



EuroVAprint/Xerox

2018 Imaging Equipment VA Random Audits

Xerox Audit – Public Summary

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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 2018. 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

Xerox is a Signatory to the imaging equipment industry's ecodesign Voluntary Agreement (VA) and, in 2018, 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 requirements. 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 OM – on the EU market otherwise it is just one product.

Xerox imaging equipment within scope of the VA includes only TEC products, hence one product was subject to the audit. This was the VersaLink C400 DN Colour non-MFD (a TEC product).

The audit was conducted in July-September 2018 and included email exchanges and calls with the auditee.

Xerox provided various pieces of evidence to demonstrate compliance including product specifications; an ECMA Eco Declaration; disassembly information; a service manual; material lists; internal records; and confirmation of ENERGY STAR certification. Supporting research was conducted online and entailed confirming the VersaLink C400 DN's Blue Angel certification as well as its silver rating within the EPEAT online registry – rating provided by DEKRA. Audit findings are summarised in the table below.

VA Section	Summarised VA Requirement(s)	Finding
Part I – Primary Design Commitments		
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

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 Xerox concerning one sample product, the VersaLink C400 DN. While this documentation encompassed certification arising from independent third party assessment, the audit did not involve RINA testing or assessing any physical hardware.

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