



LINDA S. ADAMS  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

# CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD



ARNOLD SCHWARZENEGGER  
GOVERNOR

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812-4025  
(916) 341-6000 • WWW.CIWMB.CA.GOV

**MARGO REID BROWN**  
CHAIR,  
MBROWN@CIWMB.CA.GOV  
(916) 341-6051

TO: Interested Parties

FROM: California Integrated Waste Management Board (CIWMB) and  
Department of General Services (DGS)

SUBJECT: EPP Standard for Printer and Duplication Cartridges—September 21, 2006  
Workshop

DATE: October 18, 2006

**JEFFREY DANZINGER**  
JDANZINGER@CIWMB.CA.GOV  
(916) 341-6024

**ROSALIE MULÉ**  
RMULE@CIWMB.CA.GOV  
(916) 341-6016

I would like to thank you for participating in the workshop that we held on September 21, 2006 to discuss issues related to the EPP Standard for Printer & Duplication Cartridges. We were very pleased with the number and diversity of people that participated in the workshop having representation from the original equipment manufacturers (OEMs), the remanufacturers and other governmental programs. The participants discussed a number of issues and asked questions related to the EPP standard, including a request for clarification of the purpose of the effort. In response, we would like to state that we are looking to you to help us define what an environmentally preferable printer and duplication cartridge is. To that end, we provide the following discussion of environmentally preferable purchasing (EPP) and review some of the environmental attributes we should consider in such a definition.

**CHERYL PEACE**  
CPEACE@CIWMB.CA.GOV  
(916) 341-6039

## **Definition of Environmentally Preferable Purchasing (EPP)**

EPP means the procurement or acquisition of goods and services that have a lesser or reduced effect on human health and the environment when compared with competing goods or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, disposal, energy efficiency, product performance, durability, safety, the needs of the purchaser, and cost.

**GARY PETERSEN**  
GPETERSEN@CIWMB.CA.GOV  
(916) 341-6035

To date, this effort has been described as creating an EPP Standard for Printer & Duplication Cartridges. However, we may be better served at this juncture to think of the process more in terms of defining an environmentally preferable toner cartridge and not consider it as solving a particular problem. This definition in turn, will be used in the standard so that people will be able to differentiate and distinguish environmentally preferable toner cartridge from other toner cartridges.

We hope to receive substantive input and concrete suggestions from industry on what specific characteristics define an environmentally preferable toner cartridge.

**PAT WIGGINS**  
PWIGGINS@CIWMB.CA.GOV  
(916) 341-6010



## **Attributes of an Environmentally Preferable Toner Cartridge**

As part of any effort to promote EPP, one must first define and identify environmentally preferable products to purchase. An EP product may possess a combination of attributes such as reduced air and water emissions; reduced toxicity, solid waste and packaging; energy savings; recycled content; recyclability; and product take back programs. EPP addresses human health and environmental concerns as part of the search for high quality products and services at competitive prices. Obviously, performance is one of the most important factors affecting a purchasing decision. A product cannot be EPP if it does not work well.

To date, the proposed standard has included the EP characteristics of recycled content, reuse/remanufacturing, material take-back efforts, and recently, a proposal to include a host of environmental or “eco” (synonymous with EP) criteria. We believe this is a solid start to the effort, however, we hope to receive some significant suggestions from those working in the industry to ensure that we have a comprehensive and meaningful list of environmental criteria that will provide for a useful and beneficial standard.

Therefore, the designation of a cartridge as an EPP cartridge should consider multiple attributes and not simply focus on postconsumer recycled content and/or collection efforts. We recognize that cartridge collection can not be readily quantified in a multi-tiered distribution system common in the toner cartridge industry. We acknowledge that at the beginning of the process, we proposed a narrower list of elements to be considered as benchmarks, those already identified by the statutory provisions of State Agency Buy Recycled Campaign (SABRC), as a solid starting point for our effort. As we progressed into this process, we explored national and international environmental attributes for printer & duplication cartridges and researched eco-label requirements currently used in Europe and the Far East, our focus widened. We felt that current benchmarks, while forming the basis of the standard, would be improved with the inclusion of this new information. We are of the opinion that henceforth we should focus on creating a standard that reflects the attributes of EPP and help provide the type of environmental protection we are all looking for. We value your contribution to the standard thus far and remain open to receiving significantly more concrete and substantive suggestions from you in the future.

Enclosed please find the notes from our September 21, 2006 workshop. As our next step in this effort, please send us your proposed list of characteristics that you think should be included in a definition of an environmentally preferable toner cartridge by November 16, 2006. From that input and our continuing research, we will propose a list of characteristics to be included in the definition, which in turn will become a major component of the standard.

In an effort to continue the process of establishing this EPP standard, we propose to hold another workshop. The workshop is scheduled for Wednesday, December 13, 2006 at our Cal-EPA building at 10<sup>th</sup> and I Street in Sacramento. The meeting will be held in the Training 2, 2<sup>nd</sup> floor from 1:00 p.m. to 4:00 p.m. We ask you to respond via e-mail to Mr. Fareed Ferhut at [fferhut@ciwmb.ca.gov](mailto:fferhut@ciwmb.ca.gov) and indicate whether you will attend this workshop.

I would like to thank you again for participating in the workshop and for your valuable contribution to this effort. I look forward to continuing our dialogue and working together towards establishing an environmentally preferable standard for printer and duplication cartridges of which we can all be proud. Please send your feedback to Mr. Ferhut at [fferhut@ciwmb.ca.gov](mailto:fferhut@ciwmb.ca.gov) . Thank you for your support of this effort to protect the health and improve the environmental quality of our lives by creating an EPP standard for printer and duplication cartridges.

Sincerely,

*Original Signed by*

Jerry Hart, Supervisor  
Buy Recycled Section

Attachment

cc: Bill Orr, CIWMB  
Fareed Ferhut, CIWMB