EPEAT Program
Continuous Monitoring Outcomes Report

Servers
SV-2020-01
April 12, 2021

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 major nonconformances and the actions taken to restore accuracy of the EPEAT Registry.

This document summarizes the activities and results of Continuous Monitoring Round SV-2020-01 conducted for the Servers category.

2.0 Overview of Continuous Monitoring Round SV-2020-01

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round SV-2020-01 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 were selected for Continuous Monitoring Round SV-2020-01 based on the positive sustainability impact the Criteria will have when adopted, and the potential to drive change in the sector. Each Participating Manufacturer selecting the Criteria was assigned investigations and products were chosen randomly. Any Participating Manufacturer that received a Major Nonconformance during 2019 Continuous Monitoring activities in the Server category received an additional Investigation in this Round.

Table 1: Criteria Investigated in Round SV-2020-01

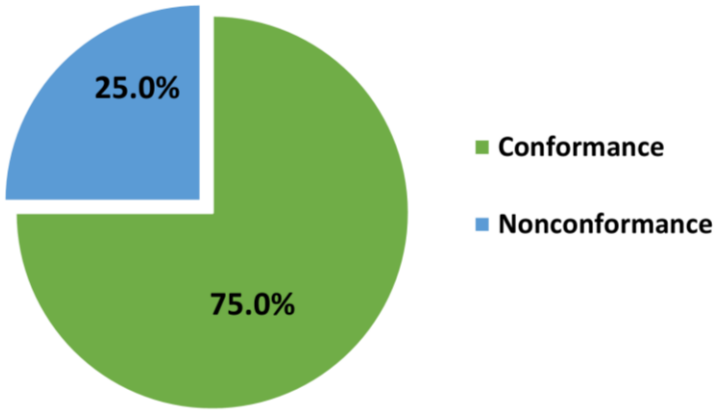
Criteria Number	Criterion Title
7.1.2	Minimum post-consumer recycled content in external enclosures
9.1.1	Design for repair, reuse and recycling

3.0 Summary of Investigations and Final Decisions on Conformity for SV-2020-01

Highlights from this Continuous Monitoring Round are:

- **8** investigations completed
- **6** decisions of Conformance
- **2** decisions of Nonconformance *Further details provided in Section 4*
- **1** investigations cancelled *Cancelled due to administrative issue.*

Figure 1: Final Conformity Decisions for SV-2020-01
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for SV-2020-01

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

Figure 2: Breakdown of Nonconformances by Criterion for SV-2020-01
(shown as a percentage of total nonconformances)

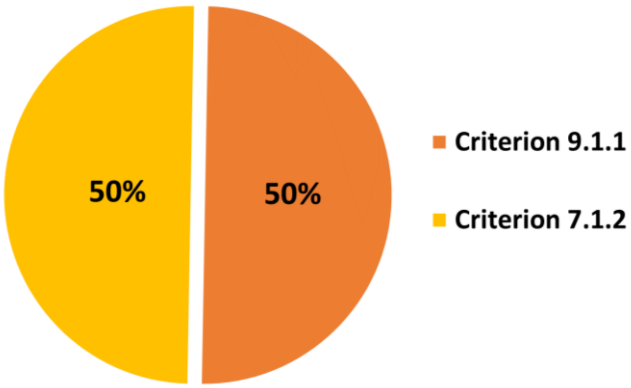
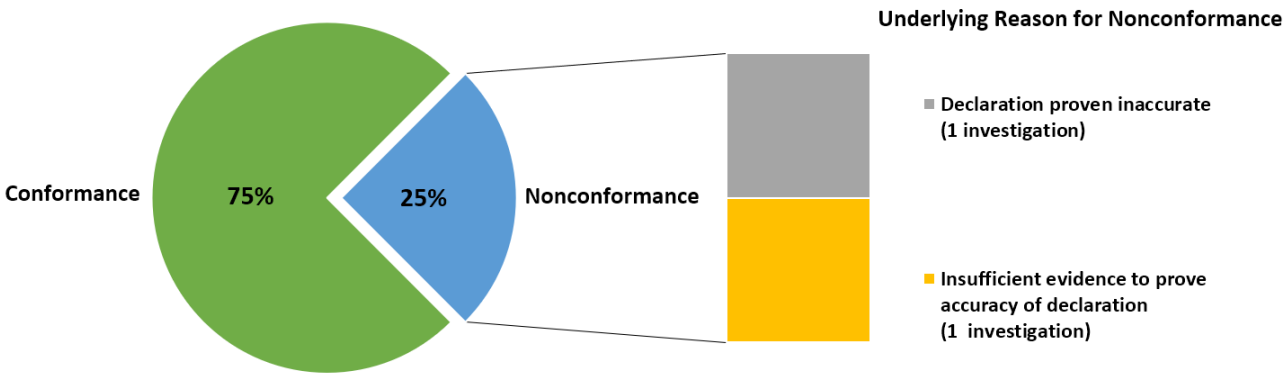


Figure 3 provides a further breakdown by the underlying reason for the nonconformances.

