

Summary of the comments received on draft criteria for Copiers (version 4.0)

Draft 4, 20. October 2005

	Supports the proposal	Supports with objections	Refrains from giving comments	Comments without support or rejection	Rejects the proposal
DANMARK:					
Dansk Tosikologi Center (DTC)			x		
Miljøstyrelsen (Danish Environmental Protection Agency)				x	
Canon- Danmark				x	
Xerox- Danmark					x
FINLAND:					
TKK Machine Design/ TKK Koneensuunnittelu, Markku Kuuva		x			
Turvatekniikan keskus, TUKES (Safety Technology Authority)		x			
Finnish Plastics Industries Federation / Muoviteollisuus ry Vesa Kärhä				x	
NORGE:					
Geelmuyden Systemer A/S			x		
Fellesforbundet			x		
Social- og Helsedirektoratet			x		
Konkurransetilsynet	x				
SVERIGE:					
SIS			x		
Tomas Risberg specialist in neurology and author of the web sites The Silent PC and Tyst Dator		x			
Konsumentverket (The Swedish Consumer Agency)			x		
Miljöförbundet jordens vänner (Friends of the Earth Sweden)		x			
Hewlett-Packard Co Information Technology Information Council (ITI) Technical Committee 6 (TC6) on Product Acoustics	x				
Hewlett-Packard Co Invent				x	
Arbetsmiljöverket	x				

	Supports the proposal	Supports with objections	Refrains from giving comments	Comments without support or rejection	Rejects the proposal
Konsumentvägledarnes Förening	x				
Plast & Kemiföretagen- The Swedish Plastics & Chemicals Federation				x	
Göran Gabrielsson Avd. Riskbegränsning/ Risk Reduction Division Kemikalieinspektionen/National Chemicals Inspectorate				x	
OTHERS:					
Ecomark					
Blauer Engel					
TOTALT	4	2	6	5	1

1. Received comments

Nordic Ecolabelling has in all received 21 statements on the proposal for revised criteria on Copiers, Printeres, fax and MFD, of which 4 are from Denmark, 3 from Finland, 4 from Norway, 10 from Sweden. Ecomark and Blauer Engel has commented the draft but before the hearing.

Of those who have answered the request for comments, 6 support the proposal, 2 support with objections, 6 refrain from giving comments and 6 give comments without support or rejection. 1 rejects the proposal.

2. General comments

2.1 Positive general comments

Konsumentvägledarnas Förening

Specialy positive to items R23 and R26

Nordic Ecolabelling:

OK

Hewlett-Packard Co

Information Technology Information Council (ITI) Technical Committee 6 (TC6) on Product Acoustics

The Information Technology Industry Council (ITI) Technical Committee 6 on Product Acoustics (TC6) has carefully reviewed the noise sections of the proposal on establishing revised criteria for the Swan Labelling for Copying machines, Printers, Fax Machines and Multifunction Devices.

ITI TC6 respectfully offers the following recommendations with respect to noise for your consideration that are contained in the attached file.

1. We support the Swan Eco label use of the ISO 7779 test modes for measuring noise to determine conformance.
2. We support the Swan Eco label use of ISO 9296 to determine declared noise values.
3. We agree with exempting faster equipment from the maximum value of LwAd of 7.5 B and agree that the noise values of those machines should be submitted for reference.

Nordic Ecolabelling:

OK

Hewlett-Packard Co (Invent)

As an overall comment, we would encourage you to make a complete criteria harmonization between the Nordic Swan, the Japanese Eco Mark and the German Blue Angel. In addition, we recommend that mutual recognition agreements are established between these systems to allow an applicant to seek one or several labels at any of these three eco labeling organizations

EU Green Public Procurement

As a general comment, we would like to draw your attention to the EU handbook 'buying green' that was published late 2004. In chapter III of the handbook, the requirements of the contract are defined.

Technical/environmental specifications have two functions:

- describe the contract to the market so that companies can decide to bid
- provide measurable requirements against which tenders will be evaluated.

Technical / environmental specifications must be clearly defined, measurable, possible to evaluate, i.e. to compare and rate and finally possible to control (check compliance) before and during the contract.

Specifications must, if available, refer to European Directives and/or standards, 1st priority CEN/CENELEC, ETSI, 2nd Regional / National standards.

EU Public Procurement Directives 2004/17/EC article 35 and 2004/18/EC article 23 explicitly allows the use of the underlying specifications of eco labels:

- to set technical specification
- to check compliance by accepting the label as a means of proof
- as a benchmark against for the compliance rating for award criteria
- by using different types of labels (single and multiple) for different purposes.

Using the underlying specifications of eco-labels is allowed, PROVIDED

- the specifications are appropriate and covered by the contract
- these are based on scientific information
- the eco-labels are adopted with participation of all stakeholders
- they are accessible to all interested parties.

It is however NOT allowed to

- request eco-label certified products

- be fully compliant with a certain eco-label as some criteria are not related to the purchased product
- relate to general management principles and ethical and similar issues.

Regarding the now presented draft Version 4.0, we have the following comments:

Positive

- better structure of the document (numbering, verification requirement etc)
- increased and improved criteria harmonization with German Blue Angel and Japanese Eco Mark

Comments and proposed changes:

General

It is not clear which products are eligible for a Swan label as there are many similar models available for the same base model (base model, base model with network connection etc). Also a base model can often be equipped with an additional sheet feeder, which has to be reflected in the certificate if it is included or not.

Many of the criteria (e.g. energy consumption) refer to applicable BA criteria RAL-UZ62, 85 and 114. As of 2006, UBA intends to provide a new RAL-UZ number, which might eliminate the current UZ numbers; therefore the reference to the UZ should be extended to this new UZ number.

R2 Energy Consumption

We support the harmonization with the Blue Angel requirements.

