EPEAT Program
Continuous Monitoring Outcomes Report

Imaging Equipment
IE-2024-01
November 1, 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 IE-2024-01 conducted for the Imaging Equipment category.

2.0 Overview of Continuous Monitoring Round IE-2024-01

2.1 Investigation Activities

As per the published Round Plan, Continuous Monitoring Round IE-2024-01 used Level 2 Investigations (laboratory evaluation of products to determine the products' conformance with specific EPEAT Criteria). GEC-approved CABs obtained the products, as identified by the EPEAT Program, from the open market without involvement of the Participating Manufacturers, where possible, and sent them for laboratory evaluation. The laboratories evaluated the products against the specified Criteria and produced reports summarizing the activities conducted and the results. GEC-approved CABs reviewed the reports, made recommendations on conformity, and sent the reports to the EPEAT Program. The EPEAT Program made the final decisions on conformity for the Investigations.

2.2 Criteria Investigated

Continuous Monitoring Round IE-2024-01 focused on sustainable use of resources. The unsustainable use of resources has triggered raw material scarcities, contributed to climate change, and caused widespread environmental degradation with implications for and negative impacts on human health and our environment. Globally, electronic waste is the fastest growing waste stream. The United Nations attributes this growth in ewaste to technological and product proliferation, along with shorter lifecycles and fewer repair options.

Sustainable use of resources to enable a circular economy is a priority for government policy, institutional purchasers, and manufacturers worldwide. A circular economy is paramount for the electronics industry to become more sustainable and resilient. Circularity seeks to keep products in use for as long as possible, emphasizing durability, repairability, reuse, and the importance of recycling.

To this end, criteria which focus on circularity and sustainable use of resources were selected for investigation in this Round. When products or components fail, the ability to repair and refurbish the product is essential to keeping it in service, and the product and packaging design should facilitate reuse and recycling.

Products were selected randomly using a random number generator from a list of Participating Manufacturers. Each product was investigated for the criteria identified in the table below, however if a product had not selected a criterion, that criterion was not investigated.

Table 1: Criteria Investigated in Round IE-2024-01

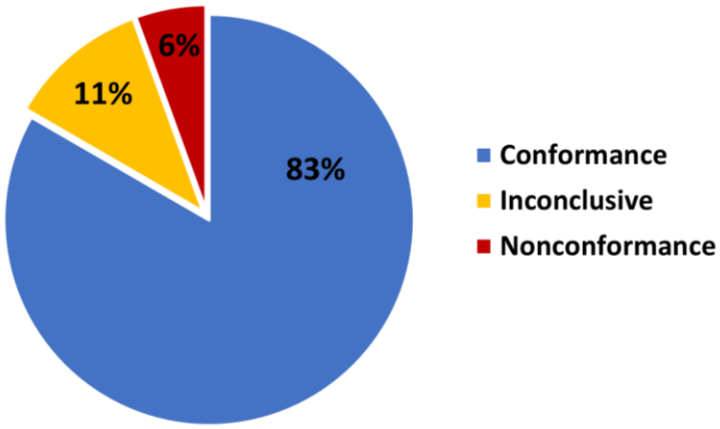
Criteria Number	Criterion Title
4.3.1.1	Ease of disassembly of product
4.3.2.1	Use of single recyclable plastic type per plastic part
4.3.2.2	Restriction on materials not compatible with reuse and recycling
4.3.2.3	Manual separation and marking of plastics
4.8.2.1	Separable packaging materials
4.8.2.3	Plastics marked in packaging materials

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

Highlights from this Continuous Monitoring Round are:

- **18** investigations completed
- **15** decisions of Conformance
- **2** decisions of Inconclusive
- **1** decision of Nonconformance *Further details provided in Section 4*

Figure 1: Final Conformity Decisions for IE-2024-01
(shown as percentage of total investigations)



4.0 Further Details on Nonconformances for IE-2024-01

Table 2 below provides a 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 IE-2024-01

Criteria Number	Criterion Title	Completed Investigations	Nonconformances	Nonconformance Rate
4.3.2.3	Manual separation and marking of plastics	3	1	33%

One nonconformance was identified in this Round, and it was a demonstrated nonconformance.

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. For Level 2 Investigations, nonconformances may be categorized as minor errors if a GEC-approved CAB is unable to obtain a product from the market and the Participating Manufacturer indicated the product has reached end-of-life and is no longer available on the market. 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 this Round.

4.2 Nonconformances

The nonconformance identified in Continuous Monitoring Round IE-2024-01 was a demonstrated nonconformance, 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 action was taken to restore accuracy to the EPEAT Registry as a result of Continuous Monitoring Round IE-2024-01:

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

Table 3 in Section 7 identifies the Participating Manufacturer and product that received a nonconformance in Continuous Monitoring Round IE-2024-01.

6.0 Key Findings

6.1 Required Criterion 4.8.2.1 – Separable Packaging Materials

Criterion 4.8.2.1 applies to packaging of all sizes, (not just packaging >25g), except for the exemptions identified in the Criterion, (plastic bags or wrap affixed with paper labels where the combined weight of the bag and label is less than 25g or the surface area of the label is less than 50cm2, as well as pallets and tape, glue and staples).

6.2 Required Criterion 4.3.1.1 – Ease of Disassembly of Product

For institutional products, the product must be designed to provide ease of access to a) materials with special handling needs b) b) material, components and subassemblies that could potentially be reused; and (c) components and subassemblies that may need removal for repair or replacement. This does not require materials (components) that require special treatment to be able to be reused, repaired or refurbished, as different components may require special handling than components that can be reused, repaired or replaced.

6.3 Plastic Marking Codes

Participating Manufacturers are reminded to check that plastic parts >100g are marked according to ISO 11469 and that the marking code is accurate for the plastic material type (e.g., PC for polycarbonate).

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
Brother	MFC-L9610CDN	Multifunction device	United States	4.3.2.3	Manual separation and marking of plastics	Required	Demonstrated nonconformance	Manufacturer provided evidence demonstrating conformance

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*
2	*1*	*Senior Manager, Ecolabels and Resources*	*Vice President, Ecolabels and Manufacturer Resources*	*Updated terminology for nonconformances to include "nonconformances" and "minor errors", in alignment with revisions to P66.*	*2022 Sep 15*	*2022 Sep 30*
2	*2*	*Senior Manager, Ecolabels and Resources*	*Vice President, Ecolabels and Manufacturer Resources*	*Updated to reflect new nonconformance category for CAB inaction or delay*	*2023 Mar 24*	*2023 Mar 24*