



20th ANNIVERSARY

ACTIVITY REPORT 2023



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ETIRA is the non-profit trade association for European companies involved in state-of-the-art toner and/or inkjet remanufacturing and their business partners. Every day, remanufacturers bring European consumers and businesses a first-class high quality product which is competitively priced and, thanks to reusing natural resources, makes a significant contribution to the European environment and a cleaner world. Yearly, the industry adds an average of 1,5 bn euros to the European economy, directly and indirectly providing 16,000-20,000 jobs, and preventing 300,000 m³ of waste from going to landfill. Visit www.etira.org for more information.



From The President



On behalf of the Board of Directors and me personally, I would like to thank all ETIRA members for their continuous support of our association. I also congratulate ETIRA on its 20th anniversary this year.

It is also excellent news that our ETIRA family is growing, and more and more companies have joined or will join us in the near future. A warm welcome to them!

Together we have achieved “Historic results” in terms of regulation and other topics, and I am certain we will have secured our market for a great future.

Personally, I have the impression that the EU wants to make our industry a textbook example of circularity, and ours will be the first energy-consuming eco-design product regulated under the EU Commission’s DG Environment’s, not DG Energy’s, oversight.

However, uncertainty remains the “New Normal”, and many of us have long suffered from linear suppliers, being OEMs or clones.

There is an Pre-Covid Pre-war Europe, and a Post -one, where trust in some partner-countries like Russia and China was being questioned, and our confidence was put to the test.

Regulation is moving at an incredible speed under the circular ambition, and let’s be clear and proud: ETIRA has become the most relevant stakeholder.

The fight is far from over, but the signs are very promising. We need to “re-shape” ETIRA so that we are in Pole Position to achieve the “Full cartridge remanufacturing potential”, estimated by the EU Commission to be at 90% of all cartridges, quite far from where we are now.

We count on all of you to help us improve even further.

Thank you for your interest in cartridge remanufacturing and ETIRA. Don’t hesitate to talk to us anytime you want: info@etira.org.

Javier Martínez

President of ETIRA
Castelldefels, Espana, May 2023

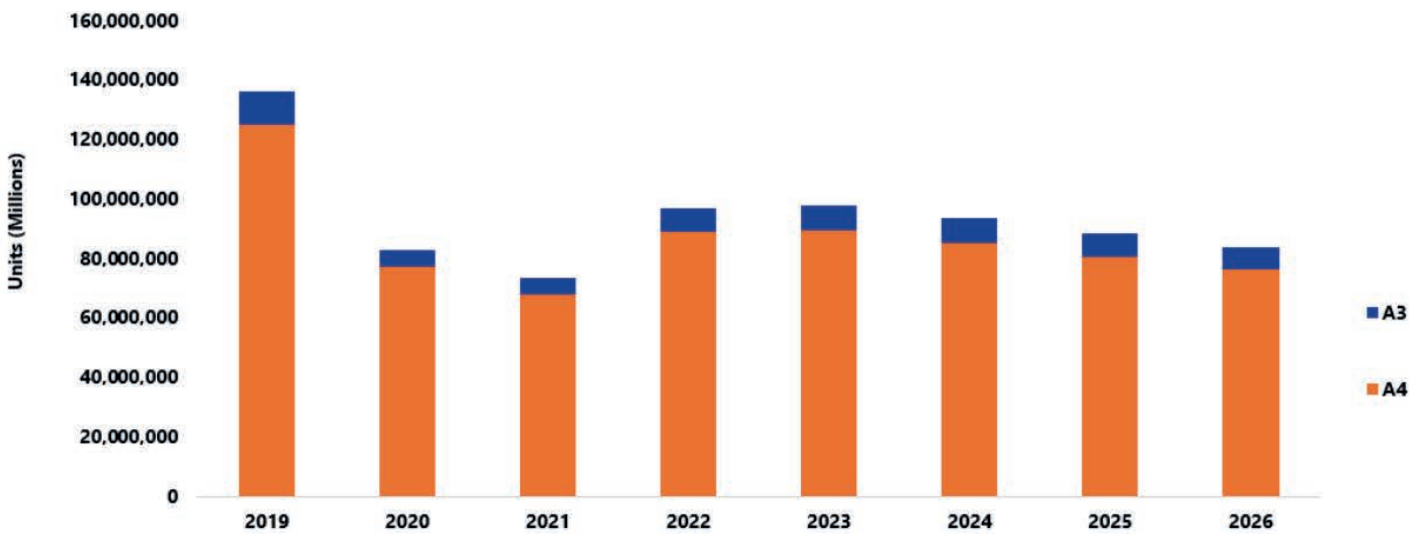


General Market Developments

In Q2 of 2023, the EU published several documents in the context of its project to develop a preparatory and an impact assessment study for the 'Imaging equipment and consumables' (see separate article in this Activity Report). The documents contain the below Keypoint Intelligence market data (www.keypointintelligence.com/) showing the (projected) sales of inkjet respectively toner cartridges in Austria, Belgium, Denmark, Finland, France, Germany, Ireland, Italy, the Netherlands, Norway, Portugal, Spain, Sweden, Switzerland and the UK.

Toner cartridges

According to the EU Commission report, the sales of toner volume are expected to peak in 2023 and will subsequently decline in the following years. In the office environment – where most of the toner is used- the type of toner cartridges sold varies between single and dual cartridge packs with black single cartridges representing the most common type unit.



