EPEAT Program
Continuous Monitoring Outcomes Report

Servers
SV-2021-01
April 1, 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 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-2021-01 conducted for the Servers product category.

2.0 Overview of Continuous Monitoring Round SV-2021-01

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round SV-2021-01 used Level 2 Investigations (laboratory evaluation of products to determine the products' conformance with specific EPEAT Criteria). GEC-approved CABs obtained the products, as identified by the EPEAT Program, from the open market without involvement of the Participating Manufacturers, where possible, and sent them for laboratory evaluation. The laboratories evaluated the products against the specified Criteria and produced reports summarizing the activities conducted and the results. GEC-approved CABs reviewed the reports, made recommendations on conformity, and sent the reports to the EPEAT Program. The EPEAT Program made the final decisions on conformity for the Investigations.

2.2 Criteria Investigated

Continuous Monitoring Round SV-2021-01 focused on chemicals of concern. Products were selected randomly using a random number generator from a list of Participating Manufacturers. In this Round, laboratories evaluated all products against the Required Criteria listed in Table 1.

Table 1: Criteria Investigated in Round SV-2021-01

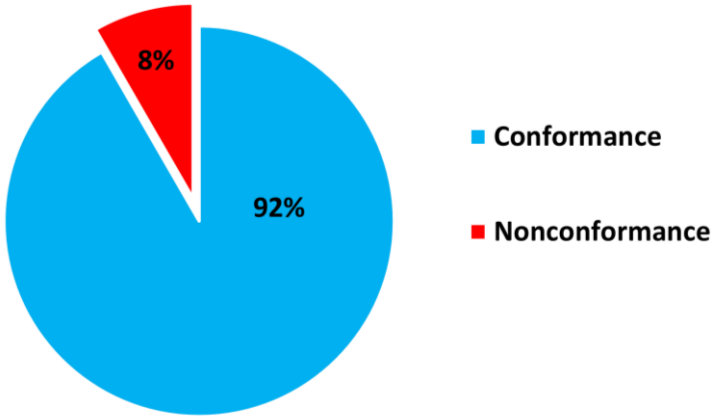
Criteria Number	Criterion Title
6.1.1	Conformance with provisions of European Union RoHS Directive
6.1.2	Conformance with substance restriction requirements of the European Union Battery Directive
6.1.3	Reduction of Bromine and Chlorine content of plastic parts > 25 grams
6.1.4	Further reduction of Bromine and Chlorine content of plastic parts > 25 grams
8.1.1	Elimination of added heavy metals in packaging

3.0 Summary of Investigations and Final Decisions on Conformity for SV-2021-01

Highlights from this Continuous Monitoring Round are:

- **12** investigations completed
- **11** decisions of Conformance
- **1** decision of Nonconformance *Further details provided in Section 4*
- **4** investigations cancelled *[Product lost in transit to laboratory]*

Figure 1: Final Conformity Decisions for SV-2021-01
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for SV-2021-01

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

Table 2: Breakdown of Nonconformances by Criterion for SV-2021-01

Criteria Number	Criterion Title	Completed Investigations	Nonconformances	Nonconformance Rate
6.1.1	Conformance with provisions of European Union RoHS Directive	3	1	33%

The only nonconformance for SV-2021-01 was a demonstrated nonconformance which means the evidence definitively showed the EPEAT Criterion was not met.

4.1 Major Versus Minor Nonconformances

All nonconformances must be categorized as either major or minor. For Level 2 Investigations, nonconformances may be categorized as minor if a GEC-approved CAB is unable to obtain a product from the market and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market. All nonconformances that do not meet the definition of minor are categorized as major.

In this Round there were no Minor Nonconformances, and one Major Nonconformance.

4.2 Major Nonconformances

The Major Nonconformance was classified as a demonstrated nonconformance, which means that the testing and analysis completed definitively shows that the criterion thresholds are not being met or that the criterion selection in the EPEAT Registry is not correct when selecting “yes” versus “not applicable” for criteria with the option to choose “not applicable”.

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-2021-01:

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

Table 3 in Section 7 identifies the Participating Manufacturer and product that received a major nonconformance in Continuous Monitoring Round SV-2021-01.

6.0 Key Findings

6.1 Review of Conformance Assurance Process to Restrict Substances

Participating Manufacturers are reminded to review their conformance assurance processes (CAP) to manage compliance with substance restrictions to ensure they continue to address and restrict all necessary substances.

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 3: 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
Lenovo	Lenovo ThinkSystem ST550	Pedestal Server	Canada	6.1.1	Conformance with provisions of European Union RoHS Directive	Required	Demonstrated Nonconformance	Manufacturer provided evidence to demonstrate 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*