EPEAT Program
Continuous Monitoring Outcomes Report

Servers
SV-2021-02
November 10, 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-2021-02 conducted for the Servers product category.

2.0 Overview of Continuous Monitoring Round SV-2021-02

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round SV-2021-02 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

The products and Criteria selected for investigation in Continuous Monitoring Round SV-2021-02 were selected randomly using a random number generator.

Table 1: Criteria Investigated in Round SV-2021-02

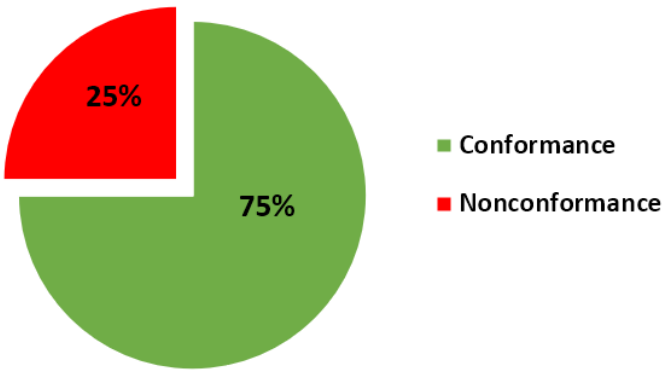
Criteria Number	Criterion Title
5.2.1	Allowable temperature and humidity specifications
9.2.1	Information and reporting in preparation for reuse and recycling
11.1.1	Provision of product take-back service (corporate)
11.2.1	End of life process requirements (corporate)
11.2.2	Trans-boundary movements (corporate)
12.1.1	Environmental management system (EMS) (corporate)
12.3.3	Participating in in-region conflict-free sourcing programs (corporate)
12.4.1	Manufacturer conformance with occupational health and safety performance (corporate)

3.0 Summary of Investigations and Final Decisions on Conformity for SV-2021-02

Highlights from this Continuous Monitoring Round are:

- **8** investigations completed
- **6** decisions of Conformance
- **2** decisions of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for SV-2021-02
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for SV-2021-02

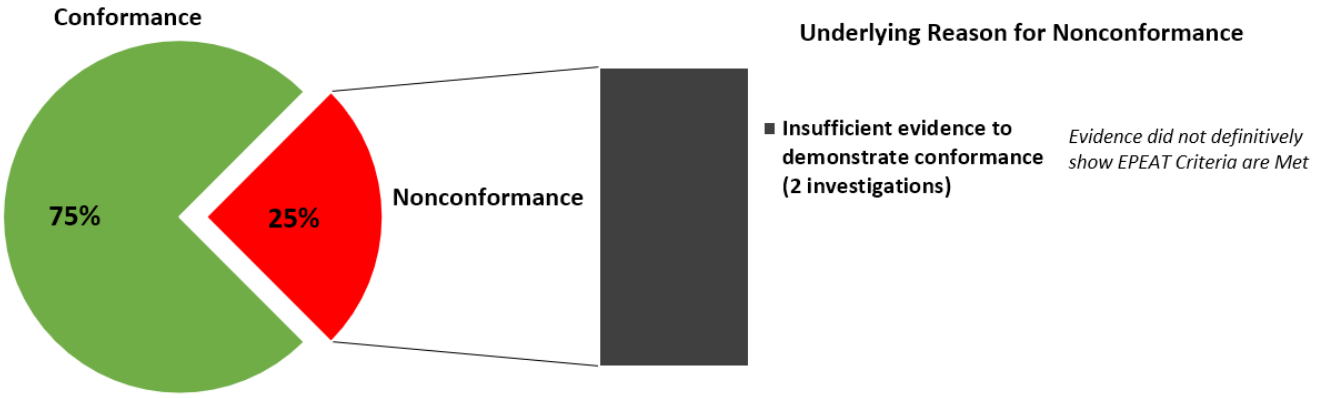
Table 2 below provides a further breakdown of the nonconformances by Criterion.