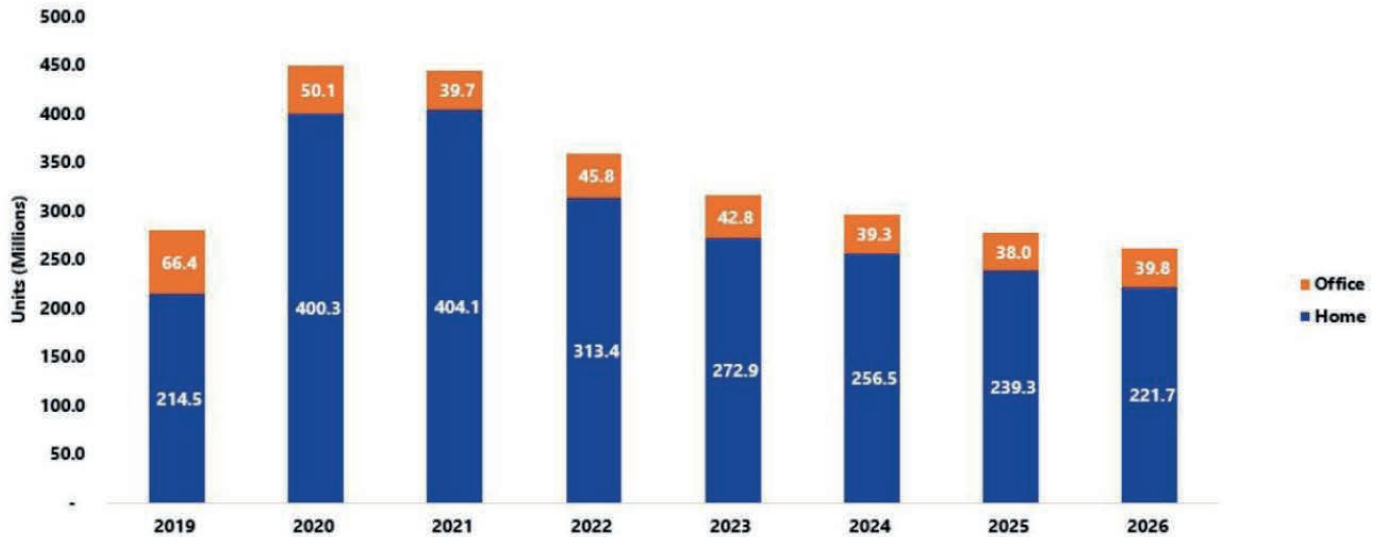
Source: Keypoint Intelligence, 2023 / EU Commission, <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/529/documents>



General Market Developments

Inkjet cartridges

According to the EU Commission report, due to the Covid-pandemic, home printing surged and inkjet sales in 2020 peaked at 450 million units. Since then, the market contracted, and a further reduction through 2026 is forecasted. In 2022, 359 million cartridges were sold in the sample of countries under evaluation.



Source: Keypoint Intelligence, 2023 / EU Commission, <https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/529/documents>

ETIRA opines that within the total market, the remanufactured OEM cartridge market remains under heavy pressure. Remans are squeezed between new OEM cartridges and cheap non-OEM single-use newbuilt cartridges (“SUC’s”) that swarm the EU market. While the overall market share of aftermarket cartridges (=remanufactured OEM and SUC’s) has grown, this growth is mostly attributable to the SUC’s. These cartridges continue to be offered at a low price, sometimes even below the cost of an OEM-empty. The major barriers to reman market share growth are listed in a separate section in this Activity Report.

Moreover, lower print volumes in the home and office reduce the overall market size, affecting OEM’s remanufacturers and suppliers of non-OEM newbuilds alike.



Unfortunately, there are many barriers to 3rd party reuse. OEM's apply a wide variety of tools to hinder the growth of our industry. Examples of the tools they use include (non-exhaustive list):

No eco-design: cartridges are not designed to allow reuse

Most cartridges today are designed in a way that makes remanufacturing very difficult or even impossible. In the 1990's, many cartridges only had screws to fit parts together. Since then, cartridge parts are glued together. The only reason why OEM's have changed to glue was to make remanufacturing of the cartridge very hard or even impossible, turning the cartridge into a single-use product.

Embedded software preventing the reuse of the cartridge

Today, almost every cartridge is fitted with embedded software/clever chip. The software creates the handshake with the printer: without it, the printer does not recognize the non-OEM cartridge and will not print, or the printer gives confusing messages to the end-user. As a result of this OEM anti-reuse strategy, it has become impossible for a growing number of cartridge models to be remanufactured by 3rd parties. Moreover, end-users are reluctant to buy remanufactured cartridges as they fear that non-OEM cartridges may not work in their printer, creating more waste cartridges.

Printer firmware updates locking out non-OEM cartridges

Printers are permanently connected to the printer manufacturer via the internet. Throughout the printer's lifecycle, a user receives many overnight software (firmware) updates from the printer manufacturer. But often, as a side-effect of this unsolicited update, the printer no longer recognizes the non-OEM cartridge, even though it used to work perfectly fine prior to the update. As a result, remanufacturers often need to replace or reset or replace the installed remanufactured cartridge.

OEM's usually claim that the update is necessary for "improved functionality, technical requirements, etc". But updates can always be designed in such a way that they do not lock out 3rd party remanufactured cartridges. According to ETIRA, many OEM's perform these firmware updates only to discourage customers to use 3rd party remanufactured cartridges.

In 2020, the Italian fair competition regulator fined printer manufacturer HP a 10 million euro penalty, because it concluded that a HP business practice unfairly limited the use of non-HP cartridges. The firmware system used by HP blocked printing when it recognized non-original or outdated cartridges. The watchdog found that HP had failed to adequately inform consumers at the time of purchase about the presence of this limitation, leading them to believe that they needed to replace non-original cartridges and therefore to use only original HP cartridges.

No sharing of information on how to remanufacture

OEM's do not make the information needed for remanufacturing available to customers or 3rd parties in any way. The software and clever chips which are present on every cartridge today all have proprietary codes owned exclusively by the OEM. These are business confidential data and not publicly available. And OEM's do not offer the codes to 3rd parties under a licensing arrangement either.

Hence the remanufacturing industry must resort to reverse-engineering these codes. This is a complex technical activity performed only by specialized high-tech companies. For each cartridge model, they are forced to invest millions of euro's and 1-2 years of work in decoding the respective cartridge chip, and due care must be taken not to infringe patents.

Blocking aftermarket chips

With a generic aftermarket chip developed by 3rd parties, a cartridge can be used again as a cartridge, and such chips have been around for years. But some OEMs recently started to block them under the pretext of providing more internet security for the customer. But according to ETIRA, the real reason is to block the reuse of the cartridge so that the user is obliged to throw it away after first use and buy a new one.

Limited printer functionality when non-OEM cartridges are used

Printer manufacturer increasingly add functions to the printer that are only available if you use original OEM cartridges. So doing, buyers may be reluctant to buy non-OEM cartridges for fear the printer may not work!

Obliging customers to not sell remanufactured cartridges

Some OEM's oblige their customers to sell only OEM cartridges. If these distributors do not comply, OEM's will withdraw that customer's benefits and rebates. As a result, remanufacturer access to these sales channels is blocked.

