The Hague/Utrecht, 2 April 2004

Comments of the Netherlands on the Directional Draft for the Energy Star Qualified Imaging Equipment Specification Revision

Summary of comments

The Netherlands welcome the Directional Draft as a good document to start the discussion on the revision of the Imaging Equipment Specification. We further welcome:

- one umbrella specifications document
- the Typical Electricity Consumption approach for copiers and MFD and consideration of „on“ mode power consumption for other appliances

However, in general we have our reservations regarding the ambition of the specifications as included in the document, and especially regarding the way the specifications are based on market data.

We repeat our concerns regarding the involvement of Europe in the process and ask the Commission to ensure that the further steps in the process are closely co-ordinated between the US EPA and the EC. The co-operation should e.g. result in a single track of discussions with industry, and not separate discussions in the USA and EU.

During the discussions on this Directional Draft, the Netherlands may issue further comments.

Specific comments

1.4 Objectives of the Revised Specification

The Netherlands welcome the goal of setting the specifications at the top 25 % of energy-efficient products in the market.
However, experience from the past shows that aiming at 25 % when the specifications are released, may easily result in arriving at 40 to 60 % compliance when the specifications are coming into force, especially when

a) the period between releasing and coming into force is long (e.g. for monitors the Tier 2 specifications are released – and certainly known - about 2 years before coming into force), and
b) the criteria are based on „current“ (= last 2 years) market data

Four (4!) years is a long time in office equipment product development.
In that case, Energy Star looks more like a Top Runner approach: the 25 % best now will set the (minimum) standard for the rest in a couple of years.
Furthermore we recommend that criteria are not only based on market data, which may be biased towards current (step) criteria, but also on technical analysis. Especially in those situations where you will find appliances with the same characteristics (e.g. speed) but different (often up to a factor 2) power consumption, having different specifications for different speeds is questionable.

The Netherlands further welcome:

- one umbrella specifications document

- use of efficiency formulas rather than a step approach (if differentiation is necessary)
- consideration of „on“ mode power consumption

2.1 Introduction to a TEC Energy-Efficiency Specification

In the definition of energy efficiency, energy (Wh) and power (W) seem to be mixed up. Wh over time (h) results in average power consumption (W). What we presume is meant by the Specification is that a product has a maximum energy consumption limit over a specified period, e.g. 855 Wh/day.

2.3 EPA's Proposed Modifications to the Law

In view of the comment under 2.1 the Energy Efficiency formula can now be specified more clearly. If the formula is to presume a 24-hour cycle, then this should be clear from the period:
Energy Efficiency = [8A+16B] expressed as Wh/day
where:

A = energy (Wh) used during one hour of a typical working day, which may include warm up

and

B = energy (Wh) used during one hour of a typical working day when the product is off, or if network compatible, in a low-power state

To arrive at the presumed 24 hour cycle the values for A and B are multiplicated with the number of hours the appliance is assumed to be in that mode, which is in the case above 8 for A and 16 for B.

2.4 TEC Test Procedure

Should not the machine be tested with standard duplex printing?

3.2 Proposed Energy-Efficiency Criteria: Operational Mode Approach

Although we favour the formula approach over the step approach, we question the need for discriminating according to speed inside the various types. More detailed comments per appliance category follow below.

Stand-alone Fax Machines

Since Fax Machines exist with Sleep mode consumption of less then 1 W, there is no need for the Plug-in Off/Standby consumption to be 2 W. What is the use anyway for the Plug-in Off/Standby mode? Reading the definition on page 23, this definition does not apply to Fax Machines, since these appliances are *not* waiting to be switched to the Active Mode by a direct signal from a user, e.g. user pushes power switch; on the contrary, Fax Machines are always waiting for a signal on the phone line to switch them on.
Furthermore, we question the need for differentiating by speed: e.g. both machines with 3 ipm and 18 ipm exist with a Sleep consumption of 2 W.
We think the Recovery Time from Sleep is not relevant with this product, as long as the appliance does not „loose“ incoming faxes.

Printers

We think there is no reason to treat photo inkjet printers different from other inkjet printers.

At least for Monochrome Printers with a speed up to 20 ipm there is no need for differentiation on speed, since printers exists with the same speed but very different power consumption in Sleep.
The categories Color Printer and Parallel Color EP Printer differ only on the Default Time to Sleep for 3 speed bands. If this is the only difference, we think it is not worthwhile to establish different categories.

Scanners
USB scanners should be eligible for the Energy Star since they have a „natural“ power limit, and they are switched off when the PC is switched off.

Appendix B: Partner Commitments
This Appendix does not contain any obligation to partners to submit power consumption data to EPA in order to be put into a public database. This obligation should be added, e.g. at the 5th bullet.

Procedure
As already expressed in our position on the Monitor Specification (13 November 2003) the Netherlands has serious concerns regarding the involvement of Europe in the process of setting specifications for Energy Star equipment. Again a document is submitted by the US EPA only, leaving the EU behind for secondary comments.
It is the opinion of the Netherlands that such documents should be submitted jointly by the Management Entities of the International Energy Star programme, the EC and the US EPA. However, since the document has already been sent, for the Imaging Equipment Specification we ask the Commission to ensure that the further steps in the process are closely co-ordinated between the USA EPA and the EC. The co-operation should e.g. result in only one track of discussions with industry, and not seperate discussions in the USA and EU.