



## **ERCC Workshop: Harmonizing State Programs**

**September 28, 2010**

### **State Program Element: Collector Registration and Best Practices**

#### **Issue Overview**

Collectors serve a key role in all state programs as they are usually the direct interface with consumers dropping off their used electronics. They are also the entity that makes the first decision about where collected devices are sent for recycling (or disposal). In order to ensure that the devices are being handled properly some states have implemented registration requirements and best practices guidelines. However, in some states collectors do not register, report to the state, or need to follow management guidelines. There have been instances where collectors have been found to be selling off more of the valuable covered devices and sending them to brokers or scrap buyers. Also, collectors who do not have contracts with manufacturers or recyclers operating under the regulated program may not be following best management practices or sending their loads to qualified recyclers. Therefore, even if a state has all of its recyclers operating under the program certified to the highest standards, there could still substantial volumes diverted to sham recyclers or “bad” exporters.

#### **Products Impacted**

All - desktop computers, laptop computers, computer monitors, printers, televisions, video game consoles (and in NY only: small scale servers, electronic keyboards, electronic mice, fax machines, scanners, VCRs, DVRs, portable digital music players, DVD players, digital converter boxes, cable/satellite receivers)

#### **States Impacted**

All

## **Challenges**

- Accounting for the different types of collectors and their ability to meet minimum requirements
- Best practice limitations may prevent some entities from becoming collectors, thereby decreasing overall collection opportunities
- Setting up guidelines through state laws may require legislation or regulation changes; alternate is a voluntary “pledge” or other declaration of conformity

## **Possible Solutions**

- Develop joint set of best management practices for collectors and encourages states to incorporate them into their program
- Develop best practices and ask collectors to voluntarily certify adherence and report certain data elements, such as (certified) recycler to which electronics are being sent