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**The Consumer Voice in Europe**

# BEUC AND ANEC COMMENTS FOLLOWING THE ECODESIGN CONSULTATION FORUM MEETING ON IMAGING EQUIPMENT OF 3 JULY 2024

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**Contact: Silvia Barlassina – [sustainability@beuc.eu](mailto:sustainability@beuc.eu)**

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**ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN STANDARDISATION**

Rue d'Arlon 80, B-1040 Brussels | +32 (0)2 743 24 70 | [www.anec.eu](http://www.anec.eu)  
EC register for interest representatives: identification number 507800799-30

**BUREAU EUROPEEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND**

Rue d'Arlon 80, B-1040 Brussels | Tel. +32 (0)2 743 15 90 | [www.twitter.com/beuc](http://www.twitter.com/beuc) | [www.beuc.eu](http://www.beuc.eu)  
EC register for interest representatives: identification number 9505781573-45



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# Summary

- BEUC and ANEC welcome and support the European Commission's decision to regulate printers and cartridges under Ecodesign.
- Printers are amongst the most reported products by consumers when it comes to early failures, who also face exorbitant prices for original cartridges. It is high time to bring on the market durable and repairable printers and enable consumers to access third party and refillable cartridges.
- BEUC and ANEC support the proposed Ecodesign measures for printers and cartridges and the introduction of a repair score for printers, which can be a very useful tool for consumers to compare the reparability of products, if correctly designed and implemented.
- BEUC and ANEC strongly disagrees with the proposed approach related to software and firmware updates that worsen printers' performance or result in non-compatibility of printers with cartridges. It is not acceptable to enable such harmful practices based on consumers' consent. They should simply be restricted.

## General comments

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BEUC and ANEC very much welcome and support the progress made by the European Commission on regulating imaging equipment and cartridges under Ecodesign. This product group has been left unregulated for far too long, with significantly negative impacts on the environment and consumers' pockets. For the past 14 years, unambitious attempts of self-regulation by the industry have failed to bring meaningful improvements, becoming a key example of the inappropriateness of such voluntary approach.<sup>1</sup> It is high time to bring on the market durable and repairable printers, while also enabling consumers to access third party and refillable cartridges and make informed choices.

Printers are amongst the most reported products by consumers when it comes to early failures through the [PROMPT webtools](#). According to our members' research and testing activities, nowadays it is particularly difficult to repair printers, and the most common failures reported appear within the first three years since purchase (and as early as 6 months). Overpriced ink cartridges also pose a significant burden on consumers. The UK consumer organization Which? [found](#) that original ink cartridges could be up to 286% more expensive than third-party ink cartridges, but the latter are often incompatible with most printers, due to restrictive design choices implemented by manufacturers.

As highlighted by the JRC in their [preparatory study](#), a longer use-time for printers would have great potential for reducing their overall environmental impact, as the biggest impact on the environment is the production of printers itself. The highest improvement potential is especially related to design aspects on circularity and material efficiency of the device and its consumables, with the objective of prolonging their lifetime.

We therefore support the Commission's proposal to take this regulatory opportunity and develop rules that aim at prolonging the lifetime of printers, as well as at facilitating the reparability, replaceability, and reusability of key components.

In the section below, we present our recommendations for the proposed Ecodesign measures, following the Ecodesign Consultation Forum meeting of 3 July 2024.

## Printers: Ecodesign requirements

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BEUC and ANEC welcome the proposed Ecodesign requirements for printers, which aim at improving their durability and reparability and build on the good measures already adopted for [Smartphones and Tablets](#).

We believe spare parts and user instructions should be made **available for at least 10 years**, regardless of the printing speed of the appliance. To avoid premature obsolescence, software and firmware updates should also be available for at least 10 years in all cases.

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<sup>1</sup> <https://www.beuc.eu/sites/default/files/publications/2010-00071-01-e.pdf>

We support the proposal to require manufacturers to provide information about the **price of key spare parts**. This information should be easily and clearly accessible also to consumers and the Commission should assess whether this is the case on the market. The price of spare parts (as well as the cost of repair services, e.g. installation) is often the main driver influencing whether consumers choose to replace or repair a product. More transparency on this aspect is essential, along with effective design requirements that enable physical repair.

