

## **JBCE response to EuP Preparatory Studies Lot 4 Task 1-8**

### **Report published December 2007**

JBCE would appreciate for having this opportunity to express our opinions to Fraunhofer IZM regarding the EuP Preparatory Studies Lot 4 “Imaging equipments” draft final report on Task 1-8 published on 4<sup>th</sup> December 2007.

At start we would like to express our impression about latest report especially about the draft Task 8 results. We believe that our industry have been contributing and supporting Fraunhofer IZM's study for the last 18 months. We were surprised and confused to see the totally different concept written in the draft Task 8 results. There are so many new recommendations without properly studied or explained in the Task 1-7 reports. Unfortunately we could not see any logical approach and support policy recommendations in your Task 8 report. We believe that the EuP preparatory study should be purely based on the scientific approach and would not take into any political account if any. We are seriously regrettable with your Task 8 report at this moment and highly request to take account of our opinions expressed in our position paper.

#### ***1. Networked standby requirement (T8 page 16)***

Firstly, JBCE would like to express that the definition “Networked standby” is not feasible to be discussed in Lot 4, because as you mentioned on T7 page7 that there are considerable overlaps with the “sleep mode” definition of the Energy Star Program. We agree that adoption of Lot 6 “networked standby” as an operational mode in the Energy Star Program in the future. However this proposed adoption can be only achieved by US EPA on next Tier 2. “Networked Standby” requirement can be set only after the Energy Star Tier 2 decision.

Secondly we understand in the previous Task report on T7 page18 that Networked Standby was discussed for IJ machines only. We would like to request your understanding that from the characteristics of EP and IJ products, it is completely difficult to have same “Networked Standby” requirements for EP and IJ machines. We agree that the “Networked Standby Type ” requirements practically to the IJ products in the future, however that will only happen when Energy Star Tier 2 OM adopts the “Networked Standby” and appropriate studies with current data to be taken.

Thirdly we would like to stress that as you've mentioned in the previous Task on T7 page 19, average sleep mode power consumption is currently between 10 and 30 Watts for medium and high speed EP-products. (Note that you states the Energy Star Program's "sleep mode" definition with the Lot 6 "networked standby" definition is similar scope (T7 page18).) It is completely unrealistic to set "Networked Standby Type " requirements for EP products. It is not applicable to set EuP requirement that most of the products in the market can not match. (Note the purpose of EuP is to exclude the worst 20% products in the market.) We agree with the "Networked Standby Type " requirements practically to the EP products in the future, however that will require the modification of the "Networked Standby Type " definition, Energy Star Tier 2 "Sleep mode" adoption of the "Networked Standby" and appropriate studies with current data.

As conclusion, JBCE would like to strongly express that the adoption of "Networked Standby" requirements proposed in T8 page 16 is not studied appropriately with relevant data and we feel total incomprehension with your unpractical recommendations. JBCE would strongly request your understanding and propose you to delete the "Networked Standby" requirements from Task 8 report.

### ***2. Default delay time settings (T8 page 14)***

Regarding the default delay time setting, the definition must be explained as if this is referring to the setting at the factory shipping, we do not have any objections about this. Assuming it is referring to the time setting limit, we do not see any logic with separating limits with 150 Watt (above and below, what about the machine with 150W). We also don't identify the time limit you set (30 minutes and 60 minutes) backed up by the data. However we agree the necessity of shorter default time settings for transition into networked standby and see "4. Maximum time limit for the "transition phase" should be 240 minutes." as only good candidate for appropriate recommendation for EuP.

### ***3. Disclosing product information (T8 page 15)***

Regarding the disclosing product information, we believe that the proposed data 1-3, referring to the different mode seems irrelevant as the mode definition the manufactures use are not harmonized and since different companies use different modes, the data which will be indicated by the companies based on the various test procedures or conditions could make consumers confused. Although we agree with the proposed data 4(TEC and OM) the method of disclosure should not be restricted only to the user manual. We believe the provision of the data on the manufacturer's website, for example, would be much more practical as the user manual will require more than 20 different languages and create unnecessary cost for the manufactures and to the customers eventually.

### ***4. ENERGY STAR TEC (and OM) Tier1 as minimum requirement***

We welcome the idea of adopting the ENERGY STAR TEC energy efficiency requirements Tier 1 for EP products as possible EuP Implementing Measure. (Again the purpose of EuP is

to exclude the worst 20% products in the market, we believe it is most feasible figures for 2010.) We would also like to propose ENERGY STAR OM energy efficiency requirement for inkjet products as possible EuP IM with the same reasons.

#### **5. Off-mode requirement**

Proposing the adoption of the Energy Star OM as possible implementing measure for OM, we strongly believe it is unnecessary to have Lot 6 off-mode requirements as additional criteria.

#### **6. Harmonization of substance emissions requirements**

As you clearly defined “it is not possible to define particular eco-design options and assess their improvement potential...” in T7 page 27, it is not feasible to adopt the Blue Angel (RAL\_UZ 122) criteria.

#### **7. Development of Eco-Profile methodology**

As you mentioned in T8 page 19, we also believe there is currently no appropriate methodology in place to come to such eco-profile data in a comparable, standardized way. We support ECMA-370 as a good starting point or may be already a possible candidate. Thus it is too early to refer to the relevant criteria (in T8 page 18). We strongly recommend European Commission to proceed appropriate study to develop the relevant criteria list.

#### **8. Cartridge design and efficiency**

The information disclosure of the toner or ink cartridge yield should be stated as in the user manual, manufacturer’s website or product brochure, respecting the individual company’s measurement procedure.

#### **Conclusion**

Finally JBCE would like to emphasize again that the Networked Standby criteria you have proposed (Type 2 for Imaging Equipments) in the draft Task 8 report is just not practical solution that could cause the possibility that most of the products could disappear from the market (and that is obviously not the intension of EuP).

We would like to support adoption of Energy Star (TEC and OM) Tier 1 as practical minimum requirement.

We appreciate your understanding of exempting the products of >85ipm and >A3 from the Lot4 scope, as they are mostly used in the professional conditions. We believe that it is not feasible and practical to add them to the scope of office imaging equipments.

Stakeholders of Lot4 companies in JBCE are willing to provide the relative data individually. We would welcome any of your further instructions on which data could be useful to be provided for the further study to finalize the text.