

# EPEAT Program

## Continuous Monitoring Outcomes Report



Imaging Equipment  
IE-2020-02  
April 12, 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 IE-2020-02 conducted for the Imaging Equipment category.

### 2.0 Overview of Continuous Monitoring Round IE-2020-02

#### 2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round IE-2020-02 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

Criteria were selected for Continuous Monitoring Round IE-2020-02 based on the positive sustainability impact the Criteria will have when adopted, and the potential to drive change in the sector. Each Participating Manufacturer selecting the Criteria was assigned investigations and products were chosen randomly. Any Participating Manufacturer that received a Major Nonconformance during 2019 Continuous Monitoring activities in the Imaging Equipment category received an additional Investigation in this Round.

**Table 1: Criteria Investigated in Round IE-2020-02**

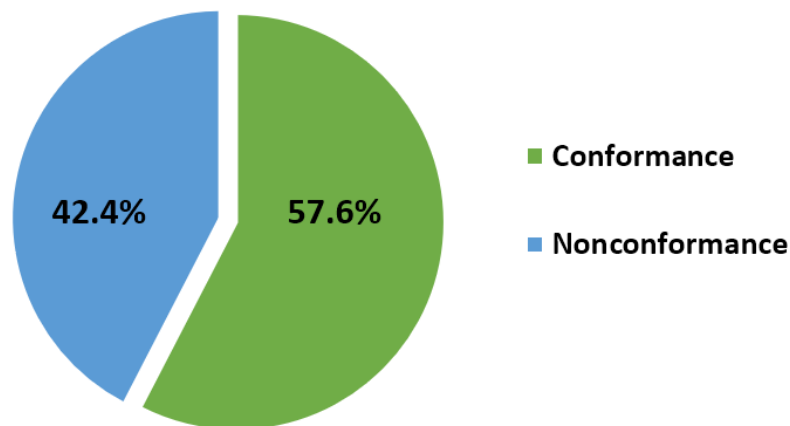
Criteria Number	Criterion Title
4.3.1.1	Ease of disassembly of product
4.7.2.1	Public disclosure of key environmental impacts

## 3.0 Summary of Investigations and Final Decisions on Conformity for IE-2020-02

Highlights from this Continuous Monitoring Round are:

- **33** investigations completed
- **19** decisions of Conformance
- **14** decisions of Nonconformance *Further details provided in Section 4*

**Figure 1: Final Conformity Decisions for IE-2020-02**  
(shown as percentage of total investigations)



## 4.0 Further Details on Nonconformances for IE-2020-02

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

**Figure 2: Breakdown of Nonconformances by Criterion for IE-2020-02**  
(shown as a percentage of total nonconformances)

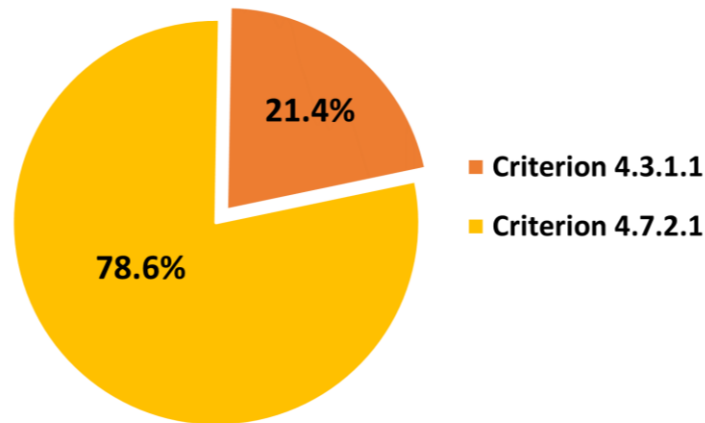
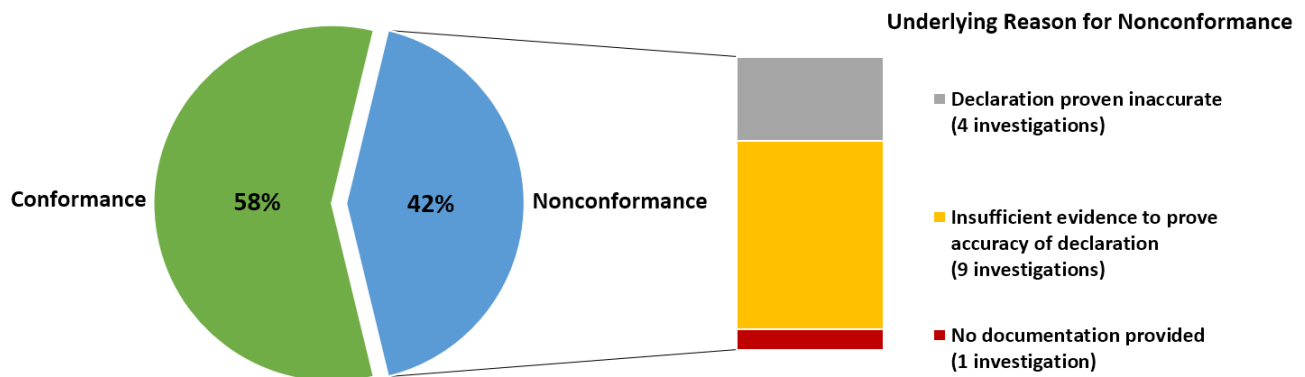


