



Electronics Producer Responsibility Organization Program Plan Proposal

July 1, 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."

MRM will provide the following documents separately to DEQ:

- A Microsoft Excel file with latitude and longitude coordinates for all collection sites
- A Microsoft Word document of this plan proposal
- 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, 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 47 manufacturers (inclusive of 66 brands) who have designated MRM as their PRO in 2026 represent at least five percent of all market obligations, as [REDACTED] manufacturers are listed as Tier One manufacturers [REDACTED]
[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 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.

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.

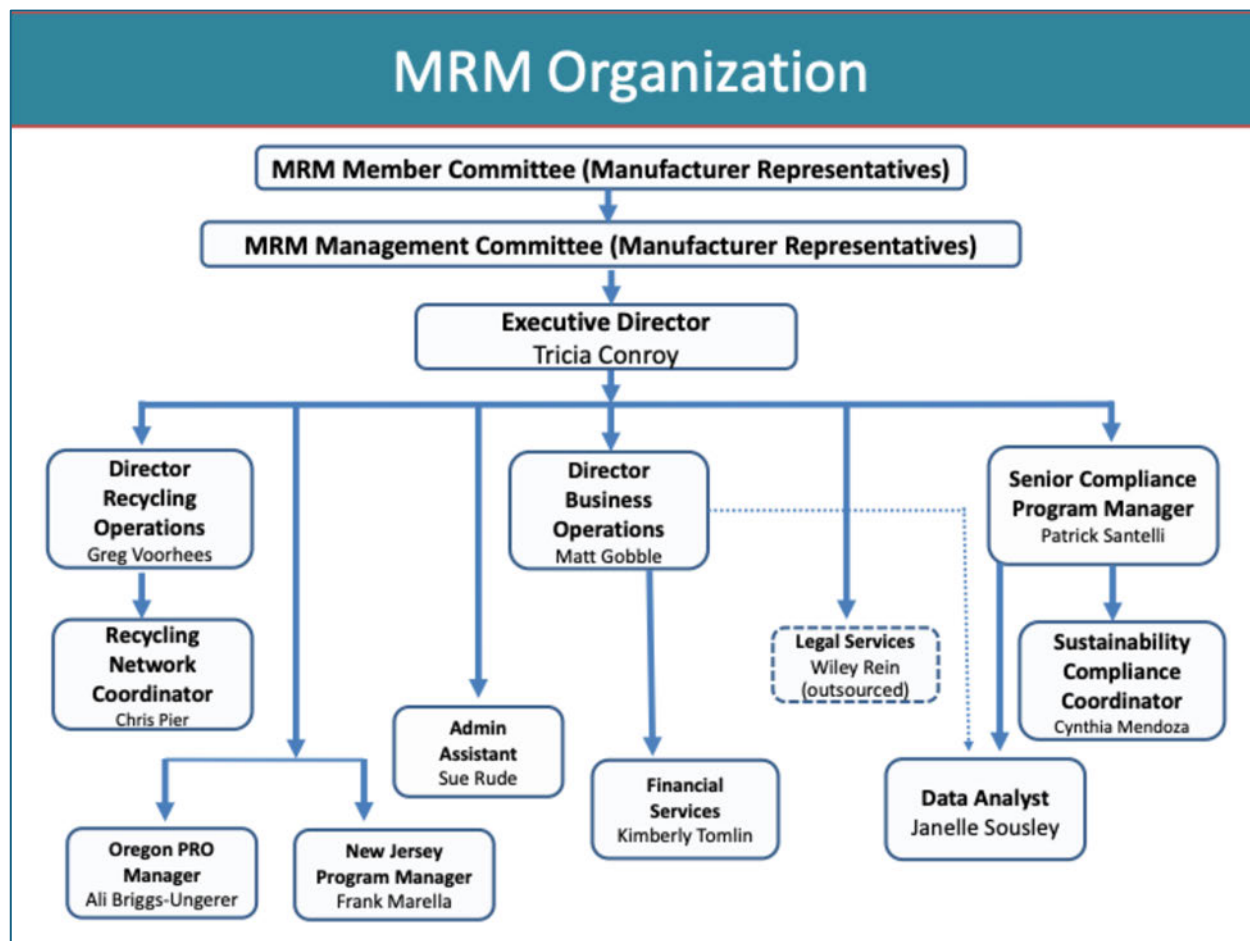


Figure 1: MRM Organizational Chart

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 D 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.

