

EPEAT Program

Continuous Monitoring Outcomes Report



Imaging Equipment
IE-2024-03
March 19, 2025

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-2024-03 conducted for the Imaging Equipment category.

2.0 Overview of Continuous Monitoring Round IE-2024-03

2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round IE-2024-03 used Level 0 Investigations, which involve reviewing publicly available information to determine Participating Manufacturers' conformance with specific EPEAT Criteria. GEC-approved CABs had a discrete time period to locate and review publicly available information to determine conformance with EPEAT Criteria selected for investigation. CABs then made recommendations on conformity based solely on the publicly available evidence, 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 IE-2024-03 focused only on Climate Change Mitigation Criteria that have requirements to make information publicly available. EPEAT launched the Climate+ designation in September 2023, and this Round focused solely on investigating Climate Criteria that Participating Manufacturers must meet to obtain the Climate+ designation.

Participating Manufacturers that obtained the Climate+ designation received two investigations. Products for investigation were selected randomly using a random number generator.

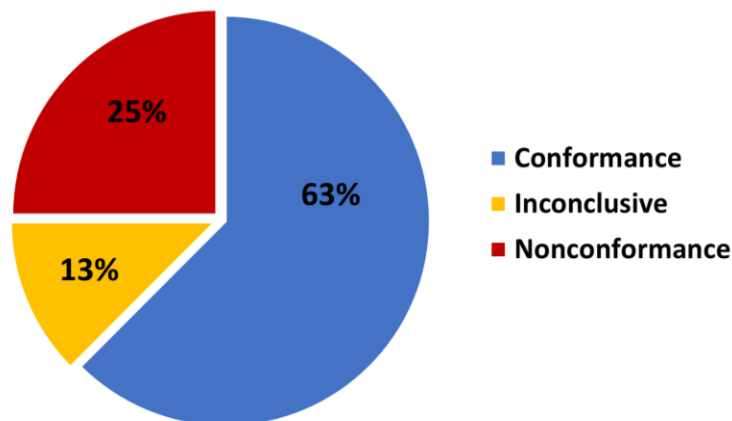
Table 1: Criteria Investigated in Round IE-2024-03	
Criteria Number	Criterion Title
Climate Change Mitigation Criterion 4.1.1	Product carbon footprint disclosure and assurance
Climate Change Mitigation Criterion 4.1.2	Corporate GHG inventory

3.0 Summary of Investigations and Final Decisions on Conformity for IE-2024-03

Highlights from this Continuous Monitoring Round are:

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

Figure 1: Final Conformity Decisions for IE-2024-03
(shown as percentage of total investigations)



Note: For inconclusive findings, the EPEAT Program may require the CAB to investigate the same Criterion in a subsequent Level 1 Round to definitively determine conformance.

4.0 Further Details on Nonconformances for IE-2024-03

Table 2 below provides a further 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.

Criteria Number	Criterion Title	Total Nonconformances
Climate Change Mitigation Criterion 4.1.1	Product carbon footprint disclosure and assurance	2

Both nonconformances were demonstrated 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).

No minor errors were identified in this Round.

4.2 Nonconformances

All nonconformances in this Round were demonstrated nonconformances, which means that evidence definitively proved the criterion was 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-2024-03:

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

Table 3 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round IE-2024-03.

6.0 Key Findings

6.1 URL to the Disclosure of the Product Carbon Footprint

Participating Manufacturers are reminded to ensure that URLs disclosed in the EPEAT Registry remain up to date and that product carbon footprints are available covering all products selecting this criterion.

Disclosures must also include the GHG emissions or the carbon footprint of the product's life cycle stages as well as the product's total life cycle carbon footprint.

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 3: 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
Lexmark	CS531dw, CS632dwe, C2335	Printer	United States	CCM 4.1.1	Product carbon footprint disclosure and assurance	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance
HP	HP Color LaserJet Enterprise Flow MFP X677z+	Printer	United States	CCM 4.1.1	Product carbon footprint disclosure and assurance	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance

<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	Vice President, Ecolabels and Manufacturer Resources	Initial release	18 Apr 23	19 Apr 23