

Communication from Public

Name: Sean Levi

Date Submitted: 08/19/2025 11:38 AM

Council File No: 21-0064

Comments for Public Posting: Public Comments RE: Report on the Proposed Definitions, Impacted Entities, Implementation schedules, and Compliance Approaches for a Single-use printer cartridge ban (Council File Nos. 21-0064 and 24-0931). Dear Honorable Adrin Nazarian, Chair, Honorable Katy Yaroslavsky, Vice Chair, and Members of the Environment Committee: My name is Sean Levi, Founder and CEO of Planet Green. For over 25 years, we have been recycling and remanufacturing used OEM printer cartridges at our facility in Chatsworth. Over the past number of years, however, we've seen a significant increase in single-use cartridges entering our recycling program. These cartridges cannot be remanufactured and ultimately end up in our local landfill. It is estimated that over 375 million printer cartridges are discarded in U.S. landfills each year. The growing saturation of the market with non-recyclable, single-use cartridges has become a serious environmental concern, especially when trying to manage the waste. This troubling trend prompted us to reach out to Councilmember Lee to highlight the urgent need for action, as these cartridges are undermining the circular economy designed to manage used OEM printer cartridge waste. We fully support the proposed ordinance to ban the sale of single-use printer cartridges. However, we believe the current report would benefit from clearer language and stronger enforcement mechanisms to ensure the ordinance meets its environmental objectives. Bulleted below are our suggestions for the Ordinance.

- **Definition of "Printer Cartridge"** The definition should be broader than just referencing "paper." We recommend it be revised to: "Holds ink or toner, intended for deposition onto any substrate, and that is designed for insertion..." In printing and manufacturing, a substrate refers to any base material—such as vinyl banners or other media—not just paper. Limiting the definition to paper excludes large-format ink cartridges used in commercial applications. These cartridges are available as both new-built single-use versions and legitimately remanufactured alternatives.
- **Include "Distribution"** in the Description The ordinance should clearly prohibit any retail or online establishment from selling or distributing single-use cartridges within the City. This addition would help close a common loophole in online marketplaces, where ambiguity exists between third-party sellers and the platforms themselves.

Including the term “distribution” strengthens enforceability and enables the City to require online platforms to take geofencing measures that restrict both the sale and delivery of single-use cartridges within its jurisdiction.

- **Public Education and Third-Party Verification** We recommend that LASAN partner with a third-party entity to help identify legitimately remanufactured printer cartridges. This will assist both regulators and consumers in easily distinguishing authentic remanufactured products from falsely labeled “remanufactured” new-build cartridges. It will also support retail and online marketplaces in verifying and sourcing from legitimate remanufactured cartridge suppliers.
- **Strengthen Penalties for Non-Compliance** The proposed fines are not sufficient to deter violations in a multi-billion-dollar industry. We recommend:
 - o A \$10,000 fine for first violation and confiscation of all non-compliant products, with a \$5 handling fee per cartridge
 - o Doubling of fines for repeat violations, with continued confiscation and handling fees

We commend the City for taking this important step toward reducing plastic waste and supporting a circular economy. As an industry stakeholder with decades of experience in sustainable cartridge remanufacturing, we are eager to support and help implement a strong, enforceable ordinance that truly meets its environmental goals. We respectfully urge the Committee to consider the clarifications and recommendations we’ve outlined—particularly expanding definitions, closing distribution loopholes, enhancing enforcement mechanisms, and supporting public education with credible third-party verification program. We appreciate your leadership on this issue and thank you for the opportunity to contribute to this process. Please do not hesitate to contact us should you need further input or collaboration. Sincerely, Sean Levi Founder & CEO Planet Green



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July 7, 2025

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