



EuroVAprint / KYOCERA Document Solutions Europe B.V.

2021 Imaging Equipment VA Random Audits

KYOCERA Audit – Public Summary

Report No. 2021-0951

Project No. REG45423-001

Rev.	0
Description	Final
Prepared by	Dr Alex Martin, Principal Regulatory Consultant
Controlled by	Dr Chris Robertson, Head of Product Regulatory Compliance
Approved by	Liz Kimber, Principal Regulatory Consultant
Date	16 September 2021

RINA Tech UK Limited | 1 Springfield Drive, Leatherhead, Surrey, KT22 7AJ, United Kingdom | P. +44 0 1372 367350 |
infoLH@rina.org | www.rina.org
Company No. 07419599 Registered in England and Wales

This document is confidential. All rights, including translation, reserved. No part of this document may be disclosed to any third party without written consent of RINA Tech UK Limited

Disclaimer

Whilst great care has been taken in the compilation of this report, use of the information contained herein is entirely at the risk of the client or recipient. It does not constitute legal advice and should not be relied upon as such. To the extent permitted by law, RINA Tech UK Limited (“RINA”) accepts no responsibility or liability for loss or damage arising out of acting upon or refraining from action as a result of any material in this publication.

Issue and Revision Record

Rev.	Description	Prepared by	Controlled by	Approved by	Date
0	Final	A. Martin	C. Robertson	L. Kimber	16/09/2021

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 2021. 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

KYOCERA Document Solutions Europe B.V. – hereafter “KYOCERA” – is a Signatory to the imaging equipment industry’s ecodesign Voluntary Agreement (VA) and, in 2021, 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.

KYOCERA imaging equipment within scope of the VA includes only TEC products, hence one product was subject to the audit. This was the ECOSYS M5526cdw, a colour multifunctional device. The audit was conducted between June and September 2021 further to email exchanges with the auditee.

KYOCERA provided various pieces of evidence to demonstrate compliance including Blue Angel certification documentation, a product operation guide, recycling information, a listing of plastic parts, and a product-specific ECMA³ Eco Declaration. 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
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

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
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 KYOCERA concerning a sample product; RINA did not test or assess any physical hardware.