R3: Single Plastic Casing parts:

see items R8, R9, R10.

R4 Combined plastic casing parts

There is a need to understand the motive for "4" types or fewer? We believe its more dependant on what the materials are and how they are joined together?

R6 Reused plastic

In the Appendix 4 "Guidelines for applicants already holding the Blue Angel" the summary spreadsheet indicates that the Swan criterion is covered by Blue Angel. However, the Appendix 6 question is written as follows: "Is at least one part >25 gram made of reused plastic or recycled plastic (post-consumer recycling)?" It does not appear that the Swan and Blue Angel requirements are the same on this particular item. Blue Angel requires that the use of recycled plastic be allowed (BA Appendix 1, item I.B.5). Also, there is a "should" requirement in Blue Angel (I.B.6) which asks whether at least 5% recycled plastics have been used. HP allows the use of recycled plastics, our supplier contacts have indicated that a consistent, high quality, reasonable cost stream of plastics is not yet

R8 Labels

If labels are required they must be easily separable or inherent. It is not clear what is meant by 'inherent'. We presume you mean moulded into the plastic? This could also be read that a label of a different material type is physically included into the body of the device. Please clarify.

R9 Recycling and reuse

75 % by weight of component, preparations and substances in the equipment shall be technically suitable for material recycling and/or reuse. Material recovery does not include the recovery of thermal energy through incineration. This is vague and subjective. As there is no defined method to assess this

requirement, it should be de-leted.

R10: Hazardous materials

'Hazardous materials must be separable'

As there is no method on how to assess this, the requirement should be removed.

R11 Subassemblies

What does "easily separable" mean? As there is no method on how to assess this, the requirement should be removed.

R12 Special requirements as to products with combined toner cartridges.

Criteria for eco-labels used in public procurement must be based on scientific evi-dence. It has not been demonstrates that reusing cartridges has a lower environ-mental impact? Also, the amount of material that can be reused would be depen-dant on financial considerations and is not under the control of the applicant.

Based on the following arguments, our overall recommendation is to delete this requirement:

- it is highly subjective
- it can neither be verified, nor controlled
- it does not meet the basic requirements under EU Green Public Procurement (see 2nd page of this document) and is not based on science.

R13: Chlorine-based plastic

We propose that this requirement is deleted as no scientific based evidence has been given why materials like PVC should not be allowed. For PVC, some addi-tives like plastizisers undergo EU Risk assessment, these are addressed in R15.

If it is kept, a scientific justification is needed and a limit for Chlorine content like < 1000 ppm must be set.

R14: Flame-retardants in plastics

The 1st sentence 'Plastic parts must not contain halogenated flame retardants' must be adjusted to specify plastic part weight, e.g. > 25g. Also clarify if it applies to all such plastic parts or product cover/casing parts only.

From July 1st 2006, the EU RoHS Directive prohibits the use of PBBs and PBDEs. Therefore, the requirement regarding plastic parts < 25g can be removed.

R16: Heavy metals in materials

From July 1st 2006, the EU RoHS Directive prohibits the use of Cd, Pb, Hg and Cr VI and flame retardants under R14. Therefore, the requirement is not needed.

R18: Chemicals during production

When purchasing products under the EU Public Procurement Directive, require-ments regarding production are not allowed. In addition, compliance is difficult, if not impossible to control. It is therefore suggested to delete this requirement.

R19: Chlorine-based packaging

We propose that this requirement is deleted as no scientific based evidence has been given why materials like PVC should not be allowed, see R13.

R21: Spare Parts

Depending on product type and category the industry makes spare parts available for 3-5 years so this

will hardly be met by any applicant.

Note: Spare part should mean, that the spare parts are available at the repair centers and that the customer gets a device of identical construction as an ex-change unit.

R22 Double sided copying:

Is this applicable for copiers and MFDs only? This is not inline with BA for MFDs – which requires a double side printing mechanism as of 25 ppm. Does double-side copying also mean, that the scanner needs to scan double-sided without user inter-vention?

R24 Emissions

Specific to the subject of air emissions for printer systems, it's good to see adoption of the current BA program and criteria - at least from the perspective of consistency for the programs.

You need to be aware of that the BA criteria are likely to be updated over the next several months. Therefore, we want to understand how you will adjust your criteria document with the upcoming BA emission criteria revision.

The background document indicates a recommendation of "less than five percent VOC in toner", whereas the proposed program document refers to "less than five percent VOC in ink". There's some inconsistency on this item in the documents.

We are concerned about the proposed criterion for max 5% VOC levels in toner as we are not aware of a true scientific/toxicological basis for assigning such a requirement. The more relevant criteria should be for VOC emissions of the prin-ting system, not toner VOC content. Although the two may be related in some un-known way, it is not even necessary to consider toner VOC content if one already considers actual printing system VOC emissions using a typical exposure scenario for the end-user.

In summary, we propose to delete the criterion for max 5% VOC levels in toner.

R25 Noise

We support the use of the ISO 7779 test modes for measuring noise to determine conformance and the use of ISO 9296 to determine declared noise values. We a-gree with exempting faster equipment from the maximum value of LwAd of 7.5 B and agree that the noise values of those machines should be submitted for referen-ce.

Appendix 7

R14: 'Are other halogenated flame retardants used in plastic parts?'

Please clarify how to respond to this question. For all questions in appendix 7, the plastic part weight limit must be repeated.

Appendix 8:

Please clarify if the requirement to complete Appendix 8 applies to all parts containing flame retardants or the requirement applies to case parts only.

Appendix 9:

In most cases, it will be difficult to gather specific flame retardant information from manufacturers as it is often "confidential". Please clarify if this declaration applies to case parts only.

