EPEAT Program
Continuous Monitoring Outcomes Report

Computers and Displays
IE-2021-03
June 3, 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 IE-2021-03 conducted for the Computers and Displays category.

2.0 Overview of Continuous Monitoring Round IE-2021-03

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round IE-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 IE-2021-03 was a Targeted Round focused on three Criteria related to repairability and extension of product life. 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 3 investigations. Participating Manufacturers that received a Major Nonconformance in any 2020 Continuous Monitoring Round for Imaging Equipment were then also assigned one additional investigation in this Round. The additional investigation assigned was an extra investigation for one of the three targeted Criteria.

Table 1: Criteria Investigated in Round IE-2021-03

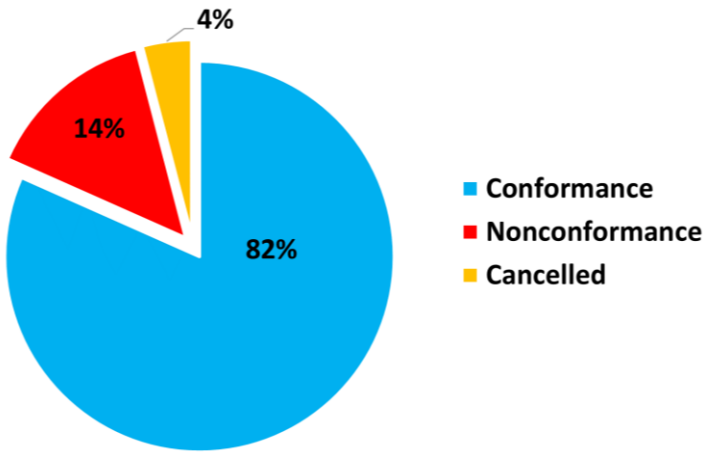
Criteria Number	Criterion Title
4.3.1.2	Ease of disassembly of consumer products
4.4.2.1	Product upgradeability
4.4.3.1	Spare parts

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

Highlights from this Continuous Monitoring Round are:

- **47** investigations completed
- **40** decisions of Conformance
- **7** decisions of Nonconformance *Further details provided in Section 4*
- **2** investigations cancelled *[Cancelled due to CAB administrative challenges]*

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



4.0 Further Details on Nonconformances for IE-2021-03

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

Figure 2: Breakdown of Nonconformances by Criterion for IE-2021-03
(shown as a percentage of total nonconformances)

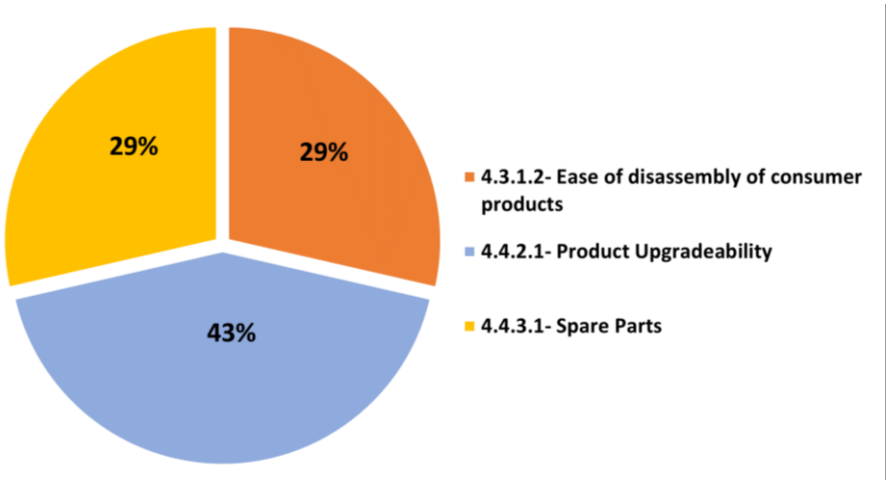
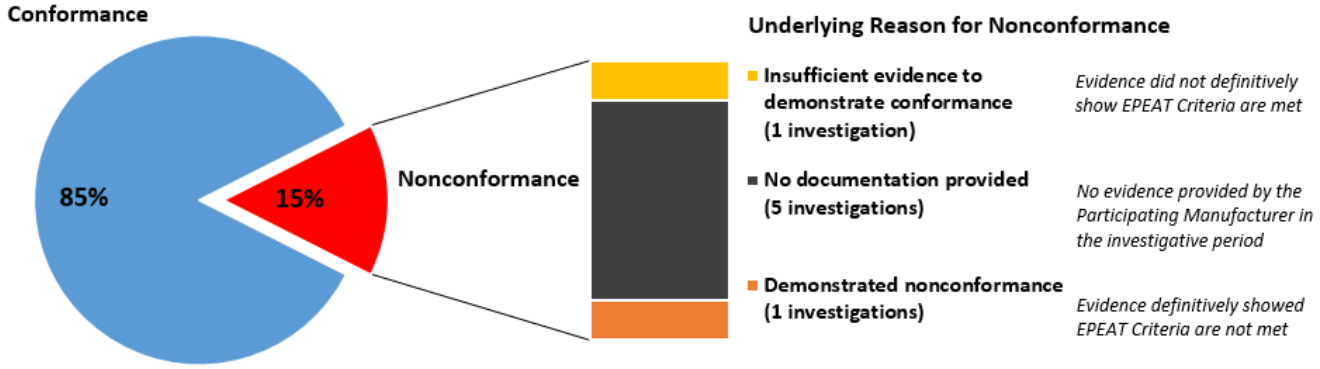


Figure 3 provides a further breakdown by the underlying reason for the nonconformances.

