INDUSTRY VOLUNTARY AGREEMENT TO IMPROVE THE ENVIRONMENTAL PERFORMANCE

OF

IMAGING EQUIPMENT PLACED ON THE EUROPEAN MARKET

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Explanatory note

Since the launch of the Lot 4 imaging equipment Voluntary Agreement (VA) in 2011, signatories remain committed to achieving ever-higher standards of environmental performance in Europe, and believe the VA is central to this objective. The design and information requirements of the VA contribute significantly to the **EU Energy efficiency agenda,** promote the **circular economy,** address **climate change,** and meet **better regulation goals**.

The EuP "*Lot 4 — Imaging equipment, copiers, faxes, printers, scanners, MFD*" preparatory studies (2007-2008) and the European Commission's "*impact assessment on the voluntary eco-design scheme for imaging equipment*" (2013)[1] recommended that the best way forward for the imaging equipment industry, given the already low energy consumption of its products and the broad diversity of products in scope, was to draft a self-regulation measure for hardware. The first version of the VA was endorsed by the European Commission in 2011, with a first revision completed in 2015 and a second in 2019.

This VA represents a pioneering model of industry self-regulation. The commitments are aimed at curbing the environmental footprint of imaging equipment for home and office use - copiers, printers, fax machines and multifunction devices using laser, inkjet and solid ink technologies. While linked to the ENERGY STAR® programme, the purpose and function of the programme and the VA are substantially different. ENERGY STAR is a label that signals products with superior energy efficiency as of the date of manufacture, and the VA represents the manufacturers' commitment that a certain percentage of products placed on the European market meet the requirements of ENERGY STAR. The percentage increases every year, and is based on a tiered system.

The European Commission impact assessment found that, when compared to a regulation scenario for the period 2011-2020, the VA would:

- Achieve **twice the energy savings** and **three times the CO_2 emission savings**

[1] http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52013SC0014&from=EN

To date, the signatories of the VA have achieved major results with regards to **energy efficiency savings**, including **energy consumption reductions of 46.2%** for Operational Mode products and **26.5%** for Typical Electricity Consumption products since 2011[2].

- Contribute to the **EU Circular Economy** objectives

  It is estimated that the VA will help further **resource efficiency in the EU** by saving **1 million tons of office paper by 2020** in the EU which is enough to cover more than **11,000 km**[1].This is achieved by putting on the market products where the duplex feature (ability to print on both sides of a sheet of paper) is configured by default, which results in direct CO2 reductions (less paper consumption) and indirect energy savings (less paper production)[1]. All of which is achieved much faster than in a regulation scenario.

  In addition, the VA contributes substantially to the **circular economy** by supporting requirements **such as design for recycling, dismantling, repair, reuse, polymer composition, indoor air quality, recycled plastics content**, **availability of spare parts and repair information**. It also includes **information requirements for end-users** to make more sustainable purchasing decisions by providing them with accurate information on the environmental performance of products, on the reuse and recycling of cartridges, and on paper (recyclability and improvements). The latter is the biggest contributor to the energy consumption, as shown by the latest OEM peer-reviewed and ISO compliant Life Cycle Assessment (LCA) studies[3].

  Indeed, the Signatories of the VA are working towards circular business models using LCA studies as a robust and evidence-based tool to achieve this objective and to significantly reduce waste through careful design, use and end-of-life treatment. When it comes to cartridges, the LCA studies mentioned above and referenced in the EuroVAprint position paper on "The environmental impact of reuse vs. recycling of toner and ink cartridges"[4] show that superior print quality, dependable page yield and overall reliability combined with material recycling are key criteria in a toner cartridge's carbon footprint because consistent prints mean less wasted paper and the need for fewer cartridges, thus yielding the best overall environmental outcome for print cartridges.

  Also, as technology evolves rapidly, OEM LCA studies are reviewed frequently in order to take these improvements into account.

  OEMs invest heavily in R&D to (1) **improve design** with a view to reducing waste through the use of recycled plastics, reducing the complexity of the consumable and incorporating design criteria from recognised environmental labels (Blue Angel, EPEAT) (2) to **understand use** and the impact of consistent print quality in saving paper, of cartridge reliability to avoid premature replacement and reduce use-phase energy consumption and finally to (3) **provide programmes** for take-back and

[2] Independent Inspector's compliance reports
[3] http://h20195.www2.hp.com/V2/GetDocument.aspx?docname=c05165504 and http://www.spencerlab.com/reports/HPReliability-EMEA-RM2016.pdf
[4] http://www.eurovaprint.eu/fileadmin/eurovaprint_files/pdfs/2017/LCA_position_paper.pdf

recycling that recycle tens of millions of kilograms of ink and toner cartridge material annually[5].

- Deliver the policy objectives of the EU Eco-Design Directive **faster** and in a **less costly manner**, in alignment with the EU Better Regulation Agenda
  The implementation cost of a regulation designed for the same purpose as the VA is estimated at **€2-2.5 million per year,** and would require involvement of Member State authorities[1]. The administrative cost of a VA is much lower – the EuroVAprint[6] budget is less than **€200,000** for 11 of the largest OEMs, a **cost borne by manufacturers,** rather than Member States and taxpayers.

  In addition, the VA is also more **dynamic** than a regulation. The VA can respond more quickly to technological developments, with more frequent and less costly updates compared to regulation; allowing industry to continue to innovate and improve its environmental performance using the latest technology. In a regulation scenario, measures would take much more time to have a critical impact on the environment and on the development of new environmental technologies.

The latest version of the VA (V.3) includes further ambitious goals and is expected to continue the success of delivering ecodesign improvements.

[5] See for e.g. HP 2015 Sustainability Report, Lexmark 2015 Corporate Social Responsibility Report, Xerox 2015 Global Citizenship Report.
[6] The association facilitating the implementation of the VA (www.eurovaprint.eu).