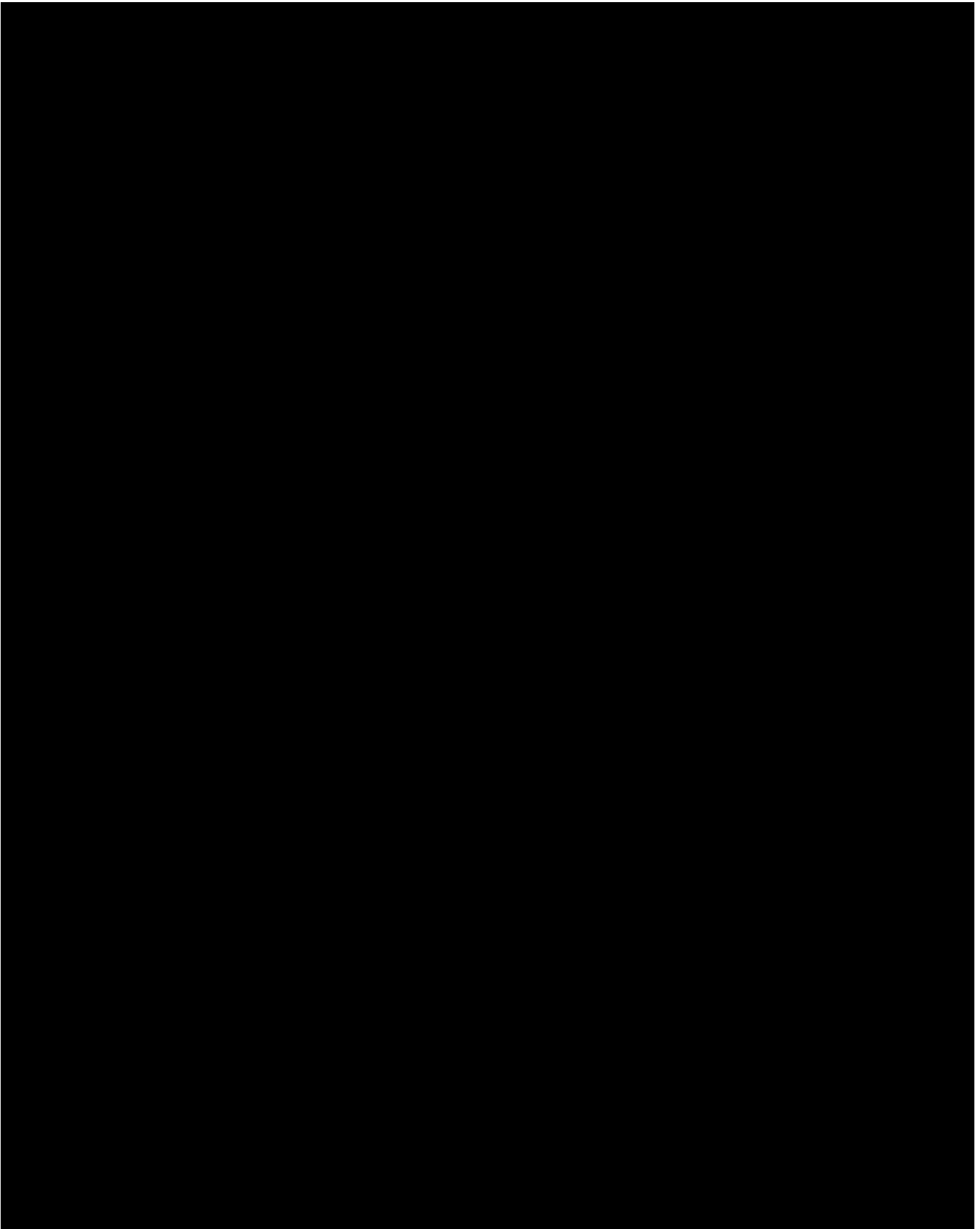
Financing

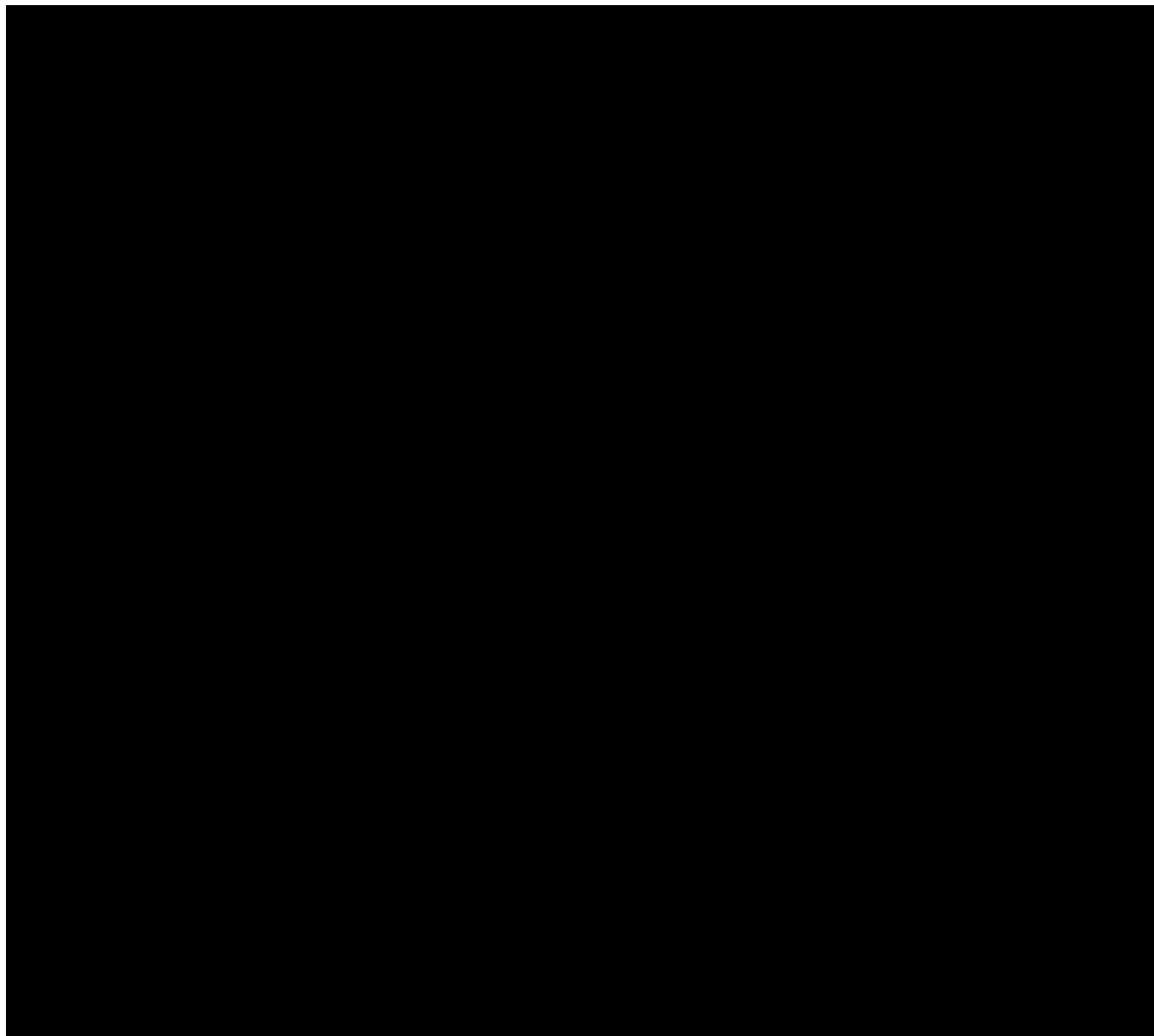
MRM has been running statewide e-waste programs on behalf of electronics manufacturers since 2007. We have developed best practices for financing and have years of significant experience ensuring strong, solvent programs. We fully understand the challenges of working with many manufacturers and vendors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

[REDACTED]

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]





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. As a result, we do not maintain a specific reserve for Oregon. In the initial years of MRM's operations, MRM established a modest reserve for the organization and that reserve remains in place. Finally, MRM carries our own

insurance in addition to the insurance we require our recycling vendors to maintain; MRM's insurance includes Pollution Liability insurance.

