



eceee comments on a voluntary agreement for imaging equipment

2010-03-25

Summary and proposals

The proposal of 19 February has some improvements compared to the first proposal, but is still not sufficient to satisfy the requirements for a solid and reliable voluntary agreement as a replacement for regulation.

We have the following specific comments:

- The market coverage is acceptable.
- We believe that at least 90% of the products should meet EnergyStar criteria by 1 January 2012, 80% is not ambitious enough. This is particularly important since some exemptions are also proposed.
- The first tier proposed by 1 January 2011 could be removed. It is better to go for the second tier directly in order to make the voluntary agreement less complicated.
- We don't understand why there should be exemptions for recycling of toners from products sold in small numbers. As we understand it, toner recycling is not connected to individual models.
- Why would a voluntary agreement need special promotion activities? A voluntary agreement is a replacement for regulation and not a consumer information activity.

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

eceee is a non-profit, membership-based European NGO. The goal of eceee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, eceee 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 eceee'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 people and offers governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.

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