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Mr. Fareed Ferhut
Integrated Waste Management Specialist
Buy Recycled Section
CIWMB
P.O. Box 4025, MS-12
Sacramento, CA 95812

Re: Comments on Draft EPP Printer and Duplication Cartridge Standard

Dear Mr. Ferhut,

I am writing on behalf of Canon U.S.A., Inc., ("Canon") regarding the California Integrated Waste Management Board's (CIWMB) proposed environmentally preferable product (EPP) purchasing standard for printer and duplication cartridges. Canon appreciates the opportunity to comment on the EPP program. We look forward to working with the agency as you develop this standard.

The proposed EPP standard is based on the California Public Contract Code 12400 which defines EPP to mean, "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 shall take into consideration, to the extent feasible, raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, disposal, energy efficiency, product performance, durability, safety, the needs of the purchaser, and cost."

The proposed EPP standard for printer and duplication cartridges references monochrome and color toner cartridges and ink jet cartridges. We think it is important to clearly define the scope of the EPP program, and to apply the EPP standards to "like" goods and services.

Canon believes that for the first set of EPP standards, the standards should only apply to monochrome toner cartridges. This is an appropriate scope based on the law and on the State's EPP objectives. We make this recommendation because the governing law requires "comparison" and "consideration" of various factors such as materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, disposal, energy efficiency, product performance, durability, safety, the needs of the purchaser, and cost. There are significant differences in consideration of these factors for monochrome toner cartridges, color toner cartridges and ink jet cartridges. Please consider the following:

A. Canon believes that it is not viable to apply the same EPP standards for both toner and inkjet cartridges because these cartridges vary greatly in product design, the environments that they are used in, and their usage patterns and distribution/sales channels. For example:

i) *Product Design:*

Inkjet and toner cartridges are similar in only one way; the function of each is to “hold” and “supply” either the ink or the toner. The ways that these cartridges differ include the other functional components for printing, materials used to construct the cartridge, and the size and weight of each product.

ii) *Different User Environments, Distribution/Sales Channels and Usage patterns:*

Currently, laser beam printers (using toner cartridges) are used in a wide variety of office environments, including governmental agencies/organizations, and are used mainly as network printers because of function and price. On the contrary, inkjet printers are currently marketed more to personal users. These different uses and different channels of distribution likely result in different alternatives for recycling or reuse of these products under EPP standards. Since laser beam printers are intended and marketed for sale to office users, such printers will almost certainly be used more frequently and by more users than personal inkjet printers. Thus, if the EPP standards focus on toner cartridges, the objectives of the program (e.g., lesser disposal of EPP products in landfills) will be more readily achieved.

B. Canon believes that monochrome toner and color toner cartridges should not be addressed in the same standard at this time. Canon feels that there are significant differences in these products when all of the California Public Contract Code requirements are considered. Monochrome toner cartridges and color cartridges differ greatly in their designs and specifications, with color cartridges requiring more complex functioning capabilities and specifications. Further, monochrome cartridges are typically used at a higher rate in business offices. As such, focusing on monochrome cartridges will most readily satisfy the EPP environmental objectives in comparison to other products.

C. Finally, Canon would like to suggest that criteria for proposed Benchmark 4 be modified to:

1. A cartridge collection program is available, and
2. The recycling percentage (total percent of “parts reused for cartridges” and “materials recycling for new cartridges /other products”, from the total weight of “toner” cartridges returned) should meet a set threshold.

This Benchmark should be self-certifying, so that there is an efficient means for identifying products that meet the EPP standards.

Canon believes that these criteria (1 and 2 above) will meet the EPP purpose to promote recycling and waste minimization. We suggest a recycling percentage rather than the collection ratio set forth in the draft EPP standard because the number of cartridges returned by the end-user is highly dependent on the end-user's behavior. Since cartridge recycling is not mandatory, it is very difficult for a manufacturer or service provider to control the quantity, type of printing equipment, or timing of cartridges returned or reused.

In conclusion, Canon supports the EPP program. We agree on the importance of environmental objectives that minimize waste, but we also recognize the high quality product standards that should be achieved. We agree that the focus of the EPP standard should be on the toner cartridge, and we think the EPP standards must be applied to only this type of toner cartridge. We suggest that the EPP standard for printer cartridges focus on monochrome toner cartridges for the first standard. We also suggest that the EPP program should be self-certified and that there be an efficient means for identifying products that meet the EPP standards.

We welcome the opportunity to continue to participate in your program. Please do not hesitate to contact me should you have any questions regarding our comments.

Very truly yours,
Canon U.S.A., Inc.

A handwritten signature in black ink, appearing to read "Mario J. Rufino". The signature is written in a cursive, flowing style.

Mario J. Rufino, CHMM
Assistant Manager,
Environmental Management & Product Safety Department
Corporate Planning Division