

ENERGY STAR Program Requirements for Imaging Equipment – V. 1.1 – Draft 1 – Comments from ECESB Technical Working Group

We present in the following comments from the European Community Energy Star Board (ECESB) Technical Working Group. These are based on written comments from the individual members and on a Technical Working Group meeting held on 30 November 2007 at the European Commission DG JRC, Ispra.

We support the revision of the specification and support to set the criteria at levels allowing not more than 25 % of the products to qualify. We 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 it should be considered to oblige the partners to update their product data shortly after a new product is brought to the market.

We would 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 ipm>72 as for ipm<72 would result in only 1 appliance less compliant). For TEC1 it would result in 6 compliant appliances less.

Line 387: We support that EPSs should comply with the ENERGY STAR Version 2.0 EPS requirements. We would like to know if it would be possible to include power supply efficiency requirement for internal power supplies, in line with the approach taken in the computer specification.

Line 412: Could EPA clarify why the change in terminology from “heat intensive” to “high performance” inkjet is required, and its potential impact?

Line 417–420: It is our impression that there is an increase in machines being offered with duplexing capabilities. Could EPA clarify 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 497: We 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. We recommend 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: Could EPA report on recovery times for products registered in order to see if there are products with unsatisfactory high recovery times?