

From: [CAB SINKEVICIUS CONTACT](#)
To: [REDACTED] (CAB-SINKEVICIUS)
Subject: FW: EU Communication on Circular Economy Action plan must include regulatory measures for printers and cartridges
Date: vendredi 14 février 2020 17:16:07
Attachments: [image001.jpg](#)
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From: ETIRA
Sent: Friday, February 14, 2020 4:57 PM
To: CAB SINKEVICIUS CONTACT
Subject: EU Communication on Circular Economy Action plan must include regulatory measures for printers and cartridges

HE Mr Virginijus Sinkevicius
Member of the EU Commission
200, Rue de la Loi
1049 Brussels

cc: Commissioners Timmermans, DG ENER, DG GROW
Breda/Brussels, 14 February 2020,

Re: Ecodesign: draft EU Commission Communication on Circular Economy Action plan must include regulatory measures for printers and cartridges- Cartridge reuse as a cartridge is "textbook circularity"!

Dear Mr Commissioner,

In January, several media outlets published the draft Commission Communication on the new Circular Economy Action plan. Among many other things, the draft says that as a priority, regulatory measures for printers and consumables such as cartridges will be included in the EU eco-design Directive promoting circularity in energy-related products (2020-2024 Working Plan).

As the EU representative body of the cartridge reuse industry, we not only strongly support this initiative, but consider it crucial to the survival of the already heavily challenged and small EU cartridge reuse industry.

However, we fear that printer manufacturers may now lobby several EU Commissioners/DG's to have this great initiative removed, but we kindly ask you to ensure that it stays in !

As you may be aware, the printer cartridge remanufacturing industry, which is a textbook example of circular economy activity, has been severely hit during the last few years due to 2 key factors:

- printer manufacturers pro-actively frustrating cartridge reuse

and

- massive uncontrolled imports of low price dumped new non-original cartridges from Asia.

As a result, currently only 5-10% of cartridges are reused as a cartridge, and this number is decreasing every year. Over 70% is landfilled after first use. But as described in the 2018 EU study on cartridges, (<https://ec.europa.eu/environment/waste/weee/pdf/KH0418170ENN.pdf>) and supported by the recent EU GPP printer criteria proposals, **in an ideal situation 75-90% of all marketed cartridges can be reused at least 1x**, giving 45-60% less CO2 emissions, less waste, saving natural resources, and 8,000-16,000 new green jobs in the EU.

The technology and market potential for such high reuse targets exist, but printer manufacturers (=OEM's) are USA and Asia-based companies that use patents, clever chips, software updates, closed loop collection schemes, etc., as tools to make reuse of a cartridge as a cartridge impossible. And even worse: the Asian newbuilt non-OEM cartridges are sold below cost price, do not comply with EU health and safety regulations, and are almost all landfilled after first use. This has not only polluted the EU waste streams, but represented a disruption of the single market, and the loss of approx. 20,000 green jobs in the EU since 2010.

Since 2011, the EU's Voluntary Agreement Imaging Equipment is in place, but it has not facilitated cartridge reuse. With their linear business model, printer manufacturers have demonstrated an absolute lack of interest to incorporate circularity into their business models. They will now oppose and try to delay a regulatory approach, and will put in place all kinds of obstacles.

The voluntary approach is also incapable of stopping the current huge import of dangerous Asian newbuilt non-OEM cartridges: a voluntary agreement only binds the signatory printer manufacturers, but the thousands of Asian free riders are then not obliged to comply with voluntary commitments like end-of-life solutions, use of safe plastics and toner/ink, etc.

As a voluntary approach cannot end the above barriers to reuse, we kindly ask that you maintain the proposal to take regulatory measures for printers and consumables such as cartridges as a priority under the Ecodesign Directive: only then can the EU stop unnecessary single-use plastics from further polluting Europe.

Cartridges can be a visible, "Green Deal in Practice" textbook example, but only if the regulatory framework is there to drive it.

We look forward to your reply.

Kind regards,

[Redacted signature]

