

Memo

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from Jos Beekwilder (Canon Production Printing) to Ryan Fogle (EPA) John Clinger (ICFI) copy to

subject

Feedback regarding Draft version 3.1 of ENERGY STAR specification for Imaging Equipment

Canon Production Printing thanks the EPA for the opportunity to provide feedback regarding the draft of Version 3.1 of the ENERGY STAR Product Specification for Imaging Equipment. This document is mainly intended to voice a number of concerns with the definition of “remanufactured equipment” and the consequences of that definition.

The below contains our concerns point by point:

- In general: While a definition is developed in the draft revision, the requirements for remanufactured products are the same as for new products. In the requirements and definition it remains unclear why remanufactured products are differentiated from new products.
- Further to the definition of “remanufactured product” in general one could conclude that a remanufactured product cannot be distinguished from a new product, other than by the designation that the manufacturer must attach to the remanufactured product: Functionality (firmware and performance), Performance, Appearance, and Warranty are defined to be the same as the new product, hence the only distinction is the utilization of new and reused components from the OEM – We would like to bring to the attention that the utilization of reused components is practiced by several manufacturers in products qualified as new. From this perspective one could understand that even such new products are remanufactured products, which would make the situation confusing for customers.
- More specifically clause 1-9-b stipulates “Firmware updated to the most recent version and erasing of all existing user data for security purposes”. As (in general) it is not possible to update the firmware beyond the capabilities of the original base model, we propose to add the following (underlined) wording to the clause: “Firmware updated to the most recent version of the model which was the basis of the remanufactured product and erasing of all existing user data for security purposes”.
- Regarding clause 1-9-c (“As new” performance including image quality, functionality, and energy performance) note that the remanufactured product is based on the model that was originally manufactured (typically) several years ago so that its energy performance will be that of models manufactured in the past. The term “as new” in this clause is confusing in that sense. An option would be to replace it by “Same as at the time of original manufacture” (the definition then would read: Same performance including image quality, functionality, and energy performance as at the original time of manufacture. (new wording underlined).

- Regarding Clause 1-9-d (“Cosmetically, as new, appearance”), we have asked ourselves what is the relevance for energy efficiency or environmental performance of this part of the definition. While clauses a, b, c, and e are essential for the functioning of the product, clause d does not seem a necessary factor. We would recommend leaving this clause out of the definition.
- Regarding the note to Table 1 in section 2.1 (“Remanufactured products would be evaluated the same as new products.”): because a remanufactured product is based on the model that was originally manufactured (typically) several years ago (previous generation of products) its energy performance will be the same as products of a previous generation. In order to make a meaningful distinction between new products and remanufactured products, we propose that the energy requirement for remanufactured products should be the same requirement as in the ENERGY STAR specification version that was valid at the time when the original model of the remanufactured product was registered.
- Regarding EPA’s note under section 4.2.3 (“remanufactured products need to be tested separately from the new product listing”) – we believe that separate testing is not necessary: the original product (when it was registered as a new product) has been tested according to ENERGY STAR test specifications. Even if part replacement, firmware update and/or cleaning were done, energy consumption of the remanufactured product is the same as long as the engine of the remanufactured product is the same as the one of the base model (which is required by the definition).

Concluding, Canon Production Printing believes that the addition of remanufactured products to the ENERGY STAR Specification for Imaging Equipment will do very limited justice to the environmental benefits of prolonging the lifetime of in the market by means of an additional usage cycle. We strongly recommend to follow our above recommendations.

In case of further questions, the EPA is invited to contact the author of this document.