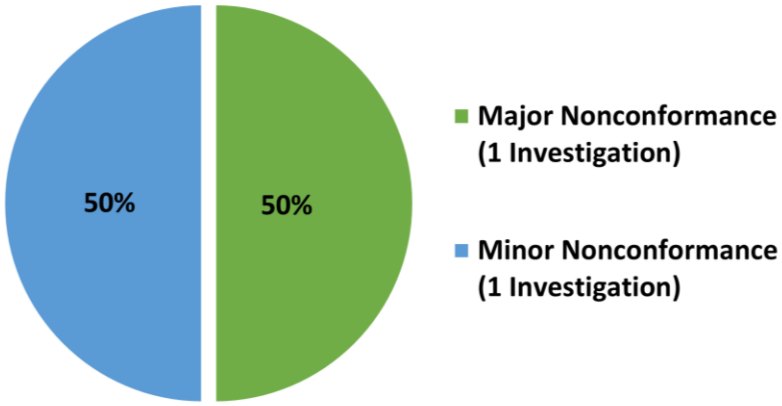
Figure 3: Underlying Reason for Nonconformances in SV-2020-01
(shown as a percentage of total nonconformances)



4.1 Major Versus Minor Nonconformances

All nonconformances must be categorized as either major or minor. Minor nonconformances 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 are categorized as major.

Figure 4: Major versus Minor Nonconformances for SV-2020-01
(shown as a percentage of total nonconformances)



4.2 Minor Nonconformances

For Level 1 Investigations, nonconformances may be categorized as minor 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 nonconformance was found in Round SV-2020-01 and it was due to a demonstrated nonconformance due to a data entry error.

4.3 Major Nonconformances

Major nonconformances may be found due to a demonstrated nonconformance, insufficient evidence provided to demonstrate conformance, or because no documentation was provided. One Major Nonconformance was found in Round SV-2020-01 and it was due to insufficient evidence to demonstrate conformance.

The Major Nonconformance in SV-2020-01 pertained to Criterion 9.1.1. This Criterion has multiple elements, all of which must be met to demonstrate conformance. These elements are removability of external enclosures, replaceability of selected components, including power and data cables and identification and removability of components requiring selective treatment. For Criterion 9.1.1, components requiring selective treatment must be identified in product documentation required by Criterion 9.2.1 or marked visually on the product as required in Criterion 9.2.3. Components requiring selective treatment are defined in the EU WEEE Directive Annex VII.

5.0 Actions to Restore Conformance

Where the final conformity decision is nonconformance (whether major or minor), 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 SV-2020-01:

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

Table 2 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round SV-2020-01.

6.0 Key Findings

6.1 Data Entry for Criterion 7.1.2

If the external enclosure of a product does not contain plastic "Not Applicable" should be claimed in the EPEAT Registry. If the sum of all plastic parts in the external enclosure weighs <10% of the total weight of all external enclosure parts, "Not Applicable" can also be claimed. Products claiming "Yes" for Criterion 7.1.2 are required to demonstrate that the external enclosure contains a minimum of 10% postconsumer recycled plastic content.

6.2 Conformity Against All Elements of a Criterion

As identified in Section 4.3 of this report, Criterion 9.1.1 has multiple elements against which conformance must be shown, including documentation that addresses external enclosures, selected components and components requiring selective treatment per the EU WEEE Directive Annex VII. Past Continuous Monitoring Rounds have shown that not all applicable components such as cables and components requiring selective treatment are identified in product documentation. Manufacturers are encouraged to review the list of components requiring selective treatment identified in the EU WEEE Directive that are applicable to their products and ensure product documentation for Criterion 9.1.1 covers all Criterion elements. Participating Manufacturers should be prepared to demonstrate conformance with all of these elements and are encouraged to work with their CABs if they have questions.

7.0 Identification of Major Nonconformances and Corrections Made by Participating Manufacturers

In the interest of transparency, the EPEAT Program identifies the Participating Manufacturers and products that received major nonconformances and the actions taken to restore accuracy of the EPEAT Registry. Minor nonconformances 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 1: Summary of Major 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
Cisco	USCB-B200-M5	Blade Server	United States	9.1.1	Design for repair, reuse and recycling	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional data demonstrating 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*