



Electronics Producer Responsibility Organization Program Plan Proposal

July 1, 2025

Revised October 13, 2025

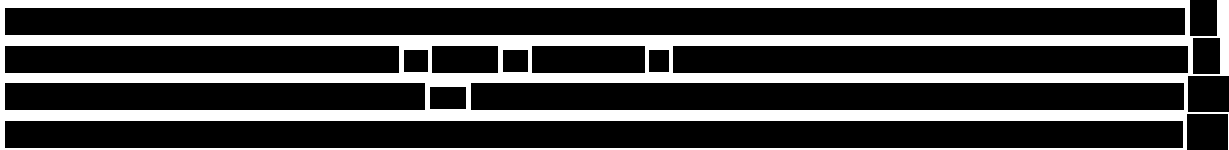
**From MRM
Electronic Manufacturers Recycling Management Co.**

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There are portions of this proposal that contain confidential business information and MRM reserves the right to work with Oregon DEQ to review and identify specific confidential sections before any release of information from the plan under public information requests.

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Introduction

This proposal for an electronics Producer Responsibility Organization’s (PRO) plan is presented by Electronic Manufacturers Recycling Management Company, LLC (MRM). This document describes the methodology proposed by MRM to implement an electronics producer responsibility program in 2026 as set forth at Oregon Revised Statutes (ORS) 459A.320 and Oregon Administrative Rules (OAR) 340-098-0240.

MRM was founded to assist manufacturers in meeting e-waste requirements and to provide environmentally responsible recycling opportunities for consumers across the US. The manufacturers working with MRM are committed to providing safe, responsible e-waste recycling in Oregon. MRM is confident our organization will provide the most effective Producer Responsibility Organization (PRO) for Oregon, and we are pleased to present this program plan.

Information in this document follows the formatting requirements in the Department of Environmental Quality (DEQ) document: “Guidance for Oregon Electronics Producer Responsibility Program Plans.”

As requested by DEQ, MRM will provide the following documents separately to DEQ:

- A clean Microsoft Word document of this revised plan proposal
- A Microsoft Word document of this revised plan proposal with visible track changes
- A Microsoft Excel file with a full list of collection sites including the site name as well as county, city, street address, phone number, hours of operation, latitude and longitude coordinates, and any special notes.

Background

Producer Responsibility Organization Qualification

Statute defines an electronics PRO as “an organization that represents at least five percent of all manufacturer obligations, designated by a manufacturer or group of manufacturers to act as an

agent of the manufacturer or group of manufacturers for the purpose of developing and implementing an electronics producer responsibility program on behalf of the manufacturer or group of manufacturers.” MRM is confident that the [REDACTED] who have designated MRM as their PRO in 2026 represent at least five percent of all market obligations, as [REDACTED]

Appendix B includes a list of each manufacturer participating in MRM’s PRO for 2026. Appendix B also includes a list of all brands of Covered Electronic Devices (CEDs) manufactured, sold or imported by each participating manufacturer, including (a) those brands being offered for sale in this state by each manufacturer; and (b) those brands that were offered for sale in this state by each manufacturer during the previous year.

MRM History and Experience

MRM was founded in 2007 by Panasonic, Sharp, and Toshiba to assist electronics manufacturers. MRM’s mission is to bring manufacturers together to help provide convenient, environmentally responsible recycling opportunities to consumers nationwide.

MRM operates regulatory compliance electronics programs in twenty (20) states and the District of Columbia, as well as a national mail back program, and programs in Canada. MRM has maintained continuous operations since 2007 and is the largest group manufacturer program in all states that require Group Plans to be submitted to State regulatory agencies. In addition, MRM is the *only* organization to operate an approved program in all states where an independent e-waste recycling program is allowed/approved.

MRM has overseen various complex collection and recycling networks across twenty states, Washington, DC and Canada. MRM oversees operations in some of the largest cities in the nation (New York City, Newark) and in remote rural areas. MRM networks are made up of municipal collection sites, private sector collectors, not-for-profit organizations, and events; we work with the largest national recyclers as well as smaller regional processors.

MRM has nearly twenty years’ experience working directly with manufacturers and ensuring their compliance. MRM has an established tracking and invoicing system to bill manufacturers and prepare complex reporting on manufacturers’ behalf. Our staff has strong relationships with manufacturers and has regular communication tools that enable us to keep manufacturers informed and in compliance.

MRM’s extensive experience will allow MRM to effectively service Oregonians and the Oregon recycling industry under the new PRO format of Oregon E-Cycles.

Strong Environmental Standards

Since inception MRM has supported the recycling of just under **two (2) billion** pounds of electronics. MRM uses only environmentally responsible recyclers that comply with all applicable laws. All MRM recyclers hold third-party certifications from e-Stewards, R2, or both. MRM requires that all recyclers contracted with MRM maintain adequate record keeping, track and report the markets for recycled material and ultimate disposition of the key recycled materials, agree to MRM's regular performance audits and inspections, adhere to provisions for safe reuse or refurbishment, and meet significant insurance requirements. The process to become a recycler for MRM is extensive; every recycler under contract with MRM has undergone MRM's vetting process (as described in the section on Environmentally Sound Management Practices and with supporting information in Appendix C "MRM Recycling Vendor Requirements") to ensure they have environmentally responsible and safe operations. Processors contracted with MRM must undergo regular third-party audits and MRM's own annual audits. MRM is proud to have never been subject to any enforcement actions against our organization.

At this time, MRM is only working with processors with whom we have a direct contract.

Oregon Experience

MRM has operated a strong and stable electronics recycling program in Oregon continuously for 17 years. MRM has been operating an approved Group Manufacturers Plan in Oregon since the first year Oregon E-Cycles began operations in 2009. During this 17-year period, MRM's operations recycled more than 175 million pounds of e-waste. This is more than 50% of all the material collected under the entire Oregon E-Cycles program during this time.

MRM has routinely been responsible for over 50% of the Return Share By Weight under the Oregon E-Cycles program since its inception. For the past five years, MRM has successfully managed over 60% of the total State e-waste recycling each year and, in some years, has managed nearly 80% of the total State e-waste recycled.

MRM is the organization best positioned to ensure that Oregonians continue to have stable electronics recycling options. Although the new Oregon E-Cycles program allows for multiple PROs, MRM has crafted this proposal as a complete and standalone implementation plan. Our experience in Oregon, strong relationships with the local recycling industry, expert Oregon staff, and depth of manufacturers participating with MRM ensure that MRM could handle the responsibility of being approved as the single PRO in Oregon, if needed.

Going forward, MRM will provide recycling services to Oregonians without interruption.

Organizational Structure

Figure 1 illustrates the structure and overall responsibilities of the managing members of the MRM team. Overall day-to-day management of MRM's PRO will remain very similar to how MRM operated under previous years of Oregon E-Cycles. MRM's Executive Director, permanent staff, and the Oregon PRO Manager will work together to manage MRM's PRO, the details of which are outlined below. MRM will continue to contract with Ali Briggs-Ungerer (Briggs-Ungerer Consulting, LLC) to manage operations locally.

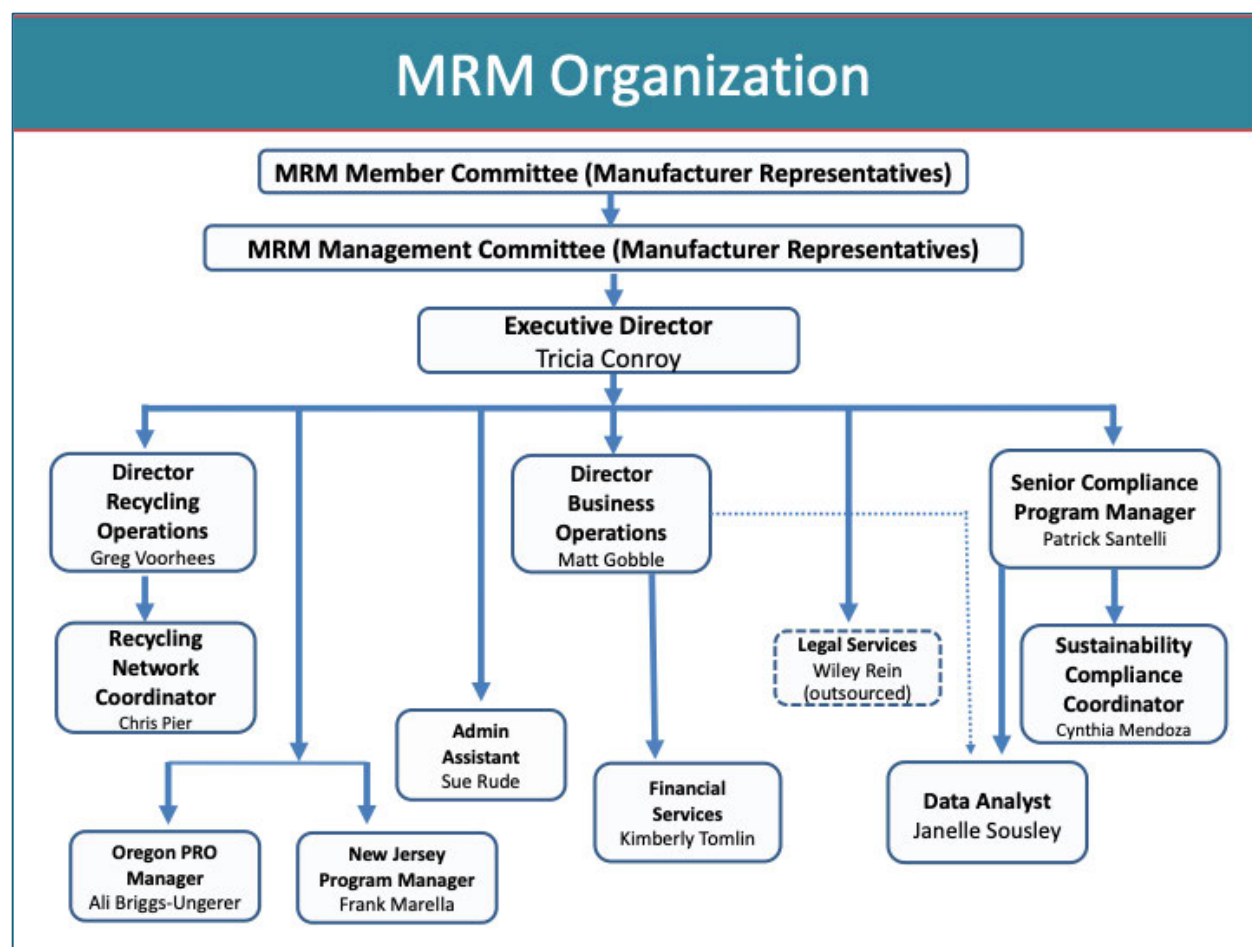


Figure 1: MRM Organizational Chart

Operational Responsibilities

In-State Oregon PRO Manager

Ali Briggs-Ungerer (“Oregon PRO Manager”) is responsible for overall, day-to-day management and she will work closely with MRM’s full-time staff. The Oregon PRO Manager will maintain an office in Oregon and will be responsible for the following activities:

