterion, additional requirements may apply. Evidence submitted to demonstrate use of renewable energy must demonstrate whether the energy comes from hydroelectric power or an alternative type of renewable energy. The evidence must also demonstrate that the renewable energy used was generated in the same calendar or fiscal year as the reported year of consumption, the last two quarters of the previous calendar or fiscal year, or the first quarter of the following calendar or fiscal year and that the energy was consumed within the same country or electrical grid as the renewable energy generation, or meets the market boundary requirements specified in the WRI GHG Protocol Scope 2 Guidance.

Figure 5 provides a breakdown of the major nonconformances found in Round CD-2021-03.

Figure 5: Reasons for Major Nonconformances for CD-2021-03
(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-2021-03:

- **27** investigations Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- **6** investigations Criterion unselected by Participating Manufacturer
- **2** investigations Manufacturer corrected information in the EPEAT Registry
- **5** investigations Product archived by Participating Manufacturer
- **3** investigations Products archived by the CAB or by the EPEAT Program

Table 3 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round CD-2021-03.

6.0 Key Findings

6.1 Making Accurate Registry Selections (4.1.8.1)

Participating Manufacturers are reminded to make accurate Criteria selections in the EPEAT Registry. The EPEAT Policy Manual (P65 Issue 2 Rev 0) confirms that Participating Manufacturers must update their EPEAT Criteria selections as needed to reflect changes (including, but not limited to, changes in product materials, components, contract services or corporate activities) if any of the changes impact how they are conforming with the Criteria and/or their ability to successfully meet the Criteria.

For Computers and Displays Criterion 4.1.8.1, Participating Manufacturers must claim “Not applicable” for products that do not contain plastic parts >25g or for products that do not contain flame retardants or plasticizers greater than 0.1% by weight in non-excluded plastic parts >25g. Criterion 4.1.8.1 is an optional Criterion, therefore, incorrect Registry selections inaccurately impact the products final points and tiers obtained in the EPEAT Registry.

Participating Manufacturers are reminded to review their Registry selections.

6.2 Conformity Against All Elements of a Criterion (4.3.1.1)

Participating Manufacturers are encouraged to ensure that all elements of Criterion 4.3.1.1 are met, including: an accurate Registry declaration of a URL that allows reuse and recycling facilities to obtain necessary information on materials and components requiring selective treatment and information on lithium ion batteries, as well as an accurate declaration regarding whether the mass storage device is soldered to a printed circuit board.

6.3 Review EU WEEE Directive Annex VII Components Applicable to Registered Products

In addition to the Key Findings in 6.2, Participating Manufacturers are reminded to ensure that information made available to reuse and recycling facilities identifies the presence and location of all materials and components requiring selective treatment listed in Annex VII of the European WEEE Directive, Directive 2012/19/EU of the European Parliament and of the Council on waste electrical and electronic equipment (WEEE) and subsequent updates.

6.4 Conformity Against All Elements of a Criterion (4.9.4.1)

Participating Manufacturers are reminded to provide evidence to demonstrate conformance to all Criterion requirements, including evidence of third-party certification, if applicable, or appropriate evidence per Table 15 as well as evidence of the type of renewable energy used. Evidence must also show the timeframe of energy generation and consumption, as well as the location of generation.

6.5 Reminder to Provide Evidence for All Investigations During the Investigative Period

Participating Manufacturers are reminded to provide evidence for all Criterion requirements during the Investigation Phase.

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 Vision X3B460STS | Desktop | United States | 4.1.8.1 | Chemical assessment and selection | Optional | No documentation provided | Manufacturer unselected the Criterion |
| Ace Computers | Ace Vision X3H410TS | Desktop | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Acer | TMP614-51T-G2 | Notebook | India | 4.1.8.1 | Chemical assessment and selection | Optional | Demonstrated nonconformance | Manufacturer unselected the Criterion |
| Acer | TMB311R-31 | Notebook | Canada | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Acer | V246HL | Monitor | Canada | 4.9.4.1 | Renewable energy use by manufacturer | Optional | Insufficient evidence to demonstrate conformance | Manufacturer provided evidence to demonstrate conformance |
| ASUSTek | ASUS B9400CE | Notebook | Germany | 4.1.8.1 | Chemical assessment and selection | Optional | Insufficient evidence to demonstrate conformance | Manufacturer provided evidence to demonstrate conformance |
| ASUSTek | ASUS B3302FE(Series:B5302FE) | Notebook | United Kingdom | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| ASUSTek | ASUS BE24EQSK | Monitor | Taiwan | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| BenQ | GL2480,GL2480E,BL2483,BL2483TM,BL2483ME (GL2480-T) | Monitor | Taiwan | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| BenQ | GW2480T (GW2480-T) | Monitor | Germany | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| CIARA TECH | Horizon 8275-A | Desktop | Canada | 4.1.8.1 | Chemical assessment and selection | Optional | Insufficient evidence to demonstrate conformance | Manufacturer archived product |
| CIARA TECH | Horizon 8116 | Desktop | Canada | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer archived product |