Closed-shop customer supply programmes

Many OEM's have sales programmes whereby they sell both the printer and the full supply of cartridges during the lifecycle of that printer (MPS). But as OEM's only offer new cartridges and do not reuse the cartridges they collect after 1st use, this sales programme also locks reuse cartridges out of the market.

Closed-shop collection programmes for used cartridges

Many OEM's have company-own collection programmes for empties. ETIRA estimates that OEM's collect only 10%-15% of all cartridges they place on the market. But after collection, these empties are generally not remanufactured to be used as cartridge again, but merely recycled: they are taken apart and their materials are shredded, plastics melted, and partially used as base material to produce other products.

Several OEM's showcase their cartridge collection and recycling activities as being good for the environment. However, the environmental footprint of mere recycling is much higher than if the spent cartridge would first be reused as a cartridge in several cycles, followed by final recycling. Clearly, the real OEM objective behind merely recycling their collected empties is to reduce the number of empties available for remanufacturing.



Intellectual property rights (patents) and aggressive legal actions against remanufacturers

Most OEM's have registered thousands of national and EU-wide patents on part(s) of, or on the entire cartridge, which can make (re)manufacturing that cartridge illegal. Very often, the patents concern in particular those parts of the cartridge that are subject to wear and tear, which makes it impossible to legally exchange these parts, yet is needed in order to produce a quality alternative product.

OEM patents on remanufacturing

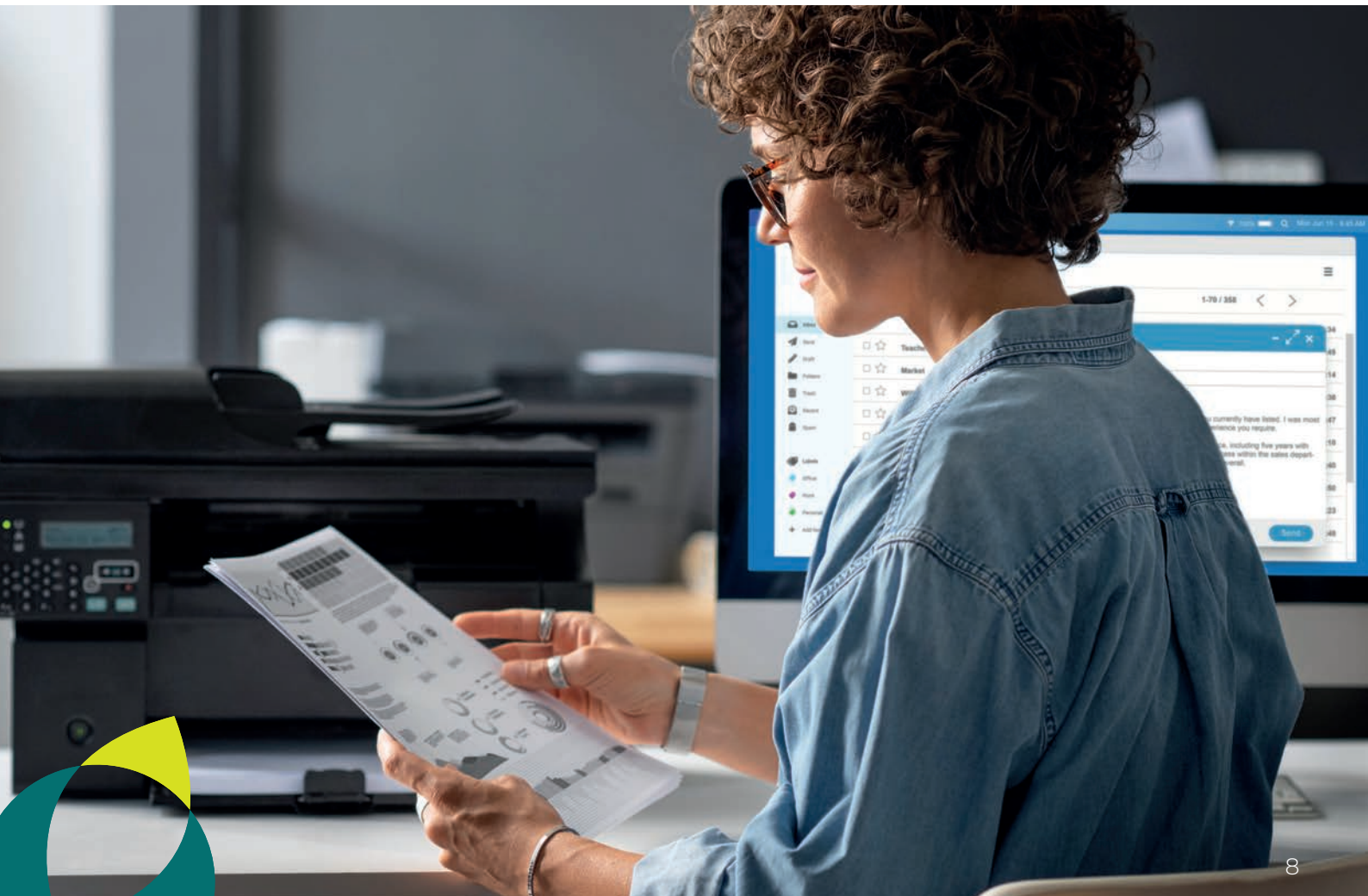
Patents on remanufacturing are a permanent problem for our industry. Some OEMs apply for patents which merely seek to render the legitimate activity of remanufacturing OEM cartridges impossible, even when they do not remanufacture cartridges themselves!. Thus, they pro-actively prevent the environment-friendly reuse of their product, only for commercial reasons. Moreover: the European Patent Office EPO grants patents far too easily, i.e. even for ideas which were fully obvious to a person skilled in the art, or without a proper analysis of the existing prior art, etc.

Public tenders excluding remanufactured cartridges under the tender

Objecting against public tenders excluding remanufactured cartridges from participating in the tender is a quasi-permanent task for ETIRA. Some public bodies ask only for OEM products and exclude remanufactured OEM cartridges. It is unfortunate that we continue to see public bodies still not fully complying with EU law on free competition, and illegally excluding remanufactured a fair and equal opportunity to tender. But as this is a matter of principle for our industry, we continue to protest everywhere we find these illegal exclusions.

Italy, France, Czech Republic and other EU countries require that environmental criteria are used when issuing a public tender, thus promoting the use of remanufactured cartridges.

In 2020, the EU published new recommended criteria for public tenders for imaging equipment. These criteria clearly favour remanufactured cartridges. ETIRA calls for these criteria to become compulsory.



