Overview:

Tier 2 will address:
- Potential revision for new Tier 2 TEC levels.
- Potential revision for new Tier 2 standby levels for large format OM products and mailing machines.
These TEC and standby levels will be determined from a review of qualified and non-qualified data.

General comments:

1. **Power supply requirements:**
   Tier 2 will require manufacturers to meet the External Power Supply (ePSU) requirements specification Tier 2.
   **MTP comments:** recommend consistency of approach with other office equipment specifications currently under review, and that wording incorporated in new tier includes compliance with “the latest” EPSU requirements to ensure requirements continue to be harmonised.

2. **TEC approach:**
   The EC has questioned if we should be moving towards a TEC approach for all printers? Could TEC be applied to all different categories of printer?
   **MTP comment:** Although this may not be possible in the short term, due to timescales, and also the potential that TEC is not suitable for lower use printers, in the longer term perhaps TEC could be adapted to be applied to all printers? Industry questioned the need to compare between OM and TEC printers, but fundamentally, a non technology-specific approach would be preferable.
   Some issues were identified in the EuP study (www.ecoimaging.org) with the TEC methodology over stating usage. It would be worthwhile the EPA addressing these issues and endeavouring to improve the TEC approach accordingly. Already declared values could be adapted in retrospect.

3. **EuP:**
   It would be worthwhile the EPA examining the EuP study on imaging to insure harmonisation of approaches.