

EPEAT Program

Continuous Monitoring Outcomes Report



Computers and Displays
SV-2021-03
May 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 SV-2021-03 conducted for the Computers and Displays category.

2.0 Overview of Continuous Monitoring Round SV-2021-03

2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round SV-2021-03 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 SV-2021-03 was a targeted Round focused on two criteria where there is a higher risk of misunderstanding verification requirements. Manufacturers were assigned one investigation per criteria and the products were selected randomly using a random number generator. Since both criteria are Required Criteria, each Participating Manufacturer received two investigations.

Participating Manufacturers that received a Major Nonconformance in any 2020 Continuous Monitoring Round for servers were also assigned one additional investigation in this Round. The additional investigation assigned was an extra investigation for one of the targeted criteria.

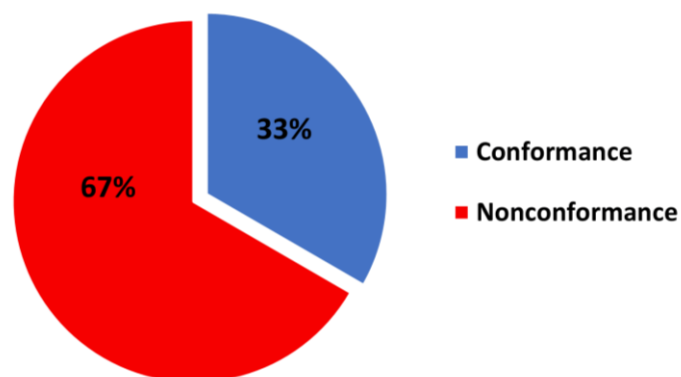
Table 1: Criteria Investigated in Round SV-2021-03	
Criteria Number	Criterion Title
6.1.3	Reduction of Bromine and Chlorine content of plastic parts > 25 grams
9.2.1	Information and reporting in preparation for reuse and recycling

3.0 Summary of Investigations and Final Decisions on Conformity for SV-2021-03

Highlights from this Continuous Monitoring Round are:

- 9 investigations completed
- 3 decisions of Conformance
- 6 decisions of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for SV-2021-03
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for SV-2021-03

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

Figure 2: Breakdown of Nonconformances by Criterion for SV-2021-03
(shown as a percentage of total nonconformances)

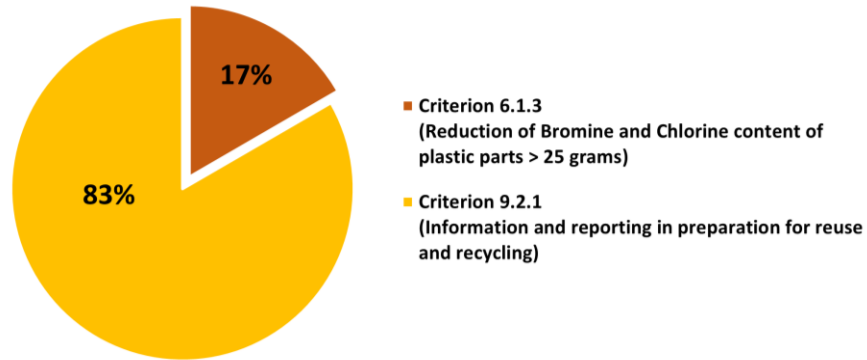
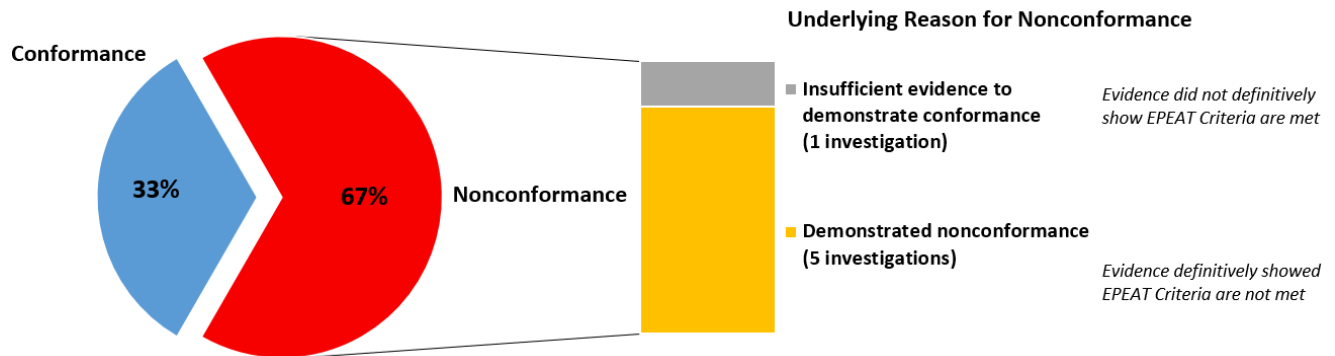


Figure 3 provides a further breakdown by the underlying reason for the nonconformances.

Figure 3: Underlying Reason for Nonconformances in SV-2021-03
(shown as a percentage of total nonconformances)



4.1 Major Versus Minor Nonconformances

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.

