



Oregon Department of Environmental Quality

# Oregon E-Cycles: Guide to Convenience Standard

March 10, 2025

## Disclaimer

This document, and its references to Oregon Revised Statutes 459A.305 to 459A.355 and related administrative rules in Oregon Administrative Rules Chapter 340, Division 98 (collectively, the Oregon Electronics Recycling Law), are provided for information and guidance only. This guide does not constitute rulemaking by the Environmental Quality Commission and may not be relied upon to create an enforceable right or benefit, substantive or procedural, enforceable at law or in equity, by any person. This guide also does not supplant, replace, or amend any of the legal requirements of the Oregon Electronics Recycling Law. An omission or truncation of legal requirements in this guidance document does not relieve an electronics producer responsibility organization or other parties of their legal obligations to fully comply with all regulatory requirements. DEQ may revise this guide or providing additional guidance on electronics producer responsibility program submissions periodically as conditions warrant.

## Purpose

This guide is intended to provide resources for estimating the number of collection sites required for an electronics producer responsibility program, starting Jan. 1, 2026. An electronics producer responsibility program must submit an initial plan by July 1, 2025, for the 2026 program year.

As part of its plan, the electronics producer responsibility organization must describe how the electronics producer responsibility organization will implement an electronics producer responsibility program that complies with ORS 459A.305 to 459A.355, including how the electronics producer responsibility organization will provide convenient and equitable service throughout the state, including to rural areas and minority, lower-income and other historically underserved populations.

## Background on Oregon E-Cycles

Created in 2007 by Oregon's Electronics Recycling Law, Oregon E-Cycles is a statewide program that requires electronics manufacturers to provide responsible recycling for consumer electronics. The Program is an example of a producer responsibility program, a waste management strategy that requires producers to share in the responsibility for the end-of-life management of their products and materials. The Program provides collection sites that accept devices for recycling year-round. The Program may also offer collection events, such as in communities where a collection site has not been established.

In 2023, the Oregon Legislature passed [HB 3220](#) to modernize Oregon E-Cycles, including expanding the types of devices that the Program will accept starting in 2026. Multiple electronics producer responsibility programs may operate and offer collection services under the modernized Oregon E-Cycles. An entity that operates an electronics producer responsibility program under Oregon E-Cycles is referred to as an "electronics producer responsibility organization" or PRO. An electronics producer responsibility organization that intends to operate an electronics producer responsibility program must submit a plan to DEQ for approval. Among other things, the plan must describe how the program will provide convenient and equitable service throughout the state, including to rural areas and minority, lower-income and other historically underserved populations.

Additional information on Oregon E-Cycles can be found on DEQ's [E-Cycles web page](#).

## Translation or other formats

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## Convenient and equitable service

As amended by [HB 3220](#), the Oregon Electronics Recycling Law requires an electronics producer responsibility organization to provide convenient and equitable service, including by providing a minimum number of collection sites as set forth in ORS 459A.320(2)(d):

**459A.320.** (1) In the form and manner prescribed by the Department of Environmental Quality, an electronics producer responsibility organization must annually submit to the department a plan for implementing an electronics producer responsibility program.

(2) The electronics producer responsibility organization's plan must describe how the electronics producer responsibility organization will implement an electronics producer responsibility program that complies with ORS 459A.305 to 459A.355, including how the electronics producer responsibility organization will:

(d)(A) Provide convenient and equitable service throughout the state, including to rural areas and minority, lower-income and other historically underserved populations.

(B) At a minimum, convenient service must include a network of collection sites distributed to ensure that 95 percent of the residents of this state are within 15 miles of a collection site, and must also include:

(i) At least one collection site in each county;

(ii) In each city with a population of at least 10,000 but less than 200,000, at least one collection site, plus one additional collection site for every additional 20,000 residents of the city over 10,000; and

(iii) In each city with a population of 200,000 or greater, at least 10 collection sites, plus one additional collection site for every additional 50,000 residents of the city over 200,000.

(C) A collection site for a county may be the same as a collection site for a city in the county. Collection sites shall be staffed and open to the public at a frequency adequate to meet the needs of the area being served. An electronics producer responsibility organization may provide collection service jointly with another electronics producer responsibility organization.

