

## Minutes EVAP Subgroup Targets Second meeting – 22 January 2021

**From European Commission: Paulo Da Silva Lemos (DG ENV), Elisa Anderson Vazquez (DG ENER)**

**From Member States: Bram Soenen (Belgium), Milena Presutto (Italy), Hans-Paul Siderius (Netherlands), Paulo Zoio (Portugal), Paula Gomes (Portugal)**

**From Remans: Gerwald van der Gijp (Armor), Frans Hondmann (Armor), Mark Perry (Clover), Jürgen Conrad (Clover), Jan-Michael Sieg (KMP), Alfred Wirch (Peach)**

**From OEMs: Robert Squires (Brother), Phil Mack (Brother), Wamda Saeid-Elsirogi (Canon), Boris Manev (Epson), Sara Rodriguez Martinez (HP), Daniel Chappell (HP), Nuno Santos (HP), Maxime Furkel (Lexmark)**

**From EVAP Secretariat: Feriel Saouli, Laura Carre-Diaz**

### **1. Welcome and introductions**

- Sara Rodriguez-Martinez (HP, EVAP President) welcomed participants and thanked Mr. Soenen and Mr. Siderius for the feedback sent after the kick-off meeting, which was taken into consideration to prepare the agenda and content of today's meeting.

### **2. Target objectives**

- Daniel Chappell (HP) mentioned there is general agreement from OEMs-Remans on the overall objective, but they still need to discuss further the issue of design criteria being applicable to both OEM and Supporting Signatories for all their cartridges in scope of the VA. He asked the Commission and Member State representatives for their views on the suggested objective and list of design criteria.
- Hans-Paul Siderius (NL) said the design criteria should kept simple at the moment and more complexity could be added in a couple of years.
- Bram Soenen (BE) summarised the preliminary comments he shared before the call started:
  - Yes to increasing targets overtime to show improvement.
  - Yes to apply to both Signatories and Supporting Signatories, but asked if NBCs would be in scope.
  - Requested additional clarity on the point about 'cannot reserve activities to any one set of Signatories/group of Signatories'. He said everybody should contribute to the targets but he did not exclude having a separate Toner and Ink target.
  - Requested adding the word 'ambitious' along data driven, realistic and flexible. Review objectives year by year (dynamic review to set targets for the next year).
  - OEMs to start data sharing as soon as possible and maybe also have Supporting Signatories sharing their data.
  - Requested additional clarity on the point 'designed to avoid unwanted side effects such as inflation in the cost of empties driven by the targets'.
- Milena Presutto (IT) said the principles were correct, but cautioned against using some of the design principles as an excuse/argument to not have ambitious targets (indicative or binding) and say something cannot be done (i.e. due to costs/technical challenges).
- Mr. Soenen (BE) added the overall objective should be more focused on single-issue reuse, as referring to Waste Hierarchy left it up for discussion on whether a cartridge can be reused or not.
- Mr. Chappell (HP) thanked the Member State representatives for their feedback. He replied to Mr. Soenen that the objective is not to side-step reuse and pointed out that the Waste Hierarchy is part of the overall policy framework of the VA and that the 'best environmental outcomes' should always be taken into account, whether that outcome is reuse or recycling.
- Mr. Soenen (BE) suggested focusing on reuse of cartridges as a key material efficiency objective, keeping in mind the overall environmental context.

- Mr. Siderius (NL) said he agreed with Mr. Soenen and added that setting realistic targets could absorb some of the other issues raised during the discussion.
- Boris Manev (Epson) said the target should not be only on refill but also include solutions that are contributing overall to the Circular Economy. Such solutions can be also business model changes that are contributing towards putting less plastics on the market in the first place, such as cartridge less printing, etc. The approach is in line with the overall objective of the process, i.e. improvement in the outcomes from printer cartridges as per the Waste Hierarchy set out in Art. 4 of the Waste Framework Directive 2008/98/EC – Reduce, Reuse, Recycle. Epson believes such approach will allow for innovation and change in business models to reduce in addition to reuse.
- Phil Mack (Brother) said he agreed with Epson’s comment that recognition should be made for non-reman solutions that improve the Circular Economy.

### 3. Choice points

- Mr. Chappell (HP) said OEMs and Remans were broadly aligned of the draft list of choice points, which are considered to be key items to set the targets. He asked the Commission and Member State representatives for their comments and if they had any additional choice points to suggest.

#### a) Choice Point 1 – Types of cartridges

- Mr. Soenen (BE) suggested considering having 2 targets (Toner and Ink).
- Mr. Siderius (NL) said he agreed with Mr. Soenen about differentiating between Toner and Ink.

#### b) Choice Point 2 – Reuse/recycling

- Ms. Presutto (IT) cautioned against using collection of empties as ‘bottleneck’ to not meet targets.
  - Mr. Chappell (HP) replied there is a difference between the amount of cartridges collected and the number of cartridges that are in a condition to be reused.
- Gerwald van der Gijp (Armor) said the targets should focus on reuse.
- Mr. Siderius (NL) added that the technical challenges to improve remanufacturing, reuse and collection were for OEMs and Remans to deal with.
- Ms. Presutto (IT) added that targets on reuse put pressure on market operators to reduce the amount of empties sent to recycling and provides an incentive to better design cartridges to allow remanufacturing.

