

# EPEAT Program

## Continuous Monitoring Outcomes Report



Computers and Displays

CD-2024-02

August 8, 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 CD-2024-02 conducted for the Computers and Displays category.

### 2.0 Overview of Continuous Monitoring Round CD-2024-02

#### 2.1 Investigation Activities

As per the published [Round Plan](#), Continuous Monitoring Round CD-2024-02 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 CD-2024-02 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.

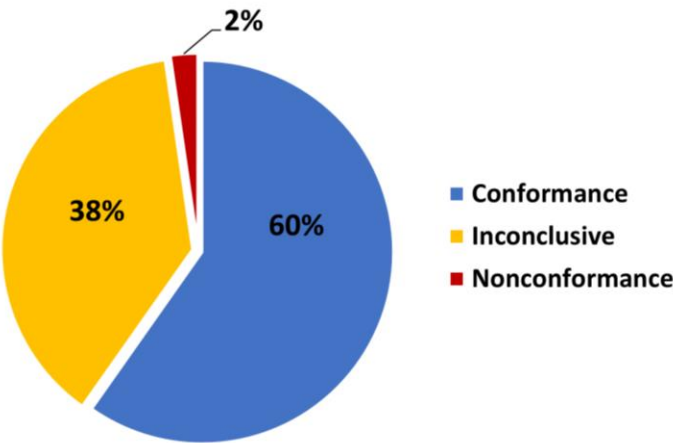
| Table 1: Criteria Investigated in Round CD-2024-02 |   |
|--|---|
| Criteria Number                                    | Criterion Title   |
| 4.5.1.1  | Conformance to current ENERGY STAR® program requirements  |
| 4.8.2.1  | Corporate carbon footprint                                |
| 4.10.2.1   | Public disclosure regarding conflict minerals in products |

3.0 Summary of Investigations and Final Decisions on Conformity for CD-2024-02

Highlights from this Continuous Monitoring Round are:

- 87 investigations completed
  - 52 decisions of Conformance
  - 33 decisions of Inconclusive
  - 2 decisions of Nonconformance
- Further details provided in Section 4*

Figure 1: Final Conformity Decisions for CD-2024-02  
(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 CD-2024-02

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

| Table 2: Breakdown of Nonconformances by Criterion for CD-2024-02 |  |                       |
|---|--|-----------------------|
| Criteria Number   | Criterion Title  | Total Nonconformances |
| 4.5.1.1   | Conformance to current ENERGY STAR® program requirements | 2                     |

Both nonconformances in CD-2024-02 were demonstrated nonconformances.

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).

No minor errors were identified in Continuous Monitoring Round CD-2024-02.

4.2 Minor Errors

For Level 0 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 minor errors were identified in Continuous Monitoring Round CD-2024-02.

4.3 Nonconformances

Both nonconformances in Continuous Monitoring Round CD-2024-02 were demonstrated nonconformances, which means that evidence definitively proved the criterion was not met.

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 CD-2024-02:

- 1 investigation      Additional data provided by Participating Manufacturer, bringing the product into conformance with the Criterion
- 1 investigation      Product archived by Participating Manufacturer

Table 3 in Section 7 identifies the Participating Manufacturers and products that received nonconformances in Continuous Monitoring Round CD-2024-02.

## 6.0 Key Findings

### 6.1 Equivalent Test Methods

Participating Manufacturers are reminded to reach out to their CABs and the EPEAT Program to review the acceptability of equivalent test methods per the requirements in P66 before using the equivalent methodology.

### 6.2 Energy Star Certification for Non-Energy Star Partner Countries

Energy Star certification in the U.S, Canada, Taiwan, and Switzerland can be used as a proxy to demonstrate conformance in non-Energy Star partner countries. For example, Energy Star certification in the United States (a 115 V country) can be used to demonstrate conformance with other non-Energy Star partner countries that also use 115 V.

### 6.3 Criteria with Annual Requirements

For Criteria with annual requirements, information must be updated once every 12 months. The 12-month reporting period may change, as long as there is no gap in reporting. It is acceptable for some fluctuation in the plus/minus of publishing of annual reports year over year. For example, it is acceptable for annual reports to not be published on the exact same calendar day year over year, however the fluctuation must be reasonable and there cannot be a gap in data.

Participating Manufacturers are encouraged to proactively notify their CAB if they are changing their annual reporting cycle.

### 6.4 Criterion 4.10.2.1 Conflict Minerals Annual Reporting

Required Criterion 4.10.2.1—Public disclosure regarding conflict minerals in products, requires Participating Manufacturers to annually disclose information on the use of conflict minerals, including a company sourcing policy or supplier code of conduct that addresses conflict minerals, description of their reasonable country of origin inquiry (RCOI), list of smelters or refiners reported by suppliers, and a description of the due diligence measures taken. The annual requirement of the Criterion requires the Participating Manufacturer to annually conduct their RCOI, identify and disclose the list of smelters and act on their due diligence process. It is acceptable if the company's policy or supplier code of conduct, process for conducting their RCOI and process for conducting due diligence is not updated or changed annually.

## 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                                  |
| CIARA TECH  | ARIUS 13580-24 | Integrated Desktop | Canada        | 4.5.1.1          | Conformance to current ENERGY STAR® program requirements | Required             | Demonstrated nonconformance          | Manufacturer provided evidence demonstrating conformance |
| Howard Technology Solutions, A Division of Howard                                       | Q470MKB        | Desktop            | United States | 4.5.1.1          | Conformance to current ENERGY STAR® program requirements | Required             | Demonstrated nonconformance          | Manufacturer archived product                            |

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