

August 7, 2026



Oregon Department of Environmental Quality
Materials Management Program
700 NE Multnomah St., Suite 600
Portland, Oregon 97232

RE: Lane County Comments on MRM's 2027 Oregon E-Cycles Program Plan

Dear Oregon Department of Environmental Quality:

Lane County appreciates the opportunity to comment on MRM's proposed 2027 Oregon E-Cycles Program Plan. As a local government providing solid waste and recycling services across a geographically diverse county, Lane County has a direct interest in ensuring Oregon's E-Cycles program provides reliable, convenient, adequately funded, and environmentally responsible collection services.

Lane County recognizes MRM's experience administering electronics recycling programs and the strength of several provisions, particularly those addressing environmentally sound management, processor oversight, downstream tracking, and chain-of-custody verification.

However, several components of the Program Plan rely on descriptions of intended activities rather than measurable performance standards or sufficiently detailed implementation strategies. Lane County respectfully requests that DEQ consider the following issues during its review.

1. Establish Measurable Performance and Collection-Site Service Standards

Lane County recommends that DEQ require measurable performance standards for collection services, public awareness and education, complaint resolution, collection-site support, training, and continuous improvement.

Collection sites are the public-facing infrastructure of the Oregon E-Cycles program. Their ability to provide consistent and convenient service depends on timely transportation, responsive communication, technical assistance, and adequate operational support.

At a minimum, the Program Plan should establish expectations for:

- **Pickup response times and service disruptions:** Define expected timeframes for removing collected electronics and procedures for addressing missed or delayed pickups, transportation disruptions, limited storage capacity, or other operational and safety concerns.
- **Collection-site capacity:** Coordinate pickup frequency and transportation services with actual collection volumes and available storage capacity.
- **Technical assistance:** Establish response expectations for questions regarding material acceptance, storage, packaging, transportation, safety, contamination, recordkeeping, and other program requirements.
- **Communication and escalation:** Identify clear points of contact, response expectations, and procedures for escalating unresolved or urgent service issues.
- **Training and implementation support:** Define the resources and training available when program requirements, materials, or procedures change.

- **Collection-site feedback:** Provide a formal mechanism for participating sites to identify concerns related to transportation, reimbursement, technical assistance, communication, and program administration.
- **Performance monitoring:** Track and report measures such as pickup response times, compliance with service standards, complaints and resolution times, and collection-site satisfaction.

Establishing minimum service standards would provide DEQ and participating collection sites with an objective basis for evaluating program performance and identifying areas requiring corrective action or continuous improvement.

2. Increase Transparency Regarding Fair Financial Compensation

Local governments and other collection-site operators incur costs associated with staffing, space, infrastructure, storage, handling, administration, safety requirements, theft and break-ins, and transportation coordination.

Lane County recommends that DEQ require greater transparency regarding how collection-site compensation is established and demonstrates that reimbursement reasonably reflects the actual costs of maintaining safe, accessible, and reliable collection infrastructure.

This is particularly important for local governments that maintain permanent collection infrastructure and serve large geographic areas.

3. Provide Additional Analysis Supporting the Proposed Collection Network

MRM states that its proposed collection network will satisfy Oregon’s statutory convenience requirements. Lane County recommends that DEQ ensure this conclusion is supported by analysis demonstrating adequate geographic coverage, operational capacity, and resiliency.

The analysis should address geographic distribution, anticipated collection volumes, site capacity, transportation logistics, service disruptions, and contingency planning, with consideration for rural communities where alternatives may be limited if a collection site becomes unavailable.

Meeting a geographic convenience standard alone does not necessarily ensure adequate service if individual sites lack sufficient capacity or operational support.

4. Establish Outcome-Based Public Awareness Measures

Lane County supports MRM’s commitment to public education and outreach but recommends that DEQ require measures that evaluate whether those efforts increase residents’ awareness and use of available E-Cycles services.

Establishing baseline awareness and periodically measuring changes would provide DEQ and MRM with better information about outreach effectiveness and where additional education may be needed.

Conclusion

Lane County recognizes MRM's operational experience and believes several components of the Program Plan provide a strong foundation for implementation. However, Lane County encourages DEQ to require greater specificity regarding measurable performance and service standards, collection-site compensation, collection-network analysis, and public awareness outcomes before approving the 2027 Program Plan.

Clear and measurable expectations will provide greater accountability for the PRO, greater certainty for participating collection sites, and a stronger and more reliable electronics recycling system for Oregon residents.

Thank you for considering Lane County's comments and for the opportunity to participate in the review of MRM's 2027 Oregon E-Cycles Program Plan.

Sincerely,

A handwritten signature in cursive script that reads "Angie R. Marzano".

Angie R. Marzano
Waste Reduction Program Supervisor