Warranties

Sometimes printer manufacturers or maintenance firms refuse to honour the printer warranty simply because non-OEM cartridges were used in the printer. But in accordance with EU and national law, a manufacturing company cannot argue that the printer warranty is null and void just because non-OEM cartridges were used: for the warranty to be justifiably refused, there must be clear and undisputed proof that the **malfunction of the printer was directly caused by the non-OEM cartridge**. If this proof cannot be provided, the warranty must be honoured in full.

Leaving the OEM logo on a remanufactured OEM cartridge

Remanufacturers question whether it is allowed to leave the OEM logo on the remanufactured cartridge. After all, a 2nd hand car is also resold under its original brand name. ETIRA commissioned a legal opinion addressing this question. The opinion is available to ETIRA members.

Data collection

Some OEM's collect data from printer users through a 24/7 online connection between the printer and its manufacturer, often without the knowledge or consent of the printer user. The data collected ranges from print frequency and cartridge type to the date and location of printing and in some cases even the scans made are collected. This information is used to construct a comprehensive customer profile. And some printer distributors are required to inform the printer manufacturer of each printer purchase, providing the manufacturer with even more data to refine his customer profiles. According to ETIRA, such practices blatantly contravene EU privacy and data collection regulations like GDPR and similar national laws, and therefore we ask regulators to intervene. ETIRA also refers to the 10 million euro fine imposed on HP by the Italian fair competition regulator in December 2020 because the regulator found that without informing printer users, HP recorded cartridge consumption data through the printer's firmware.

Offering 2 types of the same printer

Some OEM's sell 2 types of the same printer: one that works only with original OEM cartridges, and another equal but more expensive printer that may allow non-original cartridges. This pushes customers to buy the more polluting cheaper printer that locks out non-original cartridges.

In addition, thousands of cheap newbuilt non-OEM single-use cartridges (SUC's) are imported from SE Asia every day. Often these products infringe OEM patents. Moreover, they are bad for the environment as they are neither collected nor remanufactured. Unfortunately, traders who do not care about patents, quality, or the environment, sell these products to unaware European customers every day. ETIRA opposes the trade in such patent-infringing newbuilt cartridges because it is an offense, and resellers and distributors should not buy these products. And it's also anti-environmental and anti-social behaviour: these Asian cartridges often pollute the European environment as they are neither remanufactured (that would be just as illegal as manufacturing them) nor recycled. They are simply thrown away after 1st use, resulting in unnecessary extra landfill in Europe. European individuals or companies caring about sustainability should only buy remanufactured OEM cartridges.

The above list of barriers to cartridge reuse was compiled by ETIRA, but the 2023 *"Imaging equipment and its consumables, Preparatory study for ecodesign study"* by the EU 's JRC body also lists many of these barriers.



Promoting Quality Remanufacturing

Product quality is the #1 priority of ETIRA: only if our product is as good as, or better than, the OEM-equivalent, are we able to grow our market share. This is why most of our efforts focus on enhancing quality across the industry. ETIRA Members do not compromise when it comes to quality: only the best will do. ETIRA welcomes pan-European and global standards that set clear parameters, and are widely recognized.

ETIRA contributes, directly or indirectly, in the development of the following standards:

ISO cartridge standards

To measure cartridge yield, ISO has developed standards 24711 (ink), 19752 (toner B/W) and 19798 (color toner). ISO product standard 29142 for cartridges applies to OEM, compatible and remanufactured cartridges alike, and covers labelling and environmental performance criteria.

The entities participating in the ISO work are predominantly the major international OEM's. Some manufacturers of newbuilt compatibles, and a few remanufacturers also contribute to the work of this ISO Working Group. Being a trade association, ETIRA does not directly participate in ISO.

DIN standards for remanufactured cartridges

DIN standards for cartridges 33870-1, 33870-2 and 33871-1 apply only to remanufactured cartridges. The standards can be obtained from DIN.

ISO standard 8887 on remanufacturing/design for reuse

ISO has standard 8887 "Design for manufacture, assembly, disassembly and end-of-life processing (MADE)". Although this is a general standard on generic remanufacturing, it also affects products like cartridges.



Environment

Remanufacturing empty cartridges is good for the environment. The largest environmental impact from printing comes from the many cartridges and paper used in the printer during its lifetime, not from the printer as such. Reuse of cartridges can reduce CO2 emissions by 40%-60%.

In addition, today, most printers are not used to capacity. Research has shown that most printers are made redundant way too early. The OEM business model forces users to buy a new printer long before it has reached its technical end of life. This is an unacceptable waste of natural resources, and results in excessive and unnecessary greenhouse gas emissions.

The EU has defined a clear hierarchy in the environmental impact of waste: prevention of waste has the lowest impact, and re-use (=remanufacturing) follows immediately after that, so before recycling. With re-use prevailing over recycling, re-use should always be the preferred option.

To raise awareness of the benefits of cartridge reuse, ETIRA lobbies authorities and participates in seminars, meetings, working groups, etc. Reuse should receive a higher priority than it has today, as existing eco-friendly policies often fail to deliver a tangible increase in reuse. Legislative tools should include strict regulatory, not voluntary, action on eco-design (no clever chips!) and the removal of legal barriers which frustrate remanufacturing. And governments need to lead by example: public tenders should reserve a compulsory minimum percentage of the tendered volume for remanufactured products.

During the last years, we successfully lobbied for favourable wording in the EU ecodesign criteria for imaging equipment, the EU Ecolabel for imaging equipment, the EU criteria for green public procurement (GPP), the US public procurement scheme EPEAT, the Nordic Ecolabel, the EU study on cartridge reuse, the reform of the EU Voluntary Agreement Imaging Equipment, the upcoming EU regulation of the industry, the EU rules against greenwashing and right to repair, etc. etc.

Our efforts paid off in full as the EU has adopted many green policy initiatives that will support cartridge reuse.

2018 EU case study recommends more cartridge reuse

A 2018 EU Commission case study on cartridge reuse acknowledged that the EU regulatory environment was not well suited to promoting reuse of products. It presented specific proposals with regard to the re-usability/reuse of printer cartridges: Regarding the OEM's Voluntary Agreement Imaging Equipment (see below), the study said that it does not promote cartridge reuse. The study supported developing an EU Ecolabel criteria for remanufactured cartridges. The study called for improved access to cartridge design and consumables specifications, revising the EU GPP criteria, reviewing the Voluntary Agreement, etc. Through meetings, papers, etc., ETIRA had provided extensive input for the study.