#### c) Choice Points 3 and 4 – Metric and tracking by weigh or units

- Mr. Soenen (BE) said that reporting in units or in weight would have a big impact on the numbers. He mentioned there could be an issue of availability of data in one or the other format and the possibility to convert one to the other.
  - Phil Mack (Brother) replied OEMs and Remans were leaning towards a preference for tracking by weight in order to simplify the reporting. He added that reporting by product units would yield lower numbers than reporting by weight.
  - Mr. Siderius (NL) added that Toner was most often for commercial/professional use and was easier to collect than Ink cartridges.
  - Mr. Mack (Brother) added that the environmental impact is the same (whether measured in product units or by weight), and that it was important to consider the issue in terms of reporting and the impact on targets (i.e. weight of products put on the market and what can be reused).
  - Mr. Soenen (BE) added that tracking by unit (Toner and Ink) would do away with artificial trade-offs and suggested all Signatories meet a specific percentage.
- Ms. Presutto (IT) said the metric should be what is placed on the market (which automatically includes reuse).
- Mr. Manev (Epson) said his company suggested setting a single index that includes not only refill but also other cartridges that contribute to the circular economy (CE cartridge). For instance, the single index is obtained by dividing sales numbers of CE cartridges by sales numbers of all cartridges. CE cartridges include refill, continuous ink supply system/cartridge free printers, large capacity cartridges and other solutions. Each manufacturer can freely consider their measures to meet the

target. For example, to achieve the target, an OEM might choose to extend the sales of cartridge free printers, or might take some actions to increase the sales of reman cartridges by BAs, or increase sales of own remanufactured cartridges. Since some Member States as well as Remans insisted on OEMs changing business models in order to achieve targets, some operational flexibility must be allowed if we want to succeed in achieving the overall target, i.e. contribute towards the circular economy.

d) Choice Point 5 – Yearly goals or long-term goal

- Mr. Soenen (BE) suggested an asymptotic/dynamic approach.

e) Choice Point 6 – Indicative or binding targets

- Mr. Siderius (NL) said there is little data to set realistic binding targets and added that having indicative targets at the beginning would prevent a failure of the VA.
- Mr. Soenen (BE) said he agreed with Mr. Siderius that it was a risk to set ambitious binding targets at the moment due to lack of time and data. He said he was in favour of setting indicative targets and then moving on to binding targets over time (i.e. in 5 years).
- Mr. Chappell (HP) asked if targets should be set at company or VA level, to which Mr. Soenen said he favoured individual targets.
- Ms. Presutto (IT) said she favoured indicative targets (to avoid a VA failure), but remarked this also put pressure on manufacturers to meet those individual targets.

f) Additional Choice Points suggested

- Mr. Soenen (BE) suggested as additional choice points: 1) timeline to set the target and have the review and 2) details for the reporting (metric, weight, other data on page yield, etc.)
- Mr. Siderius (NL) suggested including as additional choice point the governance and criteria for Supporting Signatories to join and when (to avoid stakeholder remarks about anti-competition).
  - Mr. Chappell (HP) said those comments would be addressed at the Consultation Forum and said that the criteria for Supporting Signatories would be clarified in the VA. With regards to the window for applications, he said that OEMs-Remans are looking at the process and periods, as this would have an impact on targets.
  - Mr. Siderius (NL) replied that the future VA will mostly have new Supporting Signatories (not OEMs), so in principle having other Remans join would benefit targets by increasing the reuse numbers.
  - Mr. Soenen (BE) said he agreed with Mr. Siderius that it would be beneficial to have an open timeframe for Supporting Signatories to join the VA.
- Mr. Soenen (BE) asked if the compliance with targets would be communicated publicly and if it would be communicated per individual Signatory or as an overall figure of compliance.
  - Nuno Santos (HP) said OEMs would prefer to keep the current VA logic and remarked this issue would also depend on whether targets are set at individual or aggregated level.

#### 4. Next steps

- Mr. Soenen asked for next steps and if Signatories would prepare a Word document for the Subgroup members to comment on (track changes).
- Mr. Chappell (HP) said OEMs would expand the list of Choice Points and would share with the Subgroup for review ahead of the 3<sup>rd</sup> call on 5 February.
- Mr. Soenen (BE) said other Consultation Forum stakeholders are interested in being informed of the Subgroup discussions, and that he had already asked the Commission to invite them as observers for the 29 January meeting (to which Mr. Jérôme Lebouc, DG ENER, agreed). He suggested EVAP should also consider how to involve them in the process.

#### Next calls:

- 27 January, 5:00-6:00pm CET, weekly OEM-Remans call.
- 29 January, 10:15-11:00am CET Consultation Forum.

- 5 February, 2:00-3:00pm CET, weekly OEM-Remans call.
- 5 February, 3:00-4:00pm CET, 3<sup>rd</sup> call Subgroup Targets.

#### **ACTIONS**

- **EVAP Secretariat to share minutes of the meeting.**
- **OEMs to expand the list of Choice Points and share with all Subgroup members (by 2 February).**