(D) The department may waive the requirements of subparagraphs (B) and (C) of this paragraph with respect to a county or city if the proposed plan demonstrates to the department's satisfaction that alternative services or collection sites would provide substantially equivalent collection convenience.

An electronics producer responsibility organization may share a collection site with another electronics producer responsibility organization.

## Estimating minimum number of collection sites required

To calculate the minimum number of collection sites required by ORS 459A.320(2)(d)(B), an electronics producer responsibility organization may take the following approach:

- **Step 1:** Calculate the minimum number of collection sites required by ORS 459A.320(2)(d)(B)(i) to (iii) by consulting the Certified Population Estimates provided by the [Population Research Center at Portland State University](#). See Appendix A for an example of the estimated minimum number of collection sites required based on PSU's most recent Certified Population Estimates.
- **Step 2:** Locate and secure collection sites to meet the requirements of Step 1, either independently or by sharing a collection site with another electronics producer responsibility organization.
- **Step 3:** Conduct GIS spatial analysis on the collection site network locations established in Step 2 to evaluate whether additional collection sites are needed to ensure at least 95 percent of Oregon residents are within 15 miles of a collection site, as a straight-line distance.
- **Step 4:** Secure any additional collection sites needed to meet the requirements of Step 3. Sites can be secured either independently or by sharing a collection site with another electronics producer responsibility organization.

## Contact

For questions about this Guide to Convenience Standard, please email [ecycle.info@deq.oregon.gov](mailto:ecycle.info@deq.oregon.gov) with the subject line, "E-Cycles Guide to Convenience Standard - Questions."

## **Non-discrimination statement**

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## Appendix A: Estimated number of collection sites required by ORS 459A.320(2)(d)(B)(i) to (iii)

Based on Certified Population Estimates provided by the [Population Research Center at Portland State University](#), it is estimated that at least 138 collection sites are required by ORS 459A.320(2)(d)(B)(i) to (iii). This estimation was completed on March 15, 2025; PROs should ensure that convenience meets current population standards at time of submittal.

The following counties don't have any cities with a population of at least 10,000 as of the time of publication, but still require at least one collection site in each county, as required in statute.

County	Number of collection sites required
Curry	1
Gilliam	1
Grant	1
Harney	1
Hood River	1
Jefferson	1
Lake	1
Morrow	1
Sherman	1
Tillamook	1
Wallowa	1
Wheeler	1
<b>Total</b>	<b>12</b>

Additionally, the following cities require one or more collection sites.

City Requiring Collection Site	Certified Population Estimate July 1, 2024	Number of collection sites required
Albany	57,777	3
Ashland	21,579	1
Astoria	10,131	1
Baker City	10,104	1
Beaverton	99,843	5
Bend	104,089	5
Canby	19,114	1
Central Point	19,363	1
Coos Bay	16,093	1
Cornelius	14,490	1
Corvallis	60,408	3
Cottage Grove	10,879	1
Dallas	17,924	1
Eugene	177,155	9
Fairview	10,473	1

Forest Grove	26,916	1
Gladstone	11,944	1
Grants Pass	39,572	2
Gresham	115,233	6
Happy Valley	27,637	1
Hermiston	20,177	1
Hillsboro	111,006	6
Independence	10,056	1
Keizer	39,249	2
Klamath Falls	22,108	1
La Grande	12,818	1
Lake Oswego	41,129	2
Lebanon	19,936	1
Lincoln City	10,103	1
McMinnville	34,774	2
Medford	88,352	4
Milwaukie	21,408	1
Molalla	10,489	1
Monmouth	11,516	1
Newberg	26,249	1
Newport	10,623	1
North Bend	10,434	1
Ontario	11,874	1
Oregon City	38,029	2
Pendleton	16,996	1
Portland	639,448	18
Prineville	11,466	1
Redmond	37,146	2
Roseburg	23,876	1
Salem	177,567	9
Sandy	12,933	1
Sherwood	20,781	1
Silverton	10,882	1
Springfield	62,996	3
St. Helens	14,492	1
Sweet Home	10,088	1
The Dalles	16,103	1
Tigard	56,392	3
Troutdale	15,790	1
Tualatin	27,753	1
West Linn	27,568	1
Wilsonville	27,048	1
Woodburn	29,455	1
<b>Total</b>		<b>126</b>