# EPEAT Program
# Continuous Monitoring Outcomes Report

Imaging Equipment
IE-2022-03
May 30, 2023

## 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 nonconformances and the actions taken to restore accuracy of the EPEAT Registry.

This document summarizes the activities and results of Continuous Monitoring Round IE-2022-03 conducted for the Imaging Equipment category.

## 2.0 Overview of Continuous Monitoring Round IE-2022-03

### 2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round IE-2022-03 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

Both the products and Criteria for investigation in Continuous Monitoring Round IE-2022-03 were selected randomly using a random number generator. Each Participating Manufacturer was assigned two investigations, and any manufacturers who received a nonconformance in a 2021 Continuous Monitoring Round were assigned one additional investigation.

**Table 1: Criteria Investigated in Round IE-2022-03**

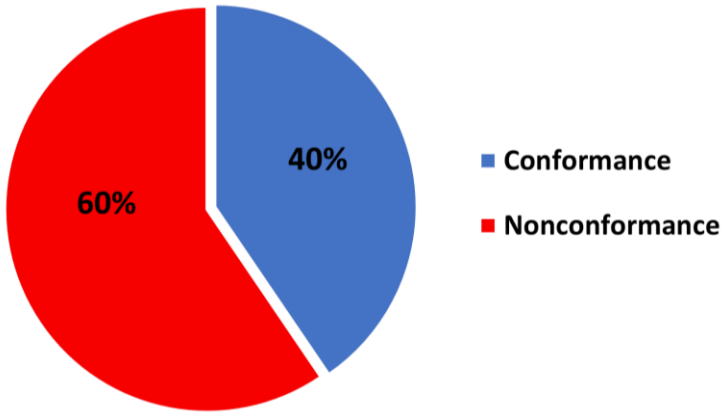
| Criteria Number | Criterion Title |
|---|---|
| 4.1.2.1 | Further reduction of the use of European Union RoHS Directive hazardous substances (cadmium) |
| 4.1.3.2 | Use of non-mercury containing light sources |
| 4.1.4.1 | Reduction of substances on the European Union REACH Candidate List of SVHCs |
| 4.1.6.1 | Reducing BFR/CFR/PVC content of external plastic casings |
| 4.1.7.1 | Reduce fluorinated gas emissions resulting from flat panel display manufacturing |
| 4.2.1.2 | Declaration of postconsumer recycled plastic |
| 4.2.1.3 | Minimum 5% to 10% content of postconsumer recycled plastic |
| 4.2.2.1 | Declaration of renewable/biobased plastic materials content |
| 4.2.3.1 | Declaration of product weight |
| 4.3.1.1 | Ease of disassembly of product |
| 4.3.2.1 | Use of single recyclable plastic type per plastic part |
| 4.3.2.2 | Restriction on materials not compatible with reuse and recycling |
| 4.3.2.3 | Manual separation and marking of plastics |
| 4.3.3.1 | Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs |
| 4.3.4.2 | Minimum reusable/recyclable rate based requirements of European WEEE Directive |
| 4.4.2.1 | Product Upgradeability |
| 4.4.3.1 | Spare Parts |
| 4.5.2.1 | Product specific greenhouse gas emissions - life cycle assessment |
| 4.5.3.1 | Standby power level ≤ 1 W and disclosure |
| 4.5.3.2 | Auto standby capability |
| 4.6.1.1 | Provision of product take-back service |
| 4.6.1.2 | Provision of product take-back service for broader scope of products |
| 4.6.2.1 | End of life processing requirements |
| 4.7.2.1 | Public disclosure of key environmental aspects |
| 4.7.3.1 | Product life cycle assessment and public disclosure of analyses |
| 4.8.1.2 | Elimination of elemental chlorine as a bleaching agent in packaging material |
| 4.8.2.1 | Separable packaging materials |
| 4.8.2.2 | Packaging 90% compostable/recyclable |
| 4.8.2.3 | Plastics marked in packaging materials |
| 4.8.3.1 | Recovered content in select fiber-based packaging materials |
| 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 |
| 4.9.3.3 | Manufacturer recycles or reuses plastic material collected through its cartridge and container take-back program |