Currently, any flame retardant alternative is accepted by submitting an MSDS sheet only. For any alternative to be accepted, we think there should be some mi-nimum requirements regarding eco-toxicological testing to be performed, submit-ting copies of such documented to be a condition for the approval.

Example: The EU Risk Assessment for TBBPA has taken several years to complete.

Based on the overall findings, the EU will not introduce any risk reduction measures for TBBPA, i.e. not restrict its use. For the very few alternatives that are available to use in Printed Wiring Board Material, very little information about conducted eco-toxicological testing is available. Replacing a well investigated substance with something less known is not recommended.

Nordic Ecolabelling:

R4 - Vi har harmoniseret med Ecomark og Blue Angel. Vi har krav til hvad materialerne må indeholde og at de skal være lette at adskille. Kravet til højst 4 polymerer skal sikre at der er muligheder for produktudvikling men samtidig at man ikke anvender et unødigt højt antal forskellige materialer, der vanskeliggør genanvendelse.

R6 - Det er korrekt at vores krav ikke er harmoniseret med Blue Angels. Det skal rettes til i appendix 4. Vi har besluttet ikke at tage Blue Angels "Should" krav da det er frivilligt om man vil efterkomme dem. "Frivillige" krav er ikke et princip, som anvendes i Nordisk Miljømærkning.

R8 - Tilføj til kravet – " The use of labels shall not reduce separation of materials and reuse".

R9 – Vi sletter krav. Kravet er vanskeligt at dokumentere på produktniveau. Efterlevelse af WEEE (Som er lovkrav) og designkrav er tilstrækkelig for at opnå god genanvendelse. Desuden definerer vi ikke i kravet, hvad der forstås ved genanvendelse. I realiteten kan langt de fleste producenter efterkomme kravet, fordi de materiale-genanvender på forskellige måder. Slettes kravet opnås yderligere harmonisering med Ecomark og Blue Angel.

R10 – Vi sletter krav. WEEE er lovgivning. Slettes kravet opnås yderligere harmonisering med Ecomark og Blue Angel.

R11 - Krav er harmoniseret med Ecomark og Blue Angel. Det er ikke vanskeligt at svare "ja" til.

R12 - Vi ønsker at beholde kravet da tonerkassetter ikke er underlagt WEEE og derfor bortskaffes uden kontrol. Vi mener at kravet er tydeligt formuleret og at 75% kravet kan dokumenteres. Ove kan evt. kikke på bedre formulering. Desuden har vi licenser. Anden tekstblok ændres til : "In order to insure that the product are returned for reuse a return system must be offered for recycling combined toner cartridges". (sidste sætninger slettes).

R13 - Vi beholder PVC kravet. Vi mener fortsat at det ikke er bevist, at kloreret plast ikke medvirker til dioxinproblemet. PVC er tilstrækkeligt kontrolleret I Norden, men ikke nødvendigvis I hele verden. Derfor at kravet stadig er relevant da kopimaskiner er globalt fremstillet produkter.

R14 - RoHS er ikke implementeret endnu og kriterierne bliver aktive før det sker. Derfor er det for tideligt at slette krav til PBB og PBDE.

R16- Vi beholder kravet det RoHS ikke er trådt i kraft endnu (medio 2006).

R18 - Ecomark har fornyeligt revideret deres krav og har beholdt det fordi de finder det stadig nødvendigt. Vi beholder derfor også kravet. De fleste producenter ligger i Asien, hvor der ikke altid er fuld kontrol med anvendelsen af de nævnte problematiske ozonnedbrydende stoffer.

R19 - Produkterne emballeres ofte i Asien, hvor der i mere udbredt grad kan være PVC i emballagen. Ecomark har fornyeligt revideret deres krav og har tilsvarende krav.

R21 - Vi medgiver at nogle af produkterne kan have kortere levetid end 7 år og en reservedelsgaranti på 5 år her er mere realistisk. Ved at ændre kravet harmoniserer vi med Blue Angel i stedet for med Ecomark, men Ecomarks licenshavere kan stadig efterleve Svanens krav da de efterlever 7 år.

R22 – Vi har harmoniseret med Ecomark. Scannere skal ikke efterleve kravet om dobbeltsidet kopiering. Hverken Ecomark og Blue Angels krav gælder for scannere. Vi tydeliggør dette i baggrundsdokumentet.

R24 - Ret "toner" til "ink I baggrundsdokument. Vi stiller ikke krav til max. 5% VOC, men anbefaler niveauet. Vi mener at informationen er vigtigt for, at brugeren kan tage de nødvendige sundhedsmæssige forholdsregler. Når BA reviderer sine krav gør vi tilsvarende. Vi har harmoniseret med Blue Angel og følger dem. Vi vil kontakte Blue Angel for at få uddybet deres revideringsplaner.

Appendix 7 - Tilføj at erklæringen gælder for plastdele over 25g.

Appendix 8 - Tilføj at erklæringen gælder for plastdele over 25g.

Appendix 9 - Tilføj at erklæringen gælder for plastdele over 25g. Tilføj at erklæringen gælder for "plastic part". Vi får ofte informationerne direkte fra leverandørerne og Nordisk Miljømærknings sekretariateter er underlagt tavshedspligt.

Arbetsmiljöverket

Arbetsmiljöverket har tagit del av förslaget till reviderade kriterier för miljömärkning/Svanmärkning – Kopieringsmaskiner, skrivare, faxar och multifunktionsmaskiner version 4.0 2005-09-19 främst ur arbetsmiljösynpunkt och har inga invändningar mot förslaget.

Nordic Ecolabelling:

OK

Avd. Riskbegränsning/ Risk Reduction Division Kemikalieinspektionen/National Chemicals

RoHS-direktivet skall tillämpas från och med den 1/7 2006.

