

**Comments on Draft Final
EU Comments
09/17/2008**

Please find below a brief summary of the main comments provided by the EU Member State experts + 1 industry representative at the Sep. 8th meeting.

General Issues

Setting Qualification Levels

Member States experts commented on the general principle of using the 25 % qualification level for all specification setting instead of also including a technological approach. E.g. it was mentioned that it may look strange to have a sleep value of 1.4 W instead of 1 W.

Label and registration

It was asked if products should be registered at either US EPA or the EC before a manufacturer can claim that the product complies with Energy Star or is labeled with Energy Star because this is not stated clearly in the partner commitment section of the specification. The US EPA has confirmed after the meeting that only product registered can be marketed as Energy Star products.

Reason for the question was that a MS had seen products declared as Energy Star compliant without being in the database.

Verification

Verification of the product in EU was raised. The verification is a responsibility of the EU Member States.

Imaging Equipment

The Member States experts did not have major objections to the final draft specification.

They and the industry representative gave the following comments:

- The data behind the reported TEC values should be published on the EU Energy Star web site.
- The recovery times of the products should be collected and published because these are important for the power management.
- The industry representative mentioned that short wake-up times may be difficult to implement for some manufacturers because many fast fusing technologies are patented.
- For the definition of the standby mode it was commented that the definition in the new draft IEC specification should be used even though it is not finally approved.
- The report on imaging equipment from the EU market survey should be available now.
- Some of the TEC lines are quite close to each other and it could be considered to combine some of them.

- It sends a wrong signal that some sleep values for OM products have been raised due to removal of PSOR adder for these products. In the communication of the new specification, the rationale behind the change should be clearly stated.

- It was not understood why there should be a PSOR adder for inkjet printers (OM2). The energy impact on the sleep level seems however to be small.