EPEAT Program Continuous Monitoring Outcomes Report



Computers and Displays CD-2020-02 July 8, 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-2020-02 conducted for the Computers and Displays category.

2.0 Overview of Continuous Monitoring Round CD-2020-02

2.1 Investigation Activities

As per the published <u>Round Plan</u>, Continuous Monitoring Round CD-2020-02 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

Criteria were selected for Continuous Monitoring Round CD-2020-02 based on the positive sustainability impact the Criteria will have when adopted, and the potential to drive change in the sector. Each Participating Manufacturer selecting the Criteria was assigned investigations and products were chosen randomly. Any Participating Manufacturer that received a Major Nonconformance during 2019 Continuous Monitoring activities in the Imaging Equipment category received an additional Investigation in this Round.

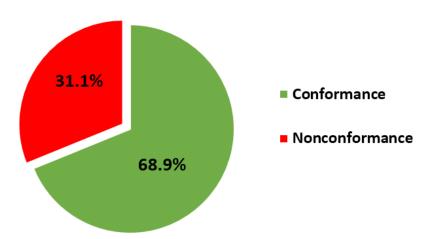
Table 1: Criteria Investigated in Round CD-2020-02							
Criteria Number	Criterion Title						
4.2.1.1	Minimum post-consumer recycled plastic, ITE-derived post-consumer recycled plastic or bio-based plastic content						
4.10.1.1	Socially responsible supplier manufacturing: Labor						

3.0 Summary of Investigations and Final Decisions on Conformity for CD-2020-02

Highlights from this Continuous Monitoring Round are:

- **61** investigations completed
- **42** decisions of Conformance
- **19** decisions of Nonconformance Further details provided in Section 4
- **3** investigations cancelled *Cancelled due to administrative issue.*

Figure 1: Final Conformity Decisions for CD-2020-02 (shown as percentage of total investigations)



4.0 Further Details on Nonconformances for CD-2020-02

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

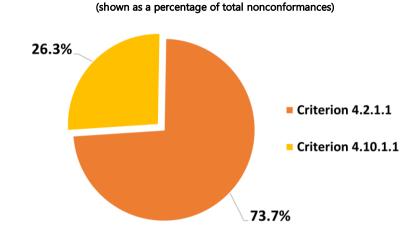
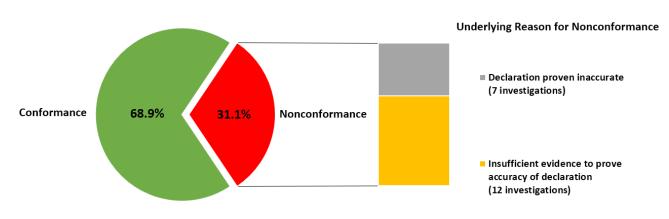
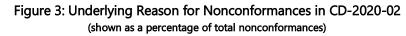


Figure 2: Breakdown of Nonconformances by Criterion for CD-2020-02

Figure 3 provides a further breakdown by the underlying reason for the 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.

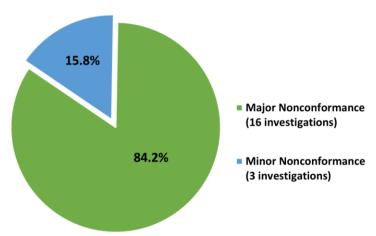


Figure 4: Major versus Minor Nonconformances for CD-2020-02 (shown as a percentage of total nonconformances)

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.

Table 2 provides a breakdown of the minor nonconformances found in Round CD-2020-02.

Criteria Number of Minor Number Nonconformances		Reason for Nonconformances			
4.2.1.1	3	All 3 minor nonconformances were due to a demonstrated nonconformance			
4.10.1.1	0	N/A			

Table 2: Reasons for Minor Nonconformances for CD-2020-02

4.3 Major Nonconformances

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

Criterion 4.2.1.1 requires the product to contain a minimum of 2% of any combination of postconsumer recycled plastic, ITE-derived post-consumer recycled plastic, or bio-based plastic, measured as a percentage of total amount of plastic (by weight) in the product. The verification requirements specifically require supplier letter(s) and a list of parts excluded from the calculation and the reason for their exclusion to support the calculation of content in the product.

