



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR ENERGY

Directorate C - Renewables, Research and Innovation, Energy Efficiency
C.3 - Energy efficiency

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Ms Ferial Saouli
Secretary-General EuroVAp rint
ASBL
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Dear Ms Saouli

Thank you for your submission of the revised Voluntary Agreement on Imaging Equipment (version 5.2) on 30 April 2015.

As you know, the Commission concluded on 29 January 2013 that your Voluntary Agreement on Imaging Equipment (version 4) could be considered a valid alternative to an ecodesign implementing measure as referred to in the Ecodesign Directive 2009/125/EC¹. The Commission highlighted in its report your commitment to update the Voluntary Agreement soon after new requirements for imaging equipment under the ENERGY STAR programme would become available, in order to adjust the stringency of these requirements to the situation on the market. Such update (ENERGY STAR version 2.0 as opposed to ENERGY STAR version 1.1 in version 4 of the Voluntary Agreement) became available on 1 April 2013, two months after the Commission published its report on your Voluntary Agreement.

Since the aim of your update of the Voluntary Agreement is to align it with the more stringent energy efficiency requirements of ENERGY STAR that became available soon after the Commission's report on your Voluntary Agreement, we have compared the new version of the Voluntary Agreement to the one recognised by the Commission on that aspect in order to establish whether the basis for the original assessment remains valid. Given that the update to ENERGY STAR requirements version 2.0 provides added value in energy savings compared to business-as-usual, we consider that your updated Voluntary Agreement remains a valid alternative to an ecodesign implementing measure.

I appreciate that you have taken the opportunity of this update to add a number of additional requirements beyond the ones on energy efficiency, paper efficiency, recycling and cartridges, as also requested by several stakeholders in the Ecodesign Consultation Forum, such as polymer composition, recycled plastic content and availability of spare parts. For the next revision of the voluntary agreement, a more detailed assessment will be carried out of all the provisions of this update. That assessment will then also be able to take into account the compliance checks on home

¹ COM(2013)23

and office printers by market surveillance authorities under the recently started EU-funded "EEpliant" project² that will run for 28 months.

I also appreciate that you have modified certain aspects of the Voluntary Agreement, notably in relation to compliance verification and the role of the independent inspector, with an aim to bring them in line with the draft guidelines for self-regulation measures under the Ecodesign Directive that the Commission services presented in the Consultation Forum of 12 June 2014. The Commission intends to publish the final version of the guidelines later this year. We will inform you once they are published so that you can take them into account in the next revision.

I look forward to our continued cooperation.

Yours faithfully

A handwritten signature in dark ink, appearing to read "Paul Hodson". The signature is written in a cursive style with a large initial 'P'.

Paul Hodson
Head of Unit

² http://prosafe.org/images/Documents/EEPLIANT/EEpliant_1st_Press_release_PROSAFE.pdf