- Ongoing working relationships with representatives from each processor to oversee incoming loads, monitor collector activity, verify adherence to environmentally sound management practices, oversee accurate recordkeeping, and ensure service for Oregon consumers.
- Ensuring processors document all loads and maintain detailed records.
- Overseeing and maintaining the statewide collection network. She will communicate regularly with collection sites, monitor sites, inform DEQ of any changes in MRM’s collection site network, and ensure proper environmental and safety management and recordkeeping.
- Primary contact for communicating with DEQ, including regularly updating DEQ on program changes as well as compiling and delivering reports to DEQ.

Recycling Team

MRM’s Director of Recycling Operations and Recycling Network Coordinator will be responsible for the following activities:

- Managing contracting with processors and collectors.
- Holding regular calls with processors to ensure the program is running smoothly.
- Conducting annual audits and overseeing third-party audits.
- Assisting the Oregon PRO Manager with monitoring materials flow to ensure proper downstream compliance.
- Coordinating transportation logistics where necessary.
- Leading work to add collection sites and addressing any issues that may arise.

Financial Management Team

MRM’s Director of Business Operations and his team will be responsible for the following activities:

- Calculating distribution of billing across manufacturers and issue all invoices.

- Reviewing vendor invoices and paying recycling, collector, and transportation vendors as required.
- Tracking costs each month and following up with any manufacturers not meeting financial obligations.

Compliance Team

MRM staff and the Oregon PRO Manager collaboratively manage compliance oversight. See Section “Environmentally Sound Management Practices” of this document for detailed descriptions of MRM’s compliance strategies for processors, collectors, and transporters. In addition, Appendix C provides detailed information on the requirements placed on vendors. The Compliance Team will assist the Oregon PRO Manager in preparing all reporting as well as communicating with participating manufacturers and the Coordinating Body, if applicable.

The Compliance team also will assist the Oregon PRO Manager in preparing any additional information required by the DEQ.

Financing

MRM has been running statewide e-waste programs on behalf of electronics manufacturers since 2007. We have developed best practices for financing and have years of significant experience ensuring strong, solvent programs. We understand the challenges of working with many manufacturers and vendors and have developed processes to manage complicated billing, payment, and data tracking for manufacturers and vendors working with MRM.

The updated Oregon E-Cycles program (effective January 1, 2026) varies from the Plan that MRM has administered since the program began in 2009. In addition to funding recycling activity, the electronics PRO will now be responsible for funding public education and outreach, a GPS tracker program, market share calculations, and other evaluation and administrative activities. In addition, the electronics PRO will be responsible for paying the \$315,000 Annual Fee to the DEQ and ensuring individual manufacturers pay their respective share of that Fee (which replaces the annual registration fee for manufacturers).

[REDACTED]

- [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]

Generally Accepted Accounting Standards and Reserves

MRM uses generally accepted accounting standards in our financial operations. In addition to adhering to industry financial standards, MRM undergoes an annual Financial Audit of all our activities. This audit is conducted by a third-party auditing firm.

MRM has operated statewide e-waste recycling programs since 2007 and has many years of operating cost data and institutional knowledge. Accordingly, we plan and price our services to manufacturers carefully to ensure we can cover all costs. MRM as an organization established a cash reserve at the outset of MRM operations and this reserve is available for use in Oregon, if necessary. MRM is confident we will have a reserve sufficient cover costs if manufacturer payments are delayed, and MRM will maintain a reserve sufficient to cover a year of operations in Oregon.

Manufacturer Compliance with Financial Obligations

MRM bills manufacturers monthly to cover the costs of operating our e-waste programs. MRM expects prompt payment from participating manufacturers and stipulates payment requirements in all manufacturer contracts. MRM has an account receivables (AR) process through which MRM makes every effort to collect payment from manufacturers. If a manufacturer does not pay its invoices, MRM issues statements and follow-up emails to alert the manufacturer to the amount they owe to MRM in order to collect the back payment.

In the event that a manufacturer does not pay its invoice, even after implementation of MRM's AR process, then MRM will escalate the situation. MRM will notify the manufacturer that we will inform DEQ of the manufacturer's non-participation in a PRO as required by law. If the manufacturer fails to pay its program costs, MRM will then advise DEQ that the manufacturer is no longer part of MRM's PRO and has not fulfilled its legal obligations under the Oregon Electronics Recycling Law (ORS 459A.305 to 469A.355). The timing of notifying DEQ about a manufacturer's non-compliance will depend on the manufacturer's payment efforts and the terms of their contract with MRM, but MRM will notify the DEQ as specified above no later than six months after payment was due.

Program Operations

MRM contracts with electronics recyclers (AKA processors) to provide the bulk of services to collection sites under MRM's authority. In general, MRM-contracted recyclers provide direct collection services to collection sites, including pickup and transportation of CEDs to recycling facilities. In some cases, MRM will contract directly with transportation companies or mid-sized collectors, consolidation points, or recyclers to provide pick up and transportation services or event services.

MRM will provide all collection sites with an easy-to-use collector handbook. The handbook will contain key information to ensure all collection sites follow Oregon law and comply with requirements, and it will provide contact information and instructions for receiving service through MRM's electronics PRO.

MRM maintains regular communication with all processors working with MRM. This includes weekly phone calls, regular site visits, initial audits to bring any new recycler on with MRM, annual desktop audits, and regularly scheduled third-party audits. MRM has found these communication techniques lead to an effective working relationship, ensure high quality service to collection locations, and environmentally safe recycling operations.

Collection and Transportation

MRM's processors will manage pick up and transportation logistics. MRM generally assigns processors to collection sites, though collector preference is taken into account. To arrange a pickup, collection sites will contact their corresponding processor directly via email or phone. The processor will respond within two business days and will coordinate a prompt pickup that ensures collection sites are not unduly burdened by an accumulation of outbound CEDs. The collector may request supplies (stretchwrap, gaylords, pallets) at this time and may also request more supplies from their processor between pickups as needed. MRM will provide collectors with appropriate contact info and detailed instructions in the collector handbook, including detailed guidance on sorting and packaging. MRM will provide the collector handbook to confirmed collection sites in the fourth quarter of 2025 and, going forward, will provide it to new collectors at the time they join MRM's network. [REDACTED]

MRM monitors the flow of materials on a quarterly basis to ensure that CEDs are sent to processors, refurbishers, or for reuse within six months of a collector receiving CEDs from

covered entities. In the rare event that a collection site has not had a pickup in six months, MRM will first contact the site to gather information. From its many years of experience in Oregon, MRM has learned that the primary reason for not requesting a pickup within six months is that the collection site is located in a very remote area of Oregon and does not receive a substantial enough volume of CEDs to warrant a pickup. If this is the case, then MRM will discuss (a) when the collection site anticipates needing a pickup, and (b) whether low material volumes are due to a lack of public awareness in that community about Oregon E-Cycles. Otherwise, then MRM will work with the collection site to schedule a pickup. If a lack of public awareness is suspected, then MRM will promptly work to resolve this with targeted public awareness in that community.

Processors will use their own fleet of trucks or third-party logistics companies for transportation. Preparation of CEDs for transportation is done in coordination between MRM and its approved processors – see Section “Collection Service” for more details on sorting guidance. Processors are required under MRM contracts to ensure that all transporters, whether in-house or third party, comply with all DOT regulatory requirements and meet all applicable State and Federal laws.

MRM performs an extensive vetting process before bringing on any recycler. [REDACTED] Once [REDACTED] processors are under contract with MRM, MRM performs annual desktop audits and arranges third-party audits. These steps help ensure strong performance and environmental and worker safety. Specific details on how MRM manages compliance for processors and transporters can be found in the Environmentally Sound Management Practices section.

Problem Resolution

MRM uses day-to-day feedback to evaluate entities that transport and process devices. Contact information for MRM’s Oregon PRO Manager and MRM staff is easily available to collection sites; if MRM receives information of concern from sites regarding transportation or processing of their CEDs, we follow up and consider the issues when evaluating work of that vendor.

MRM has 17 years of experience operating in Oregon and can build from that experience to troubleshoot any issues that may arise with the new Oregon E-Cycles program.

