

**ENERGY STAR[®] Qualified Imaging Equipment
Specification Revision**
July 14 Stakeholder Meeting
Discussion Topics Briefing

Introduction

To assist stakeholders in preparing for the July 14 imaging equipment meeting, EPA has developed this briefing document to outline the key topics for discussion. By using this opportunity to explain the background of each topic and share the comments EPA has heard to date, we can focus our discussion during the meeting and EPA can gather as much information as possible. EPA asks that participants review this document in advance, and come to the meeting prepared to contribute to the discussion on each of the following topics.

EPA has received many valuable comments on the Directional Draft, which will ultimately help us create the best possible specification. Many of the comments address details in the Directional Draft that cannot be finalized until an overall approach is chosen. As EPA reviewed the feedback and participated in some industry discussions, it became apparent that an industry meeting was needed to vet a few high-priority issues in an open forum, before proceeding to a lower level of granularity. If, after reading this document, you would like to suggest other high-priority topics for discussion on July 14, please e-mail dhoffmeyer@icfconsulting.com.

Framework Options for Imaging Specification Revision

The Directional Draft proposed the concept of evaluating the Typical Electricity Consumption (TEC) of copiers and MFDs throughout some time period, rather than only addressing the products' energy consumption in power-saving modes such as sleep. EPA feels that TEC is worthy of exploration for several reasons:

- Low power management enabling rates and/or very long default times may result in products spending little or no time in power management modes.
- TEC may allow manufacturers more flexibility to design for reduced energy consumption and user satisfaction.
- Eight of 11 stakeholders who commented on the TEC portion of the Directional Draft indicated general support for TEC at some level.

Discussion Questions

Where does TEC make the most sense and why? What are the disadvantages of pursuing TEC for all products? How might product performance be affected if TEC were pursued?

Appropriate Product Categorization

In the Directional Draft, EPA attempted to group like products while maintaining sufficient distinction to address differences in the way these products consume electricity. As an example, EP and Impact printers are addressed by the same energy efficiency formula on page 12. Comments received from industry indicated support for a “simple” specification; however, there was no consensus on where the divisions should fall. Suggestions included developing specifications for products based on:

- Product type
- Marking technology
- Color capability
- Speed
- Market segment

Discussion Questions

How much distinction is too much? How do we strike a balance? Which are the most important differences among products that warrant separate treatment in a specification, and how are these prioritized? Where are there similarities?

Test Procedures

Some stakeholders indicated that it was difficult to comment thoughtfully on TEC without a rudimentary test procedure. To facilitate stakeholder evaluation of the TEC approach, this test procedure has been provided. A test procedure for the traditional operational mode approach has been provided as well for comparison. It would be very informative to have a more detailed discussion about the advantages and limitations of these two test procedures.

Discussion Questions

Is the TEC test procedure clear and easy to follow? How burdensome would it be to test a product to this method? Where can you see need for improvement? How long would you need to evaluate this draft method comprehensively? How might the operational mode test procedure need to be updated?

Remanufactured Products

In Appendix C of the Directional Draft, EPA recognized the growing industry practice of remanufacturing or newly-manufacturing products, and invited comment on how these products should be treated in the imaging equipment specification. One organization responded that separate specifications for remanufactured products would result in consumer confusion. Another suggested that EPA should either recognize all environmental benefits offered by a product, or remain focused on direct electricity

consumption. Other respondents suggested specific conditions to define a remanufactured product including:

- Containing more than 60% weight of reused materials, parts, and/or components that were used prior in the field for at least three years;
- Containing as much as 80% weight of reused material or 80% reused parts; or
- Containing more than 50% reused content by weight.

EPA thinks it is important to address remanufactured products to the extent it encourages recycling.

Discussion Questions

How should remanufactured products be defined? How many products does this impact? How might ENERGY STAR definitions and criteria for remanufactured products need to change over time?

Roadmap

EPA understands that manufacturers are very concerned about product development cycles and the ability to anticipate revised ENERGY STAR criteria levels. EPA will establish effective dates and transition times carefully, attempting to provide as much advance notice as possible to aid in stakeholder preparation. However, predicting precise effective dates and specification levels will not be possible until an exact course of action is chosen.

The attached “roadmap” outlines the deliberative process EPA will follow to revise these specifications. Until we can speak more specifically to timeframe, it is hoped that this illuminates the steps that will be taken and the future opportunities for collaboration with industry.

Discussion Questions

How well-placed are the proposed industry meetings? Have any important steps been omitted? What would be a reasonable time frame for each of the elements on the roadmap, e.g. testing and review of a draft specification?