



EuroVAprint/Epson

2017 Imaging Equipment VA Random Audits

Epson Audit – Public Summary

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Description	Issue 1
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PREAMBLE

The imaging equipment industry has committed to meet certain environmental criteria as a self-regulating Voluntary Agreement (VA) under the Ecodesign Framework Directive, 2009/125/EC (in accordance with Article 17 and the criteria set out in Annex VIII of the Directive).

The first major revision of the imaging equipment VA, Version 5.2, was published in April 2015. Section 9 of VA Version 5.2 stipulates requirements for auditing/investigation. These include that audits “should only apply to requirements that can be tested and measured” and that audits may be random- or intelligence-based. The VA also establishes that audits are to be undertaken by the Independent Inspector; RINA Consulting (formerly Edif ERA) has held this role since July 2011.

This report presents the public summary of one of the two random audits conducted by RINA Consulting in 2017. Consistent with the contract for auditing drawn up with the client, EuroVAprint, RINA Consulting produces two versions of each random audit report: a full report for the Signatory who was subject to the audit (not for wider dissemination), and a public summary of this full report.

PUBLIC SUMMARY

Epson is a Signatory to the imaging equipment industry’s ecodesign Voluntary Agreement (VA) and, in 2017, was subject to the Agreement’s random auditing. This is conducted by RINA Consulting (formerly Edif ERA) in its role of VA Independent Inspector.

Random audits entail investigation into how a Signatory ensures a sample of relevant products comply with VA requirements. The sample consists of 1-2 products; two products are selected for investigation when a Signatory places both types of product technology that VA requirements apply to – TEC and OM¹ – on the EU market.

Epson’s imaging equipment includes both TEC and OM products, hence two products were subject to the audit. These were the Epson monochrome AL-M8100DN, a TEC product, and the Epson XP-345 inkjet, an OM product.

The audit was conducted in August-September 2017 and included email exchanges with the auditee.

Epson provided various pieces of evidence to demonstrate compliance including declarations, disassembly information, manuals, material lists, records and checklists. Supporting research was conducted online and entailed reviewing information found on the websites of Epson and other organisations like KEITI and Takeback Ltd. Audit findings are summarised in the table below.

VA Section	Summarised VA Requirement(s)	Finding
Part I – Primary Design Commitments		
4.1	OM products to meet ENERGY STAR 2.0 energy consumption requirements on sleep mode power consumption and standby mode power/default delay times.	Compliant ²
4.1	TEC products to meet ENERGY STAR 2.0 energy consumption requirements.	Compliant ³
4.1	TEC products to provide for duplex printing.	Compliant
Part II – Other Resource Efficiency Requirements		
5.1	Availability of N-up printing.	Compliant
5.2	Design for recycling: plastic parts to be manually separable with commonly available tools; products to utilise commonly used fasteners; avoidance of non-separable connections between different product materials; marking of product plastics by material type.	Compliant
5.3	TEC products placed on the market from 2015 onwards to meet various requirements pertaining to polymers including that plastic casing parts with a mass >100g to consist of one single polymer or a polymer blend.	Compliant

¹ Typical Electricity Consumption and Operational Mode.

² Based on read across to similar US product.

³ Based on Epson’s own measurements at its accredited laboratory. Independently verified data not provided but this is not required in the EU.

VA Section	Summarised VA Requirement(s)	Finding
5.4	Cartridges: two requirements apply to products placed on the market from 2015 onwards. These are (1) that the Signatory’s own cartridges are not designed to prevent reuse/recycling, and (2) that the products do not prevent the use of a cartridge made by a manufacturer other than the Signatory.	Compliant
5.5	Recycled plastic content: products placed on the market from 2015 onwards to provide customers with information on the minimum % of total plastic (by weight) in each product.	Compliant
Part III – Information Requirements for End-Users		
6.1	Provision of resource efficiency and energy efficiency information to end-users.	Compliant
6.2	Availability of spare parts: 5 years in the case of solid ink and high performance inkjet printers; 3 years in the case of inkjet printers.	Compliant
6.3	Provision of information on end-of-life management options for used cartridges to end-users.	Compliant
6.4	Provision of paper recyclability information.	Compliant
6.5	Improvement on paper recyclability – there is no product-specific requirement in this section.	N/A
6.6	Provision of information pertaining to product environmental characteristics; this includes information on inkjet and toner cartridge yield.	Compliant

It should be noted that the audit entailed review of documentation and information provided by Epson concerning two sample products as well as other published information. The audit did not involve RINA Consulting testing or assessing any physical hardware.

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