Table 2: Breakdown of Nonconformances by Criterion for SV-2021-02

Criteria Number	Criterion Title	Total Nonconformances
5.2.1	Allowable temperature and humidity specifications	0
9.2.1	Information and reporting in preparation for reuse and recycling	1
11.1.1	Provision of product take-back service (corporate)	0
11.2.1	End of life process requirements (corporate)	0
11.2.2	Trans-boundary movements (corporate)	0
12.1.1	Environmental management system (EMS) (corporate)	0
12.3.3	Participating in in-region conflict-free sourcing programs (corporate)	0
12.4.1	Manufacturer conformance with occupational health and safety performance (corporate)	1

Figure 2 provides a further breakdown by the underlying reason for the nonconformances.

Figure 2: Underlying Reason for Nonconformances in SV-2021-02
(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.

All nonconformances for Continuous Monitoring Round SV-2021-02 were major 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.

There were no minor nonconformances found in Continuous Monitoring Investigation SV-2021-02.

4.3 Major Nonconformances

Major nonconformances may be due to a demonstrated nonconformance, insufficient evidence provided to demonstrate conformance, or because no documentation was provided. Major nonconformances were found for two Criteria investigated in this Round, and in both cases, the nonconformance was due to insufficient evidence submitted to demonstrate conformance.

Criterion 9.2.1 requires the Manufacturer to publish information required by Article 15 of the European Union WEEE Directive 2012/19/EU for use by third-party reuse and recycling organizations and demonstrate that this information is available in all regions or countries in which the Criterion is declared. In addition, the manufacturer must have a written procedure to ensure the information is available for seven years following the end of production of the product.

Criterion 12.4.1 requires the Manufacturer to demonstrate conformance to ANSI/AIHA/ASSE Z10, Occupational Health and Safety Management Systems, or OHSAS 18001 [ISO 45001] for all manufacturer-owned operations with significant responsibility for the manufacture or assembly of products declared to conform to the EPEAT Servers Criteria. Manufacturers must demonstrate they have a management system that covers all elements of the occupational health and safety standard.

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-2021-02:

- **2** investigations — Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion

Table 3 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round SV-2021-02.

6.0 Key Findings

6.1 Conformity Against All Elements of Criterion 9.2.1:

Manufacturers are reminded to review all Criterion elements for Criterion 9.2.1. Participating Manufacturers are reminded to ensure that they have all of the following:

- Documentation available for reuse and recycling facilities which includes all information required for Article 15 of the European Union WEEE Directive 2012/19/EU (presence and location of materials requiring selective treatment per Annex VII of the European Union WEEE Directive 2012/19/EU).
- Demonstration that the information above is made available to reuse and recycling facilities in all regions or countries in which the criterion is declared; and
- A written procedure that assures that the information is available for seven years following the end of production of the product.

6.2 Conformity Against All Elements of Criterion 12.4.1:

Manufacturers are reminded that conformance to ANSI/AIHA/ASSE Z10, Occupational Health and Safety Management Systems, or OHSAS 18001 [ISO 45001] must be demonstrated for all manufacturer-owned operations with significant responsibility for the manufacture or assembly of products declared to conform to this product category. All aspects of the occupational health and safety standard must be addressed in the Manufacturer's evidence.

Participating Manufacturers 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 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
Cisco	UCSB-B200-M5	Blade Server	United States	9.2.1	Information and reporting in preparation for reuse and recycling	Required	Insufficient evidence to demonstrate conformance.	Manufacturer submitted evidence demonstrating conformance.
Hewlett Packard Enterprise	HPE ProLiant XL225n Gen 10 Plus Server	Multi-node Server	France	12.4.1	Manufacturer conformance with occupational health and safety performance (corporate)	Required	Insufficient evidence to demonstrate conformance.	Manufacturer submitted evidence 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*