

Imaging equipment and its consumables. A preparatory Study for ecodesign. First TWG Meeting. Minutes.

Introduction and Policy background

DG ENV provides an overview of policy background for imaging equipment and its consumables, including a tentative timeline for the publication of regulation.

HP asks whether EVAP comments on reference documents, published before work on this Preparatory Study started, have been taken into account; and suggests that they should be considered in revised versions of Task 1 and 4.

The JRC Team confirms that the scope of this process is to collect comments and that comments from EVAP as well as from other stakeholders regarding reference documents will be taken into account.

Oeko Institute asks whether the revised MEErP and EcoReport tool will be used to conduct analysis on this product group.

The JRC Team explained that, due to the fact that this revision process is still under finalisation, it has not been decided at what extend the revised MEErP methodology and the revised EcoReprot tool will be used in the context of this preparatory study.

The Preparatory Study

The JRC Team provides an overview of the Preparatory Study, in terms of general methodology and timeline for its completion.

Lexmark asks if the JRC can communicate the names of external consultants doing Tasks 2 and 3.

The JRC Team explains the administrative processes is still ongoing, and that the consultants will be public once this process concludes (signature of contracts with the Commission).

Task 1

The JRC Team provides a summary of Task 1, focusing on methodology.

The European Remanufacturing Council suggests to include in the report and take into consideration additional standards: AINISI standard in USA RIC001.1, UK British Standard BS 8887-220 and 221, and Chinese Standard based on BS8887-220, in particular regarding the definition of remanufacturing that is considered with a higher level of international recognition compared to the EN4443 standard used in the JRC proposed defintion.

ETIRA suggests including DIN 33871 as well.

Nubepriint, a company developing monitoring software for printers, highlights that there is a lack of common definition among the manufacturers on how the counter counts the pages. He suggests defining "counter" and "page".

A series of questions are made regarding different components being included into the scope, such as ink printheads (Bioservice), ink bottles (Peach), fusers, drum units (Sapi).

The JRC Team confirms that all the above components are included into the scope of the Preparatory Study.

Lexmark suggests it is a good idea to take as a reference Type I Ecolabels and GPP criteria for the development of the Preparatory Study. He suggests investigate why some labels have been more successful than others.

DKWU suggests including into the regulation review Regulation 1272/2013, Regulation 1005/2009 and take into consideration the revision process ongoing for Regulation 1272/2008.

Canon asks whether it is correct to assume that the scope of consumables will follow the device scope.

The JRC Team responds that no decision has been made yet on how to define scope (current version is a proposal).

HP highlights that the definition of the scope might be confusing as it is currently in the Preparatory Study. It is not completely clear whether large office devices are included into the scope or not. He also recommends refining the definition of Professional Imaging equipment, currently aligned with Energy Star label. Since definitions come from different sources, they are sometimes not coherent (e.g. multi-function printers). Scope and definitions must be clearly aligned.

The JRC Team confirms that the current proposal is based on the distinction between professional and not professional devices according to the Energy Star 3.2 specification for imaging equipment. Further clarifications will be made in the report for a better understanding of definitions and scope.

Task 4

The JRC Team provides a summary of Task 4, focusing on methodology and key technical aspects.

Toshiba confirms that Energy Star is a good database to provide a picture of the market today. He suggests that Blue Angel database might be helpful too.

Bioservice highlights that introductory cartridges are one of the main barriers for remanufacturing. In his view, their main purpose is to delay remanufacturing and go against circularity principles.

Sapi mentions that starter kits are a barrier for remanufacturing. She confirms that inner compartments are introduced in some toner cartridges to reduce page yield. She adds that chips are also a barrier for reuse. She suggests that cartridges should be remanufactured within the EU.

ETIRA points out that some cartridge have an unnecessary limitation of their capacity to reduce page yield, which adds extra cost and work for remanufacturers, making cartridge reuse more difficult. He adds that the definitions of "reuse" and "recycle" should be clear, as in some cases, recycling is considered reuse, although they are different processes.

Nubprint states that one of the problems reman companies have when they take back a remanufactured cartridge is that, as they do not know how many times it has been remanufactured previously, they do not dare to process it once more and discard it, which could operate as a barrier for reuse. In his view, cartridges can be reused more than two times. He suggests a tracking system in the cartridge chip, to store information about number of reuse cycles. The chip should be used as a tool and not as a barrier.

Remanufacturing Council indicates that traceability might be an important aspect of new regulation. He suggests looking at other product groups where traceability has been key, such as diesel injectors or retreaded tyres for aircraft and trucks, all of which can be traced to the specific operator. ETRMA is a good source of information on how this was implemented.

Peach highlights that the main barriers for cartridge remanufacture today are related to firmware, market structure, collection systems.

ETIRA adds that design related barriers are key, but points out that market related barriers are important, since some strategies are limiting the access to empties. Locking consumers into original cartridges is also a significant barrier.

ETIRA mentions that Ecodesign for Sustainable Products Regulation will provide the tools to address some of the issues highlighted in this meeting. He mentions that ETIRA have started using a sticker in cartridges to identify number of cartridge reuse cycles.

Nubprint currently available technology can help to increase and track number of reuse cycles.

DKWU highlights that in the Japanese market, cartridges may be reused up to ten times. He highlights traceability as a key aspect, which could be done with the use of the chip. He adds that more reuse cycles might be possible if information was available on number of previous reuses on a specific cartridge. He highlights other barriers for reuse such as welded/glued components, fast wearing components or moving parts in toner cartridges.

HP suggests to use EVAP position papers as a source for complementing Task 1 and Task 4. He recommends looking at Networked Standby Regulation for more information on low power modes for imaging equipment. He mentions it is difficult to comment on page yield analysis without having access to the database used and asked the Commission to have access to this database. In terms of base cases, he adds it is fundamental that they are representative of the current market. He recommends revising, and potentially adding more base cases to reflect better the market. In his view, all-in-one and integrated cartridges are better options as base cases. He also recommends including base cases for copiers and faxes.

ETIRA highlights that the car industry is more advanced in traceability aspects and could be an inspiration for regulation on imaging equipment and consumables. He confirms that ETIRA database on cartridge page yield can be shared with stakeholders. He suggests the importance of assessing the printing quality of remanufactured cartridges. He confirms that cartridges can be remanufactured at the same quality as new cartridges and that this is already being done by some OEMs.

Nubprint mentions that current sales models are moving from a transactional to a subscription-based sales model. This is creating a barrier to collection for reuse. It is worth

noting that this new sales model is based on the ability to remotely monitor printers at end customers. This same technology is currently able to track each cartridge from start to finish, and collect cartridge information even before the cartridge is collected by the empty collector. This brings us to the point that the current inefficiencies around improving cartridge recycling can be improved by the information collected by printer monitoring SWs.

Netherlands makes a general remark about the regulatory process. He expresses concern about the content of the discussion, which is essentially the same as the ones held 2 years ago in the context of the VA proposal. He highlights that the timeline is tight and that with current plan, regulation will not be on time before Commission elections. He recommends finishing the Preparatory Study by summer 2023, since timing is crucial.

DKWU and ETIRA ask what happens with products currently in the market when new regulation is ready.

DG ENV confirms that new regulation will affect products placed on the EU market after it comes into force and that it will not have retroactivity.

The JRC Team provide an overview of next steps and close the meeting.