Incident Monitoring and Response

Processors are required to report any fines or violations. The plan includes a structured process for incident assessment, DEQ notification, corrective action implementation, and potential escalation (e.g., vendor probation or contract termination). Continuous improvement is driven

by quarterly incident reviews. MRM will document all incidents in its Annual Report to DEQ. MRM will also document in the Annual Report any deviation from its implementation plan as outlined in this document and will detail corrective actions that MRM has taken or will take in order to meet its goals for Oregon E-Cycles.

Transportation Issues

For transportation issues between a collection site and their processor, collectors will be instructed to contact their designated processor to try to resolve the issue directly. If the collector is unable to resolve the transportation issue satisfactorily, then collectors will contact MRM's Oregon PRO Manager. Instruction on this will be included in the collector handbook.

Collection Issues

MRM will approach issues regarding collection depending on the source of the complaint. MRM provides a toll-free number and information email address on our website that the public can use to provide feedback or request assistance, but if a covered entity encounters an issue with a collection site, that individual is most likely to contact DEQ or Metro, who would then pass along the complaint to MRM. If DEQ approves multiple PROs, then MRM will work with the other PRO(s) to provide a single website and phone number for the public. Collection site signage will include contact info for the public.

If MRM's Oregon PRO Manager identifies an issue in collector performance during an in-person site inspection and/or through a desktop audit, MRM will work directly with the collector during and after the inspection to resolve the issue.

Public Input

In the event of a public complaint about a collection site, MRM would reach out to the collection site within 48 hours to (a) discuss the issue, (b) identify ways to avoid a repetition of the issue, and (c) implement corrective action as needed, e.g. updating staff training on Oregon E-Cycles at the specific collection site, developing training materials for all collection sites, etc. If applicable, MRM would follow up with the covered entity to resolve the issue. MRM will document all collection site issues and, on a quarterly basis, assess for trends in types of complaints, e.g. large TVs are the most common item of concern or a particular site is struggling with compliance.

Feedback Loop

For at least the first six months, MRM's Oregon PRO Manager will have a monthly check-in with the on-the-ground Oregon staff for each of its processors to establish a feedback loop. Each processor will identify any issues of concern and MRM will work with all relevant parties to resolve these issues. This may include identifying additional supports or resources needed to

improve contamination or packaging safety problems, and/or refining data management. These Oregon-specific check ins will be in addition to the weekly calls that the Recycling Team has with the processors.

Timeline and Milestones

Many operational functions will happen simultaneously between the time MRM submits its initial proposal (July 1, 2025) and the start of the new Oregon E-Cycles program (January 1, 2026). MRM is optimistic that its electronics PRO program will be approved by DEQ and considers implementation the remainder of 2025 as part of its implementation plan.

In terms of a specific timeline, MRM submitted an initial proposal for an electronics PRO to DEQ on July 1, 2025. MRM received detailed feedback and a request for revisions to its initial proposal from DEQ and MRM is submitting this revised proposal to DEQ on October 13, 2025.

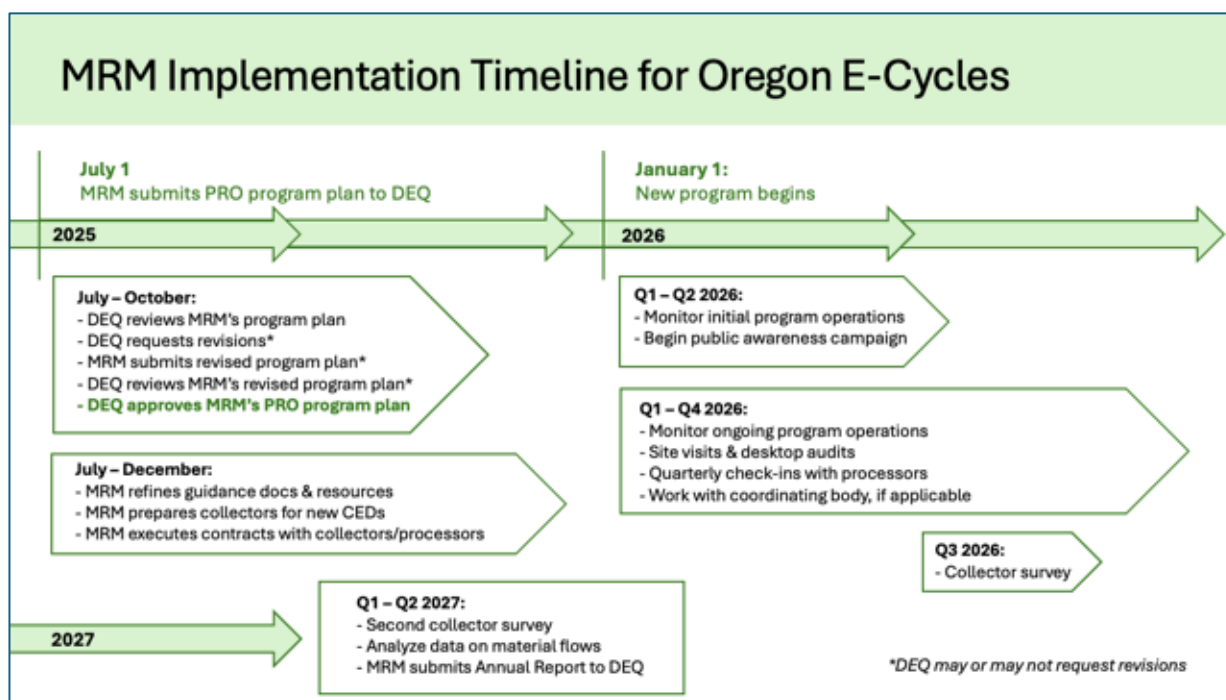


Figure 2: Key Milestones and Deliverables

During the review period, MRM will continue to refine and build on its program operations, including providing guidance to collection sites about transitioning the new program. Figure 2 shows an overview of key milestones and deliverables for the period of time beginning July 1, 2025 and continuing into the first half of 2027.

Environmentally Sound Management Practices

Overview

MRM understands the requirements stipulated in statute (ORS 459A.305(6)) and rule (OAR 340-098-0245) for environmentally sound management practices and we will implement a program that meets or exceeds the requirements.

All MRM processors are contractually required to maintain at least one major industry certification (e-Stewards and/or R2). In addition, MRM conducts our own initial evaluation of all processors that includes separate third-party audits, MRM staff review of operations, and a site visit. MRM then performs ongoing evaluations and annual audits to ensure continued responsible performance.

[REDACTED]

MRM is committed to ensuring each service provider follows industry best practices for collection, sorting, and processing CEDs. Through the MRM's audit process, MRM reviews processor environmental, health and safety manuals, third-party certifications, and downstream flow documents. We monitor processors to ensure they are providing regular trainings and have policies to safeguard employees involved in the operations side of recycling. We work with them on corrective actions if any shortcomings are revealed during audits.

MRM continuously communicates with our processors, consolidators, and collection locations. If there are substantial changes to management processes, MRM will review the changes and follow up accordingly.

Intended Outcomes and Impacts

MRM seeks continuous improvement in environmental outcomes, reduction of environmental impacts, and protection of health, safety, and data protection. MRM's contracts with our processors require they meet all Federal, State, and local requirements. MRM's program emphasizes the following program outcomes:

- **Minimize environmental impacts and increase Circular Economy efforts.** MRM strives to reduce adverse environmental impacts throughout the lifecycle of CED materials. This includes such activities as reducing greenhouse gas emissions by reducing transportation distances; conserving natural resources and energy; and implementing pollution prevention strategies at processing locations and identifying projects to increase circular economy benefits.
- **Protect health, safety, and data privacy.** MRM's contracts with processors and our instructions to collection sites participating in MRM's PRO are designed to protect worker health and safety and safeguard consumer data.
- **Incorporate the solid waste management hierarchy.** MRM's PRO will allow reuse when feasible, safe, and practical and will support Oregon refurbishers as described in the Coordination section. Materials are processed for recycling with environmentally sound recovery methods and MRM monitors and tracks data regarding our processors' downstream outlets, as detailed below. Disposal is considered as a last resort and will be conducted in compliance with all applicable laws and standards, including those prohibiting landfilling or incineration of certain electronics and hazardous materials.
- **Ensure responsible recycling.** As detailed below, MRM's processors provide MRM with information on downstream vendors and the ultimate disposition of the materials they are recycling on MRM's behalf.

Recordkeeping

MRM has operated statewide e-waste recycling programs since 2007 and has many years of experience regarding effective recordkeeping and tracking of electronics through the collection and recycling process. In addition, MRM works with vendors who have been in the e-waste field even longer than MRM and who employ industry-leading data tracking tools for e-waste. Collectors will receive instructions on maintaining recordkeeping/tracking in the collector handbook. For those collectors who incorporate reuse into their business, MRM will request a description of their reuse and/or refurbishment activities and request that they report to MRM the number of units being diverted for reuse.

MRM will retain all records related to the implementation and administration of the electronics PRO program, including records on whether environmentally sound management practices were provided, not less than three years from the time the record was created.

Each of the processors in MRM's plan regularly report to MRM the type and weight of CEDs received from each collector, either on a monthly or quarterly basis. This data is used for billing purposes, for monitoring trends in material flows, and to compile reports for DEQ. MRM will submit these collection data reports to DEQ in the format and frequency that DEQ requires.

Figure 3 offers an overview of how CEDs are tracked and managed from the time of collection through to final disposition.