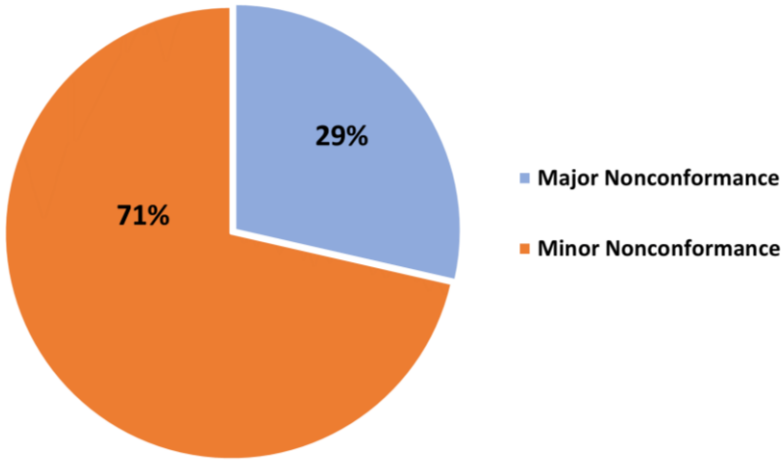
Figure 3: Underlying Reason for Nonconformances in IE-2021-03
(shown as a percentage of total nonconformances)



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 4: Major versus Minor Nonconformances for IE-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.

Four of the Minor Nonconformances were due to the fact that no documentation was provided, while one Minor Nonconformance was a demonstrated nonconformance.

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. Two of the seven nonconformances found in this Round were Major Nonconformances and both Major Nonconformances were for Criterion 4.3.1.2—Ease of disassembly of consumer products. One of the Major Nonconformances was due to insufficient evidence, while the other was due to no documentation 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.

Criterion 4.3.1.2 has multiple elements against which conformance must be demonstrated. Criterion 4.3.1.2 requires a description of the disassembly process or letters from recyclers to demonstrate that Criterion elements are met. All Criterion elements must be addressed, including all of the following:

- Ensuring ease of access to (a) materials with special handling needs that should be removed before mechanical processing; (b) material, components and subassemblies that are able to be reused; and (c) components and subassemblies that may need removal for repair or replacement.
- Ensuring external enclosures, chassis, and electronic subassemblies shall be removable by one person with commonly available tools or by hand, including:
    - The use of common fasteners for joining components, subassemblies, chassis, and enclosures, (with an exception for special fasteners needed for safety and anti-theft reasons),
    - Disassembly for recycling purposes can be done exclusively with commonly available tools or by hand,
    - Adequate points of access for ease of dismantling of enclosures, chassis, and electronic subassemblies.
    - Non-separable connections (e.g., glued, welded) between different materials are avoided unless they are technically or legally required or utilized for safety purposes or in an anti-theft application.
- Electrical and communication wiring and cables that connect to external devices or sources of power or data shall be removable without tools from all products unless they are technically required.

In addition, if there are any exemptions due to safety requirements, the Participating Manufacturer must justify the exemptions per the referenced safety standards in the 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-2021-03:

- **1** investigation — Additional data provided by Participating Manufacturer, bringing the product into conformance with the Criterion
- **1** investigation — Participating Manufacturer corrected information in the EPEAT Registry
- **1** investigation — Criterion unselected by Participating Manufacturer
- **1** investigation — Product archived by Participating Manufacturer
- **3** investigations — Corrective Action not submitted to EPEAT Program by deadline. EPEAT Program undertook necessary follow up with CAB after deadline.

Table 2 in Section 7 identifies the Participating Manufacturers and products that received Major Nonconformances in Continuous Monitoring Round IE-2021-03.

6.0 Key Findings

6.1 Conformity Against All Elements of Criterion 4.3.1.2

Criterion 4.3.1.2 has multiple elements against which conformance must be demonstrated. Criterion 4.3.1.2 requires a description of the disassembly process or letters from recyclers to demonstrate that all Criterion elements are met. Participating Manufacturers are encouraged to ensure their products meet all requirements of the criterion and that they have supporting evidence for all criterion elements.

6.2 Definition of Spare Parts versus Consumables

Criterion 4.4.3.1 requires Participating Manufacturers to declare if spare parts are available, and if available, the length of time that spare parts are available after the end of production.

Spare parts are defined as: A component of a product that is kept in reserve for possible use to replace a similar or identical component in the product.

The definition of consumables confirms that spare parts and consumables are different:

> *Consumable: A product integral to the functioning of the imaging equipment product with the intent, when depleted or worn, to be replaced or replenished by the user during the normal usage and life span of the imaging equipment product. NOTE—Consumables may include: toner, toner containers, toner bottles, toner cartridges, waste toner cartridges, ink cartridges, ink heads, ink sticks, ribbon ink, thermal paper, copy paper, imaging units, transfer belts, transfer roller, fusers, drum maintenance units, and other associated items. Items not intended to be replaced or replenished by the user would not be considered consumable supplies, but rather "spare parts."*

Therefore, Participating Manufacturers are reminded to ensure that spare parts, not consumables, are available, if the Participating Manufacturer declares that spare parts are available for Criterion 4.3.1.1.

6.3 Ensure Registry Selections are Correct

If spare parts are available, Criterion 4.4.3.1 requires Participating Manufacturers to declare the length of time spare parts are available after the end of production. Participating Manufacturers are encouraged to review Registry declarations to ensure they are accurate.

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 2: 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
Epson	DS-30000	Scanner	United States	4.3.1.2	Ease of disassembly of consumer products	Optional	No documentation provided	Manufacturer unselected the Criterion
HP	HP Laser MFD 432fdn	Multifunction Device	India	4.3.1.2	Ease of disassembly of consumer products	Optional	Insufficient evidence to demonstrate conformance	Corrective Action not submitted by CAB before deadline. EPEAT Program undertook necessary follow-up.

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*