

ENERGY STAR Program Requirements for Imaging Equipment – V. 1.1 – Draft 1 – Comments from Stakeholders

In this document is presented a summary of comments received from members of the European Community Energy Star Board (ECESB) Technical Working Group on ENERGY STAR Program Requirements for Imaging Equipment – V. 1.1 – Draft 1.

Comments were received by the following Member States: The Netherlands (SenterNovem), United Kingdom (Market Transformation Programme) and Austria (Austrian Energy Agency).

Comments were received by the following manufacturers: Ricoh Europe, Canon, Océ, Brother and Lexmark.

The comments have been summarised and should not be seen as necessarily achieved in consensus among the Member States and the manufacturers, respectively. Full details of the comments can be achieved from the stakeholders.

Comments by the Member States

They support the revision of the specification and support setting the criteria at levels allowing not more than 25 % of the products to qualify. They furthermore support the inclusion of more product data directly from the manufacturers.

Regarding the TEC test methodology, comments were provided under the EuP imaging study, which indicated that the usage assumptions built into the TEC approach were vastly over estimated – resulting in an unrealistically high TEC value (based upon usage assumptions that many products could not physically match). This means that TEC values as they stand cannot be used for purposes of understanding current and future energy consumption and it is also misleading to potential purchasers. This will however probably be difficult to resolve without delaying the specification process.

In Europe some Member States have mentioned the problem that data from the manufacturers provided in product sheets and on the web sites do not always match with the data in the ENERGY STAR databases. It may also often be difficult to see if the power consumption stated is measured in accordance with the ENERGY STAR test methodology. Therefore it should be considered to include as a requirement in the partner commitments to declare the relevant ENERGY STAR consumption data. This would benefit the purchaser and facilitate market monitoring. This applies to all products, not only imaging equipment.

In order to keep the databases continuously updated Member States commented that it should be considered to oblige the partners to update their product data shortly after a new product is brought to the market.

The Member States recommend to maintain the requirement of providing data for the relevant modes as part of the measurement method in addition to the TEC data.

Definitions

Line 197: When high performance ink jet marking technology has been included in the TEC approach, it is necessary to be defined under the definitions.

Line 259: The standby definition may not be appropriate for some products such as fax machines, because the level could be achieved by an on-off switch, which however never would be used by the user.

Eligibility Criteria

Line 441–456: The second line break is at 72 ipm. Can this be confirmed by a technology analysis? Looking at the spec lines the 72 ipm point does not seem obvious for at least TEC2 and TEC4 and less obvious for TEC3 (using the same formula for $\text{ipm} > 72$ as for $\text{ipm} < 72$ would result in only 1 appliance less compliant). For TEC1 it would result in 6 compliant appliances less.

Line 387: It is supported that EPSs should comply with the ENERGY STAR Version 2.0 EPS requirements. Inclusion of power supply efficiency requirement for internal power supplies should be considered, in line with the approach taken in the computer specification.

Line 412: The rationale behind the change in terminology from “heat intensive” to “high performance” inkjet should be provided as well as its potential impact.

Line 417–420: It is the impression that there is an increase in machines being offered with duplexing capabilities. It should be considered if it would be possible to make the requirement more stringent by requiring more machines to have automatic duplexing as standard feature. The presence of a duplexing unit should furthermore be clearly indicated in the ENERGY STAR databases so that consumers can make informed product choices.

Line 473: Member States recommend to consider if the default delay times could be reduced to maximum 15 minutes.

Line 497: Member States suggest to consider to harmonise the standby requirement with the EU Energy Using Products directive requirements for international harmonisation purposes.

Line 519–520: It is supported to remove the PSOR adder. However, the remaining functional adders make the sleep mode criteria less transparent. For a number of products the values for the adders can easily be higher than the basic values in the OM tables. Furthermore, several adders seem quite standard features. It is recommended to reconsider each of the adders. If these are to be retained, the presence of the adders per product should be clearly declared on the ENERGY STAR databases for clarity, and to aid in buying decisions.

Line 643: Avoidance of inclusion of industrial and production units should be included in the definition and not in the testing requirements. Further details are required on how “industrial and production” units should be defined, also when digital duplicators are included, which are more seen as production units.

Line 696: The Member States recommend an analysis of the recovery times for products registered in order to see the need for setting criteria for the recovery times.

Comments from the Manufacturers

Comment on the levels: The reductions of the qualification limits for some product categories are very ambitious. Furthermore, the speed threshold has been increased. Machines with less than 30 ipm will be penalised. The proposed specification uses the same limits for color printers/copiers (TEC2) and Color MFDs (TEC4). Given the extra functionality in the MFDs, additional energy should be allowed. The proposed operational mode requirements are too restrictive, they only allow 20% of the EPA's list of products to meet the new criteria. The proposed specification only uses US product data and submissions. Data from namely EU should be included. The elimination of the Power Supply Output Rating adder (PSOR) is opposed as this adder does indeed represent functionality in terms of additional features and product speed.

Comment on the data used: The models selected for the analysis were from a business publication with no regard of the actual individuals numbers sold. Furthermore, they may not be representative for the EU marketplace. Several entries are listed, but do not claim to be data from 115 V product testing. Several entries are exact duplicates of each other. The use of Better Buys for business is not a good market indicator for consumer products.

Comment on the test methodology: There is no measurement guideline set for “Network Environment”. The measurement condition during sleep mode should be clearly defined. The measurement method should be revised during the Tier 2 validity period.

Comment on the time scale: The time is short for design and manufacturing for compliance. Furthermore, the new EU procurement requirements (now mandating ENERGY STAR only purchasing of IT equipment) make it necessary for manufacturers to have at least 12 months between the finalization date of the new Energy Star specification and enforcement.

Comment on the process: A second draft should be issued before the final draft.

Line 36–47: Labeling on product literature and product packaging should be voluntary due to the no grandfathering requirement.

Line 48: The TEC data “Active 1 Time” (the time until first sheet is printed out from the sleep mode) should be disclosed in order that the customer can use this data when purchasing the product.

Line 473: The maximum default delay time should be 60 minutes.

Line 519: Fax modem has been proposed as a functional adder as part of “Other” with a level of 1 W.

Line 519: Adders for scanners with CCFL and with non-CCFL lamps should be integrated because the lamps should be off in sleep mode. Furthermore, LED lamps have less adder, however, they are more energy efficient.

Line 696: The next specification version should give incentive to products with fast recovery time from sleep mode.