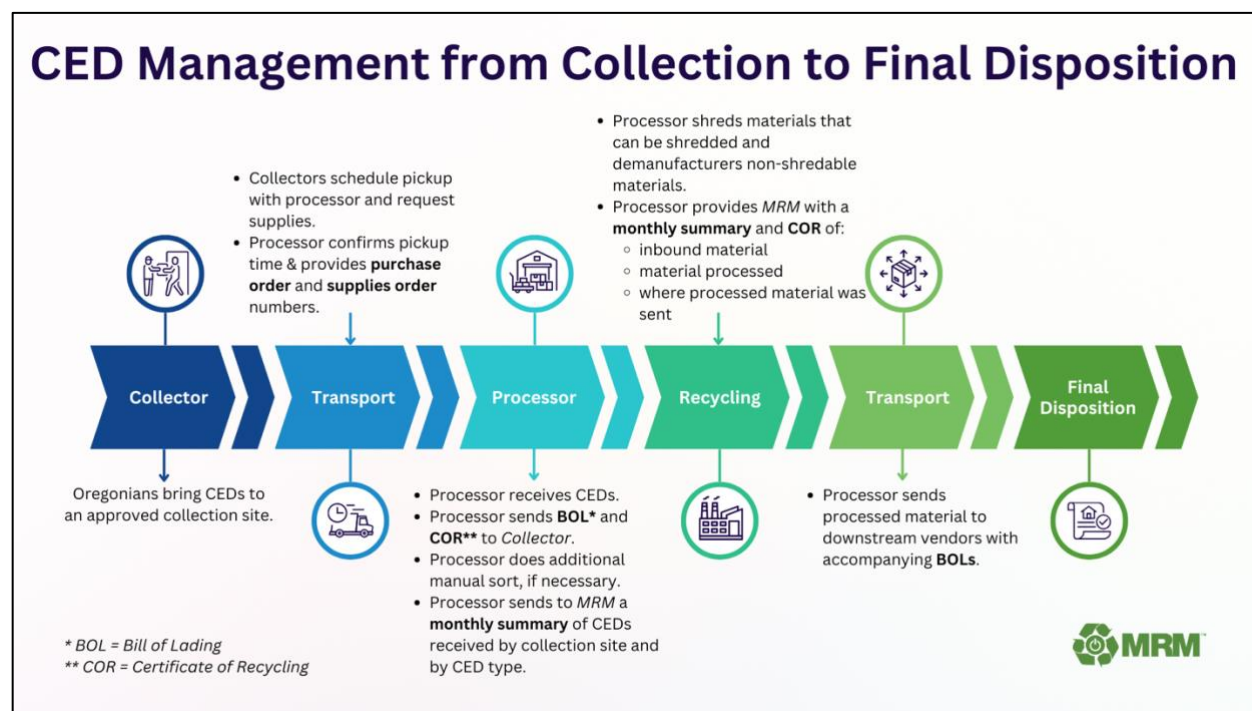


Figure 3: Path of CEDs from collection to final disposition

Insurance

MRM requires specific levels of insurance from both the processors and collectors and consolidators working with MRM. Specifically, MRM requires General Liability, Automobile, Workers Comp, Umbrella Coverage, Pollution Liability, Errors and Omissions and Cyber Security coverage, as applicable. In addition to requirements for our vendors, MRM carries our own insurance, including pollution liability, to add an extra level of risk protection. MRM requires proof of current insurance every year and keeps processors' Certificates of Insurance (COI) on hand. MRM will make these COIs and proof of MRM's insurance levels available to DEQ upon request.

Documentation

As mentioned above, processors are contractually required to maintain at least one major industry certification (e-Stewards and/or R2). Appendix A provides documentation of industry certifications for each processor as well as a point of contact for each processor and a summary of their operations. These industry certifications are inclusive of the environmentally sound management practices defined under the Oregon Electronics Recycling Law.

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

All of MRM's processors disassemble all CEDs into components or shred the CEDs into viable grades of recyclable materials, and the processors have disclosed to MRM their downstream vendors for these materials through to final disposition. MRM has an extensive audit program to ensure compliance with applicable local, state, and federal statutes and/or regulations.

Desktop Audits of Processors

MRM conducts annual desktop audits of every processor. A desktop audit consists of a review of certification adherence, any changes in process/material flow or management plans, and a

thorough search of regulatory sites to ensure compliance with State and Federal laws which might not be discovered in the scope of a certification audit. The annual desktop audits are designed to uncover any issues that are not solely focused on electronics recycling and has a risk rating system that might warrant a call, in-person visit, or additional third-party audit.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Third-Party Audits of Processors

In addition to requiring third-party certification (e-Stewards and R2) and MRM's annual desktop audits, MRM arranges for third-party audits to be conducted on our processors by an outside audit firm at least once every three years. These audits serve to verify compliance measures required for e-Stewards and R2 certification, as well as check MRM-specific requirements and additional health and safety regulations. The audits target approximately 200 data points covering health, safety and environmental regulations and include assembling background information on the processor, records review (including telephone interviews with downstream vendors) and an in-person facility visit.

The auditors' report is comprehensive and thorough, detailing material flows, recycling and refurbishing procedures, contact information and also listing major and minor non-compliance issues broken down into three categories: environmental, health and safety, and management systems. Each audit starts with verification that the processor has an adequate (as defined by ISO 14001) environmental management system, a requirement included in the ISO 14001 standard required under both R2 and e-Stewards certifications.

If a non-compliance issue ("non-conformity") is identified during an audit, MRM assesses the non-conformity. In most cases, MRM develops a list of corrective actions needed and provides the recycler with the list and deadline to have all non-conformities remedied. MRM then monitors all corrective actions through completion. If the non-conformity demonstrates a violation of MRM's contract or third-party certification requirements, or if the violation is not corrected during a timeline provided by MRM, MRM will provide the processor with notice and stop working with the company. At that time, MRM will inform the DEQ that the vendor is no longer part of MRM's PRO.

Any corrective actions required to remedy a non-compliance issue follow the procedures detailed in that environmental management system, beginning with documentation of the findings and ending with a report on issue resolution and closure of the non-compliance item. This industry standard process is identical to what is required for corrective actions under e-Stewards and R2 certifications.

Additionally, MRM will conduct in-person visits of all our Oregon E-Cycles processors at least once per year.

Transportation

Processors are required under MRM contracts to ensure that all transporters, whether in-house or third party, comply with all DOT regulatory requirements and meet all applicable State and Federal laws. This applies to transportation between collector and processor as well as between processor and all downstream vendors. Transportation management through to final disposition is evaluated in detail during R2 and e-Stewards certification audits of processors. MRM also reviews transportation management during its audits of processors. The transportation-specific questions that MRM includes in its audit include the following:

- Does the facility provide transportation of goods received and shipped to and from the facility?
- Do drivers perform pre and post trip inspections? Review inspections.
- If the facility has a transportation fleet, do they have documentation of driver training, DOT pull notice programs or a functionally equivalent program?
- If the facility performs truck maintenance are preventive maintenance records available for review?
- For outsourced transportation, does the facility conduct audits to ensure that training and safety requirements are met? Describe process, review audits.
- Do the facility trucks/drivers transport hazardous waste? If yes, review hazardous waste endorsements, training records.

Collection Sites

MRM ensures compliance at collection sites primarily during in-person site visits, as well as through desktop audits and feedback from processors (with whom MRM will be meeting monthly for at least the first six months of 2026). Site visits are a prime opportunity for MRM to evaluate strategies that they collection site might employ to improve existing practices and processes. These new strategies may be discussed on site during the visit or as a reflection on collector feedback at the end of the program year.

The Oregon PRO Manager visits collection sites periodically for general compliance checks (AKA site visits or onsite audits). Site visits may also be conducted in responses to complaints, significant changes at the collection site, and/or to maintain and enhance communication with the collection network. The majority of compliance checks are in-person visits and when that is not feasible, desk audits are performed through a convenient web form. [REDACTED]

[REDACTED] In 2026, MRM will conduct onsite audits to at least one-third of collection sites in its network. MRM will include information about which specific sites were visited in its Annual Report.

MRM will also explore the possibility of site visit coordination with other EPR programs in Oregon (e.g. Mattress Recycling Program, Recycling Modernization Act, PaintCare) in order to minimize the burden on collection sites of multiple compliance visits.

MRM requires collectors to disclose fines received and notices of violation that are not corrected within 30 days.

Technical Assistance to Collectors

Collectors will be encouraged to reach out to MRM's Oregon PRO Manager at any time if they need technical assistance. MRM will also provide all collection sites with an easy-to-use collector handbook with ample technical assistance resources to make the transition to the new Oregon E-Cycles program as smooth as possible. The handbook will contain key information to ensure all collection sites follow Oregon law and are in compliance with requirements, and it will provide contact information and instructions for receiving service from MRM's PRO. MRM will provide the collector handbook to confirmed collection sites in the fourth quarter of 2025 and, going forward, will provide it to new collectors at the time they join MRM's network.

[REDACTED]

[REDACTED]

MRM has also developed several resource documents about Oregon E-Cycles (see Appendix H) and is already distributing these materials to collection sites. Figure 4 is an example of one of these resource documents.

These resources will be available online on a landing page for collectors. MRM will also include reminders about these resources via quarterly e-newsletters to collectors. These e-newsletters will also serve to strengthen communications between collection sites and MRM's Oregon PRO Manager.

Collector Feedback

MRM will solicit feedback from collectors roughly halfway through the first program year and then again shortly after the program year ends. This exploration will include questions about what worked, what needs improvement, and how MRM can better support each site. MRM will adjust operations based on the feedback received from collectors, with particular attention on ways to improve existing practices and processes. The data received from this inquiry will be summarized in MRM's Annual Report. If MRM uncovers any noteworthy insights through this, then MRM will also share these insights with DEQ in its monthly email update.

MRM will likely solicit this feedback from its collection network regardless of whether DEQ approves multiple PROs but is open to exploring a potential collaboration if it aligns well for all parties.

