EPEAT Program Continuous Monitoring Outcomes Report



Servers SV-2023-01 September 26, 2023

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 SV-2023-01 conducted for the Servers category.

2.0 Overview of Continuous Monitoring Round SV-2023-01

2.1 Investigation Activities

As per the published <u>Round Plan</u>, Continuous Monitoring Round SV-2023-01 was supposed to use Level 2 Investigations (laboratory evaluation of products to determine the products' conformance with specific EPEAT Criteria). GEC-approved CABs obtain the products, as identified by the EPEAT Program, from the open market without involvement of the Participating Manufacturers, where possible, and send them for laboratory evaluation. The laboratories then evaluate the products against the specified Criteria and produce reports summarizing the activities conducted and the results. GEC-approved CABs review the reports, make recommendations on conformity, and send the reports to the EPEAT Program. The EPEAT Program then makes the final decisions on conformity for the Investigations. Unfortunately, this Round was cancelled because the CAB was unable to obtain the product for testing, due to product unavailability. Despite both repeated and tenacious attempts by the CAB to obtain the product, the product could not be purchased.

2.2 Criteria Investigated

Continuous Monitoring Round SV-2023-01 was supposed to focus on chemicals of concern. The production of electronics often involves over 500 chemicals, while electronic devices potentially contain up to 84% of all known stable chemical elements. Chemicals in electronic products and processes serve important technical functions, however they are sometimes used without full knowledge of their environmental or human health hazards. These chemicals can present risks of exposure throughout the product's life cycle—and toxic chemicals used in creating electronics can cause serious health issues, including cancer, nerve damage, and reproductive issues. Once released into the environment, hazardous chemicals can also change soil or water, ultimately leading to the loss of plant or animal life.

In the electronics industry, chemicals of concern remain an on-going challenge as the industry seeks safer and more sustainable alternatives for hazardous chemical substances. Manufacturers can better prepare for and lessen their risk of supply chain interruptions and high switching costs associated with regulatory restrictions by having greater clarity into the contents of their devices. Minimizing the use of hazardous chemicals in electronics and embracing safer alternatives is critical to achieving sustainable consumption and production. Given the global nature of electronics value chains and the potential reach of problematic chemicals, the social and economic burden of chemicals of concern in electronics is not confined to certain people or places related to manufacturing or use—their potential impact can be global in scale, and for this reason, the EPEAT Program selected criteria which address chemicals of concern for investigation in this Round.

One product for investigation was randomly selected (using a random number generator) from a list of Participating Manufacturers. The product would have been investigated for all of the criteria identified in the table below if the criteria were selected. Unfortunately, because the product could not be obtained no testing was conducted and the Round was cancelled.

Table 1: Criteria Investigated in Round SV-2023-01				
Criteria Number	Criterion Title			
6.1.1	Conformance with provisions of European Union RoHS Directive			
6.1.2	Conformance with substance restriction requirements of the European Union Battery Directive			
6.1.3	Reduction of Bromine and Chlorine content of plastic parts > 25 grams			
8.1.1	Elimination of added heavy metals in packaging			

3.0 Summary of Investigations and Final Decisions on Conformity for SV-2023-01

Highlights from this Continuous Monitoring Round are:

- **0** investigations completed
- 4 investigations cancelled [Product could not be obtained for testing]

4.0 Further Details on Nonconformances for SV-2023-01

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. 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).

Since the Round was cancelled and testing was not conducted, no conformity decisions were issued and no nonconformances or minor errors were identified.

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 the Round was cancelled and testing was not conducted, no conformity decisions were issued and no nonconformances or minor errors were identified. For this reason, it was not necessary to take any actions to restore 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	