Manufacturer Compliance with Financial Obligations

MRM bills manufacturers monthly to cover the costs of operating our e-waste programs. 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.

If a manufacturer remains in arrears and makes no effort to pay, MRM sends written notice that their balance must be brought up to date or MRM will not provide the required reporting to State regulators. MRM makes every effort to work with manufacturers to receive payment as it is in MRM's, the State's, and the manufacturer's interest to ensure all manufacturers remain in compliance and cover their share of costs of the State e-waste program.

If a manufacturer ultimately will not pay its program costs, MRM would inform the DEQ that the manufacturer has not carried out their responsibilities under the Oregon Electronics Recycling Law (ORS 459A.305 to 459A.355) and refer them for enforcement action by DEQ. MRM would cooperate with DEQ as necessary on this process.

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. To arrange a pickup, collection sites will contact their corresponding processor directly. MRM will provide collectors with appropriate contact info and detailed instructions in the collector handbook.

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. This includes background checks and evaluation, a third-party audit, and a site visit by MRM staff. Once 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.

Because transportation is a key element of providing good service to collection locations, MRM includes transportation management evaluation as part of our audit checklist. Examples of MRM's oversight are shown in the sample of audit checklist questions below:

- 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.

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.

Transportation Issues

For transportation issues, 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 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 periodically 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 will submit this proposal for an electronics PRO to DEQ on July 1, 2025. DEQ will then have up to 60 days to review MRM's proposal. If MRM receives detailed feedback and a request for revisions to its initial proposal from DEQ, MRM will have up to 45 days to submit a revised proposal to DEQ. One of MRM's top priorities is the stability of the existing collection network and, therefore, MRM will strive to provide the requested revisions as quickly as possible to expedite DEQ's expected final approval.

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.

