

Stakeholder comments form

Review study related to imaging equipment Voluntary Agreement

All comments should be sent to **Jan Viegand** via: jv@viegandmaagoe.dk

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#	Task No.	Section	Page	Comment	Proposed change	Comments from study team and actions
1	5	5.1 etc	10	The rationale for only focusing on the policy option of a VA and not assessing other policy options such as regulation is unclear	Clearly state in Task 5 the reasons why other policy options have not been considered.	
2	5	5.1.2.1	19/Fig 7, 20/Table 8	It is shown in table 8 that the VA targets are below BAU for ENERGY STAR, and yet all the savings achieved due to ENERGY STAR appear to be allocated to the voluntary agreement. It is stated on page 22 that “the VA has a lesser influence on ENERGY STAR penetration rates in the EU and thereby not the driver behind all the energy savings presented in Figure 7.” And yet the savings in figure 7 appear to be represented as the savings due to the VA.	Please remove statements exaggerating the energy consumption savings due to the VA and clarify when presenting the savings what proportion of savings are actually due to the VA and which are essentially business as usual due to ENERGY STAR uptake as a result of other influences.	
3	7	7.1.4.1		We strongly support the recommendation that	Retain clear language on the need for consumables to be included in scope.	

Stakeholder comments form

				<p>consumables (cartridges) be included in scope of the VA.</p> <p>An assessment of whether the VA scope should be revised to include photo printers (i.e. format < A4) is not provided.</p>	<p>Clarify via analysis if the current exclusion of smaller than A4 format photo printers from scope of the VA is still appropriate or not.</p>	
4	7	7.1.4.4	17	<p>Instead of focusing on commonly used fasteners, the requirement should expand to address fastening factors that more strongly influence the ability to repair – whether fasteners are reusable and/or replaceable (in line with prEN45554)</p>	<p>Change to: Spare parts must be accessible by using commonly used tools and/or commonly used fasteners that are reusable or at least replaceable fasteners for joining components, subassemblies, chassis and enclosure, and must be available for 5 years after product delivery.</p> <p>Add the following definitions to Annex A: Reusable: An original fastening system that can be completely re-used, or any elements of the fastening system that cannot be re-used are supplied with the new part for a repair, re-use or upgrade process. Removable: An original fastening system that is not reusable, but can be removed without causing damage or leaving residue which precludes reassembly (in case of repair or upgrade) or re-use of the removed part (in case of re-use) for a repair, re-use or upgrade process.</p>	

Stakeholder comments form

5	7	7.1.4.5	18	<p>In improvements to the VA, the requirement is suggested that “Imaging equipment in scope must contain a minimum of 20% post-consumer recycled plastic content per weight of product unit.” This could mean that products with low plastic content (<20%) would be obliged to include lumps of plastic to meet the target.</p> <p>Further, halogenated flame retardants are not addressed.</p>	<p>Reword to: “For all products, total weight of plastic content of the product unit must not contain more than 80% virgin plastic content.”</p> <p>And include: Use of halogenated flame retardants is not permitted in plastic enclosure of printers</p>	
6	7	7.1.4.6	18	<p>In improvements to the VA, the requirement is suggested that “Firmware/software for imaging equipment shall be also maintained by Signatories for minimum 3 years after product delivery.” The study estimates a lifetime of 4 to 6 years for imaging equipment, so three years is insufficient.</p>	<p>Change the duration of firmware availability to 6 years as a minimum</p>	
7	7	7.1.4.9	19	<p>As well as page yield, information on cartridge quality should be provided. This has the potential to properly inform consumers on the quality of reused and remanufactured cartridges</p>	<p>Change the section to address “Consumable page yield and quality” and edit to: 6.6.2 Signatories shall make information on all consumable yield available to Customers on packaging of consumables based on the</p>	

