



California Integrated Waste Management Board



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

Rosario Marin, Chair
1001 I Street • Sacramento, California 95814 • (916) 341-6000
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025
www.ciwmb.ca.gov

Arnold Schwarzenegger
Governor

September 19, 2005

Scott Canonico
Manager, Environmental Policy
Hewlett-Packard Company
1000 NE Circle Blvd.
Corvallis, OR 97330

Dear Mr. Canonico:

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. Cartridge Collection

You have recommended as part of Tier 1 requirement, that cartridge vendors be required to provide an established system of post-use collection for the cartridges that they sell under contract to the state or local agencies in California, in order for those cartridges to qualify as EPP. While we applaud those vendors that have established such systems, the main focus of Tier 1 is to prevent any restrictions on recycling or remanufacturing of a cartridge. Furthermore, the issue of post-use collection is addressed in Tier 2, benchmark number 4.

California Environmental Protection Agency

Printed on Recycled Paper

Join Governor Schwarzenegger to Keep California Rolling.
Every Californian can help to reduce energy and fuel consumption. For a list of simple ways you can reduce demand and cut your energy and fuel costs, Flex Your Power and visit www.fypower.com.

III. Equitable Standard for All Cartridges

We agree that vendors should responsibly manage the disposition of replaced parts and cartridges that they or their supply chain collect, but do not remanufacture due to defects or other reason. We look forward to any suggestions from the refilling and remanufacturing industry.

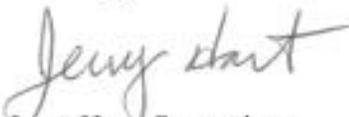
IV. Benchmark 4

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 results in remanufacturing or recycling of toner cartridges. Supplying customers with free and readily available means of returning that cartridge is an outstanding service to your customers. We understand the shared responsibility between vendors and customers. 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 providing customers with the means of returning a cartridge.

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