EPEAT Program
Continuous Monitoring Outcomes Report

Imaging Equipment
IE-2023-02
August 31, 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-2023-02 conducted for the Imaging Equipment category.

2.0 Overview of Continuous Monitoring Round IE-2023-02

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round IE-2023-02 used Level 0 Investigations, which involve reviewing publicly available information to determine Participating Manufacturers' conformance with specific EPEAT Criteria. GEC-approved CABs had a discrete time period to locate and review publicly available information to determine conformance with EPEAT Criteria selected for investigation. CABs then made recommendations on conformity based solely on the publicly available evidence, 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-2023-02 focused exclusively on Criteria that could be evaluated using publicly available information. While the EPEAT Program generally tries to focus on a specific impact or issue area in selecting Criteria for investigation, the focus in this Round was instead on Criteria which have requirements to make information publicly available.

Participating Manufacturers received up to three investigations: two of the Criteria selected for investigation were Required Criteria, and one was an Optional Criterion. As a result, all Participating Manufacturers received at least two investigations, and a third investigation was assigned if the manufacturer had selected the Optional Criterion. Products for investigation were selected randomly using a random number generator.

Table 1: Criteria Investigated in Round IE-2023-02

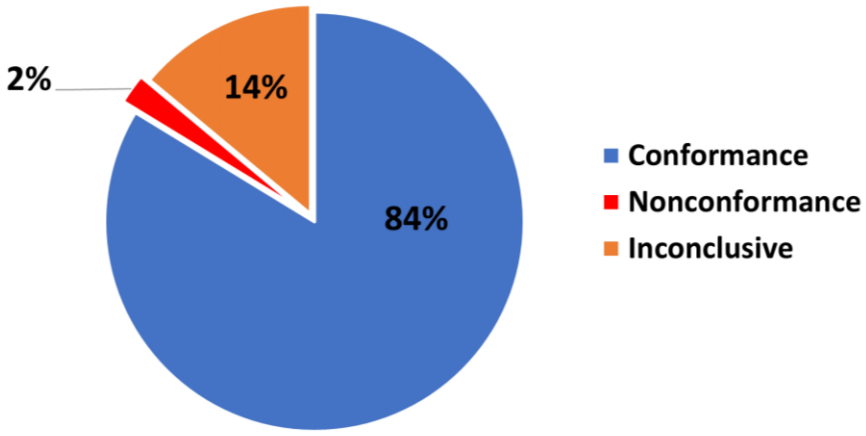
Criteria Number	Criterion Title
4.4.1.1	Early failure process
4.7.3.1	Product life cycle assessment and public disclosure of analyses
4.9.2.1	Documentation that product does not prevent the use of Non-Manufacturer Cartridges and Non-Manufacturer Containers

3.0 Summary of Investigations and Final Decisions on Conformity for IE-2023-02

Highlights from this Continuous Monitoring Round are:

- **43** investigations completed
- **36** decisions of Conformance
- **6** decisions of Inconclusive
- **1** decision of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for IE-2023-02
(shown as percentage of total investigations)



Note: For inconclusive findings, the EPEAT Program may require the CAB to investigate the same Criterion in a subsequent Level 1 Round to definitively determine conformance.

4.0 Further Details on Nonconformances for IE-2023-02

Table 2 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-2023-02

Criteria Number	Criterion Title	Total Nonconformances
4.9.2.1	Documentation that product does not prevent the use of Non-Manufacturer Cartridges and Non-Manufacturer Containers	1

There was one nonconformance in this Round, and it was a demonstrated nonconformance.

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).

In Continuous Monitoring Round IE-2023-02, there was one nonconformance and no minor errors identified.

4.2 Minor Errors

For Level 0 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).

There were no minor errors identified in this Round.

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-2023-02:

- **1** investigation — Additional data provided or corrections made by Participating Manufacturer, bringing the product into conformance with the Criterion

Table 3 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round IE-2023-02.

6.0 Key Findings

6.1 Use of Exceptions Field

Participating Manufacturers are reminded that where applicable, they must identify those exceptional configurations of an EPEAT-registered product that do not meet specific EPEAT Criteria in the exceptions field in the EPEAT Registry. This information is provided to enable clear identification of which configurations qualify as EPEAT-registered.

6.2 Secondary Data Sources for Optional Criterion 4.7.3.1—Product life-cycle assessment and public disclosure of analyses

For Optional Criterion 4.7.3.1—Product life-cycle assessment and public disclosure of analyses, Participating Manufacturers are reminded that secondary data sources used in the LCA shall be made publicly available via the company website, company annual sustainability report, industry sustainability index database if one is developed, other relevant databases, or public disclosure systems.

6.3 Required Criterion 4.4.1.1 – Early Failure Process

For Criterion 4.4.1.1—early failure process, Participating Manufacturers are reminded that troubleshooting, repair or replacement must be available for a product that fails prior to three years after the date of sale for institutional products and one year after the date of sale for consumer products.

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
Fujitsu Limited	Fujitsu fi-8170/P3810A (B075)	Scanner	United States	4.9.2.1	Documentation that product does not prevent the use of Non-Manufacturer Cartridges and Non-Manufacturer Containers	Required	Demonstrated nonconformance	Participating Manufacturer made the necessary corrections

Document Control and Change History						
Issue	***Revision***	***Owner***	***Approver***	***Description***	***Approval Date***	***Effective Date***
1	*0*	*Senior Manager, Ecolabels and Resources*	*Vice President, Ecolabels and Manufacturer Resources*	*Initial release*	*18 Apr 23*	*19 Apr 23*