

# EPEAT Program

## Continuous Monitoring Round Plan



Imaging Equipment  
IE-2022-04  
May 30, 2022

### 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.

This document contains the individual plan for Continuous Monitoring Round IE-2022-04.

### Continuous Monitoring Round IE-2022-04 Investigation Activities

Continuous Monitoring Round IE-2022-04 will use documentation review to determine the conformance of products with specific EPEAT Criteria. The EPEAT Program assigns specific products and EPEAT Criteria for evaluation to GEC-approved CABs. Participating Manufacturers have a discrete time period in which they must provide evidence that supports conformance with the selected criteria. GEC-approved CABs review the documentation, make recommendations on conformity based solely on the evidence provided by Participating Manufacturers, and send Investigation Reports to the EPEAT Program, which makes the final decisions on conformity.

### Continuous Monitoring Round IE-2022-04 Criteria and Product Selection

Continuous Monitoring Round IE-2022-04 is 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.

Overview of Criteria and Products Selected	
Product Category	Imaging Equipment
Number of Products Selected	24
Criteria Selected	4.7.2.2— Public disclosure of supply chain toxics 4.9.3.1— Provision of take-back and end-of-life management for cartridges and containers

## Continuous Monitoring Round IE-2022-04 Schedule

Phase of Round	Date
<b>Preparation Phase</b>	
CABs notified of Round schedule and activities by EPEAT	May 23, 2022
CABs receive Round assignments and materials from EPEAT	May 30, 2022
Week of Round Training for CABs	Week of June 13
<b>Investigation Phase (CABs performing investigations)</b>	
Investigative period begins	June 20, 2022
Investigative period ends	August 19, 2022
Deadline for CAB submission of Investigation Reports to EPEAT	September 2, 2022
<b>Deliberation Phase (EPEAT making conformity decisions)</b>	
Deliberation period begins	September 3, 2022
CABs receive Investigation Reports with final conformity decisions from EPEAT	October 18, 2022
<b>Corrective Action Phase (Participating Manufacturers restoring accuracy of EPEAT Registry)</b>	
Corrective action period begins	October 25, 2022
Corrective action period ends	November 24, 2022
Deadline for CAB submission of corrective action reports to EPEAT	December 8, 2022
CABs receive final Investigation Reports with correction decisions from EPEAT	December 16, 2022
<b>Reporting Phase</b>	
Outcomes Report published	January 13, 2023

## Process Details – Continuous Monitoring Using Documentation Review

Continuous Monitoring Rounds that use documentation review activities are conducted in accordance with EPEAT Policy Manual (P65) and EPEAT Conformity Assurance Implementation Manual (also called EPEAT Requirements of CABs and Conformity Assurance Procedures) (P66) in effect at the time of the Round.

- The EPEAT Program downloads a list of all active EPEAT-registered products, select products from the list for investigation and assigns EPEAT Criteria to products, as per the Round Plan.

- GEC-approved CABs receive the list of products and EPEAT Criteria selected for their Participating Manufacturer clients but do not yet notify the Participating Manufacturers of the imminent investigations.
- The EPEAT Program publishes the Round Plan on the start date of the Round.
- On the start date of the Round, GEC-approved CABs notify the Participating Manufacturers that their products have been selected for investigation and begin the evidence collection process.
- Participating Manufacturers have a discrete time period in which they must provide evidence that supports conformance with the selected criteria.
- GEC-approved CABs review the documentation, make recommendations on conformity based solely on the evidence provided by Participating Manufacturers, and prepare an Investigation Report for each product.
- GEC-approved CABs submit the Investigation Reports to the EPEAT Program. At the same time, CABs forward these same Reports to the Participating Manufacturers.
- The EPEAT Program reviews Investigation Reports and makes the final decisions on conformity. The EPEAT Program then sends the Investigation Reports back to the GEC-approved CABs.
- GEC-approved CABs send the Investigation Reports with the final decision on conformity to the Participating Manufacturers.
- For decisions of nonconformance, Participating Manufacturers must make corrections within 30 calendar days to restore the accuracy of the EPEAT Registry.
- The EPEAT Program publishes an Outcomes Report identifying the nonconforming products and Participating Manufacturers, as well as the actions taken to restore accuracy of the EPEAT Registry.

<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	Senior Manager, Ecolabels and Resources	Director, EPEAT Program	Initial release	2020 Aug 20	2020 Aug 23
1	1	Senior Manager, Ecolabels and Resources	Senior Director, Ecolabels and Manufacturer Resources	Updates throughout to match revisions to P66. Addition of Preparation Phase to schedule table.	2021 Feb 22	2021 Feb 26