

## Communication from Public

**Name:** Consumer Technology Association

**Date Submitted:** 12/08/2025 10:56 AM

**Council File No:** 21-0064

**Comments for Public Posting:** The Consumer Technology Association submits the attached written comments on the Single Use Printer Cartridge Ban. While we overall support the intent of the bill, we offer amendments on definitional language and an exemption for medical devices.



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December 10, 2025

Los Angeles City Council  
c/o City Clerk  
Room 340, City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

**Subject:** 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)

The Consumer Technology Association (CTA)<sup>1</sup> appreciates the opportunity to offer comments on the “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)”.

CTA supports the intent of reducing packaging waste and disposal and is actively engaged in the implementation of [CA SB 54](#), the “Plastic Pollution Prevention and packaging Producer Responsibility Act. While CTA does not wholly oppose the proposed ban by the City of LA on single-use printer cartridge ban, we do have the following proposed changes that we believe will make the intent of the ban clearer which will make compliance easier for producers.

**“Recommended Definitions”**

As outlined in the “Background” section of this document, original printer cartridges are subject to established take-back programs that are appropriately managed through resource circulation systems, including remanufacturing. OEMs typically own and use their own trademarks, and their cartridges fully comply with applicable laws and regulations across jurisdictions worldwide. Given these circumstances, requiring producers to demonstrate that original cartridges do not

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<sup>1</sup> CTA is North America’s largest technology trade association. Our members are the world’s leading innovators – from startups to global brands – helping support more than 18 million American jobs. Our member companies have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design, energy efficiency, and product and packaging stewardship.

fall under the definition of “single-use printer cartridge” would result in unnecessary administrative burden and inefficiency. Accordingly, we would like to request that a clarifying sentence be added to the definition to explicitly exclude original cartridges that are part of a verified resource recovery system. CTA proposes the following changes in red:

**“Single-use Printer Cartridge” means a Printer Cartridge that is not collected or recovered through *an Original Printer Cartridge Take-back Program*, or cannot be remanufactured, refilled, or reused, or infringes upon intellectual property rights or violates any applicable local, state, or federal law. “Single-use Printer Cartridge” does not include Original Printer Cartridges.**

### **Exemptions**

CTA does not believe that medical devices or their ink cartridges were the intended target of this proposed ban. Medical devices require manufacturer-specified, single-use cartridges for proper function. The FDA and other regulatory bodies often require use of approved consumables to maintain compliance with device certification and performance standards. Deviating from the approved cartridge design—such as by refilling or reusing—can void warranties, violate regulatory approval, and expose facilities to liabilities. The total volume of single-use cartridges used in medical devices is small compared to consumer or office printing. Banning single-use cartridges for medical devices would create an unacceptable risk to patient care and compliance with health regulations, while offering negligible environmental benefit. Therefore, CTA requests the insertion of the following language so that medical devices and their cartridges are exempt from the ordinance:

“Notwithstanding the provisions of this section, products or supplies classified as medical devices and regulated by the United States Food and Drug Administration that necessarily incorporate printer cartridges as part of their design, functionality, or operation, shall be exempt from the ban enacted under this ordinance.”

### **Conclusion**

Thank you again for the opportunity to provide these comments. We welcome further engagement with stakeholders in this process, and if you have any questions about our above comments please do not hesitate to contact me at [apecck@cta.tech](mailto:apecck@cta.tech).

Sincerely,

A handwritten signature in black ink, appearing to read "Ally Peck". The signature is fluid and cursive, with the first name "Ally" and last name "Peck" clearly distinguishable.

Ally Peck  
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