

EPEAT Program

Continuous Monitoring Outcomes Report



Photovoltaic Modules and Inverters
PV-2022-02
December 16, 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 nonconformances and the actions taken to restore accuracy of the EPEAT Registry.

This document summarizes the activities and results of Continuous Monitoring Round PV-2022-02 conducted for the Photovoltaic Modules and Inverters category.

2.0 Overview of Continuous Monitoring Round PV-2022-02

2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round PV-2022-02 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

Criteria for investigation in Continuous Monitoring Round PV-2022-02 were selected randomly using a random number generator. Each Participating Manufacturer was assigned two investigations, and any manufacturers who received a major nonconformance in a 2021 photovoltaics Continuous Monitoring Round were assigned one additional investigation.

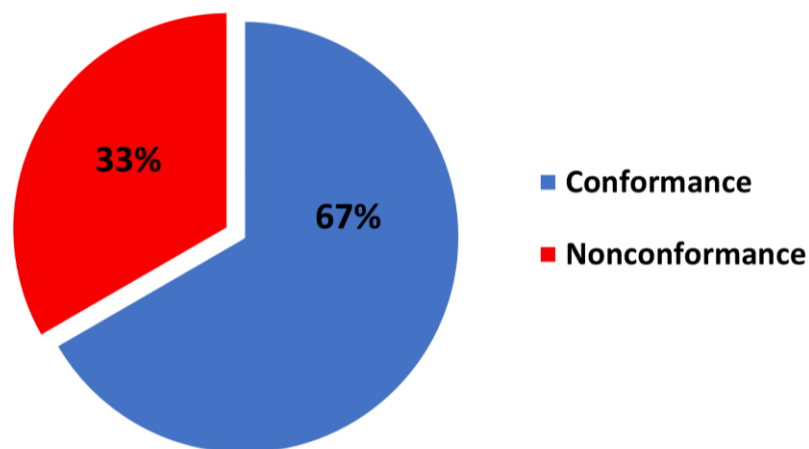
Table 1: Criteria Investigated in Round PV-2022-02	
Criteria Number	Criterion Title
5.1.6	Making alternatives assessment publicly available
11.1.1	Environmental management system (EMS) certification
11.2.1	Reporting on key performance indicators

3.0 Summary of Investigations and Final Decisions on Conformity for PV-2022-02

Highlights from this Continuous Monitoring Round are:

- **3** investigations completed
- **2** decisions of Conformance
- **1** decision of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for PV-2022-02
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for PV-2022-02

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

Table 2: Breakdown of Nonconformances by Criterion for PV-2022-02		
Criteria Number	Criterion Title	Total Nonconformances
11.2.1	Reporting on key performance indicators	1

The nonconformance was a demonstrated nonconformance, which means evidence definitively showed that the EPEAT Criterion was not met.

4.1 Minor Errors Versus Nonconformances

All nonconformances must be categorized as either a minor error or nonconformance. 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.

There were no minor errors and one nonconformance in Round PV-2022-02.

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 PV-2022-02.

4.3 Nonconformances

There was one nonconformance found in Round PV-2022-02.

5.0 Actions to Restore Conformance

Where the final conformity decision is nonconformance (including minor errors), 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 PV-2022-02:

- **1 investigation** Additional data provided 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 PV-2022-02.

6.0 Key Findings

6.1 Accreditation Requirements

Participating Manufacturers and CABs are reminded that some Criteria, such as PVMI 11.1.1 Environmental management system (EMS) certification include language such as “Certification bodies shall be accredited by an IAF member accreditation body to certify to the specific standard identified”. Evidence must be provided to show that the certification body that provided the ISO 14001 certification is accredited by an IAF member accreditation body to provide certifications to ISO 14001.

6.2 Disclosures Consistent with GRI Sustainability Reporting Standards

When data is required to be reported consistent with the topic-specific Standards in the GRI Sustainability Reporting Standards (GRI Standards), it is important to fulfill all requirements in the GRI Standard as written.

6.3 Declaration of URL of Public Disclosure

Participating Manufacturers are reminded to ensure that all declarations of URLs for public disclosure in the EPEAT Registry are up to date.

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
First Solar	Series 6 Plus	Photovoltaic modules	India	11.2.1	Reporting on key performance indicators	Required	Demonstrated nonconformance	Manufacturer provided evidence which demonstrated conformance.

<i>Document Control and Change History</i>						
<i>Issue</i>	<i>Revision</i>	<i>Owner</i>	<i>Approver</i>	<i>Description</i>	<i>Approval Date</i>	<i>Effective Date</i>
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