Trackers

Annually planned and calibrated GPS/RFID trackers will be embedded in select CEDs to monitor their transport and final disposition. When determining where to deploy trackers, MRM will consider:

- Total number of collection sites in MRM's PRO

What's changing with Oregon E-Cycles?

JANUARY 1, 2026

Many of these new items will be sorted together, e.g. in the same gaylord. Stay tuned for specific guidance on this.

MORE DEVICE TYPES

The list of electronics that Oregonians can recycle expands, which means collection sites must accept all these items:

- Monitors
- Computers/Laptops
- Televisions
- Keyboards
- Mice
- Printers
- Fax Machines
- Scanners
- Portable Digital Music Players
- VCRs
- DVD Players & Recorders
- Video Game Console
- Digital Converter Box
- Cable & Satellite Receivers
- Small-Scale Server
- Routers & Modems
- Computer peripherals

MORE COLLECTION SITES

The new law requires more collection sites throughout the state, including a requirement that at least 95% of Oregonians are within 15 miles of a collection site.

MORE PRODUCER RESPONSIBILITY

Oregon E-Cycles is currently funded by manufacturers (AKA producers) and this won't change. However, the new law explicitly requires manufacturers to form a Producer Responsibility Organization (PRO).

MRM was founded by manufacturers and has successfully operated the largest electronics recycling program under Oregon E-Cycles since 2009. MRM intends to continue doing so as a PRO in 2026.

MRM is committed to a stable network and a smooth transition.

MRM E-Cycling Management

All Briggs-Ungerer
 all@MRMrecycling.com
 971-319-0619

Figure 4: Sample Educational Resource #1

- Material flow to specific processors
- Population density
- Geographic diversity

MRM will ensure the number of trackers deployed is a valid sample for the number of collection sites in Oregon.

Data will be analyzed to verify chain of custody and identify discrepancies. If the location of a tracker shows downstream activity that is outside the planned downstream flow, MRM will follow up directly with the processor and/or collection site. MRM will work with the processor and/or collector to determine the cause of the discrepancy. If the discrepancy violates the terms of MRM's contract or third-party certification body requirements, MRM will proceed with our standard process for non-compliance, as described above. Finally, findings will be compiled in an Annual Chain of Custody Verification Report and can be made available to DEQ upon request.

For collection sites that are shared between PROs, tracker deployment will be the responsibility of the PRO listed as the primary owner, unless otherwise agreed upon by the PROs.

Coordination

Coordination Between Multiple PROs

If more than one electronics PRO is approved by DEQ, MRM and Dynamic Lifecycle Innovations will designate the National Center for Electronics Recycling (NCER) as the statewide Coordinating Body. NCER has already submitted a letter of intent to DEQ documenting its qualifications for this role. All PRO applicants have agreed in principle to coordinate through NCER, and joint planning has already begun on scope, budgets, and contracts. This ensures that coordinated activities can be launched without delay once DEQ approval is granted. Through this framework, NCER will serve as the central Coordinating Body to ensure that all PROs' activities under Oregon E-Cycles are efficient, equitable, transparent, and aligned with the requirements of ORS 459A.323.

Public Education and Outreach

MRM and Dynamic will work with NCER to ensure public outreach campaigns are unified in messaging, regularly promote electronics recycling, and clearly publicize collection

opportunities statewide. To ensure there is no duplication or inconsistent messaging, PROs will coordinate to maximize use of existing resources, including public outreach departments, contracts, and expertise, and may engage in joint advertising and statewide promotion about Oregon E-Cycles. Messaging will include which items are accepted, how to locate collection sites, and details of upcoming collection events. MRM and Dynamic further commit to ensuring that a single toll-free number and one website with a directory of all collection sites is available to all Oregonians to simplify public access and maximize convenience.

Program Goals and Public Awareness Goals

Each PRO will share its individual program and public awareness goals with NCER, and all parties will work together to establish collective, unified statewide goals. These will include public awareness goals and collection objectives that reflect Oregon’s policy priorities. MRM and Dynamic will work with NCER to conduct surveys and employ other evaluation tools – such as focus groups, event participation, website traffic, call volume, and engagement across digital platforms – in order to gauge public awareness. These tools provide valuable insight into how consumers access program information and engage with recycling opportunities. MRM and Dynamic will contribute their expertise and existing practices to this coordinated effort.

The first program year will serve as a baseline to assess program effectiveness over time. Special emphasis will be placed on evaluating awareness in minority, low-income, rural, and other historically underserved communities to ensure equitable access and effective outreach. This coordination framework will help ensure that outreach strategies are data-driven, consistent across all PROs, and subject to continuous improvement.

Manufacturer Obligation Alignment

As the Coordinating Body, NCER will annually calculate manufacturer obligations, apportion program responsibilities, and reconcile financial obligations between all electronics PROs based on manufacturer obligations of the manufacturers participating in the electronics producer responsibility organizations, as required by ORS 459A.323.

For estimating 2026 manufacturer obligations, NCER plans to use DEQ-provided market share data for 2024 sales, best available data from other states and national sources for newly covered manufacturers, and Oregon and other states’ data for return shares across the five product-type groups defined under Oregon E-Cycles regulation. MRM and Dynamic will provide NCER with necessary collection and cost data to enable accurate reconciliation of financial obligations. This alignment will ensure that all manufacturers are fairly sharing the responsibility of collecting, transporting, and recycling CEDs in Oregon.

Recycling and Reuse Programs

MRM and Dynamic will work with NCER to coordinate activities with recycling and reuse programs, including nonprofit organizations that refurbish technology, to further the environmentally sound management of recycling of electronics. This will entail promoting the non-profit organizations that refurbish technology and providing best practices guidance on reuse.

More detailed information about MRM's public awareness and outreach plans can be found in the following section.

Education and Public Awareness

MRM prefaces this section by acknowledging that a significant amount of detail on education and public awareness strategies is contingent on whether there will be one or multiple electronics PROs operating in Oregon. If multiple electronics PROs will operate under Oregon E-Cycles, statute requires that a Coordinating Body must “implement ongoing public awareness activities to ensure that covered entities can easily identify, understand and access the services provided by all electronics producer responsibility programs.” In this section, MRM addresses how it would approach education and public awareness as if it were the only PRO. Should multiple PROs be approved, MRM and Dynamic will work with the Coordinating Body to ensure public outreach campaigns are unified in messaging, regularly promote electronics recycling, and clearly publicize collection opportunities statewide.

MRM has extensive experience communicating electronics recycling information. We understand the obligations contained in the Oregon Electronics Recycling Law and will work to carry out an effective education and public awareness program, either on our own or in coordination with other approved electronics PROs.

MRM has established several channels through which a covered entity, or any other individual, may contact MRM with questions about its electronics producer responsibility program in Oregon. MRM's website includes a toll-free phone number (888-769-0149) and an email address (info@mrmRecycling.com). The website also includes a link to a broader [directory](#) of all collection sites (inclusive of all PROs) managed by DEQ. MRM will add an FAQ about Oregon E-Cycles to the Oregon-specific page, including contact info for MRM's Oregon PRO Manager. This will be in addition to the website and toll-free number established if multiple PROs are approved.

MRM will develop public awareness materials in English, as approximately 85% of Oregonians speak English. For communities that have large concentrations of Spanish-speakers (for example, Washington County), MRM will also develop public awareness materials in Spanish.

Goals for Education and Public Awareness

If DEQ approves multiple electronics PROs, MRM will work with the Coordinating Body and other electronics PROs on education and public awareness strategies, as addressed in the Coordination section. The strategies described in this section are how MRM proposes to approach public awareness. MRM can implement the following strategies on its own or in cooperation with the Coordinating Body, if multiple PROs are approved.

Oregon E-Cycles has been in existence since 2009 and there already exists a baseline awareness that Oregonians can recycle certain electronics free of charge. To foster statewide awareness of electronics recycling opportunities for Oregonians, MRM proposes focusing on four key messages:

- What can be recycled
- How to find a collection site
- Who to contact with questions
- Encouraging Oregonians to recycle electronics

To build on existing public awareness, MRM will continue to use the existing Oregon E-Cycles logo. Currently DEQ owns the web addresses oregonecycles.net, oregonecycles.org, and EcycleOregon.org. The first two web addresses redirect to DEQ's webpage on Oregon E-Cycles and the third one redirects to a "Monster in Your Closet" branded landing page. The existing toll-free phone number for Oregon E-Cycles (1-888-532-9253) is also owned by DEQ. Therefore, MRM is unable to use these existing web addresses and phone number, but MRM will work with DEQ to align on a plan for public inquiries from these channels.

Strategies

There is no one-size-fits-all solution to recycling because motivators and barriers vary across age, region, race, ethnicity and other factors¹. To meet our goals, MRM will use a comprehensive mix of methods including, but not limited to, advertising, public relations, social and digital media, direct marketing, and event sponsorships. MRM will develop educational and awareness materials that are culturally responsive to diverse audiences, including minority,

¹ <https://recyclingpartnership.org/equitable-recycling-outreach>

lower-income, rural and other historically underserved communities, and will use multiple channels (e.g. print, digital, social media, word of mouth, grassroots, etc.) to build public awareness.

MRM will take a two-prong approach to our public awareness campaign:

1. Leverage when Oregonians are already thinking about recycling and push out information about Oregon E-Cycles specifically.
2. Disseminate information about Oregon E-Cycles independently of current recycling activities.

The effectiveness of these strategies in terms of sustaining high program awareness will be evaluated by a combination of methods which are described further below in the “Measuring Success” subsection.

