

# EPEAT Program

## Continuous Monitoring Outcomes Report



Photovoltaic Modules and Inverters

PV-2024-01

August 9, 2024

### 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 PV-2024-01 conducted for the photovoltaic modules and inverters product category.

### 2.0 Overview of Continuous Monitoring Round PV-2024-01

#### 2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round PV-2024-01 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 PV-2024-01 focused exclusively on criteria that can be evaluated using publicly available information. While the EPEAT Program generally tries to focus on a specific impact or issue area in selecting criteria for investigation, the focus in this Round was instead on criteria which have requirements to make information publicly available.

Participating Manufacturers received up to three investigations: two of the criteria selected for investigation were Required Criteria, and one was an Optional Criterion. As a result, all Participating Manufacturers received at least two investigations, and a third investigation was assigned if the manufacturer had selected the Optional Criterion. Products for investigation were selected randomly using a random number generator.

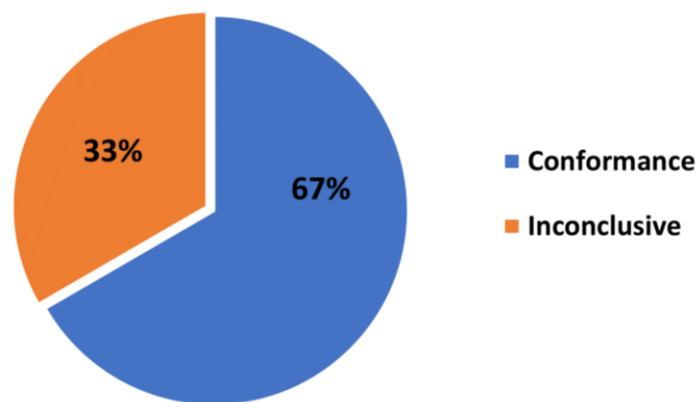
| Table 1: Criteria Investigated in Round PV-2024-01 |   |
|--|---|
| Criteria Number                                    | Criterion Title                                       |
| 7.2.1  | Environmental hot spot identification                 |
| 9.1.1  | Product take-back service and processing requirements |
| 11.2.1   | Reporting on key performance indicators               |

## 3.0 Summary of Investigations and Final Decisions on Conformity for PV-2024-01

Highlights from this Continuous Monitoring Round are:

- 3 investigations completed
- 2 decisions of Conformance
- 1 decision of Inconclusive

Figure 1: Final Conformity Decisions for PV-2024-01  
(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 PV-2024-01

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 or nonconformances were identified in Continuous Monitoring Round PV-2024-01.

## 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”).

Since no nonconformances were identified in this Round, no actions were taken to restore conformance.

## 6.0 Key Findings

### 6.1 GRI Standards Updated

Participating Manufacturers are reminded that GRI has updated several of its standards since the publication of the Criteria. For Criteria such as 11.2.1 – Reporting on key performance indicators (corporate) and 11.2.2 Optional – Reporting additional key performance indicators (corporate), the references to GRI are normative and undated, meaning the latest edition of GRI applies. A comparison table between the previous and current version of the GRI Standards is available to Participating Manufacturers and CABs in the Conformity Guidance Materials.

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