



California Integrated Waste Management Board

Rosario Marin, Chair

1001 I Street • Sacramento, California 95814 • (916) 341-6000

Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025

www.cjwmb.ca.gov



Arnold Schwarzenegger
Governor

Alan C. Lloyd, Ph.D.
Secretary for
Environmental
Protection

September 19, 2005

Mario J. Rufino
Assistant Manager
Environmental Management & Product Safety Department
Canon U.S.A., Inc.
One Canon Plaza
Lake Success, NY 11042-1198

Dear Mr. Rufino:

Thank you for your response to our letter dated August 8, 2005, regarding an effort by the California Integrated Waste Management Board (CIWMB) and the Department of General Services (DGS) to establish an environmentally preferable product (EPP) standard for printer and duplication cartridges. Your comments and suggestions were informative and helpful. In your letter dated August 29, 2005, you offered a number of suggestions. In an effort to continue our dialogue, I have the following responses.

I. The Scope of the EPP Standard

The scope of the standard should include those products that California state or local agencies purchase on contract. Currently, these products include printer, multifunctional device (MFD), and duplication cartridges, such as toner and inkjet cartridges. These cartridges consist of both black and colored cartridges. However, since the functional components of inkjet cartridges are technologically very different from toner cartridges, and toner cartridges constitute a considerably greater proportion of cartridges that the state purchases on contract, it is prudent to develop this EPP standard specifically for black and colored toner cartridges only. While we acknowledge that there are differences in design and specification between black and colored toner cartridges, we feel that there are sufficient similarities between the containers of black and colored cartridges to warrant the inclusion of both in this EPP standard.

II. Benchmark 4

The intent of benchmark 4 is to ensure that manufacturers seeking an EPP designation for their cartridges have an option to attain that designation by establishing a collection program that

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results in remanufacturing or recycling of toner cartridges. We appreciate that there could be an administrative cost associated with documenting the collection rate under such a program. However, the end result of a collection program should be to determine the percent of cartridges collected. Attainment of the standard through benchmark 4 should be based on returned cartridges and not simply having an available collection program. While improving the diversion rate for cartridges currently collected is an admirable goal, the intent is to see more cartridges diverted that are collected and remanufactured or recycled. Therefore, we feel that benchmark 4 should measure cartridges collected.

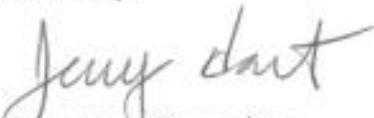
III. Certification:

It is envisioned that an efficient and enforceable self-certification system by vendors will identify those cartridges that are designated as EPP printer and duplication cartridges. It is the intent of this standard to make it as easy as possible to discern an EPP cartridge from a non EPP cartridge. Self-certification must be in writing under the penalty of perjury and be auditable and verifiable.

I would like to thank you again for responding to our letter with helpful comments and suggestions. I look forward to continuing our dialogue and working together towards establishing an environmentally preferable standard for printer and duplication cartridges. We will be sending out our next letter to the interested parties on September 19, 2005, and would like to encourage you to continue your assistance in this effort.

If you have any questions or comments, please contact Mr. Fareed Ferhut at fferhut@ciwmb.ca.gov or (916) 341-6482.

Sincerely,



Jerry Hart, Supervisor
Buy Recycled Section

Cc: Patty Wohl, CIWMB
Bill Orr, CIWMB
Fareed Ferhut, CIWMB