Messaging In Context of Recycling

MRM’s engagement with the recycling industry in Oregon over the past 17 years has shown that collection sites are the most knowledgeable about how to advertise electronics recycling opportunities to their community. MRM will support this form of communication at all its collection sites via the following strategies:

- Provide clear signage about Oregon E-Cycles – including contact information – to be posted on-site, along with instructions on how to get multiple and/or replacement signs
- Create a publicity kit with key messages (free of jargon) for collectors to use as they see fit, including:
 - Customizable flyers
 - Sample text for informative, motivational, and instructional messaging via newsletters, websites, or social media
 - Supporting graphics
 - Fact sheet and frequently asked questions (FAQs) about Oregon E-Cycles
- Resources to support collection events, if applicable, including event promotion (more details on event promotion can be found in the Collection Service section)
- Public-facing info sheets for collection sites to hand out to covered entities

MRM will also leverage other existing avenues of communication. MRM intends is to push out information to Oregonians when they are already thinking about recycling. MRM has developed a list of nearly 300 contacts in the Oregon solid waste industry who already engage

with covered entities about recycling. These sources are listed below along with specific tactics for each avenue:

- Provide ready-to-go articles or submit an ad to **local government curbside publications** and write articles for customer-facing **newsletters from haulers**.
- Share info about where to recycle electronics with locations that are not Oregon E-Cycles collection sites, but which are in the **same recycling sphere**, e.g. recycling depots.
- Coordinate with **hazardous household waste events** and **recycling and/or clean-up events** to raise awareness, e.g. handing out flyers at events to direct Oregonians to places where they can recycle electronics (when electronics are not being accepted at that particular event).
- Connect with DEQ **regional specialists** to provide informational resources about Oregon E-Cycles, both for their own education and for them to share with service providers, as appropriate.
- Liaise with **recycling-minded organizations and trade associations** such as Oregon Refuse and Recycling Association, the Association of Oregon Recyclers, and the Tribal Solid Waste Advisory Network (TSWAN).
- Look for cooperative opportunities amongst other **multiple EPR organizations** in Oregon, e.g. Circular Action Alliance, Mattress Recycling Coalition, PaintCare

Independent Outreach

MRM will develop a similar publicity kit to the aforementioned one designed for collectors but designed for use by other interested parties. MRM will share this publicity kit with local governments, service providers, and others who issue public-facing communications (e.g. chamber of commerce, environmental organizations, etc.).

Importantly, MRM will work with community groups serving historically underserved communities such as Coalition for Communities of Color and the Tribal Solid Waste Advisory Network to understand the most effective routes to distribute information on electronics recycling. This may include placing digital ads in publications serving communities of color such as The Portland Observer, the Skanner, the Asian Reporter, and/or Oregon Latino News in order to reach diverse populations. MRM will continue seeking advice and ideas from those who have experience improving recycling outcomes for historically underserved Oregonians.

Measuring Success

Shortly after the conclusion of the first program year, MRM will evaluate whether pounds of CEDs at collection sites are reflective of the population of that community and then consider whether this data necessitates changes in the public awareness strategies. [REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]

As addressed in the Coordination section, if multiple electronics PROs are approved then MRM and Dynamic will work with NCER to conduct surveys and employ other evaluation tools – such as focus groups, event participation, website traffic, call volume, and engagement across digital platforms – in order to gauge public awareness. These tools provide valuable insight into how consumers access program information and engage with recycling opportunities.

[REDACTED]

[REDACTED]

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Collection Service

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Collection Standards

MRM's is pleased to present a proposed collection network meets the requirements for convenient service as set forth in the Oregon Electronics Recycling Law. This includes:

- 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. MRM hired the company IncaTech to perform a GIS analysis which determined that 97% of Oregonians are within 15 miles of one of MRM's collection sites.
- At least one collection site in each county.
- 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.
- 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.

MRM's proposed collection network has been developed to maintain stability by continuing the service Oregonians are already used to for e-waste collection and has considered user convenience and availability in the overall network. Collection sites align with these guiding principles:

- Recognized location for the community that accepts a variety of materials for recycling or donation to minimize customer trips
- Adequate days and hours of operation to meet the community's unique needs
- Regularity of scheduled hours
- Adequate staffing at the site
- Proximity to population being served
- Ease of access

MRM trusts established collection sites to know their community the best, as they have been managing both materials and customer service for years. MRM collects information about hours of operation for all collectors and assesses staffing and facilities during in person visits. Combined with public feedback (provided to MRM or to DEQ or to the Coordinating Body, if applicable), these data points enable MRM to assess a collection site's ability to adequately serve its community. If MRM detects any issues on this front, MRM will work with the collection site to resolve the issue and, if needed, consult with the City and/or County.

MRM takes seriously the requirement to provide equitable service to historically underserved locations. For example, MRM's Plan in New Jersey provides the most service to underserved areas. In our work with the cities of Newark and Camden, we have found that providing a mix of services is the key to increasing e-waste recycling in these areas. MRM works directly with the

city solid waste agencies in these cities to support recycling through their solid waste pick up programs and works with community leaders to bring events to locations where residents are used to gathering, such as neighborhood community centers or neighborhood parks. We plan to target events and support in the same way in Oregon.

MRM will require collection sites abide by the following requirements:

- Adhere to environmentally sound management practices
- Accept all categories of CEDs, free of charge, from covered entities
- Be able to distinguish between covered entities and non-covered entities
- Be staffed in a manner that can ensure site security and monitoring of CED drop-offs
- Staff understand safe handling of material, e.g. knowledgeable about sorting/packaging, how to handle broken CRTs, etc.

The section “Environmentally Sound Management Practices” of this document describes how MRM will manage compliance and ensure that collection sites are abiding by the above requirements.

Collection Events

MRM will prioritize permanent collection sites that are open year-round. If no suitable permanent location can be found, then MRM will hold collection events in order to provide electronics recycling opportunities to that community, at frequencies adjusted to meet community needs. [REDACTED]

[REDACTED] the table in Appendix E lists collection events planned for 2026.

MRM is coordinating with Circular Action Alliance and the Mattress Recycling Council to identify opportunities for co-located, multi-material recycling events. Additionally, MRM has engaged in multiple conversations about adding e-waste to existing recycling events organized by service providers and local governments.

Access and Equity

In collaboration with community-based organizations and local service providers, MRM will ensure that collection events are conducted in areas lacking a permanent collection site, prioritizing underserved communities to ensure convenient access to recycling services. MRM has begun conversations with Green Century Electronics Recycling, St. Vincent de Paul of Lane

County, and URT about specific events and has already identified concrete possibilities for several locations, many of which are repeats of successful events held in 2025.

MRM will prioritize siting events in historically underserved areas to the extent possible. Based on our experience in underserved locations such as Newark and Camden New Jersey, MRM will reach out to respected community leaders in underserved areas and work with them to identify preferred locations, times, and days that work best for their community members.

Event Promotion

Event information will be well promoted in across multiple media channels to ensure broad and equitable community awareness, tailored to fit the needs of each community, with targeted media outreach to ensure broad awareness and encourage participation. Additionally, MRM is coordinating with Metro to determine how electronics recycling events can be incorporated into their “find a recycler” [website](#) and recycling hotline database.

MRM will consult with City and/or County recycling programs to determine the best ways to reach their community. Event promotion will generally begin four to six weeks in advance of the event but may be earlier if the City and/or County informs MRM that their community needs more notice. At a minimum, event promotion will include the following:

- MRM will share an event flyer and info sheet with City and/or County recycling programs with a request that they advertise the event to their community through existing communication channels, e.g. social media, print or digital newsletters, recycling-related mailers, etc.
- MRM will create an online link to the event flyer, with contact information provided for additional questions.

Events will be planned with as much lead time as possible. MRM will confirm events at least two months in advance to allow ample time for promotion. In all instances where a collection event is used to satisfy the convenience standard in lieu of a permanent site, MRM will document in its Annual Report its attempts to identify a permanent site for that jurisdiction.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

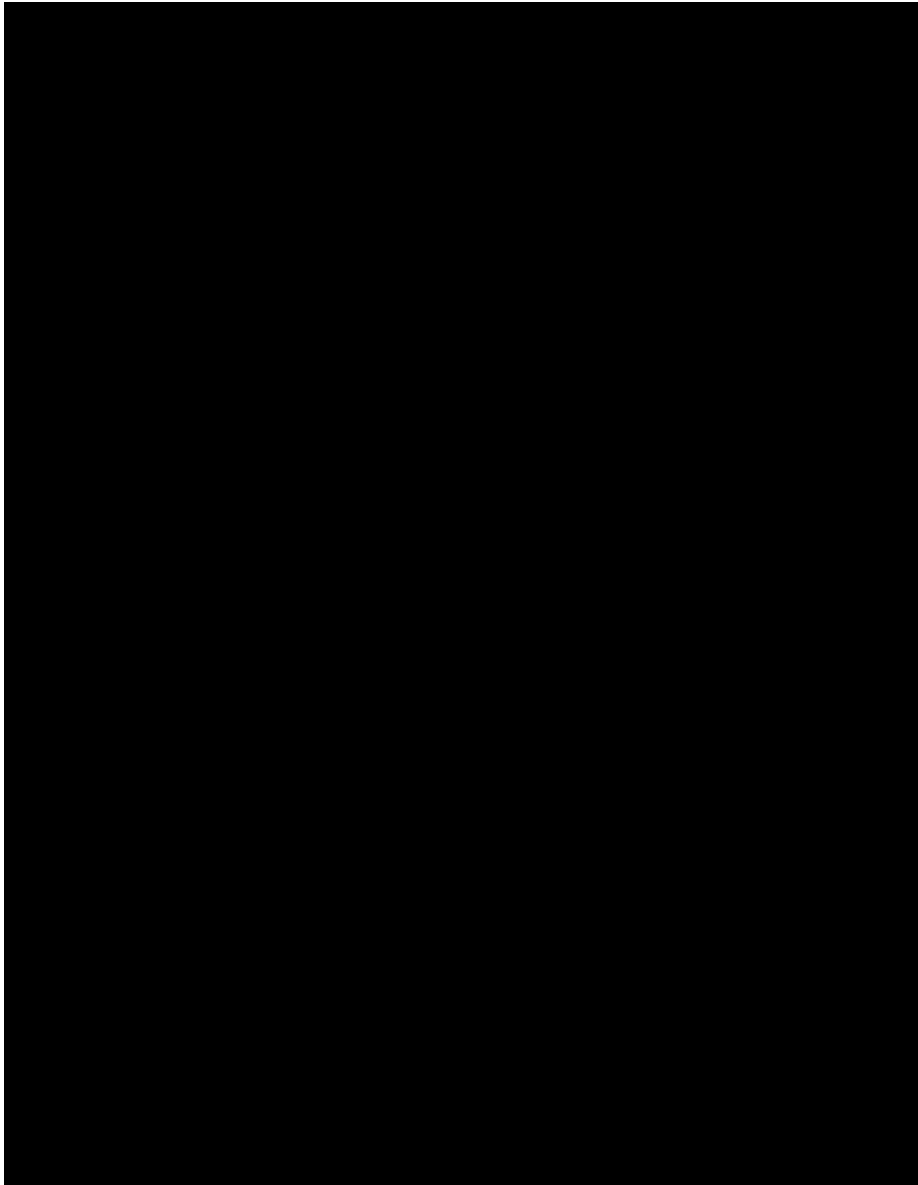
[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]



