EPEAT ProgramContinuous Monitoring Outcomes Report



Imaging Equipment IE-2022-01 May 23, 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 IE-2022-01 conducted for the Imaging Equipment category.

2.0 Overview of Continuous Monitoring Round IE-2022-01

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round IE-2022-01 used Level 2 Investigations (laboratory evaluation of products to determine the products' conformance with specific EPEAT Criteria). GEC-approved 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 IE-2022-01 focused on circularity and the sustainable use of resources. The unsustainable use of resources has triggered raw material scarcities, contributed to climate change, and caused widespread environmental degradation, while also negatively impacting human health.

Sustainable use of resources to enable a circular economy is increasingly a priority for governments, institutional purchasers, and manufacturers around the globe. Institutional purchasers in both the public and private sectors are interested in procuring products and services that further sustainable consumption and production, and for these reasons, GEC identified Criteria which contribute to these goals for laboratory investigation in 2022. Products were randomly selected (using a random number generator) from a list of Participating Manufacturers. Each product was investigated for the Criteria identified in the table below, however if a product had not selected a Criterion, that Criterion was not investigated.

Table 1: Criteria Investigated in Round IE-2022-01					
Criteria Number	Criterion Title				
4.3.1.1	Ease of disassembly of product				
4.3.1.2	Ease of disassembly of consumer products				
4.3.2.1	Use of single recyclable plastic type per plastic				
4.3.2.2	Restriction on materials not compatible with reuse and recycling				
4.3.2.3	Manual separation of marking of plastics				
4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs				
4.8.2.3	Plastics marked in packaging materials				

3.0 Summary of Investigations and Final Decisions on Conformity for IE-2022-01

Highlights from this Continuous Monitoring Round are:

- 18 investigations completed
- **9** decisions of Conformance
- 1 decision of Inconclusive
- 8 decisions of Nonconformance Further details provided in Section 4

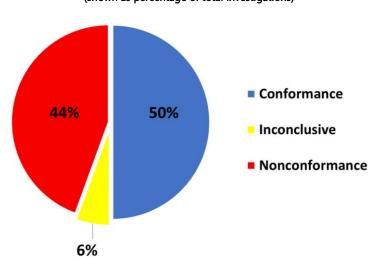


Figure 1: Final Conformity Decisions for IE-2022-01 (shown as percentage of total investigations)

4.0 Further Details on Nonconformances for IE-2022-01

Table 2 below provides a 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 IE-2022-01								
Criteria Number	a Number Criterion Title		Nonconformances	Nonconformance Rate				
4.3.1.1	Ease of disassembly of product	3	1	33%				
4.3.2.3	Manual separation and marking of plastics	3	3	100%				
4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	3	3	100%				
4.8.2.3	Plastics marked in packaging materials	3	1	33%				

All nonconformances were demonstrated nonconformances, which means evidence definitively showed that EPEAT Criteria were not met.

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. For Level 2 Investigations, nonconformances may be categorized as minor errors 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 errors are categorized as nonconformances (unless they are due to CAB inaction or delay).

No minor errors were identified in Continuous Monitoring Round IE-2022-01.

4.2 Nonconformances

All eight nonconformances were demonstrated nonconformances, which means evidence definitively showed that EPEAT Criteria were not met.

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 IE-2022-01:

• **3** investigations Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion

5 investigations Product archived by Participating Manufacturer

Table 3 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round IE-2022-01.

6.0 Key Findings

6.1 4.3.2.1 Required—Use of single recyclable plastic type per plastic part

Required Criterion 4.3.2.1—Use of single recyclable plastic type per plastic part, requires each plastic part >100 g to consist of only one recyclable plastic type. Unlike other product categories, such as Computers and Displays, the Imaging Equipment category does not reference Annex C in ECMA-341 Design Considerations for ICT and CE Products, 4th Edition / December 2010. Therefore, several investigations for Criterion 4.3.2.1 were determined to be inconclusive as opposed to either conformant or nonconformant, following ECMA-341. The EPEAT Program reserves the right to follow up on these inconclusive investigations at a later date.

6.2 Reminder to Check Plastic Marking Codes

Participating Manufacturers are reminded to ensure all discrete plastic parts >100g in the product (that are not exempted in Criterion 4.3.2.3 (Required — Manual separation and marking of plastics) are clearly marked with material type in accordance with ISO 11469/1043. This includes ensuring accurate marking codes for fillers, plasticizers and flame retardants, and that all marking nomenclature is followed. Similarly, Participating Manufacturers are reminded to ensure all plastic packaging components that are not exempt in Criterion 4.8.2.3—(Plastics marked in packaging materials), are marked by a protocol for resin identification.

Review EU WEEE Directive Annex VII Components Applicable to Registered Products Participating Manufacturers are reminded to ensure that information made available to reuse and recycling facilities identifies the presence and location of all materials and components requiring selective treatment listed in Annex VII of the European WEEE Directive, Directive 2012/19/EU of the European Parliament and of the Council on waste electrical and electronic equipment (WEEE) and subsequent updates.

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.

Participating Manufacturer	Product	Product Type	Country	Criterion Number	Criterion Title	Required or Optional	Underlying Reason for Nonconformance	Corrective Action Taken
Epson	Epson WF-C17590	Multifunction Device	United States	4.3.2.3	Manual separation and marking of plastics	Required	Demonstrated nonconformance	Manufacturer archived the product
Epson	Epson WF-C17590	Multifunction Device	United States	4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	Required	Demonstrated nonconformance	Manufacturer archived the product
Epson	Epson WF-C17590	Multifunction Device	United States	4.8.2.3	Plastics marked in packaging materials	Required	Demonstrated nonconformance	Manufacturer archived the product
Konica Minolta	Konica Minolta bizhub 4402P	Printer	United States	4.3.2.3	Manual separation and marking of plastics	Required	Demonstrated nonconformance	Manufacturer archived the product
Konica Minolta	Konica Minolta bizhub 4402P	Printer	United States	4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	Required	Demonstrated nonconformance	Manufacturer archived the product
Sharp	SHARP MX-B467F	Multifunction Device	United States	4.3.1.1	Ease of disassembly of product	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
Sharp	SHARP MX-B467F	Multifunction Device	United States	4.3.2.3	Manual separation and marking of plastics	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
Sharp	SHARP MX-B467F	Multifunction Device	United States	4.3.3.1	Notification regarding the identification of both materials and components that have hazardous characteristics or special handling needs	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance

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		
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 24	2023 Mar 24		