## 3.0 Summary of Investigations and Final Decisions on Conformity for IE-2022-03

Highlights from this Continuous Monitoring Round are:

- **42** investigations completed
- **17** decisions of Conformance
- **25** decisions of Nonconformance *Further details provided in Section 4. Of these 25 nonconformances, 24 were due to CAB failure to submit an Investigation Report.*

Figure 1: Final Conformity Decisions for IE-2022-03
(shown as percentage of total investigations)




## 4.0 Further Details on Nonconformances for IE-2022-03

Table 2 below provides a further breakdown of the nonconformances by Criterion. All nonconformances must be categorized as either a minor error, nonconformance, or nonconformance due to CAB inaction or delay not attributable to the Participating Manufacturer.

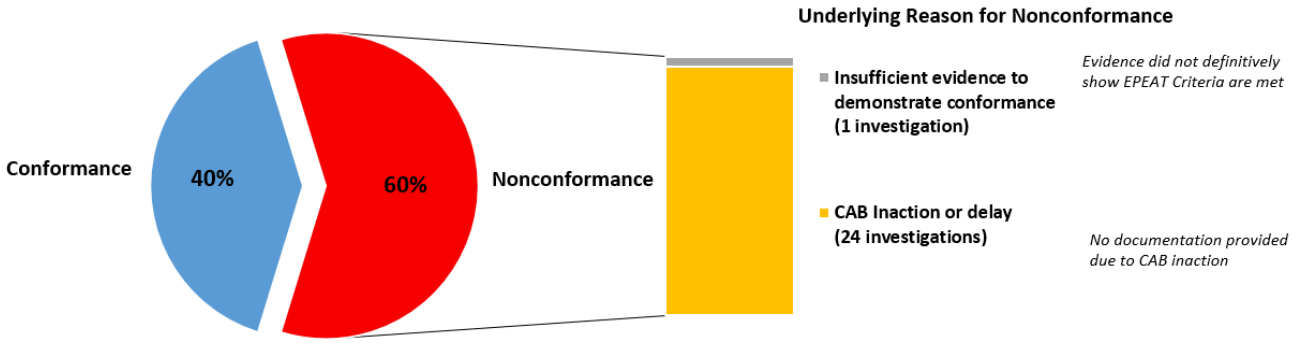
Table 2: Breakdown of Nonconformances by Criterion for IE-2022-03

| Criteria Number | Criterion Title | Total Nonconformances |
|---|---|---|
| 4.1.2.1 | Further reduction of the use of European Union RoHS Directive hazardous substances (cadmium) | 1 |
| 4.1.3.2 | Use of non-mercury containing light sources | 1 |
| 4.1.4.1 | Reduction of substances on the European Union REACH Candidate List of SVHCs | 1 |
| 4.1.6.1 | Reducing BFR/CFR/PVC content of external plastic casings | 1 |
| 4.2.1.2 | Declaration of postconsumer recycled plastic | 1 |
| 4.2.1.3 | Minimum 5% to 10% content of postconsumer recycled plastic | 1 |
| 4.2.3.1 | Declaration of product weight | 1 |