Site Sharing

At this time, MRM does not need additional sites from another electronics PRO to meet the convenience standard. Should this change, MRM would clearly document with the other electronics PRO responsibility for site management including, but not limited to, which PRO was responsible for the following:

- Compensation, training, and support for the collection site
- Transportation of CEDs from the collection site to the processor
- Compliance oversight, e.g. site visits/audits
- Contractual agreement with the site

For 2026 and if both electronics PROs are approved, where permanent collection sites cannot be feasibly established, MRM will jointly host collection events with Dynamic to ensure compliance with statutory convenience standards. These events will be advertised statewide as part of unified outreach campaigns and clearly identified on the shared central website. This coordinated approach will prevent duplication of effort, maximize efficiency, and ensure all Oregon residents have access to convenient opportunities to recycle covered electronic devices.

Reuse, Refurbishment, and Resale

Reduce and reuse are at the top of the waste hierarchy and MRM supports this in its electronics PRO program. Collection sites will be allowed to recover collected CEDs for refurbishment and resale as allowed by law, and if they meet certain criteria for environmentally sound management practices. MRM will work with the Coordinating Body, if applicable, to strengthen reuse under the Oregon E-Cycles program.

In its Annual Report, MRM will summarize which collection sites engaged in reuse and/or refurbishment activities and how they did it.

Premium Service and Limited Service

Collection sites may choose to offer premium services for customers, such as an at-home pickup service for CEDs. In these instances, a fee may be charged for the additional cost of this premium removal service. To clarify, collectors *may not* charge a fee for recycling, but they *may* charge a fee for the premium service.

Some collection sites may not be able to accept all categories of CEDs at their location or accept all items at no charge, but they may still choose to accept some of them at no charge. If the collection site can satisfactorily demonstrate to MRM that the CEDs they collect are coming from covered entities and that the CEDs are being sent to MRM-approved processors, then MRM will allow these CEDs to flow through MRM's network. MRM will not, however, include any of these collection sites in meeting its convenience standard. Neither will MRM advertise these locations as collection sites, as to minimize confusion for Oregonians.

MRM has included CEDs collected from these locations in our proposal because these sites provide significant free recycling opportunities for Oregonians. While the sites do not qualify as official collection sites as defined in ORS 459A.330, past data from these sites indicates that Oregonians turn to these sites for service. With the number of new items considered CEDs in 2026, these sites could increasingly be used as convenient locations for the variety of items an

Oregonian may have to recycle. Including these collection volumes (i.e. pounds of CEDs recycled) in our program – and thus including them in MRM’s Annual Report to the DEQ – provides a fuller, more accurate picture of the electronics recycling behaviors of Oregonians.

Collection Network Changes

MRM will email the designated DEQ contact the first week of each month if there is an update on the following items pertaining to the collection network:

- Changes to basic contact information in existing sites, such as hours of operation or phone number
- The addition of new and previously unplanned collection events, e.g. if a community group approaches MRM to add electronics to their recycling event, as well as pertinent updates on planned collection events. MRM will provide DEQ with all relevant information about the event including date, time, location, and promotion resources
- Addition of a new collection site to MRM’s network
- The intent to remove a collection site and/or announcement of a site closure

Exclusive of non-compliance issues, prior to removing a collection site from its network MRM will coordinate with other electronics PROs or, if applicable, the Coordinating Body to determine if the site can be added to another electronics PRO program. If another electronics PRO will not pick up the collection site, MRM will provide 90 days’ notice on its website about the site’s removal from the collection network. Additionally, MRM will communicate this change with DEQ, other collection sites in the same community, and with local governments and/or service providers.

MRM will provide sample text about the change which can easily be included in the regular communications that local governments and service providers push out to their communities. Additionally, MRM will ensure that changes to the collection network are highlighted in the website directory of collection sites.

Compensation

Consistency and reliability are essential for building trust and ensuring stability. This has been a priority for MRM since the beginning of Oregon E-Cycles. To reinforce this during the transition

to the new Oregon E-Cycles program, MRM has invited every single existing Oregon E-Cycles collection site to participate in MRM's PRO program in 2026.

MRM is prepared to provide fair financial compensation to collection sites to cover the costs of collecting, storing, managing and transporting CEDs. As an initial step towards understanding how Oregon collection sites are accustomed to calculating material-specific costs, MRM consulted with Oregon rate-setting experts at Bell & Associates, Inc., a consulting firm specializing in the financial and operational analysis of integrated solid waste management and which has extensive experience in Oregon rate-setting. MRM is already in discussion with collection sites about compensation details for 2026.

Collection sites are not homogenous. They can vary significantly in terms of footprint, layout, overall mix of materials accepted at the facility, staffing, security, and many more variables. Some collection sites will choose to self-haul their material to the processor or do more detailed sorting, while for others this may not even be an option. MRM will work with all collectors on an individual basis to find an on-site sortation and storage system that balances the unique needs of the site with the processor's capacity to receive incoming CEDs, along with MRM's reporting needs. These different situations may lead to different compensation levels.

Compensation Calculations

MRM is committed to stability in the collection network, as demonstrated by the relatively unchanged collection network MRM has supported since the inception of Oregon E-Cycles. MRM will provide fair financial compensation that covers the costs of collecting, storing, managing and transporting covered electronic devices. The compensation offered to each collector will consider how the collection site will (a) support the area being served and (b) adhere to environmentally sound management practices and (c) the economic data from the area in which the site is located. These factors may include:

- The secure space dedicated to CEDs, and any supporting capital investments or monthly expenses MRM is contributing to the collector, e.g. an on-site trailer or structure (which will be considered on a case-by-case basis)
- Labor costs to receive, safely sort, and package CEDs.
- Packaging materials to securely contain and transport CEDs, such as pallets, gaylords, and shrink-wrap.
- Transportation costs of collecting, consolidating, and hauling material to recycling facilities. MRM has many years of data history in Oregon for transportation costs and MRM monitors trends of contributing logistics factors like fuel, staffing, etc. for appropriate cost adjustments as needed.

- Whether the collector does not manage their own transportation and MRM manages it separately through processor contracts or directly with another hauler, if needed.

Compensation models are calculated partially on the basis of collection sites sorting CEDs in the way that maximizes worker safety and downstream commodity value. To better support collectors, MRM has developed detailed educational guidance on best practices for sorting and packaging all types of CEDs for shipment to an approved processor. These guidance documents will be included in MRM's collector handbook and reviewed periodically with collection sites.

A Note on Sorting

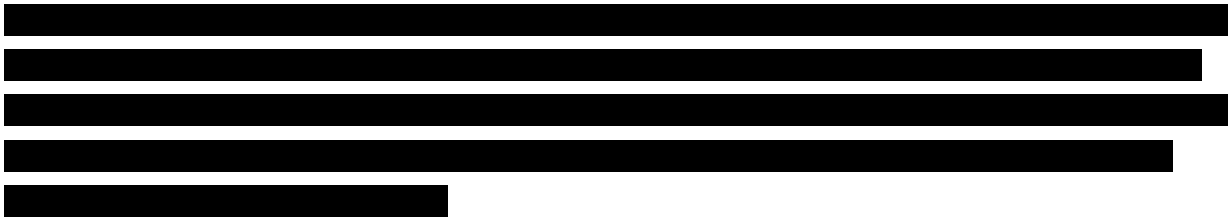
MRM will regularly check in with the processor to assess whether the collector is consistently sorting appropriately as defined in the collector handbook. MRM will also work with collectors to ensure proper sorting and to accommodate any concerns they may have, and this may affect compensation. Regardless of the sortation method used at a given collection site, data will still be collected to inform Annual Report requirements, including pounds collected according to the five product categories stipulated in OAR 340-098-0265. Additionally, data collected through alternative sortation methods will not impact the ability to accurately calculate manufacturer obligation.

