



Cheryl Grabham, Program Manager
Materials Management – Product Stewardship Team
Oregon Department of Environmental Quality
700 NE Multnomah St. Suite 600
Portland, OR 97232

April 25, 2022

By email to: ecycle.info@deq.oregon.gov

Dear Ms. Grabham:

Thank you for the opportunity to provide comment on the Department of Environmental Quality's (DEQ) draft Oregon E-Cycles Collections Determination for 2023. We appreciate DEQ's work on the Collections Determination ("target") as well as your background on how DEQ reached the recommended amount.

MRM supports the midpoint target of 13.9 million pounds, and we strongly urge the DEQ not to set a target higher than this number.

MRM has run a successful Plan and robust collection network under the Oregon E-Cycles program for more than ten years. Based on our knowledge and history of the collections from our Plan's sites and the collection data for the first quarter 2022, we believe the DEQ's recommendation of the midpoint of your estimated collection range is the correct number for 2023.

The proposed 2023 target of 13.9 million pounds represents a 20% increase from the 2022 target. This jump is significant; an increase of this amount contradicts the decline in collections year-over-year that we see at collection sites now that there are more lightweight products recycled by consumers. That said, actual Oregon E-Cycles collections in 2021 were 14.2 million pounds so, given the decrease in collections volume each year, a 2023 goal of 13.9 million pounds is a fair estimate. To set a target in excess of the 13.9 million pounds would go against all data regarding e-waste generation and recycling collections.

MRM did not drop any collection sites and, in fact, has added collection locations in 2022 under the 2022 target. We understand from our work with the DEQ and State Contractor Plan in 2022, however, that the 2022 target was perhaps too low. As a result, we support the 20% increase in 2023 even though we believe it is counter to what we see from our year-over-year data.

Thank you again for the opportunity to comment on the DEQ's draft Collections Determination document. Please do not hesitate to contact Ali Briggs-Ungerer at ali@mrmrecycling.com or Tricia Conroy at tricia.conroy@mrmrecycling.com if you have any questions.

Respectfully,

Tricia Conroy, Executive Director
cc: Ali Briggs-Ungerer

**Electronic Manufacturers Recycling
Management Company LLC**
5775 Wayzata Boulevard, Suite 700
Minneapolis, MN 55416
Tel: (952) 582-2965