- * Det behövs ett klargörande om vad som omfattas i produkterna (är kablar som är monterade på en produkt eller som är avsedda att användas tillsammans med en produkt även omfattade av kraven?)
- * Kraven på tungmetaller framstår som lågt ställda i förhållande till RoHS, dvs behövs kraven i Svanen då de motsvarar kraven i RoHS-direktivet?
- * (R16) - undantag i RoHS behöver ju inte gälla även för Svanen - möjligheter att ge företag som har alternativa lösningar bör ges i Svanen.
- * Möjligheter att inkludera ytterligare ämnen i kraven för Svanmärkning bör utredas ytterligare.
- * För att ge miljömärkningskraven mer tyngd och trovärdighet bör krav på vissa minimitester ställas avseende egenskaper hos de ämnen som ingår i produkten (motsvarande miniminivå för att klassificera ämnen/produkter som hälso-/miljöfarliga)

Nordic Ecolabelling:

Vi beholder kravet det RoHS ikke er trådt i kraft endnu (medio 2006). I første omgang skal RoHS efterleves – i anden omgang (f.eks.version 5) kan vi stramme i forhold til RoHS. Det er vigtigt at vi får erfaringer med hvordan producenterne ligger i forhold til RoHS så vi ikke skaber "flaskehalse" i vores krav, der betyder at det ikke kan opfyldes. Vi skriver til i kriterierne at det er noget vi vil kikke på i fremtiden.

2.2 Negative general comments

Miljøstyrelsen / Danmark

Generel kommentar:

Miljøstyrelsen kan i skrivende stund (19/10 2005) ikke tilkendegive om kriterieforslaget kan godkendes eller ej. Ikke fordi kriterierne ikke lever op til enten GEEA eller Eu's Energy Star, men fordi sammenligningsgrundlaget ikke er til stede. Der henvises uspecifikt til den blå engels hjemmeside mht. energikriterier, og det finder Miljøstyrelsen ikke acceptabelt. I øvrigt burde det af baggrundsdokumentet være en oversigt med sammenlignende energikrav fra Svanen nu, Eco-mark, Blå Engel, Energy Star og GEEA. Argumentet med at bruge hhv. Eco-mark eller den Blå Engel kunne være acceptabelt, såfremt sammenligningsgrundlaget var til stede, og at man uden problemer kunne se hvad man valgte til og fra. For nogle produktgrupper (f.eks. denne) kan argumentet med oprindelsesland, og de miljøkrav der stilles der veje højere end nationale/regionale miljø/energi krav som f.eks. GEEA eller Eu's Energy Star, men kun såfremt det fremgår tydeligt hvad man vælger til og hvad man vælger fra. Dette fremgår desværre ikke klart og tydeligt. Det er også uforståeligt at en sådan oversigt ikke findes, når nu energikravet er et af de vigtigste miljøkrav i produktgruppen.

Det danske miljømærkenævn er generelt meget opmærksom på at danske krav i forhold til nationale indkøbsvejledninger/Elsparafonden er overholdt. En sådan oversigt kan tage "brodden af noget" af kritikken, såfremt det bliver tydeligt hvilke krav der er harmoniseret og hvilke hvor der ikke er overensstemmelse.

Miljøstyrelsen er i øvrigt positivt indstillet overfor en generel harmonisering med omkringliggende landes miljømærkekriterier, herunder også kriterier fra regioner hvor selve produktionen finder sted (Asien). Det foreliggende arbejde med hel/delvis harmonisering mellem Svanen, Blå Engel og Eco-mark ser godt ud, men det sidste argument mht. sammenligning af energiforbrug på tværs af standarder mangler, og dermed er beslutningsgrundlaget ikke fuldstændigt.

I samme forbindelse er det vigtigt at gøre gældende at staten fremover skal indkøbe energieffektive produkter, jf. Cirkulære om energieffektivisering i statens institutioner af 19. april 2005. Og at udstyret skal enten overholde Elsparafondens indkøbskrav eller være omfattet af andre positivlister og ordninger. En sammenligningstabel kan være med til at afgøre hvordan Svanens kriterier ligger i forhold til de krav staten skal stille fremover.

Nordic Ecolabelling:

Vi laver et bilag, som sammenfatter og sammenligner energikravene for de standarder, som der henvises til. Der vil ikke komme konkrete energikrav i kriterierne for at holde dem simple mht de løbende ændringer Ecomark og Blue Angel laver. Bilaget skal kunne anvendes af professionelle indkøbere og henvende sig til dem.

Kommentarer til baggrundsdokumentet:

Side 7, Design and materials. Der står skrevet "thus allowing natural resources to be conserved and the quantity of waste sent to landfill sites to be reduced.", ikke mindst findes der andre affaldsbehandlinger end landfill, f.eks. Også forbrænding, men det er jo netop meningen med WEEE direktivet at der skal ske en større genanvendelse af produkterne efter deres brugsfase, således at landfill og forbrænding undgås.

Umiddelbart efter står der "Recycled and reused parts create no negative environmental effects from manufacturing", "no negative" er nok lidt for flot at bruge, også set i lyset af at der i sætningen umiddelbart efter trods alt peges på at genanvendte materialer kan indeholde uønskede stoffer, man f.eks. ikke er interesseret i fortsat skal anvendes i produktkæden ("down cycling").

Side 8. Flame-retardants. I starten af dette afsnit bør der være en behørig henvisning til RoHS direktivet, som jo netop går ind og udelukker brugen af specifikke flammehæmmere helt ned på 0 niveau. Nordisk Miljømærkning kunne godt nævne muligheden for hvordan de forskellige metoder flammehæmmere tilsættes på, dvs. additivt eller kemisk bundet (reaktivt) til f.eks. printpladerne. Det kan være nye veje Svanen går, idet emission fra produkterne kan minimeres hvis de er kemisk bundet.

