



**UK Market Transformation Programme (MTP)
Feedback on ENERGY STAR Version 1.1 Imaging Specification revision.**

- **Line 387 – harmonisation with other specification requirements:** MTP would support reference to ENERGY STAR requirements for external power adapters. MTP would also suggest a power supply efficiency requirement for internal power supplies, in line with the approach taken in the computer specification. MTP supports reference to ENERGY STAR computer specification, including Tier 2 updates in 2009, for DFEs.
- **Line 412 – change in terminology from “heat intensive” to “high performance” inkjet:** Could EPA clarify why this change is required, and its potential impact?
- **Line 416 to 420 – duplexing requirements:** An improvement in duplexing requirements to result in greater coverage of duplexing would be supported by MTP (as it would potentially result in reduced paper usage, which has been found to be the largest life cycle impact of a printer). Therefore EPA could assess the presence of duplexing on the current range of products, and consider how the optional requirements could be made more stringent. The presence of a duplexing unit should be clearly indicated in the ENERGY STAR database (not currently present in the EU database) so that consumers can make informed product choices.
- **Line 442 onwards – TEC table simplification:** There is an opportunity in this draft to simplify the format of the TEC tables to make them easier to use. MTP would suggest the following alternative approach:
 1. Define speed levels for various product types:

Product	Low speed	Medium speed	High speed
Mono copiers, printers, fax, digital duplicators [TEC1]	≤ 20	20 < ipm ≤ 72	> 72 ipm
Colour copiers, printers, fax, digital duplicators, MFDs [TEC2 & 4]	≤ 6	6 < ipm ≤ 72	> 72 ipm
Mono MFDs [TEC 3]	≤ 14	14 < ipm ≤ 72	> 72 ipm

2. Define TEC values based on these speeds to simplify

Product	Low speed	Medium speed ((0.25 kWh * ipm) * X) where X = ?	High speed ((0.6 kWh * ipm) * X) where X = ?
Mono copiers, printers, fax, digital duplicators	1kWh	-4kWh	-29.2kWh
Colour copiers, printers, fax, digital duplicators, MFDs	1kWh	-0.5kWh	-25.7kWh
Mono MFDs	1kWh	-2.5kWh	-27.7kWh

- **Line 457 comment and line 575 comment – revising specification for 25% threshold** – MTP would support revision of the ENERGY STAR requirements to ensure that the coverage is maintained at the level of the top performing 25% of the market only.
- **Line 497 – revision of standby requirements** – MTP would support the addition of a standby requirement of 1W for large format devices. MTP would also suggest the addition of a standby requirement for small and standard format printers, in line with Energy Using Products directive requirements, for international harmonisation purposes.
- **Line 519 – functional adders** – It is believed that these can result in a lack of clarity in terms of threshold requirements. If these are to be retained, the presence of the adders per-product should be clearly declared on the EU ENERGY STAR database for clarity, and to aid in buying decisions.
- **Line 520 – comment that Power Supply Output Rating (PSOR) adder has been removed** – MTP supports this action – power supply should be considered in the main sleep requirement only.
- **Line 545 on - New OM values for sleep** – Revised values are supported. As threshold values for 2, 5 and potentially 6 are the same, the tables could be combined for simplicity and clarity.

- **Line 643 comment - Avoidance of inclusion of industrial and production units** – as digital duplicators are included, this exclusion does not appear to be applicable. Further details required on how “industrial and production” units are defined.
- **Additional – Modifications to the TEC test procedure/calculations:** In analysing the performance of the imaging products on the EU ENERGY STAR database, difficulties have been encountered understanding the “true” consumption of imaging products from the TEC values. From discussions under the EuP imaging study (www.ecoimaging.org) it became clear from manufacturer comments 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 for analysis purposes, TEC values as they stand cannot be used for purposes of understanding current and future energy consumption. It is also misleading to potential purchasers. There are two options to resolve these issues:
 1. Alterations to the TEC test methodology to make usage assumptions more realistic. To keep this simple, there could be an update to the Job table (Table 4 in the TEC Test Methodology) to make the jobs/images per day figures more realistic for non domestic applications. Columns could also be added to suggest jobs/images per day for domestic applications. Then TEC values for both domestic and non-domestic applications could be declared for products sold to both sectors.
 2. Addition of a requirement to the specification that power consumption be measured (and declared on the database) in some distinct modes that would allow a clearer understanding / dissection of the TEC figures. If such measurement is not possible, then declared data should at least be at a level that TEC data can be dissected to understand what it means in terms of the following general “average” modes of operation : active modes, ready modes, sleep modes, off/standby modes.

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