

# EPEAT Program

## Continuous Monitoring Outcomes Report



Computers and Displays  
CD-2022-04  
March 27, 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 CD-2022-04 conducted for the Computers and Displays category.

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

#### 2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round CD-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 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 was required, and two were Optional, Participating Manufacturers received up to three 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.

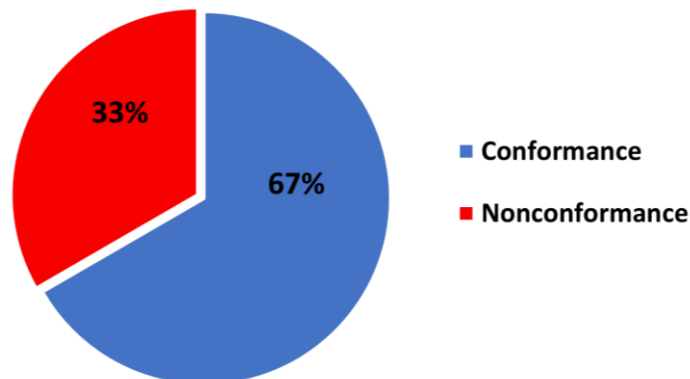
Table 1: Criteria Investigated in Round CD-2022-04	
Criteria Number	Criterion Title
4.8.2.2	Corporate Greenhouse Gas emissions from product transport
4.9.2.1	Corporate environmental performance reporting by manufacturer
4.10.1.2	Corporate socially responsible manufacturing: OHS

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

Highlights from this Continuous Monitoring Round are:

- **51** investigations completed
- **34** decisions of Conformance
- **17** decisions of Nonconformance *Further details provided in Section 4. Of these 17 nonconformances, seven were due to CAB failure to submit an Investigation Report.*

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



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

Figure 2 below provides a further breakdown of the nonconformances by Criterion. The EPEAT Program recognizes two types of nonconformances: nonconformance, and nonconformance due to CAB inaction or delay not attributable to the Participating Manufacturer.

**Figure 2: Breakdown of Nonconformances by Criterion for CD-2022-04**  
(shown as a percentage of total nonconformances)

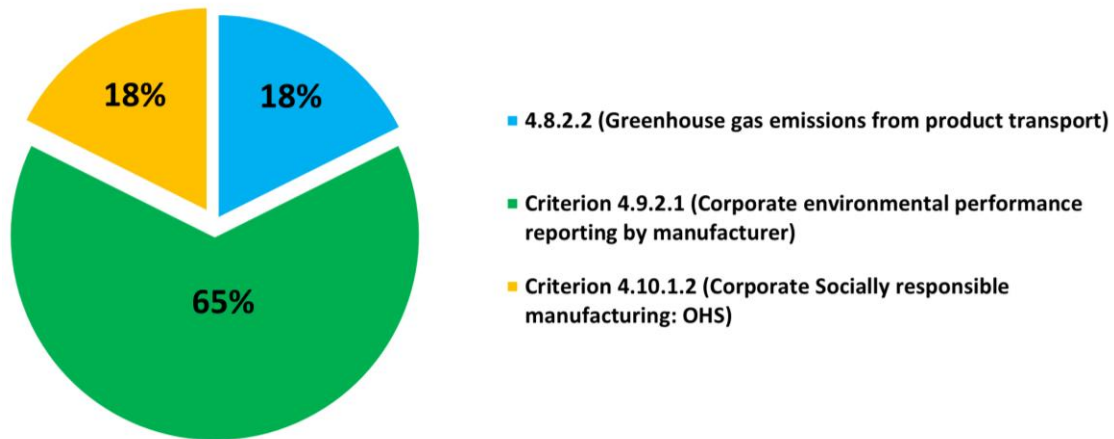
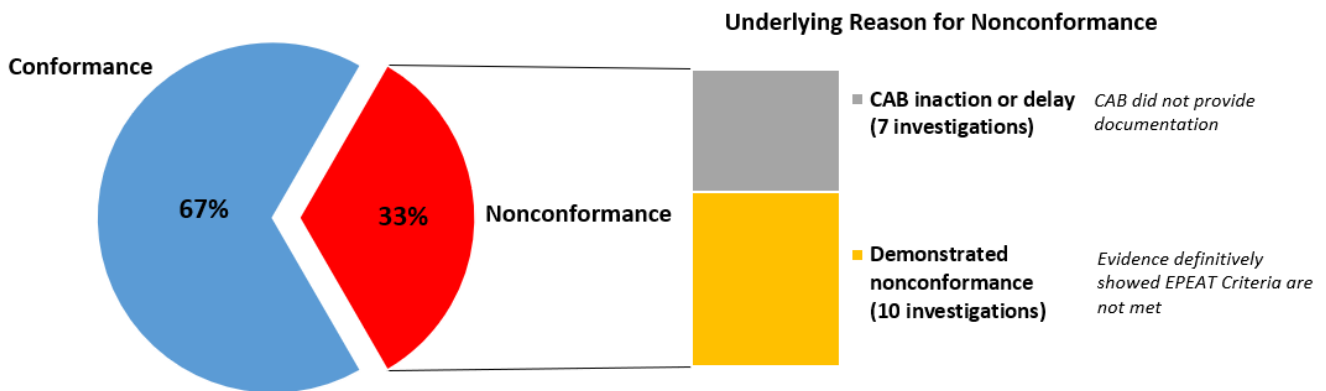