Finally, we ask the Commission to further align the proposed **measures on disassembly** to the existing requirements for smartphones and tablets. For example, to ensure that disassembly can be performed, wherever possible, with no tools or with basic tools and that the process for replacement meant for end-users can be easily performed by a layman.

#### OUR KEY RECOMMENDATIONS

- Spare parts, user instructions, and software updates should be made **available for at least 10 years**, regardless of the printing speed of the appliance
- We support the proposal to require manufacturers to provide information about the **price of key spare parts**.
- Disassembly should be performed, wherever possible, with **no tools or with basic tools**.

## Printers: Energy efficiency requirements

We support the limits proposed by the Commission for power consumption in off-mode, standby mode, and networked standby. We call on the Commission to consider, as part of future revisions, whether minimum energy efficiency requirements in the active mode should also be introduced for printers. The review clause should specify this instance, as well as the possibility to introduce an energy label.

We also agree that a manual switch to off-mode can contribute to further energy savings. However, according to our members' testing, a manual deactivation may also lead to print heads drying/clogging sooner compared to printers that can "wake up" for a cleaning cycle, when necessary. We ask the European Commission to consider this potential downside and appropriate ways to overcome it, to avoid premature replacement of print heads.

#### OUR KEY RECOMMENDATIONS

- The review clause should specify the possibility for the European Commission to introduce **minimum energy efficiency requirements** for printers in future revisions.

## Cartridges: Ecodesign requirements

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When it comes to inkjet printers, cartridges constitute the bulk of expenditures for consumers. As reported by our members, cartridges can reach a cumulative cost that is [much higher than the initial investment](#) for the printer. Nonetheless, relying on third-party cartridges can save consumers up to 60% of their printing costs.

It must be ensured that Ecodesign requirements enable consumers to use compatible third-party cartridges, without receiving daunting warning messages from printers' manufacturers or software updates that block the device when detecting a third-party cartridge. These can be incompatible because of the software or due to restrictive physical design by manufacturers (such as embedded chips). Alongside, to reduce their environmental footprint, all cartridges should be designed to ensure their durability, reusability and manufacturability.

We therefore support the measures proposed by the European Commission, that have the objectives of improving the capacity utilisation of cartridges and their material efficiency, as well as enhancing their manufacturability and reducing failure rates.

### OUR KEY RECOMMENDATIONS

- Ecodesign requirements must enable consumers to use **compatible third-party cartridges**, to enable consumers to save up to 60% of their printing costs.
- We support the proposed measures on improving the capacity utilisation of cartridges, their material efficiency, manufacturability and reducing failure rates.

## Information requirements

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We disagree with the proposal to simply inform consumers when the printer has a function that stops it from printing if it is not connected to the internet or when a colour cartridge is registered as empty. These practices should simply not be allowed, as they unduly restrict consumers from using their printers.

We call on the European Commission to introduce a requirement restricting the possibility for printers to stop working when not connected to the internet or when a colour cartridge is registered as empty. If there exist a risk of clogging the print heads due to empty cartridges, consumers should be duly informed about the need to buy new ink to avoid problems.

### OUR KEY RECOMMENDATIONS

- We call for introducing a **requirement restricting the possibility for printers to stop working when not connected to the internet** or when a colour cartridge is

registered as empty. These practices unduly restrict consumers from using their printers.

## Circumvention, software and firmware updates

We support the proposed measures to avoid circumvention, which are partially in line with those already introduced in previous product-specific regulations. However, we **strongly disagree with the proposed approach related to software and firmware updates that can worsen printers' performance.**

It is not acceptable to put on consumers the responsibility of accepting or denying a software or firmware update that negatively affect the performance of their printer. Software and firmware updates that worsen a printer's performance should simply be restricted. We are not aware of instances that would justify such worsening of performance. We urge the Commission to clarify the reasons behind this measure and reconsider their approach to protect consumers against practices that would limit their ability to use printers as expected at the time of purchase.