Der bruges gennemgående en forkortelse TVOC, også i selve kriteriedokumentet. Menes der hermed Total VOC (Volatile Organic Compounds), i såfald bør den skrives helt ud.

Nordic Ecolabelling:

Vi indfører forslag til rettelser i baggrundsdokumentet

Kommentarer til kriteriedokumentet:

R2. Energy consumption. Der mangler opstilling af energikrav. Henvisning til Blå Engel er ikke tilstrækkelig.

1.3. Design and materials. Der bør være et krav til en let-tilgængelig afbryderknap, således at brugerne let og ubesværet kan slukke apparatet. En sådan knap bør placeres i umiddelbar nærhed af betjeningspanelet. Såfremt apparatet er beregnet til at gå i dvale-tilstand kan knappen også være indrettet til det (kombineret afbryder- og dvaleknap).

R16. Krav til tungmetaller kan udvides med krom VI og organotin.

R18. Er der i dette krav, udover krav til ozonnedbrydende stoffer, også tænkt på "klimagasser", dvs. stoffer med for højt GWP (global warming potential), der øger den globale opvarmning.

R19. Er der tænkt på design-mæssigt at indføre krav til vægt-nytte forhold omkring tonerkassetter, på linie med vægt-nytte forhold i andre produktgrupper.

R23. Information to consumers. Information om energiforbrug, mulighed for indstilling af standby/dvale tilstand bør være vigtigst, efterfulgt af information om muligheden for duplex-udskrivning, herunder f.eks. LCC, life cycle cost, således at brugeren bliver bekendt med de økonomiske og miljømæssige fordele ved dobbeltudskrivning.

2. Performance properties. Der bør indføres et krav om at enheden kan benytte genbrugspapir uden nævneværdige problemer. Der findes vist nok standarder som papirkvaliteter kan opfylde, og det bør en svanemærket enhed "støtte" op om, ved at være testet til at kunne klare standardiseret papir.

Xx Det bør overvejes om der skal stilles krav til hurtig opvarmning/overgang fra dvale/standby tilstand til operativ tilstand, uden at gå på kompromis med energiforbruget. Så vil der ikke ske et fravalg af et energieffektivt produkt på grundlag af for lang opvarmningstid.

Nordic Ecolabelling:

R2 Vi laver bilag som sammenligner standarderne og tydeliggør at bilag kan anvendes af indkøbere.

1.3 Vi vil ikke stille krav om en let tilgængelig knap da energisparefunktion har større betydning for den samlede energibesparelse. Vi anbefaler i R23 at bruger skal slukke for strøm. Det vil også modvirke harmonisering da Ecomark ikke har dette krav.

R16 Det kan ikke motiveres at tungmetallerne udgør et problem i kopimaskiner. Cr VI anvendes typisk i maling og i pigmenter og tørremidler. Loddetin indeholder ikke i dag organiske tinforbindelser. Ecomark og Blue Angel har ikke krav til disse stoffer.

R18 No – Ecomark har fornyeligt revideret deres krav og har beholdt det fordi de finder det stadig nødvendigt. De fleste producenter ligger i Asien, hvor der ikke altid er fuld kontrol med anvendelsen af de nævnte problematiske ozonnedbrydende stoffer. Vi har ikke overvejet andre klimagasser.

R19 Nej – ikke vægtnytte-forhold. Kopimaskinen udgør langt den største del af den samlede vægt. At stille krav til vægten af emballagen vil belaste licensansøgerne for meget i forhold til miljøgevinsten. Ecomark og Blue Angel har ikke lignende krav.

R23 Vi vil prioritere informationskravene efter deres betydning for så vidt det er muligt. Vi kan skrive til I informationskravet at dobbeltudskrift skal overvejes fordi man både sparer miljøressourcer og penge

Vi vil ikke indføre krav om at udstyr skal kunne anvende genbrugspapir. Langt hovedparten af kopimaskiner kan i dag anvende genbrugspapir. Vi har informationskrav som siger at man skal anbefale at trykke på miljømærket papir.

Opvarmningstid indgår netop i Blue Angels energikrav.

Xerox-Danmark

It is very positive that you are harmonizing the criteria towards the Blue Angel and the Japanese Eco Mark, but as long as the harmonization is not fully implemented in all factors Xerox A/S cannot support this proposal.

- 1) After the digitalization of copy machines, there is no longer a reason to have this category, as a digital copier is a scanner and a printer combined into one machine – but anyway - please keep the same categories as the Blue Angel criteria.
- 2) R16: Is not need as the RoHS directive covers this point.
- 3) R21: 7 years is very long time in a marked that is constantly changing in a very high speed. Xerox will recommend a period of max. 5 years.
- 4) R23: "Information that offers supply of spare parts for 7 years" - See comments for R21.
- 5) R23: "Information that VOC should not exceed 5% by weight in the recommended ink" – in the background material it says "toner" not "ink".
- 6) R23: "Recommendation that eco-labeled paper be used" – NO, this is just marketing for eco-labeling – there is a lot of un-marked paper on the market there is of a higher standard than the labeled paper, so this requirement has nothing to do with the product itself !!!
- 7) R30: Xerox cannot see the environmental benefit in this requirement. We live in a multi cultural world, and we do not see, how language is an environmental matter.
- 8) "Sales in other Nordic countries": If a product wears the Swan label in one country, it wears the Swan label in the entire world, and no additional fee can be charged in the individual countries !!!
- 9) "How long is a license valid?": A Swan label should be valid for the lifetime of the product. It is impossible to remove the Swan label from all product documentation once the product it on the market.

Xerox recommend a solution where the Swan label includes a "year indication", telling the customer that this product was Swan labeled in 2005 etc.

