

# EPEAT Program

## Continuous Monitoring Outcomes Report



Mobile Phones  
MP-2022-04  
March 20, 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 MP-2022-04 conducted for the Mobile Phones category.

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

#### 2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round MP-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 MP-2022-04 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.

**Table 1: Criteria Investigated in Round MP-2022-04**

Criteria Number	Criterion Title
13.1.1	Corporate sustainability (CS) reporting
13.2.1	Corporate sustainability (CS) reporting in the supply chain

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

Highlights from this Continuous Monitoring Round are:

- 7 investigations completed
- 7 decisions of Nonconformance *Further details provided in Section 4. All seven nonconformances were due to CAB inaction or delay not attributable to the Participating Manufacturer.*

100% of the final conformity decisions were nonconformances due to CAB failure to submit the Investigation Report.

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

The EPEAT Program recognizes two types of nonconformances: nonconformance, and nonconformance due to CAB inaction or delay not attributable to the Participating Manufacturer. All nonconformances in this Round were due to CAB inaction or delay.

Table 2 below provides a further breakdown of the nonconformances by Criterion.

**Table 2: Breakdown of Nonconformances by Criterion for MP-2022-04**

Criteria Number	Criterion Title	Total Nonconformances
13.1.1	Corporate sustainability (CS) reporting	3
13.2.1	Corporate sustainability (CS) reporting in the supply chain	4

### 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).

All nonconformances in Continuous Monitoring Round MP-2022-04 were nonconformances due to CAB inaction or delay not attributable to the Participating Manufacturer.

## 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.

There were no minor errors found in Round MP-2022-04.

## 4.3 Nonconformances

All nonconformances in Continuous Monitoring Round MP-2022-04 were nonconformances due to CAB inaction or delay not attributable to the Participating Manufacturer, because the CAB failed to submit the Investigation Report.

## 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 MP-2022-04:

- **7** investigations      CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance

Table 3 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round MP-2022-04.

## 6.0 Key Findings

### 6.1 13.1.1 Corporate Sustainability Reporting Reminders

Participating Manufacturers are reminded to ensure reporting includes all required elements of the criterion, including:

- a. Statement of scope and boundaries.
- b. Statement of manufacturer's governance, commitments, and engagement including stakeholder engagement and external initiatives.
- c. Topics determined to be material by the manufacturer, which may include examples from the Criterion.

### 6.2 13.2.1 Corporate Sustainability (CS) Reporting in the Supply Chain Reminders

Disclosures must be published on at least an every other year basis, in accordance with the GRI Standards that are in effect at the time the disclosures are made.

## 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
Apple	Apple iPhone 13	Mobile Phone	Canada	13.1.1	Corporate sustainability (CS) reporting	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Apple	Apple iPhone SE	Mobile Phone	Canada	13.2.1	Corporate sustainability (CS) reporting in the supply chain	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Google	Google Pixel 4	Mobile Phone	United States	13.1.1	Corporate sustainability (CS) reporting	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Google	Pixel 6	Mobile Phone	United States	13.2.1	Corporate sustainability (CS) reporting in the supply chain	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Microsoft	Surface Duo 2	Mobile Phone	United States	13.1.1	Corporate sustainability (CS) reporting	Required	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Microsoft	Surface Duo 2	Mobile Phone	United States	13.2.1	Corporate sustainability (CS) reporting in the supply chain	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated conformance
Samsung	Galaxy S20 5G / SM-G981U (Sprint)	Mobile Phone	United States	13.2.1	Corporate sustainability (CS) reporting in the supply chain	Optional	CAB inaction or delay not attributable to the Participating Manufacturer	CAB reviewed evidence originally submitted by Participating Manufacturers, which demonstrated 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	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 9	2022 Mar 13