| Table 2: Breakdown of Nonconformances by Criterion for IE-2022-03 | | |
|---|---|---|
| **Criteria Number** | **Criterion Title** | **Total Nonconformances** |
| 4.3.2.1 | Use of single recyclable plastic type per plastic part | 1 |
| 4.3.2.3 | Manual separation and marking of plastics | 3 |
| 4.3.3.1 | Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs | 1 |
| 4.5.2.1 | Product specific greenhouse gas emissions - life cycle assessment | 1 |
| 4.5.3.1 | Standby power level ≤ 1 W and disclosure | 2 |
| 4.6.2.1 | End of life processing requirements | 1 |
| 4.7.2.1 | Public disclosure of key environmental aspects | 2 |
| 4.7.3.1 | Product life cycle assessment and public disclosure of analyses | 1 |
| 4.8.1.2 | Elimination of elemental chlorine as a bleaching agent in packaging material | 1 |
| 4.8.2.1 | Separable packaging materials | 1 |
| 4.8.2.3 | Plastics marked in packaging materials | 1 |
| 4.8.3.1 | Recovered content in select fiber-based packaging materials | 1 |
| 4.8.4.1 | Provision of take-back service for packaging | 1 |
| 4.9.3.3 | Manufacturer recycles or reuses plastic material collected through its cartridge and container take-back program | 1 |

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

**Figure 2: Underlying Reason for Nonconformances in IE-2022-03**
**(shown as a percentage of total nonconformances)**




## 4.1 Minor Errors Versus Nonconformances

All nonconformances must be categorized as either a minor error, nonconformance, or nonconformance due to CAB inaction or delay not attributable to the Participating Manufacturer. Minor errors 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 errors are categorized as nonconformances (unless they are due to CAB inaction or delay).

No minor errors were identified in IE-2022-03, and 24 of the 25 nonconformances were due to CAB inaction or delay not attributable to the Participating Manufacturer.

### 4.2 Minor Errors

For Level 1 Investigations, nonconformances may be categorized as minor errors 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.

No minor errors were identified in Continuous Monitoring Round IE-2022-03.

### 4.3 Nonconformances

25 nonconformances were identified in Continuous Monitoring Round IE-2022-03, 24 of which were due to CAB inaction or delay not attributable to the Participating Manufacturer. One nonconformance was due to insufficient evidence being submitted to demonstrate conformance.

## 5.0 Actions to Restore Conformance

Where the final conformity decision is nonconformance (including minor errors and those due to CAB inaction or delay), 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-2022-03:

- **3** investigations Product archived by Participating Manufacturer
- **22** investigations CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance

Table 3 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round IE-2022-03.

# 6.0 Key Findings

## 6.1 Evidence of all Elements of a Conformance Assurance System

Participating Manufacturers are reminded to review all requirements of a conformance assurance system, including the requirements identified in Conformity Guidance Materials, and ensure all elements are addressed.

## 6.2 Required Criterion 4.8.3.1 – Recovered Content in Select Fiber-Based Packaging Materials

This Criterion requires the EPEAT manufacturer to provide their own environmental packaging requirement. In this packaging requirement, the manufacturer must state a preference for the use of postconsumer content in the packaging they obtain. This must specifically identify *post*-consumer. A supplier letter, or the suppliers packaging specification are not sufficient to address this requirement.

