



E-Cycle Washington: Use of Existing Infrastructure for Collection of Electronics

Introduction

Subsection 302 (16) of Chapter 36, laws of 2016 require that by September 1, 2016, the Washington Department of Ecology (Ecology) report to the Washington State Legislature on whether existing infrastructure has been used for collection of electronics:

“For the purposes of evaluating the requirements of RCW 70.95.290, the department, in consultation with the Washington materials management and financing authority, shall, within existing resources, report to the appropriate committees of the legislature on whether the department and the Washington materials management and financing authority have utilized existing infrastructure for the collection of electronics. In its report, the department, in consultation with the Washington materials management and financing authority, must report on the location and number of new programs created and depot systems developed since 2006 for the purpose of collecting electronics, how many existing collection sites have been utilized, as well as how many curbside collection companies were contracted with for collection of electronics. The department must submit the report to the appropriate committees of the legislature no later than September 1, 2016.”

Background

Chapter 70.95N RCW, the authorizing law for the statewide electronic product recycling program called E-Cycle Washington, was passed in 2006. It requires manufacturers of the covered electronic products (TVs, computers, monitors, and portable DVD players) to provide collection services in every county, city, or town with a population greater than 10,000.

Manufacturers pay a fee to the product stewardship organization that covers the cost of collecting all electronics covered by the program, and all transportation and processing costs. The law requires manufacturer recycling plans to seek to use businesses within the state to provide collection, transportation, and recycling services.

Following are key excerpts from the law relating to use of existing infrastructure in the development of the Washington Materials Management and Financing Authority’s (WMMFA) recycling plan:

- RCW 70.95N.090(1)(b): *“Collection sites may include electronics recyclers and repair shops, recyclers of other commodities, reuse organizations, charities, retailers, government recycling sites, or other suitable locations.”*

- RCW 70.95N.090(3): “A program may provide collection services in forms different than collection sites, such as curbside services, if those alternative services provide equal or better convenience to citizens and equal or increased recovery of unwanted covered electronic products.”
- RCW 70.95N.280(6): “The authority (WMMFA) shall accept into the standard program covered electronic products from any registered collector who meets the requirement of this chapter. The authority shall compensate registered collectors for the reasonable costs associated with collection, but is not required to compensate nor restricted from compensating the additional collection costs resulting from the additional convenience offered to customers through premium and curbside services.”

Implementation of the Recycling Plan

On January 1, 2009, WMMFA began implementing the Ecology approved Standard Plan for Recycling Covered Electronic Products in Washington State with 194 collection sites and services. By the end of 2009, there were 242 businesses in Washington participating as collectors for the E-Cycle Washington Program. By April 2016, that number increased to 350 collection sites and services. As Table 1.1 shows, these collection sites and services for electronics are provided by charities, businesses, and governments.

Many participants were active in the existing infrastructure of reuse, recycling, and disposal of household goods (including electronics), recyclables, and refuse before the E-Cycle law was passed in 2006. WMMFA estimates that 87 percent (approximately 305) of these sites/services were collecting some of the covered electronic products before the E-Cycle Washington Program began, and 46 new sites/services were created as a result of the program.

**Table 1.1
E-Cycle Washington Collectors by Type**

Collector Type	Number of Sites/Services
Charity Reuse Organization	216
Secondhand Reuse Business	34
Recycling Business	32
Government or Tribe	21
Waste/Refuse Management Business	20
Computer/TV Retailers or Repair Service	14
Other Business	13
Total	350

E-Cycle Washington drop-off sites and services are available statewide as required by law (RCW 70.95N.090(1)(a)). Table 1.2 lists their locations by county.

