

# EPEAT Program

## Continuous Monitoring Outcomes Report



Servers  
SV-2022-04  
March 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 SV-2022-04 conducted for the Servers category.

### 2.0 Overview of Continuous Monitoring Round SV-2022-04

#### 2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round SV-2022-04 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

Continuous Monitoring Round SV-2022-04 focused on corporate Criteria with annual disclosure requirements, to confirm that Participating Manufacturers are fulfilling annual reporting requirements for the Criteria investigated. Since one Criterion is required, and one is optional, Participating Manufacturers received up to two investigations. If a Participating Manufacturer was investigated for any of the selected Criteria in another 2022 Continuous Monitoring Round, the Criterion was not assigned again in this Round, given the annual disclosure requirements. The products for investigation were selected randomly using a random number generator.

**Table 1: Criteria Investigated in Round SV-2022-04**

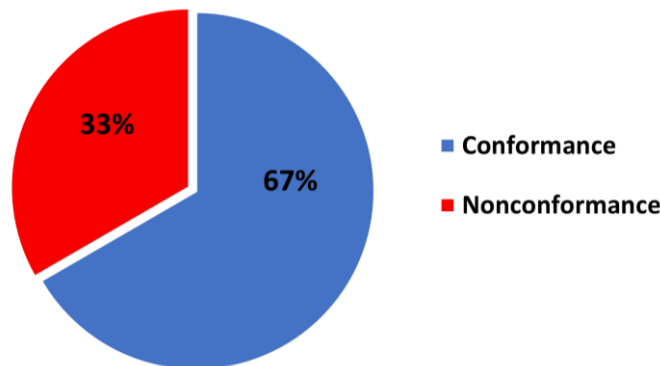
Criteria Number	Criterion Title
12.3.1	Public disclosure of use of conflict materials in products (corporate)
12.5.3	Environmental impact of product transportation (corporate)

## 3.0 Summary of Investigations and Final Decisions on Conformity for SV-2022-04

Highlights from this Continuous Monitoring Round are:

- 6 investigations completed
- 4 decisions of Conformance
- 2 decisions of Nonconformance *Further details provided in Section 4. All nonconformances were due to CAB inaction or delay not attributable to the Participating Manufacturer.*

**Figure 1: Final Conformity Decisions for SV-2022-04**  
(shown as percentage of total investigations)



## 4.0 Further Details on Nonconformances for SV-2022-04

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

**Table 2: Breakdown of Nonconformances by Criterion for SV-2022-04**

Criteria Number	Criterion Title	Total Nonconformances
12.3.1	Public disclosure of use of conflict materials in products (corporate)	2

#### 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).

All nonconformances in Continuous Monitoring Round SV-2022-04 were nonconformances due to CAB inaction or delay not attributable to the Participating Manufacturer.

#### 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 found in Round SV-2022-04.

#### 4.3 Nonconformances

All nonconformances in Continuous Monitoring Round SV-2022-04 were nonconformances due to CAB inaction or delay not attributable to the Participating Manufacturer, because the CAB failed to submit the Investigation Report.

### 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”).

The following actions were taken to restore accuracy to the EPEAT Registry as a result of Continuous Monitoring Round SV-2022-04:

- **2 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-2022-04.

## 6.0 Key Findings

### 6.1 Conflict Minerals Disclosures in Conformance with Rule 13p-1

Participating Manufacturers are reminded that disclosures on use and sources of conflict minerals, per the Criterion, must be conformant with Rule 13p-1 under the US Securities Exchange Act of 1934. Per Rule 13p-1 and the Form SD, if due diligence is necessary, Participating Manufacturers “must exercise due diligence on the source and chain of custody of its conflict mineral, as discussed in paragraph (c)(1) of this item, that conforms to a nationally or internationally recognized due diligence framework, if such a framework is available for the conflict mineral.” Participating Manufacturers should identify the framework used.

### 6.2 12.5.3 Environmental Impact of Product Transportation — Multiple Elements

Participating Manufacturers are reminded to ensure they address all elements of optional Criterion 12.5.3 – Environmental impact of product transportation (corporate). This includes the scope of the criterion, specifically, that it covers greenhouse gas (GHG) emissions from supply chain transportation activities for products declared to conform to this category, from the point of final product assembly to the customer, or transfer of product ownership and that it includes well-to-wheel GHG emissions from all modes of freight movement utilized. Participating Manufacturers must confirm the scope in the evidence provided.

When third-party verification applies, documentation of both the credentials and contact information of the third-party verifier must be provided.

## 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
Cisco	UCSC- C220 M5	Rack-mounted server	United States	12.3.1	Public disclosure of use of conflict materials in products (corporate)	Required	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Lenovo	Lenovo ThinkSystem SR670 V2	Rack-mounted server	Canada	12.3.1	Public disclosure of use of conflict materials in products (corporate)	Required	CAB inaction or delay not attributable to Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance

<i>Document Control and Change History</i>						
<i>Issue</i>	<i>Revision</i>	<i>Owner</i>	<i>Approver</i>	<i>Description</i>	<i>Approval Date</i>	<i>Effective Date</i>
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
2	2	Senior Manager, Ecolabels and Resources	Vice President, Ecolabels and Manufacturer Resources	Updated to reflect new nonconformance category for CAB inaction or delay	2023 Mar 9	2022 Mar 13