There were eight major nonconformances for Criterion 4.2.1.1. Five of these nonconformances were because a supplier letter was not provided to support the content calculation and one nonconformance was because the

supplier letter did not confirm post-consumer recycled content in the plastic. One nonconformance was due to evidence not provided to support a N/A selection for 4.2.1.1 on the EPEAT Registry. For one investigation, the CAB could not link the evidence to the EPEAT-registered product. Lastly, three investigations were nonconformant because evidence did not support a minimum of 2% postconsumer recycled plastic, ITE-derived post-consumer recycled plastic, or bio-based plastic content in the product.

Criterion 4.10.1.1 has multiple criterion elements that must be met to demonstrate conformance. The criterion requires Participating Manufacturers to have publicly available supplier requirements that include all labor provisions identified in the criterion. These requirements must be incorporated into agreements with directly contracted suppliers and require those suppliers to apply the labor provisions to their own directly contracted suppliers. The Participating Manufacturer must conduct a prioritization assessment to determine which supplier facilities are in scope. The prioritization assessment must be conducted annually using one of the methods identified in the criterion and assess a minimum percentage of directly contracted suppliers (either 80% or 95% for 1 or 2 optional points, respectively). In addition, all manufacturer-owned or -leased facilities that produce and assemble the products and the materials, components and parts contained in the products declared to conform to EPEAT Computers and Displays are in scope. All facilities in scope must then be RBA VAP recognized or included in an audit program that meets all criterion requirements (audited a minimum of every two years by qualified auditors). Lastly, the Participating Manufacturer must make an annual public disclosure of a summary of the audit results including information on nonconformities, repeat nonconformities and corrective actions by labor provision and geographic area.

There were 5 major nonconformances for Criterion 4.10.1.1. One nonconformance was due to no evidence being provided. The remainder of nonconformances were due to various elements of the criterion not being addressed. One nonconformance was due to insufficient evidence demonstrating the supplier audit program required audits to be conducted a minimum of every two years. One nonconformance was because supplier requirements were not incorporated into agreements with all directly contracted suppliers and because it was not clear which prioritization method was used. Two nonconformances were due to a number of criterion elements not being addressed, including not ensuring supplier requirements addressed the supplier's next-tier suppliers, not providing the prioritization assessment, not ensuring qualifications of auditors and topics audited in the supplier audit program and inadequate disclosure of audit results.

For Criterion 4.10.1.1, the EPEAT Program understands that RBA has identified the ongoing COVID-19 pandemic as an issue for scheduling audits and this may have caused some assessments to be postponed. RBA has indicated that the expiration date on a current VAP or SVAP is still valid, but are offering flexibility if a facility needs to reschedule.

Figure 5 provides a breakdown of the major nonconformances found in Round CD-2020-02.

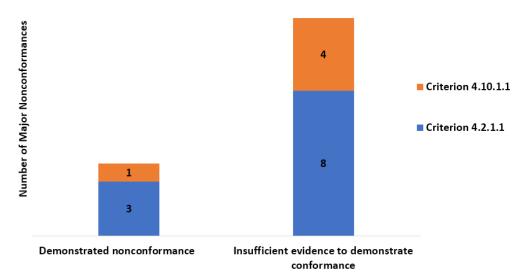


Figure 5: Reasons for Major Nonconformances for CD-2020-02 By Criterion

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-2020-02:

- **14** investigations Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- 2 investigations Participating Manufacturer exited the EPEAT Program
- 1 investigation Product archived by Participating Manufacturer
- **2** investigations Products archived by the CAB or by the EPEAT Program

Table 3 in Section 7 identifies the Participating Manufacturers and products that received major nonconformances in Continuous Monitoring Round CD-2020-02.

6.0 Key Findings

6.1 Providing Necessary Evidence to Support Calculation for Criterion 4.2.1.1

The calculation of postconsumer recycled plastic, ITE-derived post-consumer recycled plastic, or bio-based plastic content, supplier letters to support this calculation and a list of parts excluded from the calculation must all be provided.

The Participating Manufacturer must identify all excluded parts and their reason for exclusion based on the listed acceptable exclusions in the criterion text. The intent is to have all plastics accounted for either in the calculation of recycled content or in the exemptions list. All Investigation Reports should include verification requirement c) and clearly identify what evidence was provided. During this Round, the EPEAT Program found that some Participating Manufacturers forgot to include all exempted parts in the list provided and although this evidence was accepted for this Round, incomplete lists may result in a nonconformance in the future.

The EPEAT Program also identified a training opportunity to train CABs and Participating Manufacturers on how to incorporate fillers into EPEAT's Annex 1 template for calculating recycled or bio-based content.

