

Minutes EVAP Subgroup Targets Fourth meeting – 19 February 2021

From European Commission: 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: 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

Observers: Luka De Bruyckere (ECOS), Vincent van Dijk (ETIRA)

Excused: Paulo Da Silva Lemos (DG ENV), Gerwald van der Gijp (Armor), Ernestas Oldyrevas (ECOS)

1. Welcome and introductions

- Ms. Rodriguez-Martinez (HP, EVAP President) welcomed participants and mentioned ETIRA is joining the Subgroup for the first time as observer.

2. Belgium's proposed equation

- Updated equation discussed by Signatories this week: $\text{Reuse rate} = \frac{\text{All reman cartridges}}{\text{New cartridges} + \text{all reman cartridges}}$.

3. Weight vs. units calculation

- Mr. Soenen (BE), Ms. Presutto (IT) and Mr. Siderius (NL) agreed both approaches could work, provided there is a transparent, robust, accurate and verifiable method of reporting.
- Mr. Soenen added a key issue will be how to define what a remanufactured unit is and to properly measure/calculate for the weight-based approach. He requested more clarity with regards to target obligations for Remans.
- Mr. Chappell (HP, EVAP) explained that if only OEMs have obligations, there needs to be a way to distinguish between what is a Reman cartridge and what is an OEM cartridge or an NBC. The suggestion is that all new material placed on the market is subject to targets (whether it is placed by an OEM, Reman or New Built producer).
- Ms. Presutto (IT) added it is up to Signatories to decide if the VA is on the reuse of material or the reuse of cartridges. If use weight-based approach, the initial formula has to be modified (it is on number of cartridges not on weight of reused material). VA should be coherent (formula, reporting, verification) and should prevent loopholes for companies to declare more reuse materials or reuse of cartridges that what is actually done and placing on the market huge number of products with a very low percentage of reused material.
- Mr. Chappell (HP, EVAP) agreed that OEMs-Remans need to agree on a definition for remanufactured cartridges and this would be adjusted to the chosen approach.
- Mr. Mack (Brother, EVAP) added that OEMs recover components from damaged cartridges that can be used in NBCs. The weight of that material is important so it would be good to recognise the environmental benefits of using those materials again, even if not in a remanufactured cartridge.
- Mr. Siderius (NL) said the units-based approach is simpler (tied to what OEMs-Remans have available in sales figures) but less accurate. He added that counting in units could stimulate the design of cartridge that will survive more than one reuse cycle and can be remanufactured. He would be more inclined towards counting in units.

- Mr. Soenen (BE) agreed that a weight-based approach would be more accurate but indeed more difficult for smaller reman companies to accurately measure/report.
- Mr. Perry (Clover) said the Reman industry wants to recover as much of the materials as possible (from the collected products), but highlighted that different companies have different approaches into how the reman and which parts/what amount of parts they replace. He suggested the definition of a remanufacture cartridge should be based on the use of an OEM shell/core.

4. Defining “remanufactured”

- Mr. Soenen (BE) suggested the following definition: “A remanufactured cartridge shall on average contain a minimum of 75% by weight of re-used parts (excluding ink or toner). The fraction of reuse parts may be measured as a mass balance average over at least 100 units. The fraction of reuse parts shall be measured over a maximum period of one calendar year. Alternatively, the fraction may be calculated from the parts which are typically replaced/reused during remanufacture and the bill of materials”.
- Mr. Siderius (NL) suggested differentiating between ink and toner cartridges, not only in terms of targets, but also on the approach to calculate (i.e. ink cartridges could be counted in units and toner cartridges in weight). The main thing is to have a consistent and credible system that can be independently checked and does not become burdensome for participants. Mr. Soenen (BE) agreed with the suggestion of having different methods depending on ink/toner.
- Mr. Perry (Clover) mentioned the aftermarket issue of huge number of clone ink cartridges being produced as ‘new’ and said that a lot of used cartridges are sent to China, where a lot of components taken out and put back into new plastics (not original plastics). These products then come back to EU market and would be considered as remanufactured products (based on weight criteria), but for the Reman industry they are not considered as real remanufactured cartridges.
- Mr. Siderius (NL) added that one of the issues Member States would like to see improved is the design of cartridges, so original toner cartridges do not contain components that easily wear and cartridges can be reused without exchanging more components.
- Ms. Presutto (IT) asked for clarification that products coming back to the EU market from China would not count in the VA and Mr. Siderius (NL) asked for clarification about NBCs.
- Mr. Chappell (HP, EVAP) said the suggestion is that all new cartridges are subject to targets, whether they are put in the market by an OEM or a New Built company. OEMs and NBCs are subject to targets, otherwise we are not addressing all the new cartridges in the market. With regards to IT’s question, he said the main issue is whether or not those companies would get to say they are remanufacturers and produce remanufactured cartridges from the VA’s point of view and if they could join as Supporting Signatories.
- Mr. Siderius (NL) agreed that both Signatories and Supporting Signatories are subject to targets for new cartridges.
- Mr. Soenen (BE) suggested clarifying/adding wording to the VA on the requirements for becoming Supporting Signatory, i.e. meeting a certain percentage of remanufactured products placed on the market. He said another point to consider is what would be the requirement or the target for Supporting Signatories and how it would be counted.
- Mr. Chappell (HP, EVAO) said Signatories had previously included a provision for Supporting Signatories to have 80% remanufacturing, but this was deleted after comments received from Consultation Forum stakeholders. OEMs-Remans are working on amendments to the VA to account for this deletion.
- Mr. Siderius (NL) suggested keeping it simple and only counting cartridges for products that are in scope of the VA.

Next calls:

- 26 February, 2:00-3:00pm CET, weekly OEM-Remans call.
- 3 March, 5:00-6:00pm CET, weekly OEM-Remans call.
- **5 March, 3:00-4:00pm CET, 5th call Subgroup Targets.**

ACTIONS

- **OEMs-Remans to continue discussions on definition of remanufactured cartridge and what counts towards the target.**
- **EVAP Secretariat to share minutes of the meeting.**