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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF AIR AND  
RADIATION

November 18, 2021

Dear ENERGY STAR® Imaging Equipment Partner or Other Interested Stakeholder,

With this letter, the U.S. Environmental Protection Agency (EPA) is finalizing an amendment to the ENERGY STAR Imaging Equipment (IE) specification. This amendment provides updated criteria for professional imaging equipment and will be reflected as [Version 3.2](#). Products that have been already certified to Version 3.0 and Version 3.1 will not be affected by this change and will remain ENERGY STAR certified with no further action required.

EPA received multiple comments on the Version 3.2 proposal. One commenter requested that EPA ease the proposed Ready Mode Power requirement for professional imaging equipment. However, the proposed 900 W limit has been retained for Version 3.2 as EPA has observed that products with a variety of features (e.g., speed, color-capability, etc.) are able to readily meet this requirement. The commenter also indicated that the dataset used to form the Version 3.2 criteria included a few products that realize high speed duplex productivity via two serially connected engines. Subsequent analysis has shown that the proposed criteria is not appropriate for products of this type as their heightened performance appears to require a significant amount of additional energy. As such, and because a larger dataset of these models is not currently available to inform criteria, dual-engine products have been excluded from the scope of this Version 3.2 specification.

Finally, a commentator informed EPA that some models used to inform the proposed criteria were equipped with a digital-front-end (DFE) during testing and expressed concern that the proposed criteria may not properly account for the additional energy they require to provide enhanced performance (e.g., speed, resolution, etc.). It is critical to ensure that these products do not appear to be more efficient because they receive the benefits of a DFE without needing to report the additional energy required to enable them. After analysis of the impact of DFE energy on the current dataset, EPA believes that the previously proposed criteria remain appropriate when DFE energy is simply summed with the energy of the main product and has retained the proposed criteria in this Version 3.2 Final specification. EPA has provided instruction in the specification on how to incorporate DFE energy for units tested with a DFE equipped.

Please contact me at [Fogle.Ryan@epa.gov](mailto:Fogle.Ryan@epa.gov) or 202-343-9153 or Cody Niblett, ICF, at [Cody.Niblett@icf.com](mailto:Cody.Niblett@icf.com) or (202) 862-1245 with questions or concerns about the specification. For other imaging equipment related questions, please contact [imagingequipment@energystar.gov](mailto:imagingequipment@energystar.gov).

Thank you for your continued support of the ENERGY STAR program.

Sincerely,

Ryan Fogle  
EPA Manager, ENERGY STAR for IT and Data Center Products

Enclosures:

[Version 3.2 Specification](#)

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