Nordic Ecolabelling:

- 1) Den teknologiske status for produktgruppedefinitionerne har ikke været vurderet I denne revision. Vi har harmoniseret med Ecomark da langt de fleste producenter ligger i Japan og med definitionerne for kopimaskiner og multifunktionsmaskiner.
- 2) R16 vi henviser til RoHs da direktivet endnu ikke er trådt I kraft.
- 3+4) R21+R23 - Vi vil også anvende 5 år.
- 5) R23 - Vi retter til "ink".
- 6) R23- Vi ønsker at anbefale miljømærket papir fordi papiret her har en dokumenteret god miljøprofil.
- 7) R30 - Ikke alle kan læse engelsk i Norden, hvorfor vi beholder kravet.
- 8) Vi må forklare vores afgiftssystem bedre. Man betaler sit gebyr i det Nordiske land, hvor man sælger produktet med Svanen. Uden for de Nordisk lande kan man anvende Svanen uden gebyr.
- 9) Licensbeviset offentliggør gyldighedsperioden i det Nordiske system. Vi kan ikke lave vores overordnede struktur for licensgyldighed om.

2.3 Other general comments

För Miljöförbundet Jordens Vänner (Friends of the Earth Sweden):

vi stöder förslaget till kriterier med följande invändningar/kommentarer:

I bakgrundsdokumentet finns en tabell på sid 12-13, i fjärde kolumnen använder du orden "The same" ett antal gånger. Det går inte att förstå vad det betyder; om det betyder "samma som ovan" kanske du kan skriva "Ditto", om det betyder att kriteriet inte är ändrat i förhållande till tidigare kriterieveritioner, kanske du kan använda "No change".

"Apply to Blue Angel Standard" förstår jag inte heller, ska det inte vara "comply with...".

Om "The same" syftar på ovanstående, alltså Blå Ängeln, så stämmer det inte t.ex. i fråga om Noise.

Nordic Ecolabelling:

Vi indfører rettelse

Tomas Risberg (privat) - Sverige

support the Proposed criteria on Nordic Ecolabelling of Copying Machines, Printers, Fax Machines and Multifunctional Devices with the following objections:

R23 Information to consumers

Below this heading this is said: "The following information must be specified in user information: "

I want to stress that the word consumer must not be possible to replace by the word user: User is the one

using the machine, after he has bought it. It most often before before we buy a machine that we want to know its specifications. My thinking here also promotes open competition on improving products' ecological aspects. I think you should use the following sentence instead:

"The following information must be specified in purchaser information: " and you should also add that this purchaser information must be made easy accessible before buying the product, at the least via the world wide web. That information should always be found below a heading that Swan specifies to use, so that any purchaser easy can access all SWAN accepted manufacturer's product data before buying.

I cite this from the important related article **Web-Based Product Noise Declarations** by Matthew A. Nobile, IBM Hudson Valley Acoustics Laboratory, Poughkeepsie, New York and David Eames-Harlan, IBM Systems and Technology Group, Moscow, Idaho:

"Today, it is assumed, even expected, that if you are shopping for information – any kind of information – the place to start is the worldwide web."

<http://www.sandv.com/downloads/0407nobi.pdf>

The thinking in that article applies not only to noise declarations, but to all your important eco data.

Nordic Ecolabelling:

Vi tilføjer i overskrift "Purchaser" så målgruppen for informationen bliver korrekt.

CANON- Danmark

It's a positive approach that the proposed criteria document is seeking harmonization with other eco-labels globally.

Initially we would also like to stress out that an environmental label indicates that certain criteria are meet - not necessarily that the products are best in class.

In our comments we have focussed on items that need a closer look eventually further revision. Some items are commented in the context of the section they belong to.

In "Why choose the Swan-Label" one bullet is claiming that Quality requirements must be in place. This we agree on, but when quality is specified in the section 3, Quality and regulatory requirements, references are given to specific auditing schemes.

To ensure proper compliance to competition laws no specific auditing scheme should be claimed mandatory, as other auditing schemes may be applicable.

In general it is also dubious whether a certified compliance program necessarily perform better than a "self-governed" compliance program.

The positive environmental impact derived from an environmental management programme originates from its content and not only from which label it holds.

1) Leave out specific ISO standards or add "or equivalent environmental/quality management systems".

2) A better consistency should be achieved throughout the document. As an example in R2 references are given to RAL-UZ recommendations; in R24 specific values are given.

Even though harmonization is a target we prefer that specific values are listed, as RAL-UZ recommendations are undergoing changes now and then.

Leaving this criteria document without specific targets can void the compliance scheme if (when) RAL-UZ is revised.

1.3, Design and materials generally takes into account that materials must be free of hazardous substances. This we agree on.

However, if reuse of materials should be effectively implemented around the world, to reduce use of virgin material, various techniques should be allowed or even promoted in the criteria.

As an example new cover plates can be made up of granulated old plastic parts in a sandwich construction; old recycled materials form the centre part covered by virgin material that form the outer part/products surface. Read: tremendous savings on raw material.

(Refer Canon Sustainability report 2004, page 28)

By nature the payoff is a small quantity of unavoidable impurities derived from recycled material – though encapsulated and not exposed to users under normal circumstances.

It's a matter of balancing the reuse of recycled plastic and accepting the risk of impurities against large scale incineration/landfill of used plastics.

R10 and R34, conc. WEEE, and R14 and R16, conc. RoHS are irrelevant as these are national legal requirements and not a voluntary compliance scheme.

Same apply to R17, batteries, etc

There are a number of legal requirements that have to be complied to and as such the R35, Legislation and Regulation already cover any legal aspect.

Delete above mentioned items.

Keep R35 as is.

R12, Combined toner cartridges, must be split into two different requirements.

- 1) Product must accept remanufactured toner cartridges according Criteria xxxx.
- 2) Cartridge must be covered by a recycling programme.

