



EuroVAprint / Brother International Europe Ltd

2020 Imaging Equipment VA Random Audits

Brother Audit – Public Summary

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Issue and Revision Record

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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, via its acquisition of 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 in 2020. Consistent with the contract for auditing drawn up with the client, EuroVAprint, RINA 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

Brother International Europe Ltd – hereafter “Brother” – is a Signatory to the imaging equipment industry’s ecodesign Voluntary Agreement (VA) and, in 2020, was subject to the Agreement’s random auditing. This is conducted by RINA in its role of VA Independent Inspector.

Random audits entail investigation into how a VA Signatory ensures the products it places on the EU market and falling within scope of the VA meet with its requirements¹. One or two products are selected for the investigation. Two products are selected when the Signatory places both types of product technology that VA requirements apply to – TEC and OM² – on the EU market otherwise it is just one product.

Brother imaging equipment includes both TEC and OM products, hence two products were subject to the audit. These were the DCP-L3550CDW Multifunction Colour Laser Printer, a TEC product, and the MFC-J5330DW All in One Inkjet Printer, an OM product. The audit was conducted between June and early August 2020 further to email exchanges with the auditee.

Brother provided various pieces of evidence to demonstrate compliance including product user and safety guides, ECMA³ Eco Declarations, bill of materials data, signed declarations, and video footage. 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
4.1	TEC products to meet ENERGY STAR 2.0 energy consumption requirements.	Compliant
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
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

¹ The current VA is v.5.2, accessible at: https://www.eurovaprint.eu/fileadmin/eurovaprint_files/pdfs/VA_version_5.2_April.pdf

² Typical Electricity Consumption and Operational Mode.

³ Originally the European Computer Manufacturers’ Association, now ECMA International.

VA Section	Summarised VA Requirement(s)	Finding
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 provided by Brother concerning two sample products; RINA did not test or assess any physical hardware.

