

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: June 24, 2025

TO: The Honorable Adrin Nazarian, Chair
The Honorable Katy Yaroslavsky, Vice Chair
The Honorable Ysabel Jurado, Member
The Honorable Nithya Raman, Member
The Honorable Imelda Padilla, Member

FROM: Barbara Romero, Director and General Manager
LA Sanitation and Environment



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)

On October 1, 2024, the Los Angeles City Council approved the report from the Energy and Environment Committee directing the Bureau of Sanitation (BOS, LA Sanitation and Environment, LASAN) to report on the proposed definitions, impacted entities, implementation schedules, and compliance approaches for a single-use printer cartridge ban, which is one of the upstream source reduction measures identified in the Comprehensive Plastics Reduction Program (Program) and evaluated in the certified Final Program Environmental Impact Report (Final PEIR) for the Program (Council File No. 21-0064).

RECOMMENDATIONS FOR COUNCIL ACTION

1. REVIEW and CONSIDER the information contained in this report; and
2. REQUEST the City Attorney, in coordination with LASAN and based upon the information contained in this report, to prepare and present an ordinance prohibiting the sale of single-use printer cartridges.

BACKGROUND

The Los Angeles City Council has long recognized the critical role of source reduction in addressing plastic waste and advancing environmental sustainability. Over the past decade, the City of Los Angeles (City) has made substantial progress in addressing the environmental and public health impacts of single-use plastic waste by enacting six plastic source reduction ordinances and approving the Citywide comprehensive plastics reduction strategy, which includes more than 15 upstream measures designed to prevent single-use plastic pollution. In addition to these initiatives, the Los Angeles City Council has taken further action against the harmful impacts of single-use products, including single-use printer cartridges. Specifically, through Council File Nos. 21-0002-S173 and 24-0931, the Los Angeles City Council pledged strong support for state-level efforts to prohibit the import and sale of single-use printer cartridges, while also directing action at the local level. Locally, under Council File No. 24-0931, the City Council requested the City Attorney's Office to draft an ordinance prohibiting the distribution and sale of aftermarket single-use "clone" compatible printer cartridges. That request was consolidated with the efforts under Council File No. 21-0064 for coordination and to prevent any duplication.

According to industry estimates, hundreds of millions of printer cartridges are sold annually, with a significant portion not being recycled and ultimately disposed of in landfills. If improperly managed at their end of life, these cartridges can pose a threat to the environment as they contain plastics, metals, and harmful chemicals. For instance, printer cartridges disposed of in landfills may leach heavy metals and volatile organic compounds into the environment, contributing to soil and water contamination. In light of these environmental concerns, many original equipment manufacturers (OEM) of printers have implemented take-back programs for their used printer cartridges, and many OEM printer cartridges are remanufactured for reuse by third-party recyclers or remanufacturers. These take-back programs and remanufacturing systems prevent printer cartridges from being disposed of in landfills, promote reuse and the circular economy, and minimize the environmental impact of printer cartridges. In contrast, single-use printer cartridges, which are typically designed for one-time use and manufactured using low quality materials and non-standardized practices, are often landfilled because they cannot be remanufactured and lack manufacturer-sponsored take-back programs.

Beyond their environmental impacts, single-use printer cartridges pose serious legal and ethical concerns. These products are often manufactured and distributed in violation of intellectual property rights, including patents, trademarks, and trade dress protections held by OEMs. Such infringements are not only detrimental to brand owners but also mislead consumers and compromise product quality. Moreover, many single-use printer cartridges are manufactured in regions where forced labor practices have been documented, raising human rights concerns. Overall, the manufacture, reuse, remanufacturing, sale, offer for sale, or importation of single-use printer cartridges can violate a range of local, state, and federal laws, including Sections 17200 and 17500 of the California Business and Professions Code, the Lanham Act, and the Uyghur Forced Labor Prevention Act, which are meant to combat false advertising, unfair competition, and forced labor in global supply chains, respectively.

Given the significant environmental, legal, and ethical concerns associated with single-use printer cartridges, the City has identified the need to take proactive action, aligning with the City's broader sustainability, zero waste, and environmental justice goals. Accordingly, the City is considering the adoption of an ordinance that would prohibit the sale of single-use printer cartridges within City boundaries, addressing both environmental harm and the broader legal and ethical implications associated with single-use printer cartridges.

