EPEAT Program
Continuous Monitoring Outcomes Report

Mobile Phones
MP-2022-03
March 20, 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 MP-2022-03 conducted for the Mobile Phones category.

2.0 Overview of Continuous Monitoring Round MP-2022-03

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round MP-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 MP-2022-03 were selected randomly using a random number generator. Each Participating Manufacturer was assigned two investigations.

Table 1: Criteria Investigated in Round MP-2022-03

Criteria Number	Criterion Title
11.1.1	Take-back program
11.8.1	Notification regarding and the identification of materials and components requiring selective treatment
12.6.1	Environmentally preferable paper/ paperboard in POS packaging
12.9.1	Improve packaging efficiency
13.1.1	Corporate sustainability (CS) reporting
15.1.1	Supplier responsibility
15.3.3	Participation in conflict mineral responsible sourcing program

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

Highlights from this Continuous Monitoring Round are:

- **8** investigations completed
- **8** decisions of Nonconformance *Further details provided in Section 4.* ***All nonconformances were due to CAB inaction or delay not attributable to the Participating Manufacturer.***

100% of the final conformity decisions were nonconformances due to CAB failure to submit the Investigation Report.

4.0 Further Details on Nonconformances for MP-2022-03

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. All nonconformances in this Round were due to CAB inaction or delay not attributable to the Participating Manufacturer.

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

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

Criteria Number	Criterion Title	Total Nonconformances
11.1.1	Take-back program	1
11.8.1	Notification regarding and the identification of materials and components requiring selective treatment	1
12.6.1	Environmentally preferable paper/ paperboard in POS packaging	1
12.9.1	Improve packaging efficiency	1
13.1.1	Corporate sustainability (CS) reporting	1
15.1.1	Supplier responsibility	2
15.3.3	Participation in conflict mineral responsible sourcing program	1

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).

All nonconformances in Continuous Monitoring Round MP-2022-03 were nonconformances 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.

There were no minor errors found in Round MP-2022-03.

4.3 Nonconformances

All nonconformances in Continuous Monitoring Round MP-2022-03 were nonconformances due to CAB inaction or delay not attributable to the Participating Manufacturer, because the CAB failed to submit the Investigation Report.

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 MP-2022-03:

- **8** 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 MP-2022-03.

6.0 Key Findings

6.1 11.1.1 – Take Back Programs in Jurisdictions with Laws and/or Regulations

Participating Manufacturers are reminded that they must provide a take-back program for products declared to conform. If demonstrating conformance using existing laws and/or regulations which establish a program for the collection and recycling of products in a jurisdiction, and those existing laws and/or regulations do not cover the entire country/ Location of Use, (e.g., regulations only cover some states or provinces), then the Participating Manufacturer must provide their own program in states or provinces not covered under existing laws and/or regulations.

6.2 12.6.1 – Environmentally Preferable Virgin Fiber-Based in POS Packaging

If virgin fiber-based materials in the POS packaging contain certified sources of fiber-based materials, the manufacturer shall provide documentation to demonstrate that the chosen certification includes both chain-of-custody certification and chain-of-custody documentation for the material.

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
Apple Inc	Apple iPhone 12	Mobile Phone	Canada	12.9.1	Improve packaging efficiency	Optional	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer which demonstrated conformance
Apple Inc	Apple iPhone SE	Mobile Phone	United States	11.1.1	Take-back program	Required	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer which demonstrated conformance
Google	Google Pixel 4 XL	Mobile Phone	United States	12.6.1	Environmentally preferable paper/paperboard in POS packaging	Optional	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer which demonstrated conformance
Google	Pixel 6	Mobile Phone	United States	15.1.1	Supplier responsibility	Optional	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer which demonstrated conformance
Microsoft	Surface Duo 2	Mobile Phone	United States	15.3.3	Participation in conflict mineral responsible sourcing program	Optional	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer which demonstrated conformance
Microsoft	Surface Duo 2	Mobile Phone	United States	13.1.1	Corporate sustainability (CS) reporting	Required	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer which demonstrated conformance
Samsung	Galaxy A13 5G	Mobile Phone	United States	11.8.1	Notification regarding and the identification of materials and components requiring selective treatment	Required	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer which demonstrated conformance
Samsung	Galaxy S20 5G / SM-G981V (Verizon)	Mobile Phone	United States	15.1.1	Supplier responsibility	Optional	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer 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*	*2022 Mar 13*