Also leave out specific reuse percentage as this are/will be dealt with in Criteria document for toner cartridges.

Coming revision on Criteria for toner cartridges must coop with this subject.

If R12 is left as is no products ever will fulfil this Criteria document as toner cartridge recycling requirements at present only applies to non original toner cartridge re-manufacturers.

Note:

Combined toner cartridges are only used in small – medium size multifunctional, whereas medium – large segments multifunctional uses a different system.

R21, Supply of spare parts, depends on which products are targeted.

Production of spare parts is levelled out between type of product and expected lifetime.

Products having a short "technological lifetime" will have shorter supply than those products having extended lifetime.

Although we agree on the intention with this requirement, that it ensure durability of a given product over it's lifetime, there is a risk that a waste production of unused spares are being disposed of due to the 7 year obligation.

Also spares have an impact on environment!

ECO-mark as well as Blaue-Angel specifies 5 year which we recommend

R22, Double-side printing is a good idea – but it is decided by user.

Keeping this as a criterion might result in resource depletion if users refuse to use double side printing –

such equipment may end up in the waste/recycling stream after 5 - 10 years without ever being used.
No alternative proposal.
May be kept as is to ensure harmonization with Eco-mark and Blaue-Angel.

We support a general request to users that proper measures should be taken to reduce unnecessary use of paper.

R23, Information to consumers

This brings us to the point where we must decide what to be influenced by the producer and what to be influenced by the user.

Comprehensive information is normally available prior to purchase, leasing, etc. of products. That comprises energy consumption and energy management schemes, capacity, duplex, paper- and installation requirements, emission rates etc.

It's not necessary to specify where to find the requested information whether it is in user documentation, service manual or in electronic form on producers homepage.

Important is that producer specify:

- which installation, configuration and maintenance programme has to be commenced by the producer,
- which -ditto- has to be commenced by the user,
- which consumptions shall be expected based on indented usage,
- which maintenance programme is offered by producer,
- which consumables can be used by the product

How product is disposed off after end of life is a national legal requirement as well as Warranty is a legal / market requirement, and not part of a voluntary environmental programme. Often products are covered by Service Contracts with coverage beyond any warranty rules.

Items covered by any legislation shall be omitted from a voluntary compliance scheme.

R26, Recycling consumables

Separate criterion for toner cartridges, which covers residual toner as well, must replace part of this item.

For remaining part national legal requirements apply (waste legislation), that requires parts being recycled.

Target in criterion is "as far as possible", which we hardly can measure against.

National legislation requires at least collection and material recycling.

Enhanced recovery/reuse of parts that wear out is possible, though one has to consider the impact transport in such activities will have on environment.

Transport has to be taken into account if criterion is maintained as is.

R29, Quality

Producer is responsible for the quality at time of delivery and for maintenance delivered during products lifetime - if requested by user.

Whether product is maintained during its lifetime cannot be controlled by the producer.

Rephrase R29 so it matches the "envelope" or delete R29 and combine with R30, service offerings.

Ex: (producer) .. the offered service program must be capable of maintaining the (product) during the (validity period).

For logical understanding interchange R29 & R30.

Nordic Ecolabelling:

1) Vi tilføjer "or equivalent environmental/quality management systems" i Appendix 2.

2) Vi laver bilag som sammenligner standarders faktiske værdier

1.3 Design og materials. Vi har krav til genanvendelse af plast i R6. Vi anerkender at der kan være andre måder at genanvende plast, som kan være miljørigtigt. Svanen vil kikke på dette ved næste revision. Skal tilføjes kriteriedokument "New criteria". Vi forstår problemstillingen med uundgåelige urenheder.

R10 Kravet slettes da det er lovkrav. Det giver også større harmonisering med Ecomark og Blue Angel da de ikke har krav.

R14 +R16 RoHs er ikke implementeret endnu. Derfor er det også for tidligt at slette krav til f.eks. PBB og PBDE.

R12 Vi ønsker at beholde kravet da tonerkassetter ikke er underlagt WEEE og derfor bortskaffes uden kontrol. Vi mener at kravet er tydeligt formuleret og at 75% kravet kan dokumenteres. Vi har licenser. Anden tekstblok ændres til: "In order to insure that the product are returned for reuse a return system must be offered for recycling combined toner cartridges. (sidste sætninger slettes)

R21 - Vi ændre reservedelgaranti til 5 år.

R23 - Meget specifik og teknisk informationt. Vi ønsker at have generel information har fokus på miljø- og sundhedsforbedringer. Private brugere kan kassere udstyr miljømæssigt forkert selvom der er lovgivning-derfor er information nødvendig.

R26 - Vi mener at kravet er vigtigt fordi WEEE ikke dækker udskiftede dele. Tonerkassetter indsamles via serviceaftaler.

R29 - Vi lader det stå, men overskriften skal ændres til: "The quality of the production and regulatory requirements".

Plast & Kemiföretagen- The Swedish Plastics & Chemicals Federation

1.3 Design och material

Vi anser det vara fel att anta att återvinning generellt sett är bäst ur miljösynpunkt. Vi vill framhålla att, sett ur ett livscykelerspektiv, skall de största ansträngningarna läggas på produktens användningsfas vid design och produktutveckling. En dialog krävs sålunda med producenten i varje enskilt fall. Vi tillåter oss att hänvisa till bifogad sammanfattning "Waste treatment options for WEEE-products. Fullständig studie finns på: www.plasticseurope.org

1.4 Farliga ämnen i plaster

R13 Klorbaserade plaster
PVC

Tillverkningen av PVC ger idag mycket låga utsläpp av dioxiner och sett ur svenskt perspektiv är utsläppen större från tillverkningen av andra material t.ex. järn och stålindustrin, metallverk och gjuterier, cementindustrin och pappers- och massaindustrin. Naturvårdsverket har nyligen gjort en kartläggning av bl.a. utsläppen av dioxiner (Naturvårdsverkets rapport 5462 "Kartläggning av källor till oavsiktligt bildade ämnen"). Här kan utsläppen av dioxiner från tillverkningen av olika material jämföras med tillverkningen av PVC vid Hydro Polymers anläggning i Stenungsund som enligt miljöredovisningen 2004 släppte ut 0,0017 g TEQ/år till luft och 0,004-0,034 g TEQ/år till vatten. Denna tillverkning ger inte bara PVC utan även natronlut, varför dioxinutsläppen inte bara kan relateras till PVC.

