

Canon comments on ENERGY STAR® “Product Specification for Imaging Equipment Eligibility Criteria Final Draft Version 2.0” and
 “Program Requirements for Imaging Equipment Draft Partner Commitments”

As of December 19, 2012

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
Program Requirements for Imaging Equipment Draft <u>Partner Commitments</u> “Qualifying Products” Section 3 (Page 1)	3. Ensure that any model associated with the ENERGY STAR name or mark meets the following standards: - The generally accepted material restriction of hazardous substances (RoHS) ...(omitted)... Batteries are exempt. - The generally acceptable attributes of a recyclable product at the date of product manufacture: where products shall be designed for ease of disassembly and recyclability where external enclosures, sub-enclosures, chassis and electronic subassemblies are easily removable with commonly available tools, by hand, or by a recycler’s automated processes.	<i>We think that the whole Section 3 should be deleted.</i>	EPEAT for imaging equipment is adopted and waiting for publication. The requirement related to section 3 on the draft has been discussed for inclusion within EPEAT (prohibition of some substances & recyclability). EPEAT will be considered as one of public procurement standards like ENERGY STAR. We think that ENERGY STAR’s focus should be (limited) energy saving and efficiency, based on the original concept. If such requirement other than energy saving needs to be incorporated into the ENERGY STAR, we think that it should be further discussed with the partner with future direction of the ENERGY STAR specification. At this moment, we do not think that the issue is sufficiently discussed with partner and it will be premature to include it in the Partner Commitment Version 2.0.
<u>Product Specification</u> for Imaging Equipment Eligibility Criteria Final Draft	Table 3: Automatic Duplexing Requirements for all Monochrome TEC Copiers, MFDs, and Printers Monochrome Product Speed, s, as	Table 3: Automatic Duplexing Requirements for all <u>Color</u> TEC Copiers, MFDs, and Printers <u>Color</u> Product Speed, s, as	These seem to be typos. The titles of tables were reversed. Please correct them.

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
Version 2.0 3.3.1 Table3, Table4 (Page 9 of 20)	Calculated in the Test Method (ipm) Table 4: Automatic Duplexing Requirements for all Color TEC Copiers, MFDs, and Printers	Calculated in the Test Method (ipm) Table 4: Automatic Duplexing Requirements for all <i>Monochrome</i> TEC Copiers, MFDs, and Printers	
Equation 6: Maximum TEC Requirement Calculation (Page 11 of 20)	<i>Where:</i> <i>Adder_{A3} is a 0.02 kWh/wk allowance provided for A3 products with a paper path width equal to or greater than 11 inches.</i>	<i>Where:</i> <i>Adder_{A3} is a <u>0.2</u> kWh/wk allowance provided for A3 products with a paper path width equal to or greater than 11 inches.</i>	This seems to be a typo. Please correct it.
3.4.3 <u>Sleep Mode Power Consumption</u> , Table 7 “Sleep Mode Power Allowance for Base Marking Engine” (Page 16 of 20)	Product Type: Scanner P _{MAX_BASE} (watts): 2.5	<i>The P_{MAX_BASE} of scanners should be “2.7” as proposed in the first draft:</i> Product Type: Scanner P _{MAX_BASE} (watts): <u>2.7</u>	The wattage allowance for base engine of scanner is reduced up to 2.5 W by using only qual models (limited market share), according to the Note (page 16). However, it is very unclear how the allowance level was analyzed, and it is not reasonable to reflect such limited analyses on the wattage allowance as applies to overall scanners. Furthermore, although models older than 2010 were removed from the data set, the sale cycle of scanners is typically 3 years. Therefore, we believe that data set should cover at least the models after 2009. As mentioned above, we believe that 2.7 W on the Draft 1 is appropriate for the base engine of scanners set as estimated 30% conformance rate according to the material used at the Draft 1 Stakeholder meeting.
6.1.1 Effective date Page 19 of 20	The Version 2.0 ENERGY STAR Imaging Equipment specification	<i>We believe that the following paragraph should be added to the</i>	The changes of the test methods for TEC in Version 2.0 are small, therefore it is expected that re-measurement has no

Section	Current draft text	Proposed amendments <i>(Shown in italic, red font)</i>	Reasons of our proposals
<p>(Please also see Draft 1 Page 19 of 20 6.1.1 Effective date (Note: Line634-636))</p>	<p>shall take effect on October 1, 2013. To qualify for ENERGY STAR, a product model shall meet the ENERGY STAR specification in effect on its date of manufacture. The date of manufacture is specific to each unit and is the date on which a unit is considered to be completely assembled.</p> <p><i>(As of July 1, 2013 only those models that have been third-party certified by an EPA recognized Certification Body will remain on the ENERGY STAR Qualified Product List.)</i></p>	<p><i>end of current 6.1.1:</i></p> <p><i><u>As of October 1, 2013 only those models that have been third-party certified by an EPA-recognized Certification Body will remain on the ENERGY STAR Qualified Product List. However, a model may continue to use previous test results under the test methods for Versions 1.1/1.2 for qualification of the model under Ver.2.0, if an EPA-recognized Certification Body confirms that both of following two conditions are met :</u></i></p> <p><i><u>a) the changes of test methods from Versions 1.1/1.2 to Ver. 2.0 don't have substantial effects on the results of energy consumption of such model, and</u></i></p> <p><i><u>b) the model has earned ENERGY STAR Product Specification for Imaging Equipment Ver.1.1 and whose data have already met the criteria of Ver.2.0.</u></i></p>	<p>effect on judging whether a model can be qualified or not in many cases. It may impose unreasonable burden on the industry to require the test result under version 2.0 in the third party certification in such cases.</p> <p>According to the previous discussion, both of models registered in Version 1.1 prior to introducing third-party certification and models registered in Version 1.2 via third-party certification are required for third-party certification / measurement after starting Version 2.0 again.</p> <p>However, for some product types currently have a significant number of qualified products. If many models need to be re-qualifies, the manufacturers have to bear a huge amount of cost for the re-qualification.</p> <p>Even if the test results under Ver.1.1 prior to introducing third-party certification cannot be accepted, a model which has earned ENERGY STAR Product Specification for Imaging Equipment Ver.1.2 via third-party certification should be able to continue to use previous data without third-party certification for re-qualification of the model for Ver.2.0, if an EPA-recognized Certification Body confirms that the test results for such model under Ver. 1.2 are still effective under Ver. 2.0 and that the data have already met the criteria of Ver.2.0.</p>