Figure 3 provides a further breakdown by the underlying reason for the nonconformances.

**Figure 3: Underlying Reason for Nonconformances in IE-2020-02**  
(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 of the nonconformances identified in IE-2020-02 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 Round IE-2020-02.

## 4.3 Major Nonconformances

Major nonconformances may be found due to a demonstrated nonconformance, insufficient evidence provided to demonstrate conformance, or because no documentation was provided. Major nonconformances were found for both Criteria investigated in this Round. Both Criteria have multiple elements, all of which must be met to demonstrate conformance.

Criterion 4.3.1.1 requires a description of the disassembly process or statements from recyclers that demonstrate ease of access to materials with special handling needs, materials, components and subassemblies that could be reused and components and subassemblies that may need to be removed for repair or replacement. This also requires demonstrating that all electrical and communication cables that come standard with the product are removable by hand or with commonly available tools without being rendered unusable.

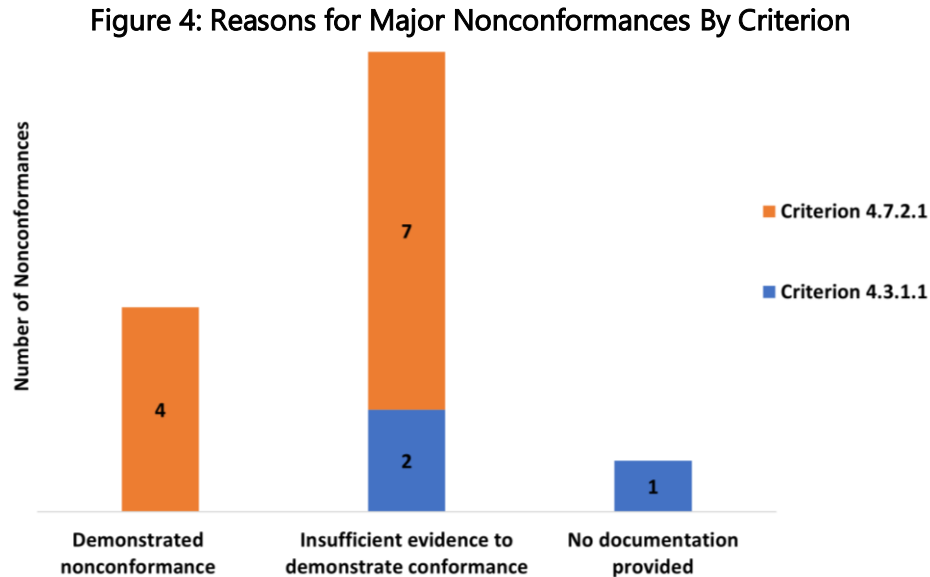
All demonstrated Nonconformances identified in this Round were for Criterion 4.7.2.1. This Criterion requires disclosure of GHG emissions, water data, waste data and toxics data for at least two consecutive years, and for each disclosure, a plan with goals, targets and objectives and last year's goals, targets and objectives and the actual performance against them, and a brief report on progress made in meeting the manufacturer's environmental performance commitments. In addition, the disclosure for water specifically requires both the percentage and total volume of water recycled and reused and information on the quality of water discharges. The waste disclosure requires the disclosure of waste reduced from a baseline year, reused, recycled, landfilled, sent to waste-to-energy, incinerated or other disposal facilities as applicable.

