EPEAT Program
Continuous Monitoring Outcomes Report

Imaging Equipment
IE-2022-04
April 6, 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-2022-04 conducted for the Imaging Equipment category.

2.0 Overview of Continuous Monitoring Round IE-2022-04

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round IE-2022-04 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-2022-04 focused on corporate criteria with annual disclosure requirements, to confirm that Participating Manufacturers are fulfilling annual reporting requirements for the criteria investigated. Since one criterion is required, and one is optional, Participating Manufacturers received up to two investigations. If a Participating Manufacturer was investigated for any of the selected criteria in another 2022 Continuous Monitoring Round, the criterion was not assigned again in this Round, given the annual disclosure requirements. The products for investigation were selected randomly using a random number generator.

Table 1: Criteria Investigated in Round IE-2022-04

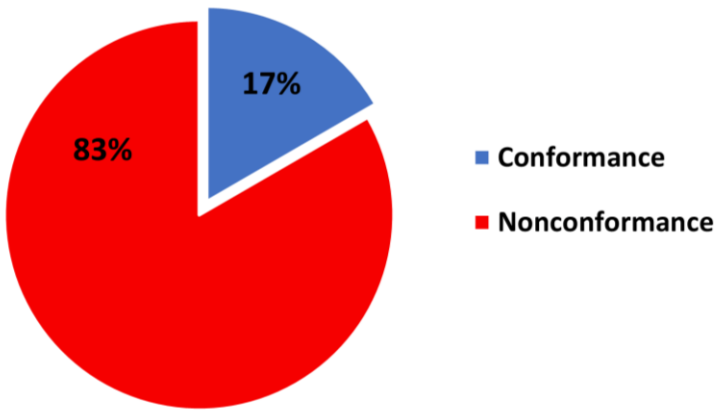
Criteria Number	Criterion Title
4.7.2.2	Public disclosure of supply chain toxics
4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers

3.0 Summary of Investigations and Final Decisions on Conformity for IE-2022-04

Highlights from this Continuous Monitoring Round are:

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

Figure 1: Final Conformity Decisions for IE-2022-04
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for IE-2022-04

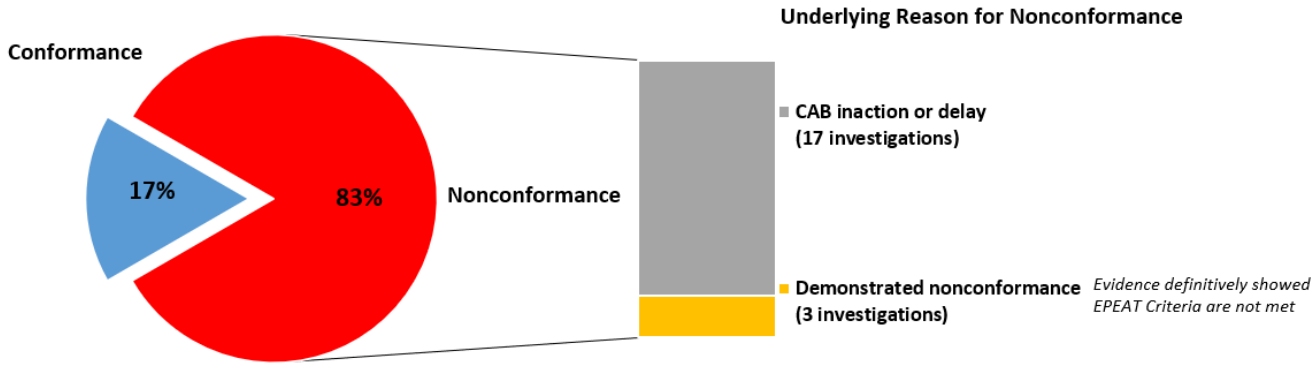
Table 2 below provides a further breakdown of the nonconformances by Criterion. All nonconformances must be categorized as either a minor error, nonconformance, or nonconformance due to CAB inaction or delay not attributable to the Participating Manufacturer.

Table 2: Breakdown of Nonconformances by Criterion for IE-2022-04

Criteria Number	Criterion Title	Total Nonconformances
4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	10
4.7.2.2	Public disclosure of supply chain toxics	10

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

Figure 2: Underlying Reason for Nonconformances in IE-2022-04
(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). One minor error was identified in Continuous Monitoring Round IE-2022-04.

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.