Figure 3 provides a further breakdown by the underlying reason for the nonconformances.

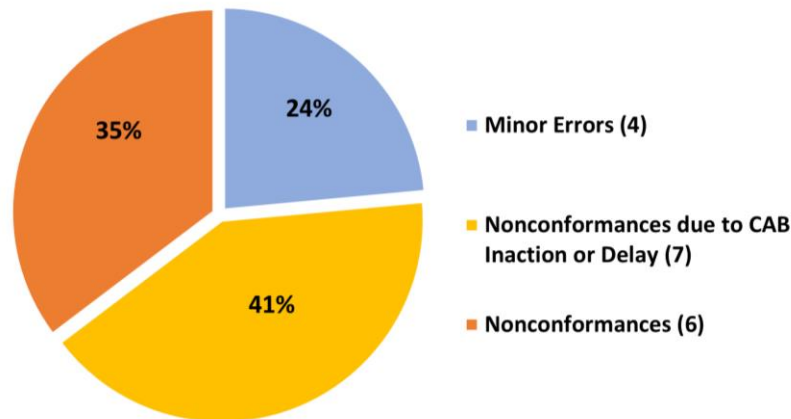
**Figure 3: Underlying Reason for Nonconformances in CD-2022-04**  
(shown as a percentage of total nonconformances)



## 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).

**Figure 4: Minor Error versus Nonconformances for CD-2022-04**  
(shown as a percentage of total 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.

All minor errors found in Round CD-2022-04 were demonstrated nonconformances.

## 4.3 Nonconformances

In Continuous Monitoring Round CD-2022-04, seven nonconformances were due to CAB inaction or delay not attributable to the Participating Manufacturer, while the remaining ten nonconformances were demonstrated nonconformances. Demonstrated nonconformances were found for all three selected Criteria. Each Criterion selected for this Round has multiple Criterion elements that must be met to demonstrate conformance. Further information on these Criteria can be found in Section 6, Key Findings.

## 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 CD-2022-04:

- **9 investigations**      Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- **1 investigation**      Product archived by the CAB or by the EPEAT Program
- **7 investigations**      CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance

Table 2 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round CD-2022-04.

## 6.0 Key Findings

### 6.1 Conformance with all Elements of Criterion 4.10.1.2

Participating Manufacturers are reminded to ensure that they meet all elements of this Criterion, including: ensuring supplier requirements are incorporated into agreements with directly contracted suppliers, including language requiring suppliers to apply requirements to their own directly contracted suppliers; that the prioritization assessment to determine supplier facilities in scope is performed annually and providing the assessment; providing evidence to demonstrate that all facilities in scope meet the criterion requirements; and ensuring the annual public disclosure is updated annually.

