

Minutes EVAP Subgroup Targets Fifth meeting – 5 March 2021

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

Observers: Luka De Bruyckere (ECOS), Vincent van Dijk (ETIRA), Beth McKee (Static Control), Ken Lalley (Static Control)

Excused: Paulo Da Silva Lemos (DG ENV), Elisa Anderson Vazquez (DG ENER), Ernestas Oldyrevas (ECOS)

1. Welcome and introductions

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

2. Definition of Remanufactured cartridge

- Mr. Chappell (HP) presented the definition proposed by OEMs-Remans, which is based on wording in the existing VA, plus Blue Angel concepts. He explained EVAP still needs to confirm its position on the X% figure: *“Cartridge resulting from a commercial process where used Cartridges are collected for cleaning, refilling, relabelling and repackaging and sold to a new user. Some worn components may be replaced in order to return the Cartridge to working condition and to meet desired functionality requirements provided that the Cartridge must retain all or a significant part of the original body. The Cartridge shall contain a minimum of [X%] by weight of reused parts but not counting ink or toner and not counting parts with a direct impact on print quality. If the Cartridge has a page yield that is at least 50% greater than the original Cartridge measured in accordance with the relevant ISO/IEC Standards then the weight of parts that must be replaced in order to achieve the higher capacity shall not be counted in calculating the percentage of reused parts.”*
- Ms. Presutto (IT) raised the following issues:
 - Definition should refer to placing products on the market, not about selling them.
 - Requested removing the word ‘worn’, or adding a definition, since the VA has legal meaning. Need to understand if a component has been replaced because it is worn or for other reasons.
 - Asked which are the parts that have a direct impact on print quality and why they are not counted (regardless of what Blue Angel states, as this might not be the correct definition for this VA).
 - Asked why the minimum % by weight of reused parts is removed.
- Mr. Chappell (HP) replied the ‘sold’ wording had been included because it relates to how the VA defines refilled cartridges (same cartridge that is refilled and returned to the user) and remanufactured cartridges, but agreed to refine the wording. He added Signatories did not see a need to define ‘worn’, as components are replaced either because they are worn or because they need to be replaced to achieve the desired printing functionality requirements.
- Mr. Santos (HP) added Blue Angel is a recognised Ecolabel and the VA draws on existing sources/concepts in the industry, such as Blue Angel.
- Mr. Perry (Clover) explained different Reman companies can build their remanufactured products in different ways, so what constitutes a worn component might differ from one company to the other, and also across products in the same range. He added that the % of parts that need to be replaced will increase over time across the number of reman cycles.

- Mr. Siderius (NL) agreed with IT on the need to define ‘worn components’ or to remove the wording (preferred option) and also questioned why parts with direct impact on print quality are not counted. He added the basic issue will be for Signatories to agree on the X% figure. On Blue Angel, he pointed out it is an Ecolabel, which is different to an Ecodesign legislation (the VA should be nearer to Ecodesign). He added it would be preferable to lower X% a bit, instead of excluding parts with a direct impact on print quality. He suggested differentiating the X% between ink and toner (X could be higher for ink and lower for toner). He said he understood the point made by Mr. Perry about the different cycles and having to replace more parts, but if at some point (i.e. 3rd cycle) the cartridge no longer complies with the established % to be considered as a remanufactured product, then maybe manufacturers should make improvements to the design of the cartridge to make it even more durable.
- Ms. Presutto (IT) asked why this last sentence was included: ‘the weight of parts that must be replaced in order to achieve the higher capacity shall not be counted in calculating the percentage of reused parts’.
- Mr. Mack (Brother) gave an example of toner cartridges and the parts that wear with time (developer roller-rubber roller), which are heavy and have a direct impact on print quality. They wear out because of different types of toner across the same product range and manufacturers need to change them to ensure good print quality. These components are exposed, so if customer doesn’t pack up cartridge correctly before return, the component can easily be damaged. That component design could represent 40-50% of the weight of a cartridge (it would lower the reuse rate for that specification). These heavy and expensive components are only changed to maintain print quality. That is why Signatories want to exclude these parts from the percentage.
- Mr. Soenen (BE) said he understood the example but, if possible, would also prefer the X% to cover any exclusions (including parts with a direct impact on print quality). He agreed with NL in splitting the % between ink and toner and suggest to also split between containers and all in one cartridges. He suggested the measurement of the % could be done as an average over production output and a mass balance approach.
- Mr. Chappell (HP) asked Mr. Siderius to clarify what he meant by saying the definition should be designed around it being always the same parts that should be replaced in the same cartridges, so as to drive design of cartridges.
- Mr. Siderius (NL) replied design should be considered if OEMs have a specific cartridge where they always have the same part that needs to be replaced. VA should allow for improvement of cartridges to be even more reusable in the future.
- Mr. Chappell (HP) explained there will be differences in design of cartridges and on which parts wear on which cartridges. He asked Member States to keep in mind that design changes take time and that cartridges are sold for printers on the market (and printer design is not changed every year).
- Mr. Siderius (NL) agreed timing should be taken into account, but stressed that while the VA should allow for a reasonable transition time (together with targets), there should be clear direction towards stimulating reuse and driving design.
- **Agreement for OEMs-Remans to continue working on the definition, taking into account comments made by Member States.**