EU Circular Economy policy initiatives

In March 2020, the EU Commission adopted a new Circular Economy Action Plan (CEAP), as part of the European Green Deal, Europe's sustainable growth agenda. On electronics and ICT, the CEAP said that they will be the priority sector for implementing the 'right to repair', including a right to update obsolete software. Other measures include improving the collection and treatment of waste electrical and electronic equipment.

EU Voluntary Agreement (=VA) Imaging Equipment rejected in March 2022 - EU to regulate industry

For many years a VA Imaging Equipment was in force in the EU. It contained some environmental impact reduction commitments from the OEM's for the printers they market in the EU, but excluded cartridges. Yet re-using a consumable as a consumable as many cycles as possible before recycling its materials, is the best way of lowering the overall environmental footprint of printing. Hence ETIRA always insisted that cartridges be included in any VA. By focusing only on reducing energy consumption, the VA's impact has been very weak and failed to meet its key objective: the lowest environmental footprint of printing. Like NGO's, Member States and others, ETIRA insisted that products should be designed with their environmental footprint in mind (Ecodesign) during production, operational life, and at end-of-life.

In 2019, the consultancy advising the EU Commission on the review of the VA suggested to include cartridges in its scope. Unfortunately, for well-known commercial reasons, OEM's have consistently refused to voluntarily facilitate cartridge reuse. Then, the March 2020 EU Circular Economy Action Plan insisted that printers and consumables such as cartridges would be covered under EU legislation, unless the printer industry would agree an ambitious VA by late 2020. In March 2022, the EU did not approve a VA text as proposed by printer manufacturers (EuroVAprint) and some remanufacturers. The EU argued that the proposal would not achieve the CEAP objectives, and could not be considered compliant with the guidelines on self-regulatory instruments, in particular regarding the possible re-use of consumables. The EU also considered that the VA proposal was not likely to deliver the policy objectives faster or in a less costly manner than mandatory requirements under the Ecodesign Directive. Therefore the EU decided that it will now regulate the industry (see full details here: <https://publications.jrc.ec.europa.eu/repository/handle/JRC129299>)

Upcoming EU regulation of imaging equipment

To prepare the legislation, a preparatory study and impact assessment are required.

Since mid-2022, the EU's JRC is working on the preparatory study and has consulted and met with stakeholders. ETIRA, being a key stakeholder, has provided extensive data input to ensure the upcoming legislation will favour cartridge reuse. Many European NGO's and EU member states are also key stakeholders and many support our cause.

In early 2023, the EU published its call for evidence on the impact assessment, clarifying that proposed methods may include designing products that are more energy efficient, durable and easier to reuse, remanufacture, repair and recycle. The design of consumables is also very important. The impact assessment will look at requirements to improve the material efficiency of imaging equipment (e.g. reliability of parts, availability of software updates, design for disassembly, polymer composition, recycled content and the availability of spare parts); requirements to improve the material efficiency of consumables, such as minimum page yield requirements and/or information requirements on page yield; requirements to enable the remanufacturing of consumables and to enable the use of these consumables, for instance by addressing software barriers; removing the least energy-efficient imaging equipment products from the market; bringing in an energy label with an A to G scale. Options for action include mandatory ecodesign requirements (with sub-options on energy- and material-efficiency); energy labelling, or a combination of ecodesign requirements and energy labelling.

ETIRA has provided extensive comments on this call for evidence.

Upon completion of the preparatory study and impact assessment, the EU will propose the legal format. According to the EU's published timetable, regulation should come into force by 2025.

EU Ecodesign Directive to be replaced by Ecodesign for Sustainable Products (ESPR) Regulation

In March 2022, the EU Commission approved its 2022-2024 Ecodesign Working Plan. They also presented a draft new regulation on Ecodesign for Sustainable Products (ESPR) Regulation, to succeed the current EU Ecodesign Directive. When adopted, the ESPR will set new requirements to make products more durable, reliable, reusable, upgradable, repairable, easier to maintain, refurbish and recycle, and energy and resource efficient. In addition, product-specific information requirements will ensure consumers know the environmental impacts of their purchases. All regulated products will have Digital Product Passports. This will make it easier to repair or recycle products and facilitate tracking substances of concern along the supply chain. Labelling can be introduced as well. The proposal incentivizes sustainable products and enables mandatory green public procurement criteria to be set, making use of contracting authorities' economic power. The new measures will also strengthen market surveillance and enforcement, boost compliance and ensure a level-playing field for all placing products on the EU market.

The upcoming regulation of the imaging equipment sector (see above) is planned to be finalized under the existing Ecodesign Directive.

Compulsory information on durability and ban on greenwashing

In March 2022, the EU presented rules regarding planned obsolescence and greenwashing, called *"Empowering consumers for the green transition through better protection against unfair practices and better information"*.

It will give consumers the right to know how long a product is designed to last for and how, if at all, it can be repaired. In addition, the rules will act against untrustworthy or false environmental claims, banning "greenwashing" and practices misleading consumers about the durability of a product. A future black-list of non-allowed practices will include, among other:

- not informing consumers about features that limit durability, for example, a software which stops or downgrades the functionality of the good after a particular period of time;
- making generic, vague environmental claims where the excellent environmental performance of the product or trader cannot be demonstrated
- not informing that a good has limited functionality when using consumables, spare parts or accessories that are not provided by the original producer.

Inducing the consumer into replacing the consumables of a product earlier than would otherwise be necessary for technical reasons, will be outlawed. Interestingly, the EU explicitly mentions cartridges as example: the practice of urging the consumer, via the settings of the printer, to replace the printer ink cartridges before they are actually empty in order to stimulate the purchase of additional ink cartridges would be prohibited.

The EU will also prohibit omitting to inform the consumer that the good is designed to limit its functionality when using consumables, spare parts or accessories that are not provided by the original producer. Here too the EU quotes as example the marketing of printers that are designed to limit their functionality when using ink cartridges not provided by the original producer of the printer without disclosing this information to the consumer, will be prohibited. This practice could mislead consumers into purchasing an alternative ink cartridge which cannot be used for that printer, thus leading to unnecessary repair costs, waste streams or additional costs.

