EPEAT Program
Continuous Monitoring Outcomes Report

Photovoltaic Modules and Inverters
PV-2023-01
April 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 PV-2023-01 conducted for the Photovoltaic Modules and Inverters category.

2.0 Overview of Continuous Monitoring Round PV-2023-01

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round PV-2023-01 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 PV-2023-01 focused exclusively on Criteria that can 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 is 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 are Required Criteria, and one is 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 PV-2023-01

Criteria Number	Criterion Title
5.2.1	Disclosure of substances on the EU REACH Regulation Candidate List of Substances of Very High Concern
7.1.2	Public disclosure of LCA results
11.4.1	Public disclosure of the use of conflict minerals in product

3.0 Summary of Investigations and Final Decisions on Conformity for PV-2023-01

Highlights from this Continuous Monitoring Round are:

- **3** investigations completed
- **3** decisions of Conformance

4.0 Further Details on Nonconformances for PV-2023-01

No nonconformances or minor errors were identified in Continuous Monitoring Round PV-2023-01.

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).

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).

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”).

Since there were no nonconformances identified in Continuous Monitoring Round PV-2023-01, no corrective actions were taken.

6.0 Key Findings

6.1 Annual Disclosure for Criterion 11.4.1

Participating Manufacturers are reminded that Required Criterion 11.4.1 (public disclosure of use of conflict minerals in products) is based on Rule 13p-1 under the US Securities Exchange Act of 1934, which requires an annual disclosure of conflict minerals found. Participating Manufacturers are reminded to ensure their URL declared in the Registry is accurate year-over-year.

6.2 Criterion 5.2.1 - Disclosure of Substances on the EU Reach Regulation Candidate List of SVHC

Participating Manufacturers are reminded that this Criterion requires a link to the list be placed on the product specification or documentation web page. The manufacturer shall declare the URL of the public disclosure.

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*