När det gäller avfallshandling av PVC trodde man förr i tiden att PVC var huvudorsaken till de dioxinutsläpp som sker vid förbränning av avfall på förbränningsanläggningar. Sedan ett antal år tillbaka vet man nu att det inte är närvaron av PVC-avfall utan förbränningsbetingelserna, såsom förbränningstemperatur, syretillgång, närvaro av katalyter samt mängden klorerat (halogenerat) material, som avgör mängden dioxiner. Mängden klorerat material är alltså av underordnad betydelse i jämförelse med de andra faktorerna. Naturvårdsverket har därför bedömt att en minskning av PVC-halten i avfallet inte skulle förändra utsläppsmängden av dioxiner i rökgaserna, eller minska dioxinhalten i restprodukterna från rökgasreningssystemen i någon märkbar grad (referens Naturvårdsverkets rapport 4594 "Vad skall vi göra med PVC-avfallet?").

Vi anser därför att Svanen särbehandlar klorerade plaster och PVC i jämförelse med andra material. Nordisk miljömärkning lever därför inte upp till sitt åtagande i ISOstandard 14024 i det att man inte behandlar PVC på ett objektivet sätt.

R14 Flamskyddsmedel

Plast & Kemiföretagen vill här göra Svanen uppmärksam på att de polybromerade difenyletrarna inte kan dras alla över en kam. dekaBDE har nu efter riskbedömning tillåtits i EU och detta måste komma till uttryck i kriterierna.

R15 Ftalater

Det är stora skillnader på ftalaternas miljö- och hälsoeffekter

Ftalaterna är en grupp med ämnen där ett antal används som mjukgörare i PVC. Inom EU har man gjort riskbedömningar för de mest använda ftalaterna. Resultaten visar att det är skillnader mellan miljö- och hälsoeffekterna hos de olika ftalaterna. Det kan innebära att det ställs krav på minskad användning av några ftalater inom vissa produktgrupper medan andra ftalater betecknas som riskfria att använda. För mer information om riskbedömningarna se <http://www.phthalates.com/RAs> där det bl.a. finns länkar till riskbedömningarna som publicerats av ECB.

Det måste vara bättre att använda föreningar som har genomgått riskbedömning än alternativa lösningar som vi har mindre kunskap om.

Plast & Kemiföretagen

Nordic Ecolabelling:

1. Vi har krav til design og krav, der understøtter produktudvikling. Vi mener dog at genbrug og genanvendelse miljømæssigt er meget vigtigt da der hermed sparer ressourcer. Det er ligeledes vigtigt at have krav, som er med til fremme teknologier, der genanvender og genbruger. Vores krav er delvis harmoniseret med Ecomark og Blue Angel.

R13 – Vi mener fortsat at kloreret plast medvirker til at dioxinproblemet. PVC er tilstrækkeligt kontrolleret I Norden, men ikke nødvendigvis I hele verden. Vi mener derfor at kravet stadig er relevant da kopimaskiner er globalt fremstillet produkter

R14 Deca-BDE som er kontrolleret af RoHs som ikke er implementeret endnu. Derfor er det også for tidligt at undtage Deca-BDE.

R15 Vi sletter krav da Ftalater anvendes i PVC. Vi udelukker anvendelse af PVC.

Säkerhetsteknikcentralen / Turvatekniikan keskus Soili Martikainen
Godkänner förslaget, men föreslår bifogade ändringar.

Stycket 1.4.

På det här stället borde man också peka på direktiv RoHS

Nordic Ecolabelling:

Vi indfører RoHs som refence

TKK Machine Design/ TKK Koneensuunnittelu, Markku Kuuva
Godkänner förslaget, men föreslår bifogade ändringar.

2/37 är kopieringsmaskin ett för omfattande begrepp, om man menar bara "ljuskopieringsmaskin"?

3/27 vad är OPC-kit?

6/37 hur man beskriver tillämpligheten av återvinningen / förnyad behandlingen? Räcker en egen redogörelse? Hur noggrant borde man dokumentera osv.?

Nordic Ecolabelling:

2/37 Vi mener al teknologi, som kan lave kopier jf. Definitionen

3/37 Vi indfører hvad forkortelse betyder

6/37 = R9. Kravet slettes.

Finnish Plastics Industries Federation / Muoviteollisuus ry Vesa Kärhä

Innehållet av stycket 1.4 är obegripligt. Att använda R-fraser i kriterier är acceptabel, men därtill har man gjort en egen negativlista till plast och tillsatämnen som inte är baserade till risk som inte är "dangerous substances". Vi hoppas att ni fortsätter dialoger mellan Nordisk Miljömärkning och plastbranchen, såsom det redan börjades den 30 maj 2005 i Köpenhamn. Man borde sluta att diskriminera plast.

Nordic Ecolabelling:

Kravet er delvist hamoniseret med Ecomark og Blue Angel. Vi har slettet krav R15, som viser en liste over ftalater, der ikke må være i plast. Denne negativliste kan slettes da vi i forvejen forbyder PVC hvor stofferne optræder.

