



August 19, 2010

Mr. John Cockburn
Director
Equipment Division, Office of Energy Efficiency
Natural Resources Canada
930 Carling Avenue, 2nd Floor, Room 25
Ottawa, ON K1A 0Y3

Re: Canada Gazette, Part I; June 21, 2010

Dear Mr. Cockburn:

The Security Industry Association (SIA) and the Canadian Security Association (CANASA) are pleased to respond to your request for comments on the Natural Resources Canada “NRCan” proposal to establish energy efficiency standards for certain electronic products. SIA is an international trade association that represents approximately 350 manufacturers, integrators, dealers, and specifiers of electronic security and life safety solutions worldwide including the United States and Canada. CANASA represents more than 1,300 companies across Canada, representing all segments of the security industry.

SIA and CANASA members manufacture, install, support, and monitor access control systems, closed-circuit television (“CCTV”) digital video systems used for security, emergency alert systems, intrusion detection systems, fire alarm systems and Radio Frequency Identification (RFID) systems used as tokens for access control and asset tracking/security. These electronic physical security system solutions protect physical assets and individuals who access government facilities, schools, colleges, hospitals, airports, mass transit systems, ports, retail establishments, chemical processing/petroleum refineries and other institutions. These systems use both external power supplies and battery backup units with both single and multiple voltages, and with multiple tap outputs. Accordingly, SIA and CANASA members should be considered stakeholders in this rulemaking.

SIA and CANASA support the goal of this proceeding and the Energy Efficiency Act (the “Act”) to promote the efficient use of energy in Canada. We also applaud NRCan’s attempts to harmonize energy efficiency standards with those of other trading partners and jurisdictions such as the United States. However, SIA and CANASA believe that the Energy Efficiency Act does not apply to, nor was it meant to apply to the products and services our member companies manufacture, specify, install and monitor.

SIA and CANASA are concerned by the broad provision of the “Proposed Amendment” to add new products categories to the Energy Efficiency Regulations (the “Regulations”), including external powers supplies. The application of the Regulations to external power supplies and battery backup units for life safety and security products used in “stand-by”, “no-load” and “off” modes would not produce any energy savings because life safety and security equipment is never to be operated in these modes.

A burglary, fire detection, video surveillance, RFID, electronic article surveillance, or card access control system is always “on.” Such systems, regardless of whether they are armed or disabled, are always powered and are always in a monitoring state. These systems continuously monitor for the presence of power, integrity of circuits, presence of a communication path(s), proper function of sensors and the condition of back up batteries, to name just a few functions.

Life safety and security systems do not operate in a no-load or stand-by modes and are not designed to be turned off. Accordingly, it is not feasible to measure energy consumption of power supplies used to power security systems in stand-by, no-load and off modes.

First, in order to detect a fire or intruder or to track assets on a protected property, life safety and security systems are required to be connected to an electricity supply and to be active and continuously on, monitoring various sensors. Therefore, the security systems are not capable, by definition, of “stand-by” mode. Secondly, life safety and security systems cannot be disconnected from their power supply putting them into a “no-load” mode. Security systems, which are in continuous operation, are connected to a main power source and are always activated to detect and monitor. Thirdly, life safety and security systems are *active* functioning products – that function being to detect or monitor. They typically do not have a switch to turn them “off.”

The U.S. Energy Independence and Security Act (EISA) of 2007 has a purpose similar to the Canadian Energy Efficiency Act and the Regulations. EISA is intended to improve energy efficiency by measuring the energy consumption of certain products, including battery chargers and external power supplies. Among its provisions, the law requires the Department of Energy to propose updates to its testing procedures for battery chargers and external power supplies. These updates are intended to clarify the requirements for the measurement of energy consumed in certain modes known as “stand-by,” “no-load” and “off” modes.

In its final rule for standards updates issued on March 27, 2009, the U.S. Department of Energy (DOE) maintained that it did not have authority to provide an exemption for life safety and security products which are never in off, no load or standby modes.¹ Consequently, SIA spent considerable time and effort negotiating in good faith with leading

¹ U.S. Department of Energy, Energy Conservation Program: Test Procedures for Battery Chargers and External Power Supplies (Standby Mode and Off Mode)

energy efficiency advocates in the U.S. to develop a consensus agreement to exempt external power supplies (EPSs) designed for use with life safety and security devices from these federal energy efficiency standards applicable to EPS performance in off mode and standby mode.²

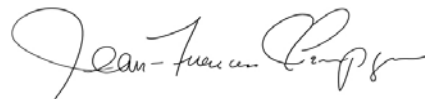
This consensus agreement has been accepted by key members of the United States Congress who have introduced legislation to codify the agreement.³ Under this agreement, all EPSs eligible for the standby-mode, no-load and off-mode exemption will remain subject to federal efficiency standards for performance in the active mode, and distinctive marking of such EPSs will be required. This life safety and security EPS exemption will be limited in duration and the U.S. Secretary of Energy will have full authority to extend, to narrow, or to rescind this exemption any time after July 1, 2017. Further underscoring U.S. government recognition of the unique nature of life safety and security systems, the Department of Energy has testified that it does not believe, “such devices can reliably transition to off or standby mode while serving their security and life safety functions. Therefore, DOE agrees that energy conservation standards regarding these modes should not apply.” SIA and CANASA urge NRCAN to adopt a similar exemption in its Proposed Amendment.

Thank you again for the opportunity to present our views as part of this important proceeding. SIA and CANASA would welcome the opportunity to serve as an expert resource for NRCAN to answer any questions you may have about our views and recommendation for an exemption for life safety and security devices from the Proposed Amendment’s requirements. We look forward to working with you to address our membership’s concerns.

Respectfully submitted,



Richard Chace
CEO
Security Industry Association



JF Champagne
Executive Director
Canadian Security Association

² October 9, 2009 letter to U.S. Senate Energy and Natural Resources Committee Chairman Jeff Bingaman and Ranking Member Lisa Murkowski signed by American Council for an Energy-Efficient Economy; Appliance Standards Awareness Project; Alliance to Save Energy; Natural Resources Defense Council; Security Industry Association; and Electronic Security Association

³ H.R. 5470 introduced by U.S. Representative Frank Pallone; S. 3059 introduced by U.S. Senate Energy and Natural Resources Committee Chairman Jeff Bingaman