

Proposal part	Amendment/Change Stakeholder comments	Rationale received/Explanation/Reply to comments	Action Taken
Scope & Definitions	Stakeholders commented on the change of the wording for the clarifications of the scope. (excluding of scanners) Some definitions should be harmonized with Ecodesign (like large format printers).	The wording was changed to improve the clarity of the scope, and some definitions were changed.	Comments accepted
Criterion 2.Duplex printing requirement	Some stakeholders claimed that the benchmark of 19 ipm (images per minute) is too low for requesting a duplex printing. They asked to harmonize the criterion with the Blue Angel criterion, in which a different benchmark is set.	Data provided in the Technical Background Report (TBR) shows that 10-20 % of the products available on the market can meet the target of duplex printing with the speed of 19 ipm (This is consistent with the goals of EU Ecolabel. In addition, 19ipm is used in the recently published Energy Star criteria V2.0.	Comment not accepted
Criterion 4 a) Energy efficiency	One member state requested not considering that remanufactured products shall meet the energy efficiency requirements of the ENERGY STAR specifications for imaging equipment at the time of sale of original products.	As scientific evidence for comparing material saving to energy saving due to the remanufacturing was lacking, the reference to remanufacturing was withdrawn from the energy criteria, especiallt that energy efficiency is, beside paper consumption, the most important criterion for this product group.	Comment accepted
Criterion 4 b) Energy efficiency	Stakeholders requested third party verifications in assessment and verification.	A test report is required and is considered sufficient for the verification. There is a strong case for harmonisation with EU Energy Star programme, which does not require third party verification.	Comment not accepted

<p>Criterion 6. Noise emissions</p>	<p>Stakeholders requested harmonization with the draft Blue Angel RAL UZ121, proposing a linear formula for measuring the noise limits.</p>	<p>Outcome of the research work coordinated with the Blue Angel expert on noise was the development of the noise model (with logarithmic formula) for benchmarking noise emissions. Technical evidence is provided in TBR showing that the log curve modelling is more comprehensive and reflects better the real results obtained by products currently available compared to the linear model. This is supported by the expert on noise of Blue Angel and the German Environmental Agency. Moreover, in the revision process of Nordic Swan Ecolabel criteria for imaging equipment the logarithmic model proposed by JRC is supported.</p>	<p>Comment not accepted</p>
<p>Criterion 7. Excluded or limited substances and mixtures</p>	<p>a) Proposal of deletion or at least limiting of the list of restricted R-phrases. Furthermore it was pointed out that the compliance of EU Ecolabel shall not be based on self-declaration. b) The compliance with SVHC candidate list at the time of establishing of Ecolabel requirement; compliance with REACH does not permit to refer to homogenous part of complex articles. c) Proposal for a lifting of derogation for Ink & Toners, or a more thorough investigation on the reasons of derogations for Ink & Toners.</p>	<p>a) The criterion 7(b) reflects the requirements set in the EU Ecolabel Regulation 66/2010 and is applied horizontally for all product groups (It should be remembered that the EU Ecolabel is a voluntary instrument aiming at 10-20% of the best performing, from the environmental point of view, products available on the market). Therefore a simple reduction of the R-phrases list agreed for the EU Ecolabelled imaging equipment products was not possible. However, along the consultation process Industry was given the possibility to submit justified requests for derogation with technical rationale. These applications were then evaluated by the project team in cooperation with external independent experts. Few industrial stakeholders manufacturers submitted however derogation requests.</p>	<p>Comments not accepted</p>

A declaration together with related documentation, such as declarations of compliance signed by the suppliers, on the non-classification of the substances or materials is required for imaging equipment. As these products are complex articles (made of many parts) and not chemical mixtures; therefore Safety Data Sheets are not available for single parts and they cannot be traced back the supply chain. Finally, JRC and DG ENV are currently engaging with stakeholder in a process (i.e. the Horizontal Task for on Chemicals") to look at this issues in the round across all products.

b) The Ecolabel product group go through the same procedure also with regards to the establishment of criteria, relating the SVHC candidate list. The Ecolabel regulation does refer to homogenous part of complex article.

c) In the context of Imaging Equipment criteria, Ink & Toner are considered as a separate product group. For that reason they are exempted from the Criterion 7. However without entering into analysis of Ink & Toner composition an additional criterion 12 has been introduced stipulating which substances should not intentionally be added.

