EPEAT Program
Continuous Monitoring Round Plan

Imaging Equipment
IE-2021-02
March 26, 2021

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-2021-02.

Continuous Monitoring Round IE-2021-02 Investigation Activities

Continuous Monitoring Round IE-2021-02 will use documentation review 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. Participating Manufacturers have a discrete time period in which they must provide evidence that supports conformance with the selected criteria. GEC-approved CABs review the documentation, make recommendations on conformity based solely on the evidence provided by Participating Manufacturers, and send Investigation Reports to the EPEAT Program, which makes the final decisions on conformity.

Continuous Monitoring Round IE-2021-02 Criteria and Product Selection

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

Overview of Criteria and Products Selected	
Product Category	Imaging Equipment
Number of Products Selected	30
Criteria Selected	4.1.1.1—Compliance with provisions of European RoHS Directive upon its effective date
	4.1.3.2—Use of non-mercury containing light sources
	4.1.5.1—Compliance with provisions of European Union Battery Directive
	4.1.8.1—Inventory of intentionally added chemicals residing in the product
	4.2.1.1—Declaration of postconsumer recycled plastic content
	4.2.1.4—Minimum 25% content of postconsumer recycled plastic
	4.2.2.1—Declaration of renewable/biobased plastic materials content
	4.2.3.1—Declaration of product weight
	4.3.2.2—Restriction on materials not compatible with reuse and recycling
	4.3.4.1—Preparation of product end-of-life characterization report
	4.3.4.2—Minimum reusable/recyclable rate based requirements of European WEEE Directive
	4.4.1.1—Early failure process
	4.4.2.1—Product upgradeability
	4.5.1.1—ENERGY STAR
	4.5.2.1—Product specific greenhouse gas emissions- life cycle assessment
	4.5.4.1—Default to automatic duplex printing
	4.6.2.1—End of life processing requirements
	4.7.1.1—Self-declared environmental management system for design and manufacturing organizations
	4.7.2.2—Public disclosure of supply chain toxics
	4.8.1.2—Elimination of elemental chlorine as a bleaching agent in packaging material
	4.8.4.1—Provision of take-back service for packaging
	4.9.2.1—Documentation that product does not prevent the use of Non-Manufacturer Cartridges and Non-Manufacturer Containers
	4.9.3.1—Provision of take-back and end-of-life management for cartridges and containers

Continuous Monitoring Round IE-2021-02 Schedule

Phase of Round	Date
Preparation Phase	
CABs notified of Round schedule and activities by EPEAT	March 22, 2021
CABs receive Round assignments and materials from EPEAT	March 26, 2021
Week of Round Training for CABs	Weeks of March 29 & April 5, 2021
Investigation Phase (CABs performing investigations)	
Investigative period begins	May 3, 2021
Investigative period ends	August 1, 2021
Deadline for CAB submission of Investigation Reports to EPEAT	August 16, 2021
Deliberation Phase (EPEAT making conformity decisions)	
Deliberation period begins	August 17, 2021
CABs receive Investigation Reports with final conformity decisions from EPEAT	September 15, 2021
Corrective Action Phase (Participating Manufacturers restoring accuracy of EPEAT Registry)	
Corrective action period begins	September 23, 2021
Corrective action period ends	October 23, 2021
Deadline for CAB submission of corrective action reports to EPEAT	October 31, 2021
CABs receive final Investigation Reports with correction decisions from EPEAT	November 16, 2021
Reporting Phase	
Outcomes Report published	November 24, 2021

Process Details – Continuous Monitoring Using Documentation Review

Continuous Monitoring Rounds that use documentation review activities are conducted in accordance with EPEAT Policy Manual (P65) and EPEAT Conformity Assurance Implementation Manual (also called EPEAT Requirements of CABs and Conformity Assurance Procedures) (P66) in effect at the time of the Round.

- The EPEAT Program downloads a list of all active EPEAT-registered products, select 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 yet notify the Participating Manufacturers of the imminent investigations.
- The EPEAT Program publishes the Round Plan on the start date of the Round.
- On the start date of the Round, GEC-approved CABs notify the Participating Manufacturers that their products have been selected for investigation and begin the evidence collection process.
- Participating Manufacturers have a discrete time period in which they must provide evidence that supports conformance with the selected criteria.

- GEC-approved CABs review the documentation, make recommendations on conformity based solely on the evidence provided by Participating Manufacturers, and prepare an Investigation Report for each product.
- GEC-approved CABs submit the Investigation Reports to the EPEAT Program. At the same time, CABs forward these same Reports to the Participating Manufacturers.
- 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.
- For decisions of nonconformance, Participating Manufacturers must make corrections within 30 calendar days to restore the accuracy of the EPEAT Registry.
- 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*	*Director, EPEAT Program*	*Initial release*	*2020 Aug 20*	*2020 Aug 23*
1	*1*	*Senior Manager, Ecolabels and Resources*	*Senior Director, Ecolabels and Manufacturer Resources*	*Updates throughout to match revisions to P66. Addition of Preparation Phase to schedule table.*	*2021 Feb 22*	*2021 Feb 26*