



ecee's comments on the Working Document for a Voluntary Agreement for imaging equipment

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Why the current proposal is not acceptable

ecee believes that the proposal for a voluntary agreement for imaging equipment as described in the Working Document is weak. In its current form it is far from an adequate alternative to an implementing measure. The proposed agreement is not ambitious enough: With 80 % market coverage and a 50 % compliance rate, the effective coverage is only 40 % of products on the market.

The compliance rate of 50 percent as of 1 January 2011 is probably what would be achieved by Energy Star Imaging Equipment specification without this agreement; thus the agreement seems to have no added value. The commitments should therefore be much stricter.

In general we believe that a voluntary agreement could serve as a substitute for legal measures (implementing measures). However, if the agreement is too weak, all other voluntary agreements would risk a bad reputation.

Specific comments

Alignment with Energy Star

ecee supports alignment with Energy Star requirements and definitions. However, several of the aspects covered in the Energy Star specification are not covered in the proposed voluntary agreement.

Scope

The scope is limited to standard size format products with three types of marking engine. We suggest the scope to be extended also to cover small and large format products as well as other commonly used marking engines.

Furthermore, not all requirements from Energy Star have been included e.g. delay time to sleep.

About the European Council for an Energy Efficient Economy (ecee)

ecee is a non-profit, membership-based European NGO. The goal of ecee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, ecee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of ecee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 participants from a wide range of backgrounds. ecee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.