# **EPEAT Program**Continuous Monitoring Outcomes Report



Photovoltaic Modules and Inverters PVMI-2021-02 February 11, 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 PVMI-2021-02 conducted for the Photovoltaic Modules and Inverters product category.

# 2.0 Overview of Continuous Monitoring Round PVMI-2021-02

### 2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round PVMI-2021-02 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 PVMI-2021-02 focused on two Criteria which require an understanding of issue areas and concepts that are relatively new to the EPEAT Program. There is currently only one PVMI Participating Manufacturer and this manufacturer was assigned one investigation for each Criterion. The products were selected randomly using a random number generator.

Table 1: Criteria Investigated in Round PVMI-2021-02				
Criteria Number	Criteria Number Criterion Title			
5.1.5	Alternatives assessment			
8.2.1	Water inventory			

## 3.0 Summary of Investigations and Final Decisions on Conformity for PVMI-2021-02

Highlights from this Continuous Monitoring Round are:

- 2 investigations completed
- 2 decisions of Conformance

### 4.0 Further Details on Nonconformances for PVMI-2021-02

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-2021-02.

#### 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 Substance Selection for Alternatives Assessment

Criterion 5.1.5 requires Participating Manufacturers to document that it, a supplier, or an independent third party has performed an alternatives assessment on at least one substance of concern included in the product or manufacturing process as documented in Section 5.1.1 – List of declarable substances. Manufacturers must consider exposure and risk throughout the product life cycle as part of the substance selection process. It is helpful for Participating Manufacturers to identify all aspects of the Criterion, including this consideration, when submitting evidence and reviewing this Criterion with their conformity assurance body.

Document Control and Change History							
Issue	Revision	Owner	Approver	Description	Approval Date	Effective Date	
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	