EPEAT Program Continuous Monitoring Outcomes Report



Computers and Displays CD-2020-01 April 7, 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 CD-2020-01 conducted for the Computers and Displays category.

2.0 Overview of Continuous Monitoring Round CD-2020-01

2.1 Investigation Activities

As per the published <u>Round Plan</u>, Continuous Monitoring Round CD-2020-01 used Level 2 Investigations (laboratory evaluation of products to determine the products' conformance with specific EPEAT Criteria). GECapproved 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 CD-2020-01 focused on criteria related to the sustainable use of resources. In this Round, laboratories examined the Required Criteria for all products and the Optional Criterion for those products that had selected the Criterion.

Table 1: Criteria Investigated in Round CD-2020-01					
Criteria Number	Criterion Title				
4.3.1.1	Required – Identification of materials and components requiring selective treatment				
4.3.2.1 Required – Plastic parts compatible with recycling					
4.3.2.2	Required – Plastic parts separable for recycling				
4.4.2.1	Required – Removal of external enclosure				
4.4.2.6	Optional – Removal of lithium-ion batteries				
4.7.2.1	Required – Separable packaging material				
4.7.2.2	Required – Plastics marked in packaging materials				

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

Highlights from this Continuous Monitoring Round are:

- 24 investigations completed
- **15** decisions of Conformance
- 2 decisions of Inconclusive
- 7 decisions of Nonconformance Further details provided in Section 4
 - **13** investigations cancelled Products unable to be obtained for testing for reasons other than the product being end-of-life. Investigations to be rescheduled.

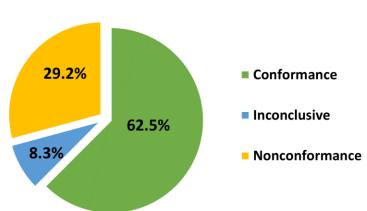


Figure 1: Final Conformity Decisions for CD-2020-01 (shown as percentage of total investigations)

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4.0 Further Details on Nonconformances for CD-2020-01

Criteria Number	Criterion Title	Completed Investigations	Nonconformances	Nonconformance Rate	
4.3.1.1	Identification of materials and components requiring selective treatment	4	1	25%	
4.3.2.1	Plastic parts compatible with recycling	4	2	50%	
4.3.2.2	Plastic parts separable for recycling	4	1	25%	
4.4.2.1	Removal of external enclosure	4	1	25%	
4.7.2.1	Separable packaging	4	1	25%	
4.7.2.2	Plastics marked in packaging materials	4	1	25%	

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

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

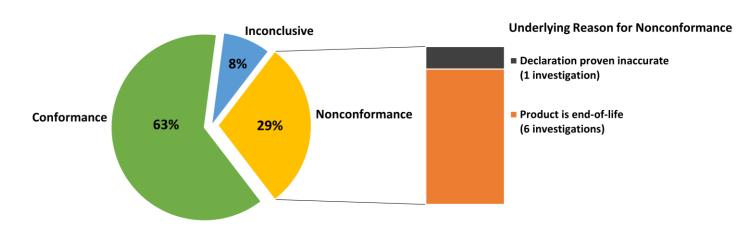


Figure 2: Underlying Reason for Nonconformances in CD-2020-01 (shown as a percentage of total nonconformances)

4.1 Major Versus Minor Nonconformances

All nonconformances must be categorized as either major or minor. 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. Only 1 nonconformance of the 7 total nonconformances was identified as major. The other 6 nonconformances were minor due to the product being end-of-life.

4.2 Major Nonconformances

The major nonconformance in CD-2020-01 pertained to Criterion 4.3.2.1. This Criterion has multiple elements, all of which must be met to demonstrate conformance. These elements are conformance with ISO 11469/1043 plastic material marking codes, removability of metal inserts, and restriction of adhesives, coatings, paints or finishes that are not compatible with recycling.

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 CD-2020-01:

• 7 investigations: Product archived by the Manufacturer, CAB or the EPEAT Program

Table 3 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round CD-2020-01.

6.0 Key Findings

6.1 Archiving End-of-Life Products

Participating Manufacturers are reminded that they are only able to achieve and maintain EPEAT-registration for products that are available on the market. Participating Manufacturers must remove/archive products when the products are end-of-life and no longer offered for sale.

6.2 Conformity Against All Elements of a Criterion

As identified in Section 4.2 of this report, Criterion 4.3.2.1 has multiple elements against which conformance must be shown. Participating Manufacturers should be prepared to show conformance to 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 3: Summary of Major Nonconformances and	Corrections Made by Participating Manufacturers
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Participating Manufacturer	Product	Product Type	Country	Criterion Number	Criterion Title	Required or Optional	Underlying Reason for Nonconformance	Corrective Action Taken
Positivo Tecnologia S.A.	VAIO F15	Notebook	N/A	4.3.2.1	Plastic parts compatible with recycling	Required	Demonstrated nonconformance	Manufacturer archived the
								product

Docume	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			