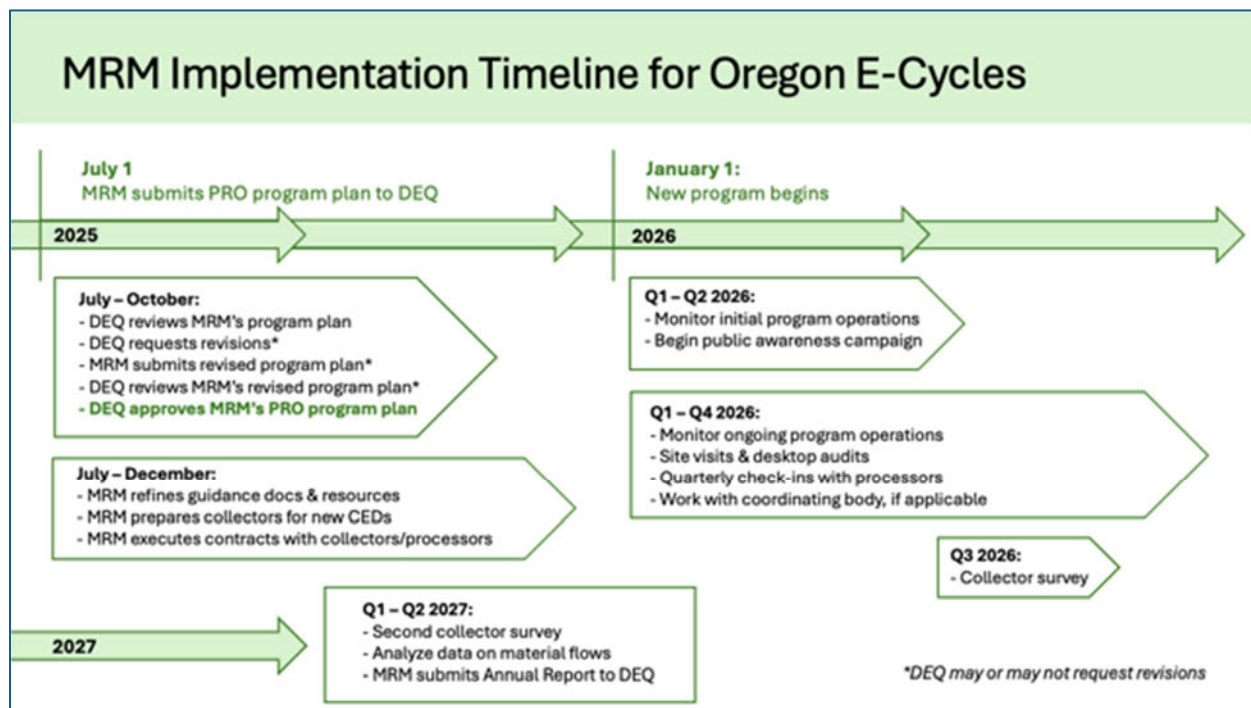


Figure 2: Key Milestones and Deliverables

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.

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 and safe and will strive to accommodate Oregon refurbishers. Materials are processed for recycling with environmentally sound recovery methods and MRM monitors and tracks data regarding our processors' downstream outlets. 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.** MRM vendors provide MRM with information on downstream vendors and the ultimate disposition of the materials they are recycling 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.

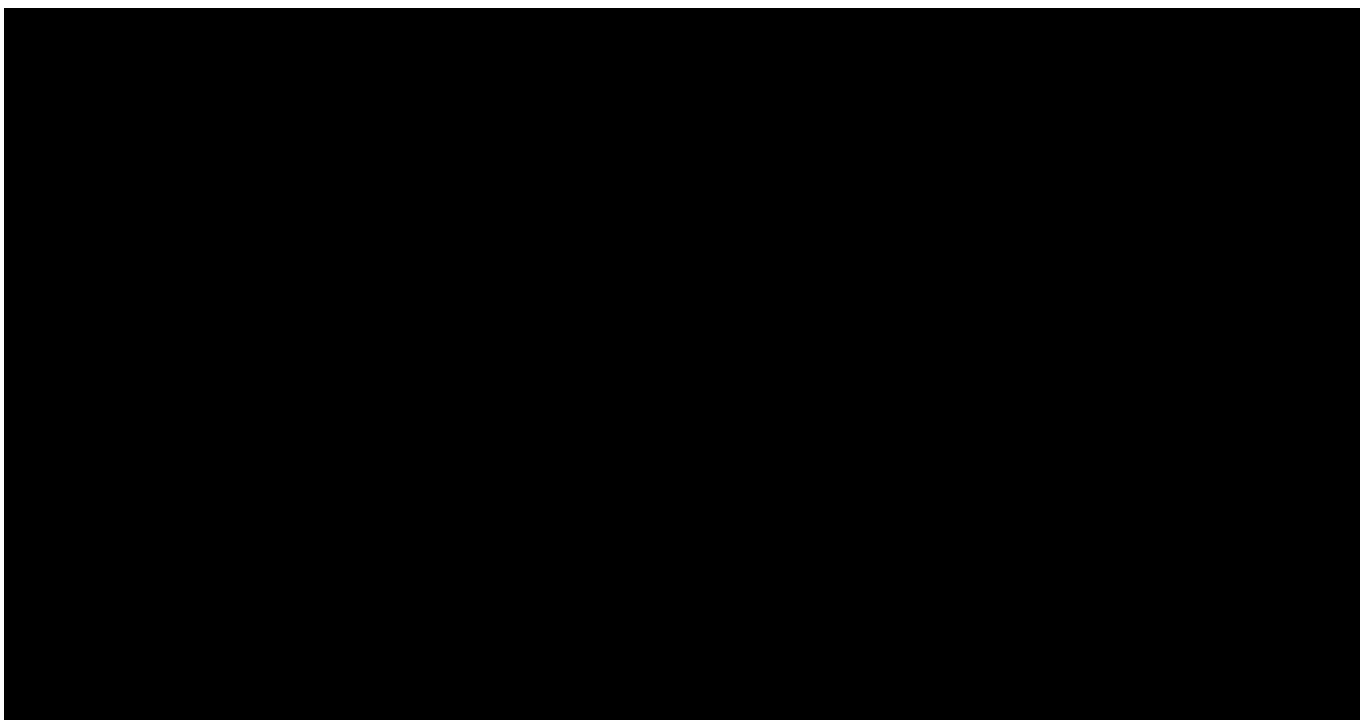
Insurance

MRM requires specific levels of insurance from both the processors and collectors and consolidators working with MRM. These include industry-standard levels of 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.