<p>The former Criterion 9. Plastic parts</p>	<p>Stakeholders stated that the risk posed by flame retardants in the end of life is not justified, as the tests performed after the proper incineration of plastics with flame retardants show that the formation of dioxin like substances is significantly decreased.</p> <p>Stakeholders also requested the harmonisations with the Blue Angel draft RAL UZ-171 limitation to plastic casing (≥ 25 g); internal plastic parts are required to fulfil specific specifications such as heat resistance, high mechanical strength and sliding performance.</p>	<p>There are split views among stakeholders. The way the criteria was draft also raised question as to the added value of the criteria because of it definition and exemptions. In addition, the measurement of the environmental savings per imaging device is difficult to verify and depends on the particular end-of-life treatment scenario.</p> <p>This aspect is recommended to be further investigated in the next criteria revision and the criterion is withdrawn from the current proposal</p>	<p>Comment accepted</p>
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<p>The former Criterion 11. Recycled and reused content</p>	<p>1. One stakeholder provided a sample data where only 1 model out of 181 registered models (with the EPEAT scheme) meets the requirement of 5% recycled and reuse content and the rest of products do not meet this requirement.</p> <p>2. Stakeholders requested the harmonization of thresholds with those of the draft EPEAT 4.2.1.2. They suggested that the some components may be excluded from the combined total weight (like printed circuit boards, labels, cables or connectors).</p>	<p>This criterion seems to have an extremely high ambition level. Furthermore there are additional costs for manufacturers and Competent bodies in verifying compliance with this criterion.</p> <p>The criterion was withdrawn and it is proposed to be further investigated in the next revision.</p>	<p>Comment accepted</p>
<p>Criterion 11. Toner and/or ink cartridge take-back requirement</p>	<p>Some stakeholder pointed out that they would like to see an exception made for cartridge-free printers in the same way as solid ink.</p>	<p>The comment was found reasonable as the criteria have to be technology neutral. As a consequence the criterion was changed appropriately.</p>	<p>Comment accepted</p>
<p>Criterion 13. Requirements on packaging</p>	<p>Stakeholders proposed that the requirement of providing a sample of the product should be removed</p>	<p>The proposal was found reasonable as type of packaging for Imaging Equipment is often very large and it is not possible to handle with an application.</p>	<p>Comment accepted</p>
<p>Criterion 14. Warranty, guarantee of repairs and supply of spare parts.</p>	<p>Stakeholders proposed to allow for the provision of spare parts from third party at a price.</p>	<p>The option of ensuring spare parts from third party at a price is reasonable as this reflects the reality of supplies chain in the markets and therefore it should be allowed.</p>	<p>Comment accepted</p>

<p>Criterion 15. User Information</p>	<p>1. Stakeholders requested the deletion of previous point b) which deals with printouts produced after cancelation.</p> <p>2. Stakeholders suggested changing the wording of section c) which deals with Reuse of Ink and toner cartridges, as the wording is not appropriate for cartridge-free/toner.</p>	<p>1. There is a relation between speed of printing and number of printouts produced after cancelation. Furthermore, other aspects may affect the measurement of printouts e.g. mode, orders sent, applications or PC. Standardisation of the measurement together with further consultation with manufacturers was considered appropriate.</p> <p>2. Comment improves the text therefore the criterion was changed respectively</p>	<p>Comments accepted</p>
<p>The former Criterion 17. Social accountability</p>	<p>It was mentioned that it was not clear whether the criterion requires fulfilment of fundamental principles and rights at work which are embodied in 8 fundamental ILO Conventions or it refers also to other ILO Conventions. Stakeholders had doubts whether the reference to ILO conventions as such is appropriate in this context.</p>	<p>It was agreed that the actual formulation was not sufficiently clear and achieving a proper legal formulation is very challenging In addition there were concerns with the high cost of monitoring/verifying compliance.</p>	<p>Comment accepted</p>
<p>Comments on clarifications and legal formulations of text</p>			<p>There were numerous changes in the text for the sake of clarifications, and aiming on writing a robust legal text.</p>