

Business Unit : Integrity

Report Title : **Imaging Equipment Voluntary Agreement**
Report of the Independent Inspector
Non-Compliance resolution (Period 4 - Co 16)
(1 January – 30 June 2014)

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Executive Summary

The Imaging Equipment industry has undertaken to meet certain environmental criteria as a self-regulating Voluntary Agreement (VA) within the context of the Ecodesign Directive 2009/125/EC. The terms of voluntary agreements set up under this directive require the appointment of an Independent Inspector to oversee and report on compliance; ERA was appointed to this role in July 2011.

During Period 4 (January to December 2013), one VAS, Company 16, reported figures that showed they were underachieving by $\leq 5\%$ (Scenario A).

They were the same company that was previously identified as underachieving in the previous annual report (Period 3). The Steering Committee was therefore required by the VA to start discussions with Company 16 regarding remedial actions, which they contracted with ERA Technology to do; this report is the outcome of that investigation.

Company 16 was contacted by ERA, who responded quickly and effectively to the request for information regarding reasons and remedies for their non-compliance.

The information supplied confirms their compliance over the period 1 January to 30 June 2014, explains the reasons for the previous non-compliance, and their plans to address the issue.

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1. Introduction

1.1 Context

The Imaging Equipment Industry has undertaken to meet certain environmental criteria as a self-regulating voluntary agreement (VA) within the context of the Ecodesign Directive 2009/125/EC. The terms of voluntary agreements set up under this directive require the appointment of an Independent Inspector to oversee and report on compliance, and ERA was appointed to this role for the imaging industry in July 2011.

The remit and extent of the Imaging Inspector's role is laid down by the Steering Committee to EuroVAPrint, to whom ERA are contracted.

The First Report, the Initial VA Baseline Report, covering the first reporting period (1 January – 30 June 2011), was presented by ERA to the Steering Committee at a meeting held in Brussels on 7 December 2011.

The Second Report, the Compliance Target Demonstration Report, covering the second reporting period (1 October 2011 – 30 March 2012) was presented to the Steering Committee at a meeting held in Brussels on 4 December 2012.

The Third Report, the First Annual Report, covered the third reporting period (1 January to 31 December 2012), was presented to the Steering Committee at a meeting held in Brussels on 10 June 2013. This was the first report covering a full calendar year when all the compliance requirements are in force. One VAS was identified as not meeting the requisite compliance criteria.

The Fourth Report (the Second Annual Report) covered the fourth reporting period for the calendar year 2013, and was delivered to the Steering Committee in 12 May 2014. Again, one VAS, the same one as in the Period 3 report, was identified as not meeting the requisite compliance criteria.

1.2 Scope and requirements

ERA Technology was tasked by EuroVAPrint to investigate the reasons for the non-compliance, and the steps taken to remedy this and to achieve compliance.

Hence, all the results are presented anonymously so that they cannot be correlated with any particular VA signatory.

1.3 Enquiries

Should you have any queries or comments about this report please email andy.skarstein@era.co.uk and copy EuroVAPrint (secretariat@eurovaprint.eu).

2. Methodology

2.1 Requirement

The VA sets out the actions required for the resolution of non-compliance issues in Section 9; the relevant extract is reproduced here :

The Signatory will have a grace period of 6 months to achieve the target and present an updated semester progress report. During those 6 months, the Signatory will not be required to achieve any new target set out in a revision of the Voluntary Agreement. If the Signatory fails to achieve the target, the Steering Committee shall start discussions with the Signatory in order to develop a suitable way forward. The Steering Committee may decide to change the Signatory's status from Signatory to Defaulting Signatory. Until the Defaulting Signatory fulfils the target, no new targets will apply.

2.2 The Action

The Steering Committee was required by the VA to start discussions with Company 16 regarding remedial actions immediately.

At the request of EuroVAPrint, ERA contacted Company 16 on 28 April 2014, and received on 11 July 2014 a document showing the reasons found for the non-compliance, and the figures for the first half of 2014 showing full compliance had been achieved.

3. Results – Annex C Compliance report

3.1 Compliance

The figures submitted by Co 16 for the period 1 January – 30 June 2014 show that a compliance rate of 92.17% has been achieved during this remedial period. The compliance rate is defined as the number of compliant products declared by a single VAS / total number of products declared as in scope of the VA by that VAS. The requirement is that this figure is at least 90%.

3.2 Reason for Period 4 Non-Compliance

Company 16 investigated the reason for non-compliance internally, and discovered the software shipped with a number of products controlling the default duplex print mode was incorrectly configured, with no pre-ticked default setting even though the units concerned were capable of duplex printing. Moreover, that same software available online by download was correctly configured. All software shipped with the product is now reported to be correctly configured.

The length and control of the knowledge chain between the European market place and the Design Authority located outside Europe was a contributory factor to this issue; in this case control of

changes to drivers and utilities had been inadequate. This is being addressed, but is currently an internal proposal only which has yet to be finalised and agreed; the target date for this is the end of September 2014.

4. Summary

This was the first occasion for which the process of dealing with non-compliance had been invoked. The process works well, and there was very good co-operation from the representatives of Co 16 in resolving the situation.