

Comments of Group for Energy Efficient Appliances on “Energy Star® Qualified Imaging Equipment. Specification Revision. Directional Draft”



Introduction

The European Commission has invited GEEA (Group for Energy Efficient Appliances) to submit comments to the “Energy Star® Qualified Imaging Equipment. Specification Revision. Directional Draft”. Brief comments are provided in the following.

Harmonisation of Labelling Activities and Collaboration with GEEA

It is recommended that the US EPA works for harmonising as much as possible with other energy labelling schemes and similar energy efficiency activities concerning primarily definitions and test methods and secondly levels and schedules.

As a consequence of this, GEEA invites US EPA to involve GEEA in the revision activities. GEEA intends to harmonise product groups, definitions etc. under the GEEA scheme with the Energy Star and consequently has also initiated a revision process of imaging technology product groups under GEEA.

One proposal is to share data collections, studies, experiences etc. on both sides.

Grouping of Products

GEEA agrees with Energy Star in combining the various imaging technology products in one product group. GEEA further recommends that the principle used for the newly revised monitor specification also is used for imaging technologies i.e. mainly grouping according to service provided by the device and not the technology to produce the service.

Modes

GEEA recommends the Energy Star to carefully consider the use of duty cycle versus the traditional mode criteria approach. Uncertainties of the duty cycle method increase with different usage patterns at the users. In any case, use of duty cycle should be combined with low power consumption in off and sleep modes.

The modes comprised by the specification should be the modes with the largest consumption and largest saving potential.

Criteria

GEEA supports the Energy Star’s approach of substituting the stepwise criteria with linear dependencies between speed and power requirements. GEEA also recommends Energy Star to stick to the overall target of labelling the top 25 percent of marketed appliances. At the same time Energy Star should also not only passively look at the present market but also more proactively study promising technologies, which are available at the market or which could be brought into the market in near future.

Use a More Targeted Approach

When revising the product groups and the criteria, it is recommended that the efforts are focused at the areas with largest consumption and saving potentials by combining data of:

- sales of the various product types for various consumer segments;
- power consumption data for the product types in the various modes; and
- usage pattern for the various products and various consumer segments.

Faster Reaction to Market Changes

The imaging technology area is under considerable development these years, which makes it necessary to follow the market closely both regarding market sales and technology development and use a more flexible and dynamic approach to the revision process. This would make the US EPA able to revise the criteria and product groups frequently and when it is needed.