PRINTER CARTRIDGE LANDSCAPE

The printer cartridge landscape is diverse and dynamic, continually evolving in response to technological advancements, shifting consumer needs, environmental concerns, and increasing regulatory pressures. Printer cartridges are integral components of printers, serving as the medium that stores and dispenses ink, toner, or other substance during the printing process. The printer cartridge market offers a variety of printer cartridge types, each designed to meet different printer models and consumer needs. These printer cartridges can be categorized based on several characteristics including technology, user requirements, cartridge type, and unique features. Today, inkjet printers and laser printers, utilizing ink and toner printer cartridges, respectively, are two of the most common printer technologies. Based on print speed, volume, and demand frequency, inkjet printers with ink cartridges are typically preferred by household consumers and small offices, while laser printers with toner cartridges are primarily used by larger industries and businesses for their fast printing and higher print volume capabilities. Below is an overview of the different types of printer cartridges available on the market.

- **Original Equipment Manufacturer Printer Cartridges:** OEM printer cartridges are produced by the same company that manufactures the printer they are intended to be used with. These printer cartridges are specifically designed and tested to work with a specific printer model or series.

- **Non-OEM New Build Printer Cartridges:** Non-OEM new build printer cartridges are third-party products designed to function in a specific printer model or series, but produced by companies other than the OEM of the printer. Their performance and quality can vary depending on the manufacturing process.
- **Remanufactured Printer Cartridges:** Remanufactured printer cartridges are previously used OEM printer cartridges that have been professionally cleaned, refilled, and refurbished for reuse.
- **Refillable Printer Cartridges:** Refillable printer cartridges are designed to be refilled with ink or toner multiple times. Unlike remanufactured cartridges, refillable printer cartridges do not undergo the complete remanufacturing process. Instead, users can purchase ink or toner and refill these cartridges themselves or use professional services for refilling.

STAKEHOLDER ENGAGEMENT

In response to a directive from City Council, LASAN undertook a comprehensive and multi-faceted outreach and engagement campaign to gather diverse perspectives on key elements of a potential single-use printer cartridge ban. This robust engagement effort included outreach to a wide range of stakeholders, including OEMs, remanufacturers, trade associations, environmental advocacy organizations, retailers, and consumers.

As part of this process, LASAN held direct discussions with key stakeholders, including HP, Inc., Epson, Planet Green, Clover Imaging Group, and the International Imaging Technology Council. Additionally, LASAN collaborated with the National Stewardship Action Council (NSAC) and actively engaged their Single-Use Plastic Cartridges Working Group (Working Group). Meetings with NSAC and the Working Group were convened on October 31, 2024, November 20, 2024, and January 15, 2025, with participation from a diverse array of industry representatives including HP Inc., Brother, Sharp, Ricoh, Planet Green, Clover Imaging Group, Technology Systems Inc., Liberty Laser Solutions, and the Information Technology Industry Council. To supplement these discussions, LASAN administered a targeted survey among Working Group members to ensure a thorough understanding of their current programs and processes as well as their comments, suggestions, and concerns.

To expand public participation and further broaden the scope of engagement, LASAN hosted two virtual public workshops on March 26, 2025, and April 16, 2025. These workshops aimed to engage and capture input from consumers and other stakeholders. A total of 38 participants representing the public, industry, environmental groups, and trade associations attended, reflecting the community's interest and involvement in the issue. In parallel, LASAN deployed a public survey to gather additional feedback from a wider audience.

Throughout the engagement process, LASAN received supportive feedback from industry representatives, including several manufacturers and remanufacturers, who acknowledged the necessity of the proposed ban and the environmental benefits of reducing single-use printer cartridge waste. Public input initially reflected a range of views, largely due to confusion around the definition of a “single-use printer cartridge.” However, once the term was clarified during the workshops, the majority of participants expressed support for the proposed ban.

Through this extensive stakeholder engagement process, LASAN has collected a wealth of input from industry experts, advocacy organizations, and the public. Informed by this feedback, LASAN is providing City Council with well-informed recommendations that will help support the City's environmental goals and contribute to the development of effective and impactful policies.

DISCUSSION

Informed by LASAN's stakeholder engagement and consultations, research findings, best practices, and experience in implementing source reduction ordinances Citywide, LASAN has detailed the definitions, impacted entities, implementation schedule, and compliance approach it recommends for City Council's consideration. These recommendations aim to ensure that the proposed ordinance is both effective and equitable, helping the City achieve its sustainability objectives while minimizing disruption to local businesses and consumers.