Appendix D defines downstream tracking requirements for processors, including maintaining any and all written reports, shipping documentation, packing lists, and other transactional reporting documentation. In addition, upon request, processors must provide an accounting to MRM of all MRM material processed. This accounting may include, but is not limited to, mass balance accounting of all material received, processed and disposed; detail on the downstream flow of material through the ultimate disposition of MRM e-waste processed; specific commodities generated and amounts and the ultimate disposition of those commodities. Third-party audits help ensure that appropriate tracking systems remain in place – see below for more detail on third-party audits.

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.



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. MRM has an extensive audit program to ensure compliance with applicable local, state, and federal statutes and/or regulations.

Third-Party Audits of Processors

MRM arranges for third-party audits to be conducted on our processors by an outside audit firm on a regular basis. 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 environmental management system, a requirement included in the ISO 14001 standard required under both R2 and e-Stewards certifications.

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.

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 law 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.

Site Visits for Collectors

The Oregon PRO Manager visits collection sites periodically for general compliance checks. 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. A copy of MRM's desktop audit can be found in Appendix E. In 2026, MRM will conduct onsite visits 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.

In previous years MRM has coordinated a site visit schedule with DEQ's Technical Assistance facility inspections and welcomes the opportunity to continue this coordination. MRM will also explore the possibility of site visit coordination with other EPR programs in Oregon in order to minimize the burden on collection sites of multiple compliance visits.

Technical Assistance to Collectors

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 are in compliance with requirements and will provide contact information and instructions for receiving service from MRM's PRO.

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 one-pager 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 the one pager that summarizes changes to the Oregon E-Cycles program can be found in Figure 3. MRM is already distributing these materials to collection sites working with MRM.

Collector Surveys

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.

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

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

Figure 3: Sample Educational Resource

MRM will adjust operations based on the feedback received in these surveys.

Trackers

Annually planned and calibrated GPS/RFID trackers will be embedded in select CEDs to monitor their transport and final disposition. Data is analyzed to verify chain of custody and identify discrepancies, with findings compiled in an Annual Chain of Custody Verification Report for potential submission to the Oregon DEQ.

Coordination

MRM designates the National Center for Electronics Recycling (NCER) as the coordinating body if DEQ approves multiple electronics PROs.

MRM will coordinate with all other electronics PROs through the designated coordinating body in accordance with ORS 459A.323. Broadly, this coordination would include the following activities, though specific strategies for each would be finalized in cooperation with all approved electronics PROs, the coordinating body, and DEQ:

- **Public Education and Outreach:** We anticipate that each PRO will bring advertising and outreach resources to the Oregon program. MRM expects the PROs would work together under the lead of the coordinating body to identify where and how the PROs may coordinate to maximize the use of existing resources the groups already have in place (e.g. public outreach departments or contracts, etc.). Coordination may also entail joint advertising and promotion across Oregon about the Oregon E-Cycles program, including but not limited to, instructions and information about which items are accepted under the program, how to locate collection sites, and upcoming collection events.
- **Program Goals and Public Awareness Goals.** MRM will share our PRO's program and public awareness goals with the other PROs and the coordinating body and work together to develop overall goals for the State.
- **Measuring Public Awareness:** MRM will work with other PROs under the lead of the coordinating body to identify how best to measure public awareness regarding electronics recycling opportunities. This could involve surveys or targeted focus groups or other techniques that would measure public awareness across the state. MRM will

ensure that particular attention is given to evaluate awareness in minority, lower-income, rural and other historically underserved communities.

- **Manufacturer Obligation Alignment:** MRM will work with the coordinating body to reconcile financial obligations between MRM and the other electronics PROs based on individual manufacturer obligations (aggregated by electronics PRO). This alignment would ensure that all manufacturers are fairly sharing the responsibility of collecting, transporting, and recycling CEDs in Oregon. MRM will track collections and cost data and provide data to NCER that will allow them to perform the necessary assessment to carry out financial reconciliation.
- **Reuse and Refurbishment:** This might entail promoting non-profit organizations that refurbish technology, actively exploring opportunities for qualified collection sites to triage CEDs to identify potentially reusable CEDs, 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 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.