**Table 1.2
E-Cycle Washington Collection Sites/Services by County**

County	Number of Sites/Services	County	Number of Sites/Services
Adams	1	Lewis	5
Asotin	1	Lincoln	1
Benton	14	Mason	3
Chelan	6	Okanogan	4
Clallam	3	Pacific	2
Clark	26	Pend Oreille	3
Columbia	1	Pierce	32
Cowlitz	2	San Juan	3
Douglas	1	Skagit	7
Ferry	3	Skamania	3
Franklin	3	Snohomish	34
Garfield	1	Spokane	29
Grant	3	Stevens	1
Grays Harbor	5	Thurston	10
Island	4	Wahkiakum	*1
Jefferson	2	Walla Walla	4
King	*67	Whatcom	6
Kitsap	8	Whitman	*3
Kittitas	3	Yakima	14
Klickitat	1		

* In some areas, E-Cycle Washington providers offer “modified curbside collection” of electronics. See “Curbside Collection” discussion below.

RCW 70.95N.310 (2) states “*If practicable, the authority (WMMFA) shall avoid creating new infrastructure already available through private industry in the state.*” As directed by the law, WMMFA relied on the existing infrastructure to create a convenient collection network of sites and services for free public drop-off of covered electronics for recycling.

In addition, WMMFA’s recycling plan used the existing infrastructure to transport the electronics to the recycling facilities. Transport service providers are either processors (recyclers) who were already routinely picking up materials to take back to their facilities for recycling, common carrier transporters who move household goods including recyclables from one destination to another, or collectors who self-transported the electronics they collected for additional compensation.

Curbside Collection

WMMFA built the E-Cycle collection network based on the extensive coverage provided by the existing infrastructure of reuse and recycling businesses available in 2009. Curbside collection was not excluded, but the practicality and expense of collecting electronics for recycling at the curb have proven to be difficult obstacles to overcome.

Those obstacles include Ecology's concerns about consumers' data security if computers are left at the curb for pickup. There are also public safety concerns and potential environmental contamination issues from accidental or intentional breakage of electronics left on the side of the road. In addition, protection of electronics from the weather, a concern for items left uncovered, is a requirement needed to safeguard workers at the recycling facilities.

The extra cost of curbside collection over that of drop-off collection is an issue. WMMFA finds it impractical to pay higher costs for curbside or premium services when other collection services are already available in all counties and required cities in Washington. As the law states in RCW 70.95N.260 (6), cited above, WMMFA is not required to pay those costs.

Curbside recycling service providers are allowed, but in general are unwilling to charge consumers for the extra cost of curbside collection. Currently there are no recycling service businesses contracted to provide curbside collection for the E-Cycle Washington Program.

A number of curbside recycling service providers, some that are contracted with WMMFA as collectors at public drop-off sites as noted above, offer an option best described as "modified curbside collection" of electronics. A customer can make an appointment with their service provider and place their electronics (within certain size limitations) at the curb for pickup on a scheduled day. In a few areas, the cost for this service is included in their regular curbside fees, but an add-on fee for curbside pickup of electronics is the norm. Other recycling businesses offer in-home pickup service of electronics and the homeowner is charged a fee.

To promote curbside collection of electronics and address the issues of cost, environmental protection, and public safety, as well as recycling facility worker safety, Ecology released *A Guide to Curbside Collection of Electronics through the E-Cycle Washington Program* in February 2015. This publication offers guidance to recycling service providers on how curbside pickup service could safely and effectively operate in the E-Cycle Washington Program. The guidance was distributed to recycling industry associations and posted on the E-Cycle Washington website at www.ecyclewashington.org.

To date, Ecology has not received inquiries or proposals from curbside recycling service providers describing how safe, cost-effective curbside collection of electronics could be provided to consumers. However, at least three providers had discussions with WMMFA about doing so. These companies were already providing curbside pickup of electronics as required in their municipal refuse hauling contracts. In their discussions with WMMFA, it became evident that those contracts included payment for that service, as well as the recycling and/or disposal of the electronics. Negotiations stalled as the providers realized their contract was already compensating them for the same services the E-Cycle Washington Program provides.

Publication Information

This report is available on the Department of Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1607025.html>

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