| | | | | | | | | |
|-----------------------------|---|--------------|---------------|---------|--|----------|--|---|
| CIARA TECH | Kronos 545 | Desktop | Canada | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | CAB archived product |
| DT Research | DT Research Rugged Tablet / DT301Y | Tablet/Slate | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer archived product |
| Dynabook | dynabook Portege X40-G PMR40E | Notebook | Germany | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Fujitsu Limited | FUJITSU LIFEBOOK U9311X | Notebook | Germany | 4.1.8.1 | Chemical assessment and selection | Optional | Demonstrated nonconformance | Manufacturer unselected the Criterion |
| Fujitsu Limited | FUJITSU Display B24-9 WE | Monitor | Germany | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| GETAC | B360 | Notebook | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Howard Technology Solutions | Q470MKB | Desktop | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| HP | HP Elite Folio 13.5 inch 2-in-1 ENERGY STAR | Notebook | New Zealand | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| IGEL Technology | UD3 M350C | Thin Client | United States | 4.1.8.1 | Chemical assessment and selection | Optional | No documentation provided | Manufacturer unselected the Criterion |
| Iiyama | XU2492HSU-B1 | Monitor | Germany | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Lenovo | P340 SFF (CTO EPEAT Gold Model) | Workstation | Canada | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| LG Electronics | LG 24BL650C-B | Monitor | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Microsoft | Surface Laptop 3 15-inch, metal palm rest | Notebook | Canada | 4.9.4.1 | Renewable energy use by manufacturer | Optional | Insufficient evidence to demonstrate conformance | Manufacturer provided evidence to demonstrate conformance |
| MMD | PHILIPS 346B1C | Monitor | Netherlands | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Northern Micro | Spirit Q370-AS | Desktop | Canada | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |

| | | | | | | | | |
|--------------|--|--------------|----------------|---------|--|----------|-----------------------------|---|
| Panasonic | TOUGHBOOK A3 | Tablet/Slate | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Positivo | 24BL550J | Monitor | Brazil | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Samsung | Samsung S24R652FDU | Monitor | United Kingdom | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrate nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Samsung | NP935XDB-KC2UK | Notebook | United Kingdom | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrate nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Teknoservice | TeknoPack | Desktop | Switzerland | 4.1.8.1 | Chemical assessment and selection | Optional | Demonstrated nonconformance | Manufacturer corrected information in the EPEAT Registry |
| Teknoservice | TeknoPro | Desktop | Switzerland | 4.1.8.1 | Chemical assessment and selection | Optional | Demonstrated nonconformance | Manufacturer corrected information in the EPEAT Registry |
| Ticnova | Ticnova DLC E70 SFF | Desktop | Spain | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | No documentation provided | CAB archived product |
| Ticnova | Ticnova DLC E70 SFF | Desktop | Spain | 4.9.1.1 | Third party certified environmental management system (EMS) for design and manufacturing organizations | Required | No documentation provided | CAB archived product |
| TRANSOURCE | MIRAGE/B2000S | Desktop | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Zebra | Zebra ET51 Enterprise Rugged Tablet WLAN (10") | Tablet/Slate | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |
| Zebra | Zebra ET51 Enterprise Rugged Tablet WLAN (8") | Tablet/Slate | United States | 4.9.4.1 | Renewable energy use by manufacturer | Optional | No documentation provided | Manufacturer unselected the Criterion |
| Zebra | Zebra L10 Rugged Tablets (XPAD, XSLATE, XBOOK) | Tablet/Slate | United States | 4.1.8.1 | Chemical assessment and selection | Optional | No documentation provided | Manufacturer unselected the Criterion |
| Zebra | Zebra ET56 Enterprise Rugged Tablet WWAN (8") | Tablet/Slate | United States | 4.3.1.1 | Identification of materials and components requiring selective treatment | Required | Demonstrated nonconformance | Manufacturer provided evidence to demonstrate conformance |

| <i>Document Control and Change History</i> | | | | | | |
|--|-----------------|---|---|--|----------------------|-----------------------|
| <i>Issue</i> | <i>Revision</i> | <i>Owner</i> | <i>Approver</i> | <i>Description</i> | <i>Approval Date</i> | <i>Effective Date</i> |
| 1 | 0 | EPEAT Conformity Assurance Manager | Director, EPEAT Program | Initial release | | |
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| 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 |