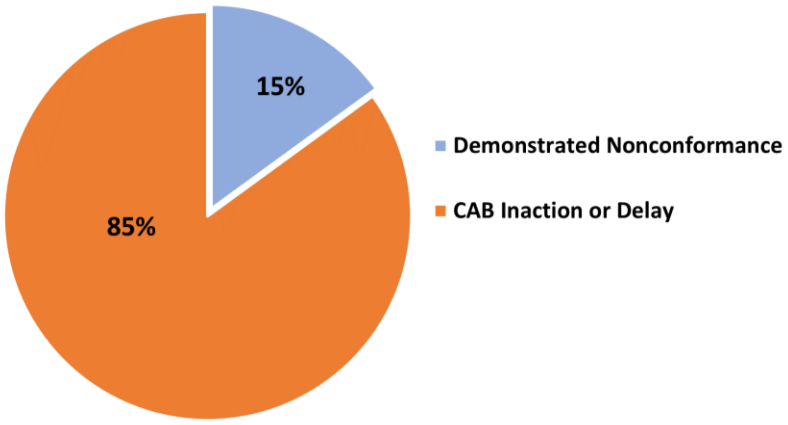
One minor error was identified in Round IE-2022-04—it was a demonstrated nonconformance, which means that evidence definitively showed that the Criterion was not met.

4.3 Nonconformances

Seventeen nonconformances due to CAB inaction or delay were identified in Continuous Monitoring Round IE-2022-04. The three other nonconformances were demonstrated nonconformances. Both required Criterion 4.7.2.2 and optional Criterion 4.9.3.1 require public disclosure of certain information. If the public disclosure does not meet all requirements of the Criterion, then the nonconformance is a demonstrated nonconformance. Criterion 4.7.2.2 requires disclosures for a minimum number of suppliers of specific components, while Criterion 4.9.3.1 requires disclosure of the total tonnage of cartridges and containers collected annually (in metric tons), as well as the tonnage of materials sent to the end-of-life management methods identified in the Criterion.

Figure 3 provides a breakdown of the nonconformances found in Round IE-2022-04.

Figure 3: Reasons for Nonconformances for IE-2022-04
(shown as a percentage of total nonconformances)



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-2022-04:

- **3** investigations Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- **17** 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-2022-04.

6.0 Key Findings

6.1 Demonstration of Conformance with All Elements of Criterion 4.9.3.1

Required Criterion 4.9.3.1 (provision of take-back and end-of-life management for cartridges and containers) requires Participating Manufacturers to provide a take-back service for toner and ink cartridges and containers. Verification requirement 2) requires manufacturers to provide evidence of this program, by providing evidence of a business relationship with the recycler or service provider. Verification requirement 4) requires evidence that landfill disposal and incineration are not used as part of the take-back program for registered and formerly registered products. Evidence may include policies or procedures, business contracts, tonnage records from provider or recycler's downstream flowchart that show incineration and landfill are not utilized.

6.2 Disclosure per Criterion 4.7.2.2 —Public disclosure of supply chain toxics

Optional Criterion 4.7.2.2 (public disclosure of supply chain toxics) requires disclosure of the toxic release data for at least one registered product for at least three major suppliers for three of the six following listed parts/component suppliers: display, external power supply (EPS), unpopulated printed circuit board, lamp, motor and integrated circuit/semiconductor. Clarification #22 identifies the requirements if the Participating Manufacturer has less than 3 suppliers for one of the key components identified. The Criterion also requires a copy of the previous two annual public disclosures, unless it is the first year claiming the Criterion and the Participating Manufacturer provides the most recent annual public disclosure and the policy establishing the annual nature of the public disclosure.

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
Brother	MFC-J4335DW	Multifunction Device	United States	4.7.2.2	Public disclosure of supply chain toxics	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Brother	Brother ADS-2700W	Scanner	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Canon	imagePRESS C710CA	Multifunction Device	United States	4.7.2.2	Public disclosure of supply chain toxics	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Canon	GP-4000	Printer	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Epson	DS-575W	Scanner	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	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 N7100A	Scanner	United States	4.7.2.2	Public disclosure of supply chain toxics	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 MFP E82560dn (X3A75A)	Multifunction Device	Canada	4.7.2.2	Public disclosure of supply chain toxics	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
HP	HP Designjet T1300 44-in PostScript® ePrinter with Encrypted HDD (CR652B)	Printer	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	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 C368	Multifunction Device	United States	4.7.2.2	Public disclosure of supply chain toxics	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 C3080	Multifunction Device	Canada	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance

Kyocera	KYOCERA ECOSYS M5526cdw	Multifunction Device	United States	4.7.2.2	Public disclosure of supply chain toxics	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Kyocera	KYOCERA ECOSYS P2235dw	Printer	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Lexmark	Lexmark C2326, C3426dw, CS431dw, C3326dw	Printer	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
Ricoh	RICOH P C600	Printer	United States	4.7.2.2	Public disclosure of supply chain toxics	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Ricoh	RICOH PRO 8300S	Multifunction Device	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Riso Kagaku Corporation	RISO ComColor FW5000	Printer	United States	4.7.2.2	Public disclosure of supply chain toxics	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Riso Kagaku Corporation	RISO MF9450U	Digital Duplicator	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Toshiba	Toshiba eStudio 2518A	Multifunction Device	United States	4.7.2.2	Public disclosure of supply chain toxics	Optional	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
Sharp	SHARP MX-7580N	Professional Imaging Product	United States	4.9.3.1	Provision of take-back and end-of-life management for cartridges and containers	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*