

Report Title: **2016 Imaging Equipment VA Random Audit  
- Lexmark**

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20 September 2016

Ref. REG0266001 EuroVAPrint-Lexmark SUMMARY Audit Report

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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 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; Edif ERA has held this role since July 2011.

This report presents the public summary of one of the two random audits conducted by Edif ERA in 2016. Consistent with the contract for auditing drawn up with the client, EuroVAPrint, Edif ERA 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

Lexmark is a Signatory to the Imaging Equipment industry's ecodesign Voluntary Agreement (VA) and, in 2016, was subject to the Agreement's random auditing. Random audits are conducted by the VA's Independent Inspector and entail investigation into how a Signatory ensures compliance of 1-2 products falling within the VA's scope with VA requirements. A single product is chosen for investigation when a Signatory is just placing one type of product technology on the EU market; this was the case with Lexmark, whose business is in Typical Electricity Consumption (TEC) products.

The audit was conducted in July/August 2016, with MS811dn being selected as the product under investigation. Lexmark provided various pieces of evidence to demonstrate compliance, inclusive of a laboratory report, product specification and user information, copy of the ECO Declaration for the product, and teardown instructions. Supporting research was conducted online and entailed reviewing information on the Lexmark website. Audit findings are summarised in the table below. It should be noted that VA requirements pertaining to TEC products placed on the EU market from 2015 onwards were deemed not applicable owing to the fact that the product under audit, the MS811dn, was first placed on the EU market in 2012. In these instances "not applicable" is recorded as a result.

VA Section	Summarised VA Requirement(s)	Finding
Part I – Primary Design Commitments		
4.1	TEC products to meet ENERGY STAR v2.0 energy consumption requirements and 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	Polymer composition: applies to "new TEC product models first placed on the EU market after 1 January 2015" – the MS811dn was first placed on the EU market in 2012.	N/A
5.4	Cartridges: applies to "new product models first placed on the EU market after 1 January 2015" – the MS811dn was first placed on the EU market in 2012.	N/A

VA Section	Summarised VA Requirement(s)	Finding
5.5	Recycled plastic content: applies to “new product models first placed on the EU market after 1 January 2015” – the MS811dn was first placed on the EU market in 2012.	N/A
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: applies to “new product models first placed on the EU market after 1 January 2015” – the MS811dn was first placed on the EU market in 2012.	N/A
6.3	Provision of information on end-of-life management options for used cartridges to end-users.	Compliant
6.4	Information paper recyclability: applies to “new product models first placed on the EU market after 1 April 2015” – the MS811dn was first placed on the EU market in 2012.	N/A
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.	Compliant