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BY REGISTERED MAIL

Slovak Trade Inspection
Prievozska
32 827 99
Bratislava
Slovakia

19 February 2015

Dear Sir/Madam

NOTIFICATION OF POTENTIAL NON-CONFORMITY ISSUE UNDER THE ROHS II DIRECTIVE

We are writing to provide written notice of a potential non-conformity issue under Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (the **RoHS II Directive**) with respect to a limited number of commercial (B2B) copy/printing units imported and branded by Xerox (the **Xerox Equipment Units**).

With respect to the Xerox Equipment Units (further specified in this letter), Xerox understands that the maximum concentration value for cadmium (ie 0.01%) as permitted by Annex II of the RoHS II Directive has been exceeded by the Xerox Equipment Unit manufacturer between July 2014 and December 2014.

In the event of a potential non-conformity, the RoHS II Directive requires manufacturers to take specific actions and to inform the competent national authorities in the Member States where the equipment has been made available. Similar obligations apply to importers and distributors.

1. RELEVANT FACTS

- Xerox has been informed by the manufacturer of the Xerox Equipment Units (Fuji Xerox Co., Ltd, incorporated in Japan, FX) that FX had been supplied with a component, a sensor, which FX then incorporated into the Xerox Equipment Units. The sensor contained four very small plastic parts which were now suspected of being non-RoHS II compliant.
- It was later established that a lower tier supplier had unknowingly purchased counterfeited resin in Asia which was used to form these four plastic parts. The relevant (potentially) non-compliant

plastic parts (weighing a total of 2.32 grams) were then utilised by a sensor manufacturer in Asia, which sold those assemblies to FX. FX, in turn, incorporated those assemblies into the following Xerox Equipment Units:

Xerox Limited
Riverview
Oxford Road
Uxbridge
Middlesex UB8 1HS
Telephone: 01895 251133
Facsimile: 01895 254095

- Xerox Phaser® 7500 Colour Printer
- Xerox® Phaser® 7800 Colour Printer
- Xerox® WorkCentre® 7830 / 7835 / 7845 / 7855
- Xerox® WorkCentre® 7970
- Total excess cadmium weight per Xerox Equipment Unit is very small (approximately 5.8 mg per Unit) and can be found in the four small plastic parts which are located within a sensor assembly deep within the Xerox Equipment Unit which weigh between 66 kg and 268 kg. Xerox possesses RoHS II compliance certifications from its supplier. FX discovered the excess cadmium during periodic screening as part of the supply chain RoHS II due diligence efforts.
- Total excess cadmium that we believe Xerox may have made available across all Member States combined (as listed below) is approximately 0.10 kg. The potentially impacted Xerox Equipment Units have been placed on the EU market in the following Member States:

Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the United Kingdom.
- Xerox is in the process of informing the competent authorities in each relevant Member State of the potential non-conformity issue.

2. CORRECTIVE MEASURES TO BRING THE EEE IN CONFORMITY

- The cadmium is bound up in a hard resin material and was not and cannot reasonably become subject to grinding, abrasion or leaching of any kind in connection with routine use or repair of the Xerox Equipment Unit. The parts are enclosed deep within the Xerox Equipment Unit, and are not accessible by customers.
- FX is now utilizing compliant parts in production and the manufacturer of the plastic parts is now purchasing the resin from an authorised agent. All new batches of sensors have been assigned a test plan and are being checked by FX for ROHS II compliance upon receipt from the sensor supplier.

On determining the potential non-compliance, all Xerox Equipment Units in the Xerox-controlled distribution channels across the EU Member States were promptly placed on hold. These Xerox Equipment Units will be returned to a central location and undergo a retrofit prior to being made available for sale.

Xerox Equipment Units which have already been installed at customer sites or are otherwise outside of Xerox's control in the distribution chain will be identified for retrofit on a "next call" basis by service engineers at end customer location. Xerox Equipment Units will be marked with a modification tag to show the product has been reworked.

- Any non-compliant parts will be either retrofitted by the sub-assembly manufacturer or will be collected and disposed in an environmentally sound manner in compliance with applicable regulations.
- Xerox estimates that a total of 15,637 Xerox Equipment Units have been made available across the relevant Member States (including your jurisdiction), of which (i) 9,418 Xerox Equipment Units are installed with end customers and/or in distribution beyond Xerox's control and (ii) 6,219 Xerox Equipment Units are within Xerox's warehouses or distribution channels and will be taken back and retrofitted before customer installation. For your jurisdiction, approximately 71 Xerox Equipment Units are impacted.
- Xerox has received the approval of the United Kingdom National Measurements Office enforcement personnel to carry out the above plan. We anticipate that the UK NMO will be contacting your agency via your enforcement communication network with further details.

We trust that this written notice satisfies the requirements of the RoHS II Directive and that Xerox has sufficiently addressed this matter in a timely and effective fashion in accordance with the requirements of the ROHS II Directive.

Please feel free to contact me for further information.

Yours faithfully



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