

REUSE AND RECYCLING ARE THE PREFERRED METHODS OF E-SCRAP MANAGEMENT

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The U.S. Government Accountability Office estimates that over 100 million computers, monitors, and televisions become obsolete each year, and that this number is growing. The U.S. Environmental Protection Agency estimates that electronic waste accounts for a significant amount of the heavy metals found in landfills. If improperly managed, these used electronics (“e-scrap”) can harm the environment and human health.

States have enacted varying laws and regulations addressing e-scrap. These range from bans on disposal in municipal solid waste landfills and combustors, to treating e-scrap as municipal solid waste, which is disposable in Subtitle D landfills and combustors, just like ordinary trash.

In considering the various methods that could be used to manage e-scrap, we strongly agree that reuse and recycling are far and away the preferred methods – and, with sufficient infrastructure and incentives, nearly all e-scrap could be technically and economically recyclable. We further believe that before a State bans the disposal of e-scrap, there must be a plan for adequate infrastructure and arrangements to ensure that it will be recycled. To be effective, any such ban should be applied and enforced so as to deter people from placing their e-scrap in the waste stream.

Recycling produces a range of benefits. By capturing valuable materials from these products, recycling can dramatically reduce the need for environmentally harmful and energy intensive mining around the globe. The recycling of e-scrap can also fuel economic activity, create jobs, transfer technologies to the developing world in accordance with international law, and divert these materials from disposal facilities.

Today, hundreds of companies and organizations exist throughout the U.S. to process e-scrap for reuse and recycling. Unfortunately, no comprehensive and effective nationwide strategy has been devised or implemented by the public or private sector to ensure that the maximum amount of these products is recovered for reuse and recycling. We believe that there is a pressing need for such a strategy at the federal level to provide a framework. This framework could be complemented by each State, providing some standardization while allowing the States the flexibility to implement more stringent programs, if desired.

We represent a diverse coalition of industries and stakeholders that have a vital role in shaping the development of effective infrastructure and policy framework for recovering e-scrap. We believe that with the right national effort and effective

policies, we can achieve the goal of greatly increasing to nearly 100% the recycling of computers and related e-scrap in the U.S. within ten years. We commit ourselves to that goal and ask all electronic product manufacturers, recyclers, retailers, federal, state and local governments, environmental groups, trade associations, and other stakeholders to work cooperatively with us to attain this goal.

More specifically:

- We will work with all stakeholders to devise and implement policies, programs and strategies to maximize e-scrap recycling in the nearest possible term.
- We respect the right of States to enact policies they deem most appropriate and commit to work with individual States as they seek to address this issue.

As a starting point, we support and urge the adoption of financial incentives such as tax credits to consumers, manufacturers, retailers and recyclers for recycling old or unwanted computers and monitors. Financial incentives such as those found in S.510, as introduced by Senators Wyden (D-OR) and Talent (R-MO) in the 109th Congress, would be a good first step.

Integrated Waste Services Association

National Recycling Coalition

National Solid Wastes Management Association

Solid Waste Association of North America