EPEAT Program
Continuous Monitoring Outcomes Report

Servers
SV-2022-03
January 6, 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 SV-2022-03 conducted for the Servers category.

2.0 Overview of Continuous Monitoring Round SV-2022-03

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round SV-2022-03 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

Both the criteria and products for investigation in Continuous Monitoring Round SV-2022-03 were selected randomly using a random number generator. Each Participating Manufacturer was assigned two investigations, and any manufacturers who received a nonconformance in a 2021 servers Continuous Monitoring Round were assigned one additional investigation.

Table 1: Criteria Investigated in Round SV-2022-03

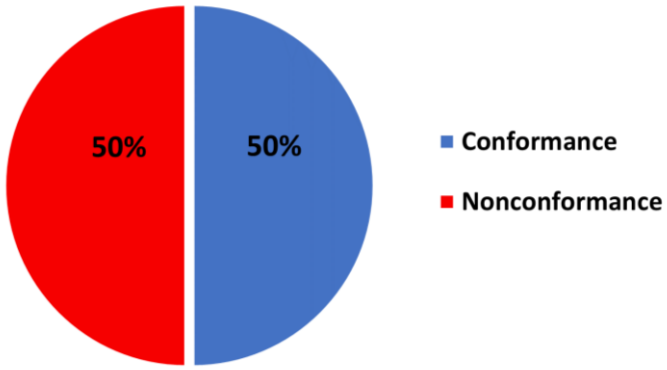
Criteria Number	Criterion Title
8.1.1	Elimination of added heavy metals in packaging
8.1.2	Restriction on the use of elemental chlorine as a bleaching agent in paper-based packaging material
8.2.1	Enhancing recyclability of packaging materials
9.1.4	Product recyclability calculation and minimum 90% recyclability rate
9.2.1	Information and reporting in preparation for reuse and recycling
10.1.1	Replacement components availability
11.1.1	Provision of product take-back service (corporate)
11.1.2	Manufacturer take-back service for de-installed servers (corporate)
11.2.1	End-of-life processing requirements (corporate)
12.1.1	Environmental management system (EMS) (corporate)

3.0 Summary of Investigations and Final Decisions on Conformity for SV-2022-03

Highlights from this Continuous Monitoring Round are:

- **12** investigations completed
- **6** decisions of Conformance
- **6** decisions of Nonconformance *Further details provided in Section 4.* ***Note: Five of the Nonconformances were due to CAB failure to submit an Investigation Report.***

Figure 1: Final Conformity Decisions for SV-2022-03
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for SV-2022-03

Note: Five out of the six Nonconformances in Continuous Monitoring Round SV-2022-03 were due to CAB failure to submit an Investigation Report. One Nonconformance was a demonstrated Nonconformance.

Table 2: Breakdown of Nonconformances by Criterion for SV-2022-03

Criteria Number	Criterion Title	Total Nonconformances
8.1.1	Elimination of added heavy metals in packaging	1
8.1.2	Restriction on the use of elemental chlorine as a bleaching agent in paper-based packaging material	1
9.2.1	Information and reporting in preparation for reuse and recycling	1
10.1.1	Replacement components availability	1
11.1.1	Provision of product take-back service (corporate)	1
12.1.1	Environmental management system (EMS) (corporate)	1

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.

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 in Round SV-2022-03.

4.3 Nonconformances

Five out of the six Nonconformances in Continuous Monitoring Round SV-2022-03 were due to CAB failure to submit an Investigation Report. One Nonconformance was a demonstrated Nonconformance.

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 SV-2022-03:

- **1** investigation — Additional data provided by Participating Manufacturer, bringing the product into conformance with the Criterion.
- **5** investigations — CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance.

Table 3 in Section 7 identifies the Participating Manufacturers and products that received Nonconformances in Continuous Monitoring Round SV-2022-03.

6.0 Key Findings

6.1 Review European Union WEEE Directive 2012/19/EU Article 15 and Annex VII Components Applicable to Registered Products.

Participating Manufacturers are reminded to ensure that information made available to reuse and recycling facilities identifies the presence and location of all materials and components requiring selective treatment listed in Annex VII of the European WEEE Directive, Directive 2012/19/EU of the European Parliament and of the Council on waste electrical and electronic equipment (WEEE) and subsequent updates.

6.2 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
Ace Computers	PWKS1AA15PWTR	Rack-mounted Server	United States	10.1.1	Replacement components availability	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance.
Cisco	UCS C480 M5	Rack-mounted Server	United States	8.1.2	Restriction on the use of elemental chlorine as a bleaching agent in paper-based packaging material	Required	CAB failure to submit Investigation Report.	CAB reviewed information originally submitted by Participating Manufacturer, which demonstrated conformance
Cisco	UCSC-B480 M5	Blade Server	United States	12.1.1	Environmental management system (EMS) (corporate)	Required	CAB failure to submit Investigation Report.	CAB reviewed information originally submitted by Participating Manufacturer, which demonstrated conformance
Lenovo	Lenovo ThinkSystem SN850	Blade Server	Canada	11.1.1	Provision of product take-back service (corporate)	Required	CAB failure to submit Investigation Report.	CAB reviewed information originally submitted by Participating Manufacturer, which demonstrated conformance
Lenovo	Lenovo ThinkSystem ST650 V2	Rack-mounted Server	United States	9.2.1	Information and reporting in preparation for reuse and recycling	Required	CAB failure to submit Investigation Report.	CAB reviewed information originally submitted by Participating Manufacturer, which demonstrated conformance
Lenovo	ThinkSystem SD650 V2 Neptune DWC Tray	Blade Server	Canada	8.1.1	Elimination of added heavy metals in packaging	Required	CAB failure to submit Investigation Report.	CAB reviewed information originally submitted by Participating Manufacturer, which demonstrated 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*
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*