



April 25, 2022

Oregon E-Cycles
700 NE Multnomah St.
Suite 600
Portland, OR 97232

Re: Draft Oregon E-Cycles Collection Determination for 2023

Dear DEQ Oregon E-Cycles Team:

Thank you for the opportunity to submit feedback on the calculation of the 2023 statewide collection target for covered electronic devices. As manager of the State Contractor Program (SCP), the National Center for Electronics Recycling (NCER) is uniquely impacted by this annual calculation, which is based on best estimates available through modeling.

NCER is supportive of the collection determination for 2023 as proposed by DEQ. Despite a lower collection target set for 2020 and 2021, actual collections remained similar to 2019 levels. In fact, we are seeing collection volumes for the first quarter of 2022 exceed that of the same time period for 2019, and with fewer overall collection sites in the SCP network. Based on these trends, we expect volumes to remain steady through 2023, and comparable with collection trends experienced by the SCP network over the past three years.

Given these indicators, which match the DEQ modeling for 2023 very closely, NCER is supportive of DEQ setting the statewide collection target for covered electronic devices between 13.9 and 15.8 million pounds for 2023. There are greater risks for the overall program in setting the goal too low on this spectrum rather than too high. When it is too low, it puts pressure on the programs to reduce excess collection sites, and special programs such as events and curbside services. If the target ends up being too high, the programs can use credits from prior-year over-collection or DEQ can consider enforcement discretion for manufacturer programs who came in under weight despite best efforts.

We look forward to continuing to be an active stakeholder in making the e-Cycles program a success for Oregon.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Linnell', is positioned above the typed name.

Jason Linnell
Executive Director
National Center for Electronics Recycling