The European Parliament approved the proposal in May 2023. Their decision explicitly says that *"producers should not be allowed to limit a product's functionality when it is used with consumables, spare parts or accessories (for example chargers or ink cartridges) made by others."*

The fact that this generic legislation mentions cartridges as example proves that ETIRA's outreach efforts were successful!

Review of the WEEE Directive

The EU 2012 WEEE Directive on waste from electrical and electronic equipment seeks to protect the environment and human health, contributes to sustainable production and consumption, and ensure efficient use of resources by preventing and recovering waste. In October 2022, the EU launched an online public consultation to evaluate its progress and assess whether the objectives are met and to what extent it supports a circular economy and environmentally sound management of WEEE.

ETIRA voiced its concerns re. the WEEE. As is supported by several EU studies: in terms of promoting cartridge reuse, the WEEE is dysfunctional. Member States can reach the generic reuse / recycling percentage targets set under the WEEE without a single cartridge being reused. That's why cartridges need to get their own WEEE reuse target.

Also, WEEE implementation is very different across EU Member States. Environment-friendly cartridge reuse is made impossible as operators are confronted by a plethora of different and often outright contradictory rules and definitions and classifications of used cartridges. And for cartridges, the article 4 WEEE prohibition of specific design features or manufacturing processes that prevent WEEE from being re-used (eco-design) is a farce, because all cartridges on the EU market today have such illegal features ! In addition, enforcement of WEEE compliance by national market surveillance authorities is often fully absent: imports of polluting single-use newbuild cartridges from the Far East by rogue traders without any registration in national WEEE registers and containing illegal chemicals are rampant in most EU countries.

ETIRA hopes that the review will turn the WEEE into a real tool to end single use of cartridges.

Green Claims Directive

In March 2023, the EU Commission proposed more detailed rules to fight greenwashing with its proposal for substantiation and communication of explicit environmental claims, the so-called "Green Claims Directive". This Directive finetunes the abovementioned "*Empowering consumers ...*" -initiative by acting against green claims and labels that are not substantiated.

The Green Claims Directive should put an end to printer manufacturers claiming green credentials if they do not support cartridge reuse. Also, many printer manufacturers advertise that they "recycled x million used cartridges" without mentioning what percentage of their total sales that number represents. In reality, this is often less than 10%, and hence way below the 80-90% reuse potential. The Green claims Directive should outlaw such misleading claims.



EU Ecolabel

The EU Ecolabel has existed for decades. It allows consumers to identify the products which have the best environmental performance and is a tool for public authorities that want to buy green products, because the Ecolabel is part of the EU's recommended Green Public Procurement criteria (GPP) which public bodies may use when buying office equipment.

Several years ago OEM's accepted an EU Ecolable for printers, but then refused to produce compliant printers, under the pretext that its criteria were too strict.....ETIRA continues to call for a separate Ecolabel for cartridges, the Green Claims directive may provide new impetus for that.

Right to Repair

In March 2023, the EU Commission proposed new rules promoting the repair of goods. The proposal will make it easier and more cost-effective for consumers to repair as opposed to replace goods. It will ensure that more products are repaired within the legal guarantee, and that consumers have easier and cheaper options to repair products that are technically repairable when the legal guarantee has expired or when the good is not functional anymore as a result of wear and tear. Within the legal guarantee, sellers will be required to offer repair except when it is more expensive than replacement. Beyond the legal guarantee, a new set of rights and tools will be available to consumers to make 'repair' an easy and accessible option.

EU Green Public Procurement (GPP) criteria recommend using remanufactured cartridges

The EU has model criteria for public authorities that want to buy environment-friendly printers and cartridges. They can be downloaded here: https://ec.europa.eu/environment/gpp/eu_gpp_criteria_en.htm

The criteria endorse sustainable printing by lowering the environmental footprint of printers, and favor the use of remanufactured cartridges over new. The new criteria set, which also includes requirements re. the printer's plastics, chemicals, emissions, etc., may be used by public authorities when they solicit offers for imaging equipment through tenders.

The criteria also require that printers must comply with existing EU regulations on REACH, WEEE etc., and must meet standards for emissions, noise, energy consumption, and not contain hazardous substances. They must offer warranties and allow the use of remanufactured cartridges. Any firmware update must not prevent the use of reused / remanufactured consumables. Take-back programmes are also requested, and there are criteria for consumables supplied under a managed print contract. Cartridges must comply with page yield standards and must not be designed to limit the ability to reuse/remanufacture them.

To help a public body or authority on how to purchase "green" printer cartridges, ETIRA produced a note members can send to the authority.

EU action against imports of cheap and unsafe newbuilt non-OEM single-use cartridges (SUC's)

ETIRA also welcomes the introduction of better tools for Market Surveillance Authorities. This programme requires all products sold in the EU– whether sold directly, online or through a fulfilment service provider – to be registered with an official responsible party based in the EU. A 'responsible party' can be a manufacturer, importer, distributor, fulfilment service provider or 'authorised representative'.

According to ETIRA, knowing who placed products on the EU market is key to holding suppliers and manufacturers to account when it comes to compliance with product safety rules, hazardous content, etc. The new legislation provides more tools for the national authorities to ban products at the EU border and impose penalties on companies offering infringing products on the EU market. Online platforms are required to fulfil the same obligations as other importers and cannot dodge their responsibility and liability for products offered on their websites etc.

ETIRA and its members have pointed national authorities to online platforms and other market places offering "orphan" cartridges that fail to comply with the new rules.

Networking

Organising events on a regular basis is a key activity of ETIRA: meeting current and new partners, in both informal and formal settings, helps to create new business and raise the overall industry market share.

ETIRA at 2023 Frankfurt remanexpo trade show Ambiente

Due to the Covid pandemic there was no trade show in 2021 and 2022, but in February 2023 ETIRA again exhibited at the 5-day remanexpo at the international trade show Ambiente. This largest European show for office supplies was held at Frankfurter Messe in Frankfurt, Germany. From our joint booth with co-sponsoring members, we met Members, prospects, OEM rep's, and distributed flyers urging visitors to buy remanufactured cart's and services from ETIRA Members only. In the show's speaker programme, ETIRA's Vincent van Dijk presented the latest Brussels' news.

ETIRA 2022 annual meeting in Prague

Due to the Covid pandemic, our 2020 and 2021 annual meetings were held online. But on 19 May 2022, ETIRA held its annual meeting in Prague, in the context of the "The Recycler Live Europe" conference. With over 100 delegates it was again the #1 event to learn from speakers, meet fellow industry members and hear the latest industry data. Many thanks to The Recycler and the sponsors for making this event happen!