3. Target level setting

- Mr. Chappell (HP) presented the current proposal from OEMs-Remans for the reuse rate = collection rate x remanufacturing rate x VA coverage (the “factors”). Suggestion to work backwards, meaning: set long term goals for the factors, determine overall target and work towards it.
- Mr. Siderius (NL) said both the main thing is to agree on a target for reuse. The different factors are only to get a feel on whether it is a reasonable reuse rate, but Signatories would not automatically have reuse rate based on those factors. He asked for clarification on the VA coverage factor. He suggested setting a reasonable and ambitious target for 2025, which can then be readjusted based on whether Signatories are overachieving/underachieving that target.
- On the VA coverage factor, Mr. Chappell (HP) explained that in order to measure the reuse rate, we need to think about where the data about remanufacturing is coming from. If data comes from

information provided by Signatories, then that coverage factor depends on who is providing the data (i.e. who is a Signatory to the VA). If we are not capturing data on the whole market, that has an impact on the reuse rate. He added that the two ideas of working forwards or backwards are not an indication of what the targets would be, but rather the process to get to those targets. Working backwards is probably simpler.

- Ms. Presutto (IT) questioned the suggested 'working backwards' proposal was a way for OEMs-Remans to keep their current business models. She stressed targets should not be set based on bottlenecks (i.e. collection rates) that could be improved by changing business models. She agreed with NL that setting the levels of the three factors will not automatically generate the target. OEMs-Remans need to set an ambitious but reasonable target and then try to see which factors they need to work on in order to meet the target (i.e. how to improve collection rate, remanufacturing rate and VA coverage to meet the target), not the other way around.
- Mr. Soenen (BE) agreed with NL's proposal on a 2025 target and added that the backwards approach would give the individual companies more time to work on improving on the different points (collection, remanufacturing). He suggested having an indicative trajectory which could be used for reporting to see if Signatories are on track on meet the 2025 target. He said some items were still unanswered at this point: what to report and how (collectively/individually, indicative/binding), how to communicate about it (naming and shaming).
- Mr. Chappell (HP) said the proposal is to look at what is challenging and achievable for each of the factors, do a calculation and then from there get a reasonable target.
- Mr. Siderius (NL) remarked that Signatories would have different starting points (towards the 2025 target), so it is better to have a reasonable target that will give everyone a chance to catch up. He agreed with BE's comments on also having intermediate targets and said reporting will also play a role into what is reasonable (i.e. as an incentive to meet targets). He said he would rather have a good overall definition, process, reporting and targets, where targets might be seen as not so ambitious, but where everyone is motivated to reach them. IT agreed.
- Mr. Chappell (HP) asked NL for clarification on whether targets should be different for each company at the start or if everyone should have the same targets.
- Mr. Siderius (NL) said all companies should have the same target, differentiating between ink/toner. Since companies will perform differently the first 1-2 years, he suggests relatively low targets at the start and then stepping them up. IT agreed.
- Mr. Soenen (BE) explained that the spreadsheet he prepared has a breakdown of how a target could be achieved based on different factors. The proposed formula can be used both in the backwards and forward approach.

Next calls:

- 12 March, 2:00-3:00pm CET, weekly OEM-Remans call.

- 17 March, 5:00-6:00pm CET, weekly OEM-Remans call.

- **19 March, 3:00-5:00pm CET, 6th call Subgroup Targets. *Extended by half an hour as agreed.***

ACTIONS

- **OEMs-Remans to continue working on the remanufactured cartridge definition ahead of next meeting.**
- **EVAP Secretariat to update meeting requests for the last two Subgroup meetings.**
- **EVAP Secretariat to share minutes of the meeting.**