

EPEAT Program

Continuous Monitoring Outcomes Report



Photovoltaic Modules and Inverters
PV-2022-01
June 6, 2022

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 major nonconformances and the actions taken to restore accuracy of the EPEAT Registry.

This document summarizes the activities and results of Continuous Monitoring Round PV-2022-01 conducted for the Photovoltaic Module and Inverter category.

2.0 Overview of Continuous Monitoring Round PV-2022-01

2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round PV-2022-01 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 PV-2022-01 focused on climate change. Climate change is creating irreversible damage to the planet and threatening conditions for all life on earth—extreme temperatures and weather conditions, rising sea levels, melting ice caps, and loss of biodiversity have already been documented as a result of climate change. The primary contributor to climate change is the release of greenhouse gases into the atmosphere from the use of fossil fuels for electricity generation and other energy needs. The majority of greenhouse gas emissions from the electronics industry are often attributed to the supply chain, which includes raw materials mining, manufacture, and assembly of electronic components, as well as transportation of the finished product. Additionally, the electricity consumed to power electronic products contributes significantly to climate change as well. As a result, GEC selected Criteria which address these issues for investigation in this Round. The products for investigation were selected randomly using a random number generator.

Table 1: Criteria Investigated in Round PV-2022-01

Criteria Number	Criterion Title
5.2.5	Avoidance or reduction of high global warming potential (GWP) gas emissions
11.2.2	Reporting on additional key performance indicators

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

Highlights from this Continuous Monitoring Round are:

- 2 investigations completed
- 2 decisions of Conformance

4.0 Further Details on Nonconformances for PV-2022-01

All nonconformances must be categorized as either major or minor. Minor Nonconformances 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 are categorized as major.

There were no nonconformances of any kind identified in Continuous Monitoring Round PVMI-2022-01.

5.0 Actions to Restore Conformance

Where the final conformity decision is nonconformance (whether major or minor), 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”).

Since no nonconformances were identified in this Round, no corrective actions were taken.

6.0 Key Findings

6.1 Clarification of High Global Warming Potential Gases for Criterion 5.2.5

The EPEAT Program has previously clarified in the Conformity Guidance Materials for this criterion that due to no definition of high-GWP gases being included in the criterion or Appendix 8.A of the IPCC 5th Assessment report, at this time, N₂O and all F-GHG gases listed in the IPCC 5th Assessment Report, are considered in scope for this criterion. F-GHGs in Table 8.A.1 of the IPCC 5th Assessment report include: Chlorofluorocarbons, Hydrochlorofluorocarbons, Hydrofluorocarbons and Fully Fluorinated Species

6.2 Variation Between Key Performance Indicators Referenced in 11.2.2 and GRI

The EPEAT Program has noted that the referenced key performance indicators in GRI Standards have changed compared to the table in Criterion 11.2.2. GRI standards sections 303-2 and 303-3 no longer match Table 11.2 “water withdrawn in water stressed areas” and “water recycled and reused” respectively. Manufacturers must disclose the key performance indicators identified in Table 11.2, even if the reference in GRI, SASB or SEIA has changed. This includes disclosing water withdrawn in water stressed areas (instead now required as part of GRI 303-3) if the manufacturer chooses to include this indicator. This also includes disclosing water recycled and reused transparently, even if no longer included as part of GRI 303-3, if this indicator from Table 11.2 is chosen by the Participating Manufacturer.

<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