



# Memo

Venlo, 26 July 2012

from  
Jos Beekwilder

to  
EPA - Christopher Kent

reference  
ICFI - Matt Malinowski

JBEE|12-0196

subject  
ENERGY STAR for Imaging Equipment, version 2.0 second draft: Océ position

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Océ welcomes the opportunity to provide comments on the second draft ENERGY STAR Product Specification for Imaging Equipment version 2.0 and the pertaining draft partner commitments. Océ's specific attention was dedicated to the definition and proposed criteria for Digital Front Ends, following our proposals done after the stakeholder meeting in March.

Océ thinks that the definition of Digital Front End types and the TEC criteria in the second draft document are clear and provide a good balance between ambition and commonly currently available technology.

Below we will discuss our concerns with the current draft specifications.

## Non-energy criteria

The EPA has decided to move the non-energy requirements from the Product Specifications – eligibility criteria - to the Partner Commitment section of the Program Requirements. Although Océ is still not positive about the addition of non-energy criteria to the ENERGY STAR program, we understand that this decision may already be taken and irreversible. We are concerned that the requirements as written in the draft, referring to the RoHS directive, can be misinterpreted. The requirements following from the RoHS directive are dynamic, as exemptions will be revised and can expire under this directive. It should be very clear for manufacturers that the partner commitment refers to the state of RoHS requirements at the date of manufacture. In order to underline this, we propose to add reference to the current RoHS directive 2011/65/EU in order to avoid confusion with the first version of the RoHS directive and to incorporate the dynamic character of the directive.

## TEC criteria

In section 3.3.2 of the draft eligibility criteria table 4 (line 412) seems to contain a typographical error: the criteria for Monochrome MFD's as written in the draft leave a gap between 80 and 90 ipm. It seems that the fastest Monochrome MFD category should start at 80 ipm. We ask the EPA to check and confirm this.

#### Definition of “product family”

With respect to the definition of “product family” (lines 175-185 of the draft specifications) and the requirement for the number of units to be tested (lines 611-619 of the draft specifications) there is no mention that the models should be tested “as-shipped”. This was clarified in the notes to the first draft of the specifications but it did not return in the second draft. Without the requirement to test as-shipped, it could be that non-manufacturer parties add energy consuming components after installation, that would require requalification of the model. Such after-market changes can not be controlled by the manufacturer and should be excluded from the requirements. Océ urges the EPA to add the requirement “as shipped” to the requirements for testing in section 4.2 of the specifications.

#### Effective date

With respect to the Effective Date (lines 627 and following) as stated in the draft eligibility criteria, Océ has concerns that the proposed effective date is too ambitious. Due to the revision of the test-specifications, all products that are currently qualified have to be re-tested, in addition to a number of products that require a redesign in order to meet the proposed criteria. Although the intention of the EPA is, to have a limited percentage of available models qualified at the effective date, this amount of models still represents a considerable challenge for the certification institutes and affiliated laboratories, so that the limitation for qualification will be the available test capacity instead of technological innovation challenges. We propose that the EPA considers a later effective date, i.e. in the spring of 2014.

#### Provisions for remanufactured products

Finally, Océ notes that the discussion on remanufactured models that took place during the stakeholder consultation meeting in March 2012 is in no way reflected in the draft criteria. While we understand that the EPA did not have time to draft any criteria for remanufactured products in the short timeframe until now, Océ would expect that the topic of rewarding resource efficiency (embedded energy) by remanufacturing imaging equipment would be high on the list of items for consideration in a future revision. A number of manufacturers has significant remanufacturing operations, and stimulating such practices can significantly contribute to savings. We propose to consider this and we are prepared to work with the EPA and other stakeholders in order to develop guidelines how to treat remanufactured products.

Kind regards,

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Director Product Safety & Environment