Collection Event Compensation

Compensation for event service providers or partners will be determined using costs based on MRM's years of experience with e-waste collection events in Oregon. Many variable factors that affect their success, such as:

- **Date:** Weekends, holidays, festivals can increase participation, but costs may be higher for logistics services like labor, transport, rentals, etc.
- **Time:** Events held outside of traditional work hours may increase participation, but labor may be more expensive due to overtime costs.
- **Location:** Factors include getting equipment to the site, traffic planning, and event day flexibility.
- **Marketing:** The amount and type of promotion needed to effectively inform a particular community about the event, and for event organizers to estimate attendance.
- **Volume:** The estimated and actual amount of CEDs received at the event.
- **Equipment:** The need for any or additional trailers, forklifts, pallet jacks, pallets, gaylords, wrap, safety, cones, etc.
- **Labor:** Greeters, traffic directors, unloaders (cars), loaders (trucks), truck drivers.

- **Transport:** Cost of moving CEDs off-site after the event to a collection site, consolidation point, or directly to a processor.



Goals for Program Year One

For the first year of the new Oregon E-Cycles program, MRM will focus on two primary goals: (1) supporting collectors and processors with the program transition, and (2) educating the public about the expanded list of CEDs.

In terms of collector and processor support, MRM is developing a variety of guidance materials that collectors and/or processors can easily reference as needed. For collectors, MRM is developing a handbook that covers a broad range of applicable topics, including but not limited to:

- On-site requirements like signage, access control, staff training, recordkeeping, etc.
- How to arrange for a pick-up of CEDs
- Best practices for sorting and packaging CEDs
- Guidance on safely handling broken devices
- Who to contact with questions
- How to distinguish between covered and non-covered entities

MRM has also developed several resource documents about Oregon E-Cycles, including definitions of CEDs and covered entities, an overview of the interested parties who make Oregon E-Cycles work and how they interact, and more. An example of one document that summarizes the main interested parties of Oregon E-Cycles can be found in Figure 6. MRM is already distributing these materials to collection sites working with MRM.

Regarding public awareness of the Oregon E-Cycles program, in the event multiple PROs are approved by DEQ, MRM will work with the Coordinating Body to determine how best to assess public awareness of the Oregon E-Cycles program. More detail



Figure 6: Sample Educational Resource #2

on this can be found in the Coordination section. In the event that no other PROs are approved by DEQ, MRM will conduct this assessment on its own. More details on this can be found in Section “Education and Public Awareness.”

From a more quantitative perspective, MRM will use historical collections data for Oregon E-Cycles as a baseline by which to assess participation in Oregon E-Cycles. MRM will monitor collection volumes throughout the year and, if multiple PROs are approved, MRM will work with the Coordinating Body to ensure that each PRO supports pounds of CEDs that are commensurate with their aggregated manufacturer obligations.

Measuring Goal Achievement

MRM will gauge success on processor support by the following metrics:

- Processors are receiving CEDs from collectors that have been sorted and packaged appropriately.
- Processors are providing data to MRM in a manner that aligns with DEQ reporting requirements.
- MRM and processors have an effective feedback loop.

For at least the first six months, MRM’s Oregon PRO Manager will have a monthly check-in with each of its Oregon processors to establish a feedback loop. Each processor will identify any issues of concern and MRM will work with all relevant parties to resolve these issues. This may include identifying additional supports or resources needed to improve contamination or packaging safety problems, and/or refining data management. These meetings will be in addition to the MRM Recycling staff weekly meetings with their contacts at the processors.

On the collection side, MRM will conduct a survey of selected collectors roughly halfway through the first program year and then again shortly after the program year ends. This survey will include questions about what worked, what needs improvement, and how MRM can better support each site. MRM will adjust operations based on the feedback received in these surveys.

Based on processor and collector feedback, MRM may consider instituting additional support resources such as hosting webinars, hosting regular “office hours” for questions, and/or refining existing guidance documents.

More details on measuring public awareness can be found in Section “Education and Public Awareness.” Shortly after the conclusion of the first program year, MRM will evaluate whether pounds of CEDs at collection sites are reflective of the population of that community and then consider whether this data necessitates changes in the public awareness strategies.

For any year in which a program goal was not met, MRM will describe, with supporting data, what changes or steps the program will undertake that can ensure the program achieves its goals in the upcoming year.

CED Evaluation

In 2029, MRM will evaluate whether additional electronic devices should be included in, or existing devices be removed from, the Oregon E-Cycles program. Starting in 2026, MRM will do the following:

- Analyze data on material flows on an annual basis (e.g. percentage breakdown of device types) with as much granularity as is possible within sortation protocols.
- Gather data from collectors via site visits and feedback forms. MRM will ask probing questions such as:
 - Are there non-CED household electronics that customers frequently ask to recycle?
 - Are there non-CEDs devices which regularly appear in the stream (as contamination)?
 - Are there existing CEDs which collection sites rarely see?
- Gather data from processors via quarterly check-ins to flag:
 - Contamination, sortation, and/or packaging issues
 - Are there specific CEDs which notably appear infrequently?

If the data that MRM gathers suggest a need for a finer level of detail, then MRM will consider periodic sampling of commingled CEDs, specifically reporting categories four and five.

Closure

MRM has been operating an approved Group Manufacturers Plan in Oregon since the first year of operation of Oregon E-Cycles in 2009. MRM has over 16 years of continuous operation across the State and has been responsible for over 50% of all recycling in Oregon during that time. MRM plans to provide recycling services to Oregonians going forward without interruption.

In the event that MRM chooses to leave the Oregon E-Cycles Program, however, MRM would ensure a smooth transition for another party to take over its electronics PRO program. Because MRM was founded by electronics manufacturers, operates to assist electronics manufacturers, and continues to be supported by electronics manufacturers, MRM would take reasonable and necessary steps so that participating manufacturers would be able to stay in compliance after MRM exits the market.

The manufacturers participating with MRM would continue to have State requirements after MRM's exit and would need a solution to stay in compliance. If MRM decided to or was forced to exit Oregon, MRM would actively seek out another entity to assume the operations of a PRO. We would actively assist in the transition to a new entity. This entity could be another approved PRO if one is in place in Oregon, or some other third party that could assume the role of a PRO (with DEQ approval).

Financial

If MRM were to exit Oregon E-Cycles, MRM would exit without accrued financial obligations to ease transition to another entity. MRM clears financial obligations for Oregon each month. That is, MRM does not accrue obligations for payment, but will pay all recyclers, collectors, and other vendors (such as advertisers, etc.) within 45 days using the amounts billed to and paid by manufacturers. We do not collect an advance reserve from manufacturers that would have to be distributed as part of MRM's exit. Other than the contracts and assets described herein, MRM would not plan to assign, or have the incoming PRO assume, other MRM assets or liabilities.

Operations

MRM would provide notice of exit to all collection sites, recyclers, and manufacturers no later than our contractually obligated notification period (30 – 90 days depending on the

organization). Ideally, MRM would plan to provide six months' notice of exit to DEQ to allow adequate time to identify a new entity in good standing, clear any potential conflicts, and execute a transfer agreement before notifications to participating manufacturers are issued. MRM's notice would provide information on MRM's planned activities to wind down and transition operations.

Obligations and Progress Toward Goals

MRM would communicate clear information to all manufacturers participating with MRM regarding their recycling data to date and the progress toward goals made at the time of exit. MRM keeps strong and accurate records of all recycling activities and program costs, and the amounts billed to all participants. We would share the year-to-date activity with each manufacturer, and they would then have data to demonstrate to DEQ and any new or entity they would begin working with the activity they had already paid for in the State. If MRM were to exit, MRM would make every effort to exit at the end of a Program Year so that transition would be easier. MRM would offer the new PRO the option to assume the consulting agreement should the new PRO opt to utilize their assistance for continuity as well as historical knowledge of the program.

DEQ communications

MRM would provide formal notification to DEQ well in advance of exit and would work with DEQ to ensure DEQ has all data and information needed from MRM to wind down its electronics PRO program.

Reporting on Program Changes

MRM will email the designated DEQ contact the first week of each month, if there are updates to provide, regarding the following items pertaining to the collection network:

- Changes to basic contact information in existing sites, such as hours of operation or phone number².
- The addition of new and previously unplanned collection events, e.g. if a community group approaches MRM to add electronics to their recycling event, as well as pertinent

² See subsection "Collection Network Changes" for how MRM will communicate changes to the collection network to the public.

updates on planned collection events. MRM will provide DEQ with all relevant information about the event including date, time, location, and promotion resources.

- Addition of a new collection site to MRM's network.
- The intent to remove a collection site and/or announcement of a site closure, following the process detailed in the Collection Service section.

If there are changes pertaining to processing and/or transportation, MRM will contact DEQ in a separate email from the aforementioned monthly email. This email would include a summary of the change, timeline, parties impacted, action(s) needed, and any other additional detail that is relevant to the specific change.

In the event the primary contact for MRM's PRO will change, MRM will contact DEQ with as much advance notice as possible and provide alternate contact information.

If there are other changes in MRM's approved plan, MRM will promptly notify DEQ.

Contact Information and Certification

Contacts

MRM PRO Authorized Representative

Tricia Conroy, Executive Director
5775 Wayzata Boulevard, Suite 700
Minneapolis, MN 55416
952.582.2965
tricia.conroy@mrmrecycling.com

Oregon PRO Manager

Ali Briggs-Ungerer
Portland, OR 97206
971.319.0619
ali@mrmrecycling.com

Certification

"MRM understands that MRM's PRO, if approved, retains legal responsibility for ensuring the program complies with the Oregon electronics recycling law. Additionally, MRM's PRO, if approved, will retain all records related to the implementation and administration of the electronics producer responsibility program for not less than three years from the time the record was created and make the records available for inspection and audit by the department upon request electronically or at DEQ's office. I/We hereby declare under penalty of false swearing (Oregon Revised Statute 162.075 and ORS 162.085) that the above information and all of the statements, documents and attachments submitted with this plan are true and correct to the best of my/our knowledge and belief."



Appendices

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