EPEAT Program
Continuous Monitoring Round Plan

Imaging Equipment
IE-2023-02
March 13, 2023

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.

This document contains the individual plan for Continuous Monitoring Round IE-2023-02.

Continuous Monitoring Round IE-2023-02 Investigation Activities

Continuous Monitoring Round IE-2023-02 will rely exclusively on publicly available information to determine the conformance of products with specific EPEAT Criteria. The EPEAT Program assigns specific products and EPEAT Criteria for evaluation to GEC-approved CABs. CABs then have a discrete time period in which they conduct the investigations, make recommendations on conformity based solely on publicly available evidence, and send Investigation Reports to the EPEAT Program, which makes the final decisions on conformity.

Continuous Monitoring Round IE-2023-02 Criteria and Product Selection

Continuous Monitoring Round IE-2023-02 will focus exclusively on Criteria that can be evaluated using publicly available information. While the EPEAT Program generally tries to focus on a specific impact or issue area in selecting Criteria for investigation, the focus in this Round is instead on Criteria which have requirements to make information publicly available.

Participating Manufacturers received up to three investigations: two of the Criteria selected for investigation are Required Criteria, and one is an Optional Criterion. As a result, all Participating Manufacturers received at least two investigations, and a third investigation was assigned if the manufacturer had selected the Optional Criterion. Products for investigation were selected randomly using a random number generator.

Overview of Criteria and Products Selected	
Product Category	Imaging Equipment
Number of Products Selected	44
Criteria Selected	4.4.1.1—Early failure process
	4.7.3.1—Product life cycle assessment and public disclosure of analyses
	4.9.2.1—Documentation that product does not prevent the use of Non-Manufacturer Cartridges and Non-Manufacturer Containers

Continuous Monitoring Round IE-2023-02Schedule

Phase of Round	Date
Preparation Phase	
CABs notified of Round schedule and activities by EPEAT	March 6, 2023
CABs receive Round assignments and materials from EPEAT	March 13, 2023
Week of Round Training for CABs	Week of March 27
Investigation Phase (CABs performing investigations)	
Investigative period begins	April 3, 2023
Investigative period ends	April 17, 2023
Deadline for CAB submission of Investigation Reports to EPEAT	May 1, 2023
Deliberation Phase (EPEAT making conformity decisions)	
Deliberation period begins	May 2, 2023
CABs receive Investigation Reports with final conformity decisions from EPEAT	June 16, 2023
Corrective Action Phase (Participating Manufacturers restoring accuracy of EPEAT Registry)	
Corrective action period begins	June 23, 2023
Corrective action period ends	July 23, 2023
Deadline for CAB submission of corrective action reports to EPEAT	August 6, 2023
CABs receive final Investigation Reports with correction decisions from EPEAT	August 20, 2023
Reporting Phase	
Outcomes Report published	September 5, 2023

Process Details – Continuous Monitoring Using Publicly Available Information

Continuous Monitoring Rounds that use publicly available information (called Level 0 Rounds), are conducted in accordance with *EPEAT Policy Manual* (P65) and *EPEAT Conformity Assurance Implementation Manual* (P66) in effect at the time of the Round.

- The EPEAT Program downloads a list of all active EPEAT-registered products, selects products from the list for investigation and assigns EPEAT Criteria to products, as per the Round Plan.
- GEC-approved CABs receive the list of products and EPEAT Criteria selected for their Participating Manufacturer clients but **do not notify** the Participating Manufacturers of the imminent investigations.
- On the start date of the Round, **GEC-approved CABs are not permitted to notify the Participating Manufacturers that their products have been selected for investigation.**
- GEC-approved CABs have a discrete time period in which they must review publicly available evidence that supports conformance with the selected Criteria and prepare an Investigation Report for each product.
- GEC-approved CABs make recommendations on conformity based solely on publicly available information. CABs are not permitted to request additional information or clarification from Participating Manufacturers, or inform them that their products have been selected for investigation until the Corrective Action Period begins.
- GEC-approved CABs submit the Investigation Reports to the EPEAT Program. For Level 0 investigations, CABs are NOT permitted to forward the Investigation Report to Participating Manufacturers until after the EPEAT Program makes the final conformity decision.
- The EPEAT Program reviews Investigation Reports and makes the final decisions on conformity. The EPEAT Program then sends the Investigation Reports back to the GEC-approved CABs.
- GEC-approved CABs send the Investigation Reports with the final decision on conformity to the Participating Manufacturers.
- The EPEAT Program publishes the Round Plan on the date that the Corrective Action period begins.
- For decisions of nonconformance, Participating Manufacturers must make corrections within 30 calendar days to restore the accuracy of the EPEAT Registry. For decisions of ‘inconclusive’, the EPEAT Program may require the CAB to investigate the same Criterion in a subsequent Round to definitively determine conformance.
- The EPEAT Program publishes an Outcomes Report identifying the nonconforming products and Participating Manufacturers, as well as the actions taken to restore accuracy of the EPEAT Registry.

Document Control and Change History						
Issue	***Revision***	***Owner***	***Approver***	***Description***	***Approval Date***	***Effective Date***
1	*0*	*Senior Manager, Ecolabels and Resources*	*Vice President, Ecolabels and Manufacturer Resources*	*Initial release*	*2023 Feb 13*	*2023 Feb 13*