Recommended Definitions

The following definitions are recommended to ensure clarity in the implementation of a potential ban:

- **“Designated Administrative Agency”** or **“DAA”**, as defined in Section 10.53.1 of the Administrative Code of the City of Los Angeles (LAAC) means the Department of Public Works, Bureau of Sanitation.
- **“Person”**, as defined in Section 198.01 of the Municipal Code of the City of Los Angeles (LAMC), means a natural person, joint venture, joint stock company, partnership, association, club, company, corporation, business trust or organization, or the manager, lessee, agent, servant, office, or employee of any of them.
- **“Printer Cartridge”** means a consumable unit that holds ink or toner, intended for deposition onto paper, and that is designed for insertion into and connection to a printer. A Printer Cartridge may include integral components necessary for its operation, including, but not limited to, one or more reservoirs for holding ink or toner, a mechanism for dispensing ink or toner, and integrated electronic components, such as circuit board, chips, or terminals, for communication with the printer. Printer Cartridge does not include ink or toner bottles.
- **“Manufacturer”** means a Person with legal authority to design, manufacture, package, and label a product or device before it is placed on the market, regardless of whether these operations are carried out by that Person itself or on its behalf by another Person.
- **“Original Equipment Printer Manufacturer”** means a Manufacturer that designs, manufactures, and markets printers and the original parts and components used in the printer.
- **“Printer Cartridge Remanufacturer”** means a Person who collects, disassembles, cleans, repairs, reassembles, refills, and tests an Original Printer Cartridge, as necessary, to bring it to a like-new, marketable condition to be reused for the same purpose for which it was initially produced.
- **“Original Printer Cartridge”** means a Printer Cartridge that is designed, manufactured, distributed, and offered for sale by the Original Equipment Printer Manufacturer of the specific printer model or series with which it is intended to be used.
- **“Genuine Printer Cartridge”** means Original Printer Cartridge.
- **“Remanufactured Printer Cartridge”** means a previously used Original Printer Cartridge that has been disassembled, cleaned, repaired, reassembled, refilled, and tested, as necessary, to restore it to a like-new, marketable condition to be reused for the same purpose for which it was initially produced.
- **“Non-Original Equipment Printer Manufacturer New Build Printer Cartridge”** means a newly manufactured Printer Cartridge produced by a third-party manufacturer, not affiliated with or authorized by the Original Equipment Printer Manufacturer of the printer model or series in which it is intended to be used.
- **“Generic Printer Cartridge”, “New Build Compatible Printer Cartridge”, and “Clone Printer Cartridge”** mean Non-Original Equipment Printer Manufacturer New Build Printer Cartridge.

- **“Single-use Printer Cartridge”** means a Printer Cartridge that is not collected or recovered through a 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.
- **“Non-recoverable Printer Cartridge”** means a Single-use Printer Cartridge.
- **“Printer Cartridge Take-back Program”** means a program established, operated, authorized, sponsored, or endorsed by a Printer Cartridge Manufacturer or Printer Cartridge Remanufacturer that provides for the collection and recovery of used Printer Cartridges for the purpose of remanufacturing, refilling, reuse, and recycling.
- **“Retail Establishment”**, as defined in LAMC Section 198.01, means any commercial establishment located within the City that sells goods directly to customers primarily for the customer’s own consumption or use.
- **“Online Retail Establishment”** means any business, including but not limited to online marketplaces and online retailers, that sells goods directly to customers located within the City through digital platforms, websites, mobile applications, or other remote or internet-based means, primarily for the customer’s own consumption or use. For purposes of this definition, “online marketplace” includes any third-party platform that facilitates the sale or distribution of goods by multiple sellers to customers within the City.

Recommended Description

No Retail Establishment or Online Retail Establishment shall sell to any Person any Single-use Printer Cartridge, whether sold separately or with a printer.

Recommended Impacted Entities

The following entities will be directly affected by and subject to the proposed ban:

- Retail Establishments and Online Retail Establishments selling Single-use Printer Cartridges.

Recommended Implementation Schedule

The following schedule is recommended for implementation of the proposed ban to ensure a smooth transition:

- The single-use printer cartridges ban should go into full implementation 12 months after the ordinance is adopted to allow for LASAN to conduct adequate outreach and education to consumers, businesses, and other impacted entities.