All nonconformances in Continuous Monitoring Round SV-2021-03 were Major Nonconformances.

4.2 Minor Nonconformances

For Level 1 Investigations, nonconformances may be categorized as minor 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.

4.3 Major Nonconformances

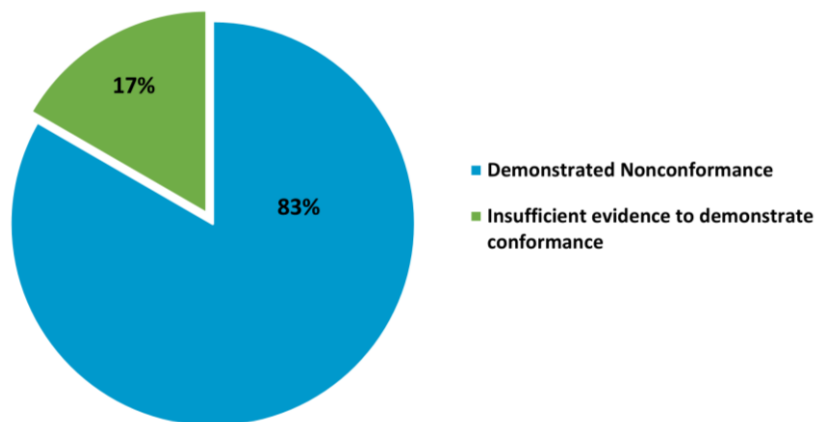
Major Nonconformances may be due to a demonstrated nonconformance, insufficient evidence provided to demonstrate conformance, or because no documentation was provided. All nonconformances found in this Round were Major Nonconformances. One Major Nonconformance was due to insufficient evidence provided during the Round, while the remainder were Demonstrated Nonconformances.

Criterion 6.1.3 requires documentation that confirms plastic parts greater than 25 grams in the product do not contain >1000 ppm bromine or chlorine. If test data for pellets used in the plastic parts is provided, additional evidence is necessary to ensure no additional additives are added during plastic processing.

Criterion 9.2.1 requires Participating Manufacturers to publish information required per the EU WEEE Directive 2012/19/EU, as well as have a written procedure ensuring the information will be available for seven years following the end of production of the product.

Figure 4 provides a breakdown of the Major Nonconformances found in Round SV-2021-03.

Figure 4: Reasons for Major Nonconformances for SV-2021-03
(shown as a percentage of total major nonconformances)



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”).

The following actions were taken to restore accuracy to the EPEAT Registry as a result of Continuous Monitoring Round SV-2021-03:

- **5 investigations** Additional data provided by Participating Manufacturers, bringing the products into conformance with the Criterion
- **1 investigation** Product will be archived the EPEAT Program

Table 2 in Section 7 identifies the Participating Manufacturers and products that received Major Nonconformances in Continuous Monitoring Round SV-2021-03.

6.0 Key Findings

6.1 Review EU WEEE Directive Annex VII Components Applicable to Registered Products

Participating Manufacturers are reminded to ensure that information made available to reuse and recycling facilities identifies the presence and location of all materials and components requiring selective treatment as required per European Union WEEE Directive 2012/19/EU.

6.2 Conformity Against All Elements of a Criterion (9.2.1)

Participating Manufacturers are reminded to ensure that in addition to making information available to third-party reuse and recycling organizations, that they have a written procedure that requires the information to be available for a minimum of seven years following the end of production of the product.

7.0 Identification of Major Nonconformances and Corrections Made by Participating Manufacturers

In the interest of transparency, the EPEAT Program identifies the Participating Manufacturers and products that received Major Nonconformances and the actions taken to restore accuracy of the EPEAT Registry. Minor Nonconformances 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 2: Summary of Major 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
Cisco	UCS C240 M5	Rack-mounted server	United States	9.2.1	Information and reporting in preparation for reuse and recycling	Required	Demonstrated Nonconformance	Manufacturer provided evidence demonstrating conformance
Cisco	UCSC- C220 M5	Rack-mounted server	United States	9.2.1	Information and reporting in preparation for reuse and recycling	Required	Demonstrated Nonconformance	Manufacturer provided evidence demonstrating conformance
Dell EMC	DELL EMC PowerEdge R550	Rack-mounted server	Germany	9.2.1	Information and reporting in preparation for reuse and recycling	Required	Demonstrated Nonconformance	Manufacturer provided evidence demonstrating conformance
HPE	HPE ProLiant DL380 Gen 10 Server	Rack-mounted server	United States	9.2.1	Information and reporting in preparation for reuse and recycling	Required	Demonstrated Nonconformance	Manufacturer provided evidence demonstrating conformance
HPE	HPE Synergy 480 Gen10 Compute Module	Blade server	Canada	6.1.3	Reduction of Bromine and Chlorine content of plastic parts > 25 grams	Required	Insufficient evidence to demonstrate conformance	Manufacturer provided evidence demonstrating conformance
Lenovo	Lenovo ThinkSystem SR650	Rack-mounted server	Canada	9.2.1	Information and reporting in preparation for reuse and recycling	Required	Demonstrated Nonconformance	Product will be archived by the EPEAT Program

<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