## 7.0 Identification of Nonconformances and Corrections Made by Participating Manufacturers

In the interest of transparency, the EPEAT Program identifies the Participating Manufacturers and products that received nonconformances and the actions taken to restore accuracy of the EPEAT Registry. Minor errors 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 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 |
|---|---|---|---|---|---|---|---|---|
| Toshiba | eStudio 389CS | Multifunction Device | United States | 4.8.3.1 | Recovered content in select fiber-based packaging materials | Required | Insufficient evidence to demonstrate conformance. | Participating Manufacturer archived the product. |
| Brother | Brother MFC-J6530DW | Multifunction Device | United States | 4.6.2.1 | End of life processing requirements | Required | CAB inaction or delay not attributable to the Participating Manufacturer | Participating Manufacturer archived the product. |
| Brother | HL-L6400DWX | Printer | United States | 4.1.6.1 | Reducing BFR/CFR/PVC content of external plastic casings | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Canon | Canon imagePROGRAF TX-3000 | Printer | United States | 4.7.3.1 | Product life cycle assessment and public disclosure of analyses | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Canon | imageRUNNER ADVANCE DX 4725i DADF | Multifunction Device | United States | 4.5.3.1 | Standby power level ≤ 1 W and disclosure | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Canon | PlotWave 3000 | Printer | United States | 4.3.2.3 | Manual separation and marking of plastics | Required | CAB inaction or delay not attributable to the Participating Manufacturer | Participating Manufacturer archived the product. |
| Epson | DS-770 | Scanner | United States | 4.8.1.2 | Elimination of elemental chlorine as a bleaching agent in packaging material | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Epson | Epson DS-6500 | Scanner | United States | 4.8.2.3 | Plastics marked in packaging materials | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Epson | ES-865 | Scanner | United States | 4.7.2.1 | Public disclosure of key environmental aspects | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Fujitsu Limited | Fujitsu fi-7160 | Scanner | United States | 4.1.4.1 | Reduction of substances on the European Union REACH Candidate List of SVHCs | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Fujitsu Limited | Fujitsu N7100A | Scanner | United States | 4.3.2.3 | Manual separation and marking of plastics | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| HP | HP Color LaserJet Pro MFP M283fdn, M283fdw, M283cdw | Printer | Australia | 4.2.1.2 | Declaration of postconsumer recycled plastic | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| HP | HP ENVY Inspire 7900e series | Printer | United States | 4.8.4.1 | Provision of take-back service for packaging | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| HP | HP LaserJet Managed E60055dn (M0P33A) | Printer | India | 4.5.3.1 | Standby power level ≤ 1 W and disclosure | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Konica Minolta | AccurioPress C7090 | Multifunction Device | Australia | 4.1.3.2 | Use of non-mercury containing light sources | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Konica Minolta | Konica Minolta Accurio Press C3070 | Multifunction Device | United States | 4.5.2.1 | Product specific greenhouse gas emissions - life cycle assessment | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Konica Minolta | Konica Minolta bizhub C759 | Multifunction Device | United States | 4.9.3.3 | Manufacturer recycles or reuses plastic material collected through its cartridge and container take-back program | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Kyocera | KYOCERA TASKalfa 6004i | Multifunction Device | United States | 4.2.1.3 | Minimum 5% to 10% content of postconsumer recycled plastic | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Kyocera | KYOCERA TASKalfa Pro 15000c | Professional Imaging Product | United States | 4.3.2.1 | Use of single recyclable plastic type per plastic part | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Ricoh | LANIER IM 7000 | Multifunction Device | United States | 4.1.2.1 | Further reduction of the use of European Union RoHS Directive hazardous substances (cadmium) | Optional | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Ricoh | LANIER PRO 8320 | Printer | United States | 4.3.2.3 | Manual separation and marking of plastics | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Ricoh | RICOH MP 2555SPG | Multifunction Device | United States | 4.8.2.1 | Separable packaging materials | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Sharp | SHARP MX-4051 | Multifunction Device | United States | 4.7.2.1 | Public disclosure of key environmental aspects | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Sharp | SHARP MX-C357F | Multifunction Device | United States | 4.2.3.1 | Declaration of product weight | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |
| Sharp | SHARP MX-M4071S | Multifunction Device | United States | 4.3.3.1 | Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs | Required | CAB inaction or delay not attributable to the Participating Manufacturer | CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance |

| *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* |
| *2* | *1* | *Senior Manager, Ecolabels and Resources* | *Vice President, Ecolabels and Manufacturer Resources* | *Updated terminology for nonconformances to include "nonconformances" and "minor errors", in alignment with revisions to P66.* | *2022 Sep 15* | *2022 Sep 30* |
| *2* | *2* | *Senior Manager, Ecolabels and Resources* | *Vice President, Ecolabels and Manufacturer Resources* | *Updated to reflect new nonconformance category for CAB inaction or delay* | *2023 Mar 9* | *2023 Mar 13* |