

Comments on ENERGY STAR Product Specification for Imaging Equipment Eligibility Criteria Draft Version 3.1

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Overall

We too agree to the idea that the inclusion of remanufactured products to ENERGY STAR would bring about apparent benefit to the global environment, noting the imaging equipment consumes more energy in manufacturing stage (including raw material procurement) than in usage stage.

However, remanufactured products that conform to Version 3.0 have already been registered to ENERGY STAR. Notwithstanding this fact, the new proposal Version 3.1 has been published. We request the EPA to show in detail its background and rationale.

Also, it is written that current registered products are not influenced by Version 3.1. A question is; after Version 3.1 is in effect, whether a remanufactured product, which does not meet the definition but satisfies the other criteria, can no longer be registered anew with Version 3.1.

In the cover letter it is described as follows in *italics*, meaning that this proposal adds only the definition of remanufactured products with its criteria referring to that of the recent Version 3.0;

"EPA proposes to allow for certification of remanufactured imaging products if they meet the enclosed definition and the same eligibility criteria as a corresponding new model."

We recognize that a remanufactured product is a model (belonging to the previous generation), which had once been shipped to the market, was collected

after several-year use and will be once again shipped to the market after changing minimum parts/units and upgrading firmware to guarantee the product performance. Therefore, its energy performance is the same as that of the previous generation.

Thus, we deem, the conformity criteria of remanufactured products must refer to the same version as that which was applied to the base model at the time of its registration. Please let us know what the EPA thinks regarding the criteria of remanufactured products, including a possible addition of criteria.

1-A-9) Remanufactured Imaging Equipment

The overview of remanufactured products, as we understand, is as follows;

“A remanufactured product is a product based on a model (previous generation), which was once shipped to the market, collected after several-year use and will be once again shipped to the market after changing minimum parts/units and upgrading firmware in order to guarantee its performance.”

The remanufactured product suppresses the energy use in manufacturing stage (including raw material procurement) and reduces the load to global environment. Therefore, the specification of remanufactured product is not appropriate, if it conflicts with the aforementioned point.

We would like to request the EPA to review and revise the definition and specifications of the proposed draft as described below.

Definition of remanufactured products

[Revision proposal]

In order to make the meaning of “like new” clearer, add “of the base model” as follows;

“Product that meets the definition of a product (as defined in Section 1.A) 1-8)), which has been returned to a “like new” state of the base model by the manufacturer.”

1-A)-9-b) Firmware updated

[Revision proposal]

In order to make the meaning of “most recent version” clearer, modify as follows;

“Firmware shall be updated to the most recent version of the base model of the remanufactured product, erasing all existing user data for the purpose of security.”

[Rationale]

For a remanufactured product, a collected product is used, which was manufactured basically several years ago, i.e. belonging to the previous generation. Therefore, its firmware may not be functionally the same as that of the most recent model belonging to the new generation. As such, the description of “firmware” shall be “firmware of the collected base model”.

1-A)-9)-c) “As new” performance

[Revision proposal]

Delete “energy performance” and revise as follows;

““As new” performance including image quality and functionality.”

[Rationale]

The remanufactured product is a collected product made “like a new product”. Its performance cannot be better than that of the base model, i.e. its energy-saving performance is the same as its base model. Therefore, the energy criteria (TEC) of the remanufactured product shall be the same as that applied to the base model as it was manufactured and shipped to the market.

1-A)-9)-d) Cosmetically, as new, appearance

[Revision proposal]

The item 1-A)-9)-d) should be deleted.

[Rationale]

From the standpoint of energy-saving in remanufacturing stage, it is important to

make maximum re-use of parts in order not to waste energy. To meet this point, the exterior part should be washed/cleaned and re-used without exchanging to the new part. Thus, the energy to manufacture the new part and to discard the taken-away part becomes unnecessary, leading to energy-saving.

The current expression looks like suggesting to exchange even an adequately reusable exterior part for a new exterior part.

1-A)-9)-e) Warranty of same length

[Comment]

Clarify the meaning of "warranty".

We recognize that "warranty" means the period during which the product quality is guaranteed (so-called the product warranty period), not the product life.

[Reason]

If "warranty" requires "product life", it is difficult to require the same product life for remanufactured product as that of new product.

In order to make the remanufactured product, which has been used in the market for many years, acquire the same life as new product, a number of parts/units need to be changed. Then the merit of remanufactured product, i.e. reducing energy in manufacturing stage (including raw material procurement), will fade away.

4.2.3 All units/configurations for...

[Revision proposal]

The requirement to assign an identifier in the model name/number should not be mandatory but arbitrary.

Please explain the necessity and the rationale of this requirement.

[Rationale]

If the product specification including energy-saving performance is quite the same, there is a case to sell the remanufactured product with the same model name/number as the new product.

In this case, since the energy performance of the remanufactured product is the same as that of the new product, there is no need to test/register separately.

Also, the change of model number has an impact not only to ENERGY STAR

registration but also to a number of safety standards, urging a lot of load to manufacturers.

6.1.1 Effective Date

[Comment]

Please let us know the revision schedule of Version 3.1 (publication date, effective date).

END