6.2 Conformity Against All Elements of Criterion 4.10.1.1

Manufacturers are reminded to review all criterion elements for Criterion 4.10.1.1. Participating Manufacturers are reminded to ensure that they have all of the following:

- Publicly available supplier requirements that include all labor provisions identified in the criterion, are incorporated into agreements with directly contracted suppliers and require those suppliers to apply the labor provisions to their own directly contracted suppliers.
- Annual prioritization assessment to determine which supplier facilities are in scope. The prioritization assessment must be conducted using one of the methods identified in the criterion and assess a minimum percentage of directly contracted suppliers (either 80% or 95% for 1 or 2 optional points respectively).
- Evidence that all manufacturer and supplier facilities in scope are RBA VAP recognized or included in an audit program that meets all criterion requirements.
- Annual public disclosure of a summary of the audit results which includes all information identified in the criterion.

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.

Participating Manufacturer	Product	Product Type	Country	Criterion Number	Criterion Title	Required or Optional	Underlying Reason for Nonconformance	Corrective Action Taken
ASUSTeK Computer Inc.	N/A: Corporate Criterion	N/A: Corporate Criterion	N/A: Corporate Criterion	4.10.1.1	Socially responsible supplier manufacturing: Labor	Optional	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
ASUSTeK Computer Inc.	VP348QGL	Monitor	Portugal	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
BenQ	BL2381T, BL2381TE (BL2381T-T)	Monitor	United States	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
BenQ	PD2700U, PD2700UE (PD2700U-B)	Monitor	United States	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
Ciara Tech	Horizon 8275-A	Desktop	Canada	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Demonstrated nonconformance	Participating Manufacturer provided additional evidence demonstrating conformance.
Comercializadora Milenio S.A. de C.V.	Mitsui MLT003	Notebook	Mexico	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Manufacturer exited the EPEAT Program and the products were archived.
Lenovo	ThinkPad T15p Gen 1	Notebook	Canada	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Demonstrated nonconformance	Participating Manufacturer provided additional evidence demonstrating conformance.
Microsoft	N/A: Corporate Criterion	N/A: Corporate Criterion	N/A: Corporate Criterion	4.10.1.1	Socially responsible supplier manufacturing: Labor	Optional	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
Positivo Tecnologia S.A.	MASTER N2140	Notebook	Brazil	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
Samsung	Samsung QM43R	Signage Display	Sweden	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.

Participating Manufacturer	Product	Product Type	Country	Criterion Number	Criterion Title	Required or Optional	Underlying Reason for Nonconformance	Corrective Action Taken
Teknoservice S.L.	N/A: Corporate Criterion	N/A: Corporate Criterion	N/A: Corporate Criterion	4.10.1.1	Socially responsible supplier manufacturing: Labor	Optional	Demonstrated nonconformance	Participating Manufacturer provided additional evidence demonstrating conformance.
TICNOVA QUALITY TEAM	N/A: Corporate Criterion	N/A: Corporate Criterion	N/A: Corporate Criterion	4.10.1.1	Socially responsible supplier manufacturing: Labor	Optional	Insufficient evidence to demonstrate conformance	Product archived by CAB.
TICNOVA QUALITY TEAM	Ticnova DLC E70 SFF	Desktop	Spain	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Demonstrated nonconformance	Product archived by CAB.
ViewSonic	N/A: Corporate Criterion	N/A: Corporate Criterion	N/A: Corporate Criterion	4.10.1.1	Socially responsible supplier manufacturing: Labor	Optional	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
ViewSonic	ViewSonic / VS16453 / TD2230	Monitor	Canada	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.
Zebra Technologies	Zebra L10 Rugged Tablets (XPAD, XSLATE, XBOOK)	Tablet / Slate	United States	4.2.1.1	Minimum post-consumer recycled plastic, ITE- derived post-consumer recycled plastic or bio- based plastic content	Required	Insufficient evidence to demonstrate conformance	Participating Manufacturer provided additional evidence demonstrating conformance.

Document Control and Change History									
Issue	Revision	Owner	Approver	Description	Approval Date	Effective Date			
1	0	EPEAT Conformity	Director, EPEAT	Initial release					
		Assurance Manager	Program						
1	1	EPEAT Conformity	Director, EPEAT		2018 Dec 11	2018 Dec 11			
		Assurance Manager	Program						
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			