For most Investigations where Criterion 4.7.2.1 was found Nonconformant due to insufficient evidence or a demonstrated nonconformance, the Manufacturer provided publicly available disclosures for the four key environmental aspects but had just not addressed all Criterion elements. Commonly missed for this criterion is the requirement for current goals, targets and objectives and the previous year's goals, targets and objectives and the performance against them. Nine nonconformances in this Round were due, or partially due to not including a current or previous goal for one or more key environmental aspects. Two nonconformances in this Round were due, or partially due, to disclosures for water not including water discharge quality information or waste disclosures not including values for each type of waste required by the criterion. Historically, nonconformances for Criterion 4.7.2.1 have also been due to all elements of the Criterion not being addressed in publicly available disclosures.

In addition, two nonconformances were related or partially related to the scope of disclosures. The Participating Manufacturer is responsible for disclosing data for all four key environmental aspects at either

the whole enterprise level or for parts of the company having significant or complete responsibility for the design and manufacture of the declared product. For the toxics key environmental disclosure this applies to company owned manufacturing, assembly facilities and office operations for the whole enterprise or with significant responsibility for design and manufacture.

Figure 4 provides a breakdown of reasons for the Major Nonconformances found in Round IE-2020-02 by Criterion.



## 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 IE-2020-02:

- **13** investigations      Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- **1** investigation      Product archived by the CAB or by the EPEAT Program

Table 2 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round IE-2020-02.

## 6.0 Key Findings

### 6.1 Conformity Against All Elements of 4.3.1.1

As identified in Section 4.3 of this report, Criteria 4.3.1.1 and 4.7.2.1 have multiple elements against which conformance must be demonstrated.

Criterion 4.3.1.1 requires a description of the disassembly process or letters from recycler to demonstrate that Criterion elements are met. Additional evidence such as product photographs or exploded diagrams and declarations must be accompanied by a description of the disassembly process or letters from recyclers.

### 6.2 Conformity Against All Elements of 4.7.2.1

Manufacturers are reminded to review the scope requirements for disclosures for each of the key environmental aspects in Criterion 4.7.2.1, including the scope of their disclosure, disclosures for reused and recycled water use and water discharge quality and disclosures for different types of waste. Manufacturers are also reminded to review their disclosures for goals, targets and objectives including those for the current year and their previous year's, as well as their progress on meeting the previous year's goals, targets, and objectives. Participating Manufacturers are encouraged to work with their CABs if they have questions.

## 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 7: 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
Panasonic	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Demonstrated nonconformance	Participating Manufacturer left the Imaging Equipment product category
Visioneer	Visioneer Patriot H80	Scanner	United States	4.3.1.1	Ease of disassembly of product	Required	No documentation provided	Participating Manufacturer provided additional data demonstrating conformance
Visioneer	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Demonstrated nonconformance	Participating Manufacturer provided additional data demonstrating conformance
Kodak Alaris	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
Brother	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
Fujitsu Limited	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
HP	HP LaserJet Enterprise M610dn	Printer	United States	4.3.1.1	Ease of disassembly of product	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
HP	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
Konica Minolta	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
Kyocera	KYOCERA TASKalfa 8003i	Multifunction device	United States	4.3.1.1	Ease of disassembly of product	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
Kyocera	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
Lexmark	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Demonstrated nonconformance	Participating Manufacturer provided additional data demonstrating conformance
Ricoh	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating conformance
Sharp	N/A- Corporate Criterion	N/A- Corporate Criterion	N/A- Corporate Criterion	4.7.2.1	Public disclosure of key environmental impacts	Required	Demonstrated nonconformance	Participating Manufacturer provided additional data demonstrating 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		
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