

Comments from participants of the workshop

General

- Clarification on the November 17, 2005 letter is needed regarding the 100 point system. Once a product receives 100 points or more, it can be designated as an EPP. Additional clarification is also needed to explain that the 100 points can be accumulated across the Tier 2 Benchmarks. (This was addressed in an individual letter, but not in the latest interested parties' letter).
- The scope of the standard should focus on monochrome cartridges at this stage. Since the bulk of the cartridges are black cartridges, it might be better to focus on the black cartridges first then include color cartridges later. The technology is different between color and black cartridges. This additional time for color cartridges would allow the industry to develop better technology for the color cartridges to address precision color images, the quality, and how the toner flows. [CIWMB asked Canon was going to provide CIWMB with industry market data indicating the relative percentage market share of monochrome versus color cartridges. numbers on the volumes between black and color.](#)
- As the standards are written some companies within the industry are unable to take advantage of the benchmarks since they do not distinguish between remanufactured and new – they provide the same quality and guarantees.

Benchmark 1

- Sharp is planning to re-design the IC chip interface with the cartridge for easy removal. This would ensure that authorized remanufacturers could remanufacture the toner cartridge, utilizing the new IC chip supplied by the original manufacturer. Would designing the IC chip that is easily removable satisfy the requirement of benchmark1?

Benchmark 2

- No comments provided. [A comment was made on recycled content percentage but further discussion was not forthcoming therefore this issue is still open for discussion.](#)

Benchmark 3

- ISO 9000 standards are self documentation of a process; therefore industry is considered about “a drill and fill” process meeting these standards. ISO 9000 certification is something that a “drill and fill” can not claim easily. It requires audit and accreditation by an independently recognized organization. Additionally, the proposal to include independent third party verification of print quality and failure rate would help in this respect.
- Can the following wording be clarified – how would it work and define them individually (restored or renovated) “A cartridge is considered restored or renovated if it is cleaned and its worn parts are replaced without being subjected to a formal process of disassembly and reassembly.”

Third party certification for remanufactured cartridges addressing “comparable” quality

- Industry is concerned this is only adding an additional layer that is not beneficial. It seems like this type of third part certification would then have to be added to each benchmark to be fair. (Although, some remanufactures are okay with having to obtain this since “quality” always seem to be an issue.)
- The level of proof/certification for comparable should be between the bidder and the purchaser i.e. the discretion of purchaser and supplier. This kind of discretion is too subjective and concerns regarding the qualifications of the staff making this determination.
- Will this certification process require information be provided on the quality testing of new standards?
- While it can be slower, it is better to let the market address quality.
- What measures would be or are in place to ensure that the cartridges provided for testing have not been altered?
- Maybe we need to discuss “comparable” with the Department of General Services. Contracts can be mandatory or optional and purchases of cartridges can fall under several types of contracts – purchase contract, equipment purchase and/or service, office supplies. Additionally, State agencies can obtain the cartridges without utilizing a contract.

Benchmark 4

- Industry is able to calculate what is collected, but industry is unable to calculate when the product was sold. Therefore, establishing a collection rate becomes difficult. However, industry is going to look into the feasibility of calculating this. (HP’s best estimate is 2 to 4 million cartridges are sold in California - HP doesn’t do direct sells to customers.) If this isn’t feasible, an option to consider is making this a tier 1 requirement [however, all efforts will be taken to try to achieve consensus on an accurate means of meeting both CIWMB requirements that the efforts be measurable and the Industry’s requirements for accuracy and ability to comply rather than totally eliminate Benchmark 4. Industry will work together to try to establish a workable means to do this](#)– having a “take back” option available to the purchaser/consumer. Consider making certain steps/processes part of the achievements – if your take back features x, y, and z you get x points. [i.e. certain attributes of the program leads to acceptable points].
- If a “take back” recycling option is available to the customer, the customer should be making the decision to return the cartridge.
- Consider having a 5th benchmark option that industry can certify a diversion rate based on what is returned for recycling and/or ~~remanufacturing~~ - X% of the

material returned is either reused or recycled. (Come up with an agreed diversion rate).

- If the cartridge is not returned to the manufacturer, but instead to another remanufacture how is that accounted for?
- Specify in a contract that the cartridges should be sent back. However, this would only be applied to agencies utilizing this contract.
- Unsure how this could be certified under penalty of perjury.
- Hard to distinguish between remanufactured, restored, renovated, and recharged.

Closing

- Look into having another workshop to discuss comments raised in January/February.
- CIWMB still needs to address comments to individual companies.
- HP is compiling information they are planning on providing to CIWMB in late January early February.
- Canon, Xerox, HP, Lexmark and Sharp will work together to provide an alternative method to determine ~~was going to take the lead on working with industry to look into~~ a diversion rate and inform CIWMB by mid to late January.
- CIWMB was going to distribute revised standard based upon all feedback received since the November 17 interested letter. The next version for the standard should come out by February, 2006.