### 6.2 Third-Party Assurance of Environmental Data for Criterion 4.9.2.1

Participating Manufacturers are reminded to ensure that the independent third-party assurance for Criterion 4.9.2.1 Required—Corporate environmental performance reporting by manufacturer, verifies each environmental aspect, including water, energy and greenhouse gas emissions.

### 6.3 Conformance with all Elements of Criterion 4.8.2.2

Participating Manufacturers are reminded to ensure they address all elements of Optional Criterion 4.8.2.2—Greenhouse gas emissions from product transport. 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 location of the purchaser, 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.

In addition, Participating Manufacturers must demonstrate that they have used one or more of the approaches identified in the Criterion. The emissions reduction goal must be specific to greenhouse gas emissions from product transport.

## 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 2: 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
Apple	Apple MacBook Air	Notebook	United States	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer, which demonstrated conformance
Apple	Apple Mac Studio	Desktop	Canada	4.10.1.2	Corporate Socially responsible manufacturing: OHS	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer, which demonstrated conformance
Apple	Apple 12.9-inch iPad Pro Wi-Fi + Cellular	Tablet / Slate	Canada	4.8.2.2	Greenhouse gas emissions from product transport	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer, which demonstrated conformance
BenQ	GW2283,GW2283E (GW2280-T)	Monitor	Germany	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	Demonstrated nonconformance	EPEAT archived products
Dynabook Americas	dynabook Portege X40-G PMR41E	Notebook	France	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer, which demonstrated conformance
Dynabook Americas	TECRA A40-J PMM11	Notebook	United Kingdom	4.10.1.2	Corporate Socially responsible manufacturing: OHS	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer, which demonstrated conformance
Dynabook Americas	SATELLITE PRO C40-J	Notebook	Canada	4.8.2.2	Greenhouse gas emissions from product transport	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer, which demonstrated conformance
Google	Google Pixelbook Go Model G021A	Notebook	United States	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturer, which demonstrated conformance
HP	HP t240 Thin Client	Thin Client	Sweden	4.8.2.2	Greenhouse gas emissions from product transport	Optional	Demonstrated nonconformance	Participating Manufacturer submitted evidence demonstrating conformance
Hyundai IT America Tech Corp.	HYUNDAI R227DPN	Monitor	United States	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	Demonstrated nonconformance	Participating Manufacturer submitted evidence demonstrating conformance
IGEL Technology	UD3 M350C	Thin Client	United States	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	Demonstrated nonconformance	Participating Manufacturer submitted evidence demonstrating conformance
Viewsonic	ViewSonic / VS17380 / VP2768-4K	Monitor	Canada	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	Demonstrated nonconformance	Participating Manufacturer submitted evidence demonstrating conformance

Zebra	Zebra ET51 Enterprise Rugged Tablet WLAN (8")	Tablet/ slate	United States	4.9.2.1	Corporate environmental performance reporting by manufacturer	Required	Demonstrated nonconformance	Participating Manufacturer submitted evidence demonstrating conformance
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<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	<i>EPEAT Conformity Assurance Manager</i>	<i>Director, EPEAT Program</i>	<i>Initial release</i>		
1	1	<i>EPEAT Conformity Assurance Manager</i>	<i>Director, EPEAT Program</i>		<i>2018 Dec 11</i>	<i>2018 Dec 11</i>
2	0	<i>Senior Manager, Ecolabels and Resources</i>	<i>Senior Director, Ecolabels and Manufacturer Resources</i>	<i>Reformatting of document. Addition of standardized text.</i>	<i>2021 Mar 25</i>	<i>2021 Mar 30</i>
2	1	<i>Senior Manager, Ecolabels and Resources</i>	<i>Vice President, Ecolabels and Manufacturer Resources</i>	<i>Updated terminology for nonconformances to include "nonconformances" and "minor errors", in alignment with revisions to P66.</i>	<i>2022 Sep 15</i>	<i>2022 Sep 30</i>
2	2	<i>Senior Manager, Ecolabels and Resources</i>	<i>Vice President, Ecolabels and Manufacturer Resources</i>	<i>Updated to reflect new nonconformance category for CAB inaction or delay</i>	<i>2023 Mar 9</i>	<i>2022 Mar 13</i>