At the online ETIRA general meeting on 4 March 2021, members (re-) elected Javier Martinez (Turbon) as President, Gerwald van der Gijp (Armor) as Vice-President, and Jan-Michael Sieg (KMP), David Connett (The Recycler), Volker Kappius (Delacamp), Peter Knak (IMEX), and Milan Banjic (TIN Group) as Board members.

EU Remanufacturing Council (CER)

ETIRA is member of the EU Remanufacturing Council (CER), based in Brussels. The CER is supported by the EU and promotes the growth of business activity in the sector. CER lobbies on behalf of remanufacturing. ETIRA joined the ERC early on, and our Secretary General Vincent van Dijk is a member of its Steering Committee. The CER helps us to educate the world regarding the problems and barriers facing cartridge remanufacturers today, and call for support from the EU for our industry.



Public Relations

ETIRA's role includes raising awareness about the industry among the general public. We stress that remanufacturing used OEM cartridges is a high-tech, innovative and dynamic activity, good for both the customer and for the environment. We work with professional PR service providers.

ETIRA booth at annual Ambiente international trade show

To help ETIRA Members grow their business, ETIRA exhibits every year at the annual Ambiente trade show (formerly: Paperworld) held in January/February in Frankfurt. We use the booth to showcase our industry, and inform many resellers and distributors from all over Europe about remanufactured cartridges, and the added benefits of trading with an ETIRA Member. We distribute leaflets and info in different languages. We answer enquiries about ETIRA and the Code of Conduct logo and product label, outline the advantages of buying from an ETIRA member, and inform visitors why ETIRA Members provide value for money.

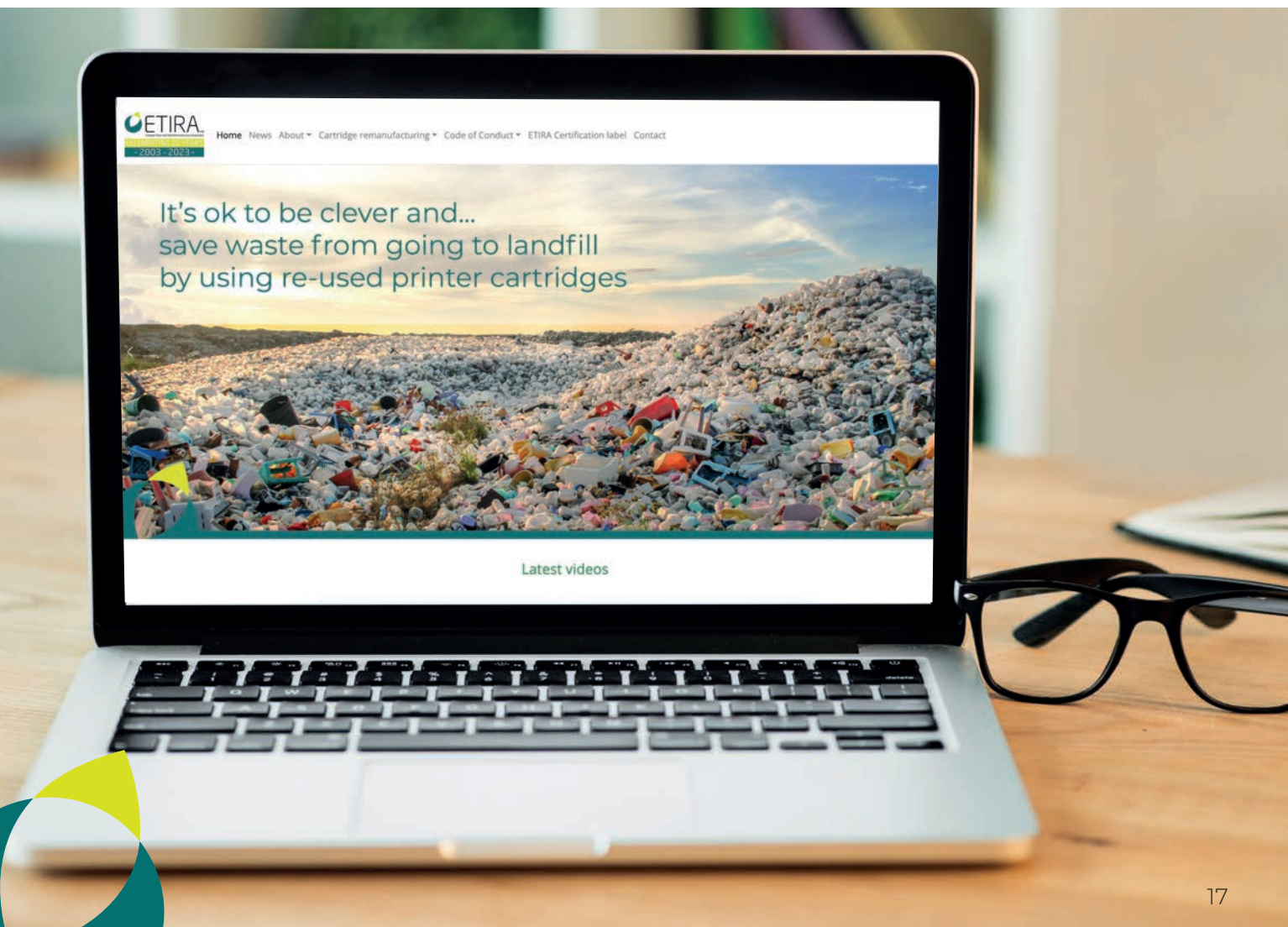
Annual meetings

Every year we organise our annual statutory meeting in a European city, often jointly with industry magazine *The Recycler*. The event provides extended learning from top-speakers about latest industry developments, and first-hand networking opportunities

News, website, social media, video's

Frequent Newsflashes are sent to members to inform them about industry developments and ETIRA activities.

ETIRA operates a website (www.etira.org) for the general public to learn about the benefits of inkjet and toner remanufacturing, and to enhance the general industry image. The website also lists all ETIRA members, allowing clients to find suppliers instantly.



ETIRA social media presence

ETIRA has a dedicated LinkedIn platform, Twitter, and Facebook page, publishing ETIRA news, in addition to outlets like industry magazine The Recycler and other publications.

ETIRA videos

ETIRA has produced a series of short animated videos to support our Reuse, Reduce, Recycle message, the second of the series focuses on Reduce. The videos are shared through our social media platforms and on our website.