The 12-month period would also allow Retail Establishments and Online Retail Establishments to inform customers and suppliers, renegotiate contracts, or address inventory and ordering processes, as necessary.

Recommended Compliance Approaches

LASAN recommends that the following compliance approaches be employed for the proposed ban:

- LASAN will utilize an education-first approach to launch a comprehensive public education campaign to inform consumers and businesses about the ban, its importance, and alternative products prior to full implementation of the ban. With this approach, LASAN will provide informational resources and guides to assist Retail Establishments and Online Retail Establishments in complying with the requirements of the ban.
- LASAN will begin enforcement of the ban once it is in full effect, 12 months after it is adopted. LASAN will conduct inspections of Retail Establishments and Online Retail Establishments to

ensure compliance, and will issue administrative citations and fines for non-compliance. Attachment 1 provides guidance on the determination of compliant and non-compliant Printer Cartridges. Printer Cartridges must satisfy all three criteria identified in Attachment 1 to be a compliant Printer Cartridge. LASAN proposes to be identified as the Designated Administrative Agency, and the Administrative Citation Enforcement (ACE) program to be utilized for enforcement and appeals procedures. Fines for violations are to be deposited into the Citywide Recycling Trust Fund (CRTF). Fines for violations are structured as follows:

- \$250 for the first violation;
- \$500 for the second violation of the same provision; and
- \$1,000 for the third or any subsequent violation of the same provision.

Additionally, to support and demonstrate compliance with requirements related to a Printer Cartridge Take-back Program, LASAN recommends mandating the following:

- A Printer Cartridge Take-Back Program must be available and communicated to all consumers within the City, include clear instructions for return on the product label, offer a convenient method for collection, operate in compliance with all applicable local, state, and federal laws, and ensure the responsible processing of returned Printer Cartridges in compliance with applicable environmental and safety regulations. A Printer Cartridge Take-Back Program prioritizes responsible material reuse and remanufacturing and secondarily material recycling. Collection methods may include mail-back services, in-store drop-off, or other verifiable, convenient means of recovery.
- To ensure collected Printer Cartridges are put into the circular system (i.e., reused, remanufactured, or recycled) and not just disposed (i.e., landfilled, incinerated, or other method) Printer Cartridge Manufacturers and Printer Cartridge Remanufacturer must report to the DAA biennially the total mass (metric tons) of Printer Cartridges collected through their Printer Cartridge Take-back Program, total mass of collected Printer Cartridges reused and/or recycled, and total mass of collected Printer Cartridges disposed annually. Such reporting must be done on a form prescribed by the DAA and must be signed by a responsible agent or officer of the Printer Cartridge Manufacturer or Printer Cartridge Remanufacturer confirming that the information provided on the form is accurate and complete. Biennial reports must be submitted no later than 30 days following the end of the year for which the report is made.

CONCLUSION

The proposed ban on single-use printer cartridges is a critical step in the City's broader effort to reduce plastic waste, mitigate environmental harm, and promote a circular economy. The ordinance's structured framework, including clear definitions, impacted entities, an implementation schedule, and a compliance strategy, aims to facilitate a smooth transition while minimizing disruptions to businesses and consumers. By prioritizing education and adopting a phased enforcement approach, the City seeks to maximize compliance and encourage the adoption of sustainable alternatives.

Successful implementation will require dedicated resources for public outreach, enforcement, and ongoing monitoring. LASAN will need funding for educational campaigns, printed and digital materials, community workshops, and targeted business support, as well as staffing for compliance inspections and enforcement efforts.

Despite its environmental benefits, the ban presents challenges, including consumer adaptation and enforcement logistics. Many consumers may be unfamiliar with remanufactured and refillable alternatives, requiring robust public education efforts to highlight their cost-effectiveness, availability, and performance.

Ensuring widespread access to compliant products – both in physical stores and online – will be essential. Additionally, enforcement will require coordinated inspections, standardized procedures, and efficient administrative processes to ensure compliance without overburdening businesses.

By proactively addressing these challenges and securing the necessary resources, LASAN can implement the ordinance effectively, advancing the City's sustainability goals. Collaboration with stakeholders will be key to fostering long-term compliance and ensuring the policy's success.

ATTACHMENT 1