Similarly, software and firmware updates should not result in non-compatibility of the printer with cartridges, regardless of whether the end user explicitly consents to such non-compatibility. The practice of making non-original cartridges incompatible with printers is common among printers' manufacturers, and it is **consumers that ultimately pay the price for it**. The French consumer organisation UFC Que Choisir [found](#) that, in most cases, using third party cartridges allows to achieve between 30 and 60% savings on printing costs compared to using original cartridges. Nonetheless, it is not uncommon that third-party cartridges incur into compatibility issues, such as the appearance of an error message or the sudden blockage of the printer, making it impossible for consumers to benefit from such cheaper options. We therefore urge the European Commission to restrict software and firmware updates that result in non-compatibility of printers with cartridges.

### OUR KEY RECOMMENDATIONS

- **Software and firmware updates that can worsen printers' performance** should simply be restricted. It is not acceptable to put on consumers the responsibility of accepting or denying a software or firmware update that negatively affect the performance of their printer.
- **Software and firmware updates should not result in non-compatibility of the printer with cartridges**, regardless of whether the end user explicitly consents to such non-compatibility.

# Repair Score

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We welcome the decision to introduce a repair score for printers. If correctly designed and implemented, this tool can be very useful for consumers who currently lack any adequate means to compare the repairability of products.

We support that the proposed approach reflects the one already introduced for the repair score of smartphones. We urge the Commission to maintain at least the same level of ambition. To further improve the repair score, we also recommend measuring the disassembly time, and not just the common measure of number of steps, as easier disassembly and repair may also lower the overall cost of repair.

We also wish to recall that the price of spare parts is a key criterion for an effective repair score, as cost of repair (including the cost of repair services, e.g. installation) is often the main driver influencing whether consumers choose to replace or repair a product.<sup>2</sup> According to a [survey conducted by our German member vzby](#), 88% of consumers expect that a repair score with a high rating would mean that the cost of repair of a product would be significantly lower when buying a new product. It is therefore crucial to examine integrating the cost of repair in the score, or the tool risks losing relevance and effectiveness for consumers.

For consumers to properly compare products, they should have access to extended information behind the score criteria. The French consumer organisation UFC-Que Choisir found that [consumers struggle to find information on the criteria behind the score](#). For this reason, we believe it would be important to include information on the specific criteria and weighting behind the EU score also in the public interface of EPREL. While not all consumers might be interested in this additional information, we believe more transparency on these aspects would be beneficial for the tool's trustworthiness and could be useful for third party organisations (such as national consumer organisations) when advising consumers on the best choice to make.

If the Commission eventually decides not to introduce an energy label for printers, it should ensure that the repair score is adequately showcased to consumers at the point of sale, both online and offline. We recommend keeping the visual form of the score as close as possible to the one that has already been introduced for smartphones and tablets, to avoid confusion.

## OUR KEY RECOMMENDATIONS

- We support the introduction of a **repair score for printers**. If correctly designed and implemented, this tool can be very useful for consumers.
- The **price of spare parts** is a key criterion for an effective repair score. We urge the Commission to assess ways to include it in the EU repair score methodology, including for printers.

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<sup>2</sup> This is reflected in the findings gathered by consumer organisations, such as through the webtool 'trop vite use' where consumers can directly report this data. This is a bottom-up approach that provides valuable insights into consumers' frustrations when products break down as well as whether they attempted repair and how their experience went.

- We recommend measuring the **disassembly time**, and not just the common measure of number of steps, as easier disassembly and repair may also lower the overall cost of repair.
- In the absence of an energy label for printers, we recommend that the **repair score is adequately showcased to consumers at the point of sale**, both online and offline, keeping the visual form of the score as close as possible to the one that has already been introduced for smartphones and tablets.

## Review and application

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The envisaged 8-year timeline for the first revision of this Regulation is unjustifiably long and risks delaying further improvement due to technological progress. We ask the Commission to align with other Ecodesign Regulations where a 4-year timeline is provided for the review. The review clause should also specify the possibility of introducing an energy label for printers and energy efficiency requirements in active mode.

We also call on the Commission to consider an earlier date for the application of the proposed measures, to avoid further delaying improvements. For example, for information requirements, the date of application could be shortened to 6 months from entry into force.

### OUR KEY RECOMMENDATIONS

- We recommend reducing the **timeline for the first revision**, from 8 years to 4 years.
- We recommend specifying the possibility of introducing an **energy label** in the review clause.
- We recommend an **earlier date of application** for the proposed information requirements, which should start applying as of 6 months from entry into force.



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