ETIRA hand-out: Say “NO!” to single -use cartridges!

ETIRA has produced a 1-pager that sets out the reasons why you should stay away from single-use cartridges (SUC's). To support your sales, members can print and distribute it to customers. Alternatively, you can order copies from the Secretariat: info@etira.org.

ETIRA Code of Conduct

The ETIRA Code of Conduct is a code of good business practice. Its obligations include social and environmental responsibility, promotion of top-quality and innovative products, clear warranties, compliance with laws and regulations at national and international level, and ensuring consumer and worker safety and health. The Code also includes a clear obligation to refrain from trading patent-infringing newbuilts. All ETIRA members must comply with the Code. The ETIRA Code of Conduct is available for download from the ETIRA website.

ETIRA cartridge certification label

In addition to its existing Code of Conduct, which is a collective mark certifying the ETIRA member company, ETIRA launched in late 2021 its “members only” cartridge certification label. The label certifies a product, and differentiates remanufactured Original Equipment Manufacturer (OEM) cartridges from new OEM and non-OEM newbuilts. The certification raises the profile of remanufactured products produced by ETIRA members and eliminates confusion about which cartridges offer a very good environmental performance and those which don't. The label is limited to ETIRA members through a qualification process and license agreement. The member-remanufacturer can apply the certification label not only to his own brand of cartridges, but also to any 3rd party brand of cartridges produced by that member in compliance with the label's license requirements.

To promote the label, ETIRA has published three brochures, freely available in six languages from our website: one for users, one for public tender buyers, and one for remanufacturers.

By March 2023, the “1 million labels” milestone was reached by ETIRA members using the label.



ETIRA celebrating 20th anniversary in 2023

In 2003, so 20 years ago, a group of visionary entrepreneurs from many EU countries created ETIRA, the official Brussels-based representative organisation of the European toner and inkjet cartridges' remanufacturing industry. The group included industry veterans like David Connett, Heinz Sieg, and many others. Their objective was to fight for the right of consumers to reuse their cartridge as a cartridge, instead of being forced by the multinational Japanese and American printer manufacturers to buy an overpriced new one each time it runs empty. A reuse cartridge is cheaper and saves 45-60% of CO2 emissions. It also creates European jobs and European profits.



Since then, it was a hard and difficult journey for European cartridge remanufacturers and ETIRA. For many years, printer manufacturers were able to block such cartridge reuse by introducing mechanical and software (chips) barriers and deployed many other ways to avoid making printing greener. Later, massive imports of new and cheap single-use copycat cartridges from SE Asia pushed remanufactured cartridges out of the market, further hindering reuse of new cartridges as a cartridge.

Throughout these tough times, the small association ETIRA worked to serve its members by promoting cartridge reuse and helping to grow reman market share. We focused on 3 main pillars of activity: we lobbied regulators for reuse-friendly market regulation, did the PR to tell the world about why it is good to buy remanufactured cartridges, and brought the industry together through our regular networking events all over Europe, and attendance at the annual trade shows.

So doing, in line with their innovative nature, remanufacturers were able to weather the storm. Fighting Goliath like David did, they eventually succeeded in convincing lawmakers that cartridge reuse is a textbook example of circularity, and that regulation of the market is needed to grow the market share of remanufactured cartridges to its full potential.

Now, 20 years on, the polluting practice that is single-use will finally be tackled. The EU will now regulate this industry and will set compulsory rules that will lower the environmental impact of printing, and provide tools to enhance cartridge reuse. After 20 years, ETIRA's hard work has paid off. ETIRA thanks all who made this happen!



2006 - Board of Directors



2004 - Annual meeting



2018 - Budapest annual meeting

ETIRA Bodies

ETIRA is the acronym of the European Toner & Inkjet Remanufacturers' Association aisbl/ivzw. A non-profit organisation in accordance with Belgian law, its statutory seat is Brussels, Belgium, with a Secretary General's office in Breda, The Netherlands. ETIRA represents the interests of the European inkjet and toner cartridge remanufacturers and related service providers/compatibles manufacturers, etc. in Europe. Created in 2003, the current 35 ETIRA members now account for over 65% of industry turnover. A full up-to-date list of ETIRA Members and their contact details can be found on our website: www.etira.org

Today, ETIRA is the recognized industry body for all topics affecting cartridge remanufacturing, and registered in the EU Transparency Register.

General Assembly

The General Assembly is comprised of all ETIRA full Members and meets at least 1x per year. It sets the general guidelines of the Association, elects the Board of Directors, approves the annual accounts and budgets, etc.

Board of Directors

ETIRA's Board of Directors is elected by the General Assembly every other year, and composed of respected company representatives from the various sections of the cartridge remanufacturing industry across Europe. Meeting online or in person approx. 3-4 times per year, Board Members are not remunerated and carry their own travel expenses. The Board of Directors implements the General Assembly's guidelines, sets an annual work program, approves membership applications, prepares annual accounts and budgets, etc.

The ETIRA Board of Directors is currently composed of the following persons (mandate 2021-2023):

President	Javier Martinez	Turbon	E
Vice-President	Gerwald van der Gijp	Armor	F
Member	David Connett	The Recycler	UK
Member	Jan-Michael Sieg	KMP	D
Member	Peter Knak	IMEX	E
Member	Volker Kappius	Delacamp	D
Member	Milan Banjac	TIN Group	RO
Secretary General	Vincent van Dijk	Non-affiliated	NL/B

Secretariat

ETIRA aisbl/ivzw, European Toner & Inkjet Remanufacturers Association
Vincent van Dijk, secretary general
Haydnlaan 13
4837 CS Breda
The Netherlands
Tel + 31 6 414 614 63
info@etira.org www.etira.org
(Registered address: Henri Wafelaertsstraat 34, 1060 Bruxelles)
EU Transparency Register nr. 66749712601-11





ETIRA is the non-profit trade association for the European companies involved in state-of-the-art toner and/or inkjet remanufacturing and their business partners. Every day, remanufacturers bring the European consumers and businesses a first-class high quality product which is competitively priced and, thanks to re-using natural resources, makes a major contribution to the European environment and a cleaner world. Yearly, the industry adds an average 1,5 bn euro to the European economy, directly and indirectly provides 16,000-20,000 jobs, and prevents 300,000 m³ of waste from going to landfill. Visit www.etira.org for more information.