

# EPEAT Program

## Continuous Monitoring Round Plan



Imaging Equipment  
IE-2024-03  
August 30, 2024

### 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 CD-2024-03.

### Continuous Monitoring Round IE-2024-03 Investigation Activities

Continuous Monitoring Round IE-2024-03 will rely exclusively on publicly available information 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. CABs then have a discrete time period in which they conduct the investigations, make recommendations on conformity based solely on publicly available evidence, and send Investigation Reports to the EPEAT Program, which makes the final decisions on conformity.

### Continuous Monitoring Round IE-2024-03 Criteria and Product Selection

Continuous Monitoring Round IE-2024-03 will focus 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 is focused solely on investigating Climate Criteria that Participating Manufacturers must meet to obtain the Climate+ designation.

Participating Manufacturers that have obtained the Climate+ designation received two investigations. 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	8
Criteria Selected	Climate Change Mitigation Criterion 4.1.1—Product carbon footprint disclosure and assurance Climate Change Mitigation Criterion 4.1.2—Corporate GHG inventory

## Continuous Monitoring Round CD-2024-03 Schedule

Phase of Round	Date
<b>Preparation Phase</b>	
CABs notified of Round schedule and activities by EPEAT	September 2 2024
CABs receive Round assignments and materials from EPEAT	September 9, 2024
Week of Round Training for CABs	Week of September 23
<b>Investigation Phase (CABs performing investigations)</b>	
Investigative period begins	September 30, 2024
Investigative period ends	October 14, 2024
Deadline for CAB submission of Investigation Reports to EPEAT	October 28, 2024
<b>Deliberation Phase (EPEAT making conformity decisions)</b>	
Deliberation period begins	October 29, 2024
CABs receive Investigation Reports with final conformity decisions from EPEAT	December 13, 2024
<b>Corrective Action Phase (Participating Manufacturers restoring accuracy of EPEAT Registry)</b>	
Corrective action period begins	January 6, 2025
Corrective action period ends	February 5, 2025
Deadline for CAB submission of corrective action reports to EPEAT	February 19, 2025
CABs receive final Investigation Reports with correction decisions from EPEAT	March 5, 2025
<b>Reporting Phase</b>	
Outcomes Report published	March 19, 2025

## Process Details – Continuous Monitoring Using Publicly Available Information

Continuous Monitoring Rounds that use publicly available information (called Level 0 Rounds), are conducted in accordance with *EPEAT Policy Manual (P65)* and *EPEAT Conformity Assurance Implementation Manual (P66)* in effect at the time of the Round.

- The EPEAT Program downloads a list of all active EPEAT-registered products, selects 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 notify** the Participating Manufacturers of the imminent investigations.

- On the start date of the Round, **GEC-approved CABs are not permitted to notify the Participating Manufacturers that their products have been selected for investigation.**
- GEC-approved CABs have a discrete time period in which they must review publicly available evidence that supports conformance with the selected Criteria and prepare an Investigation Report for each product.
- GEC-approved CABs make recommendations on conformity based solely on publicly available information. CABs are not permitted to request additional information or clarification from Participating Manufacturers, or inform them that their products have been selected for investigation until the Corrective Action Period begins.
- GEC-approved CABs submit the Investigation Reports to the EPEAT Program. For Level 0 investigations, CABs are NOT permitted to forward the Investigation Report to Participating Manufacturers until after the EPEAT Program makes the final conformity decision.
- 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.
- The EPEAT Program publishes the Round Plan on the date that the Corrective Action period begins.
- For decisions of nonconformance, Participating Manufacturers must make corrections within 30 calendar days to restore the accuracy of the EPEAT Registry. For decisions of ‘inconclusive’, the EPEAT Program may require the CAB to investigate the same Criterion in a subsequent Round to definitively determine conformance.
- 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	Vice President, Ecolabels and Manufacturer Resources	Initial release	2023 Feb 13	2023 Feb 13