Stakeholder comments form

				<p>compared to OEM options, and facilitate informed decisions. Further, the information should be clearly provided on packaging to inform consumer decisions.</p>	<p>measurement standards specified, for example, in ISO/IEC 24711:2006 (for 18 ink), ISO/IEC 19752:2004 (for monochrome toner), ISO/IEC 19798:2006 (for colour toner), and through other company methods</p> <p>6.6.3 Signatories shall make information on consumable quality available to Customers on packaging of consumables based on the measurement standards specified in DIN 33870-1/- 2.</p>	
8	7	7.1.4 New section		<p>The task 4 report presents the processing approaches for cartridges returned to OEMs. On average a quarter of cartridges being returned to OEMs were being incinerated via waste to energy schemes, with one signatory incinerating 100% of their returned cartridges. Action is necessary in order to incentivise greater reuse and improved processing of cartridges, as well as to provide sufficient value via the voluntary agreement compared against a regulatory approach. In order to improve the performance of OEMs in cartridge processing, a public declaration of the processing approaches (via the</p>	<p>Include the following option in chapter 7.1.4:</p> <p>5.X.X Declaration of return scheme processing of cartridges Signatories will provide information to the independent inspector on an annual basis detailing how cartridges received via return schemes are processed. The categories for processing will be:</p> <ul style="list-style-type: none"> * Reuse of cartridge * Reuse of components * Material recycling * Waste-to-Energy * Material in storage pending processing * Incineration * Landfill 	

Stakeholder comments form

				EuroVA website) should be committed to in the VA.	Quantities of cartridges for each category will be provided to the independent inspector, who will publish the % for each category for each signatory on the EuroVA website.	
9	7	7.1.4.11	20	<p>Targets for ENERGY STAR coverage are not expressed in a way that is consistent with the voluntary agreement.</p> <p>Some of the commitments in the redrafted VA are higher than those suggested in the technical study</p>	<p>We suggest splitting the target for OM and TEC as per the VA, or providing clear justification for why the VA should combine the targets for OM and TEC products into one.</p> <p>We suggest at least the following targets are defined:</p> <ul style="list-style-type: none"> • Tier I: Jan-Dec 2020 OM: 85% TEC: 60% • Tier II: Jan-Dec 2021 OM:90% TEC:70% • Tier III: Jan-Dec 2022 OM:95% TEC:95% • Tier IV: Jan-Dec 2023 OM:99% TEC:99% <p>Furthermore, the need to differentiate between product vs signatory compliance ("products meeting requirements" vs "Voluntary Agreement compliance"), should be discussed. To ensure consumers can make informed purchasing decisions, it should be required that a detailed list of compliant and non-compliant products is published. Therefore, it should be recommended that the requirement for identifying which</p>	

Stakeholder comments form

					<p>products meet the requirements in the VA should be edited (in all three commitments sections 4, 5 and 6) to state:</p> <p>"To ensure that the VA enables customers to make more sustainable purchasing decisions by providing them with accurate information on the environmental performance of products, the Signatories shall publish on the EuroVAprint website the details of to what extent each of their products meet the requirements of Section 4 from when those Products are first Placed on the Market after the commencement date of this Voluntary Agreement. This information will detail not only which aspects of the agreement the product is compliant with, but also specifically how the product complies with the requirements of Part I, listing the energy consumption of the product and what (if any) functional adders have been applied. A list of products that do not meet the requirements will also be published. The information shall be updated on a monthly basis."</p>	
10	7	7.4	32	<p>Sensitivity analysis should be carried out on product lifetime. Consumer complaints suggest that many inkjet printers are now</p>	<p>Carry out sensitivity analysis on a much shorter printer lifetime of 2 years for OM products.</p>	

Stakeholder comments form

				<p>being thrown away after a lifetime of two to three years, with some being in use as for little as six months before they become e-waste. Therefore the assumptions of lifetimes of 4 to 6 years are very ambitious. (Printers: faster in the trash than a t-shirt, Apr 6, 2017, Test Achats, https://www.test-achats.be/action/espace-presse/communiques-de-presse/2017/imprimantes---trop-vite-use)</p>		
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