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 [searchable directory](#) of its collection network, along with 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.

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. 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 three key questions:

- What can be recycled
- How to find a collection site
- Who to contact with questions

There is no one-size-fits-all solution to recycling because motivators and barriers vary across age, region, race, ethnicity and other factors¹. MRM will develop educational and awareness materials that are culturally responsive to diverse audiences, including minority, lower-income, rural and other historically underserved communities.

Strategies

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 to be posted on-site, along with instructions on how to get multiple and/or replacement signs
- Create a media kit with key messages, free of jargon, for collectors to use as they see fit, including:
 - 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
- Public-facing info sheets for collection sites to hand out to covered entities

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

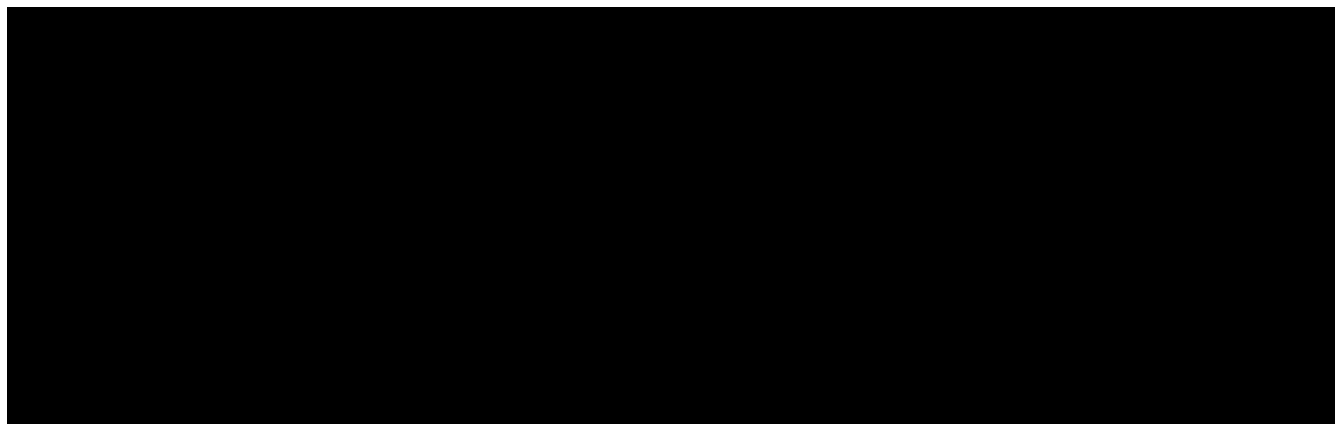
MRM will also leverage other existing avenues of communication. MRM intends is to push out information to Oregonians when they are already thinking about recycling. MRM has developed a list of nearly 300 contacts in the Oregon solid waste industry who already engage with covered entities about recycling.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

Importantly, MRM will work with community groups serving historically underserved communities such as Coalition for Communities of Color 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 and the Scanner in order to reach diverse populations.

Lastly, 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 wasteshed and then consider whether this data necessitates changes in the public awareness strategies.

Collection Service



A full list of collection sites can be found in Appendix C. [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
- 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 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.

MRM has organized hundreds of collection events and has found that the following components lead to successful outcomes and significantly higher participation:

- The event accepts multiple materials, not just e-waste. These kinds of "bundled" events are more convenient and incentivize residents to make the trip.

- The event is planned in partnership with local government, service providers, and/or community organizations. These groups often have solid insight into which promotional avenues best reach their community members, i.e. they know how the community receives, and then acts on, information.
- Build on established events with a similar theme, e.g. annual town clean-up day or Earth Day fair.
- Ease of access in terms of event siting. An ideal event location accommodates a good traffic flow and is in a conveniently located part of town.
- Clear and robust promotion, e.g. event fliers, local advertisement, shared fact sheet for event organizers etc.

Regarding the first bullet point about “bundled” events, 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

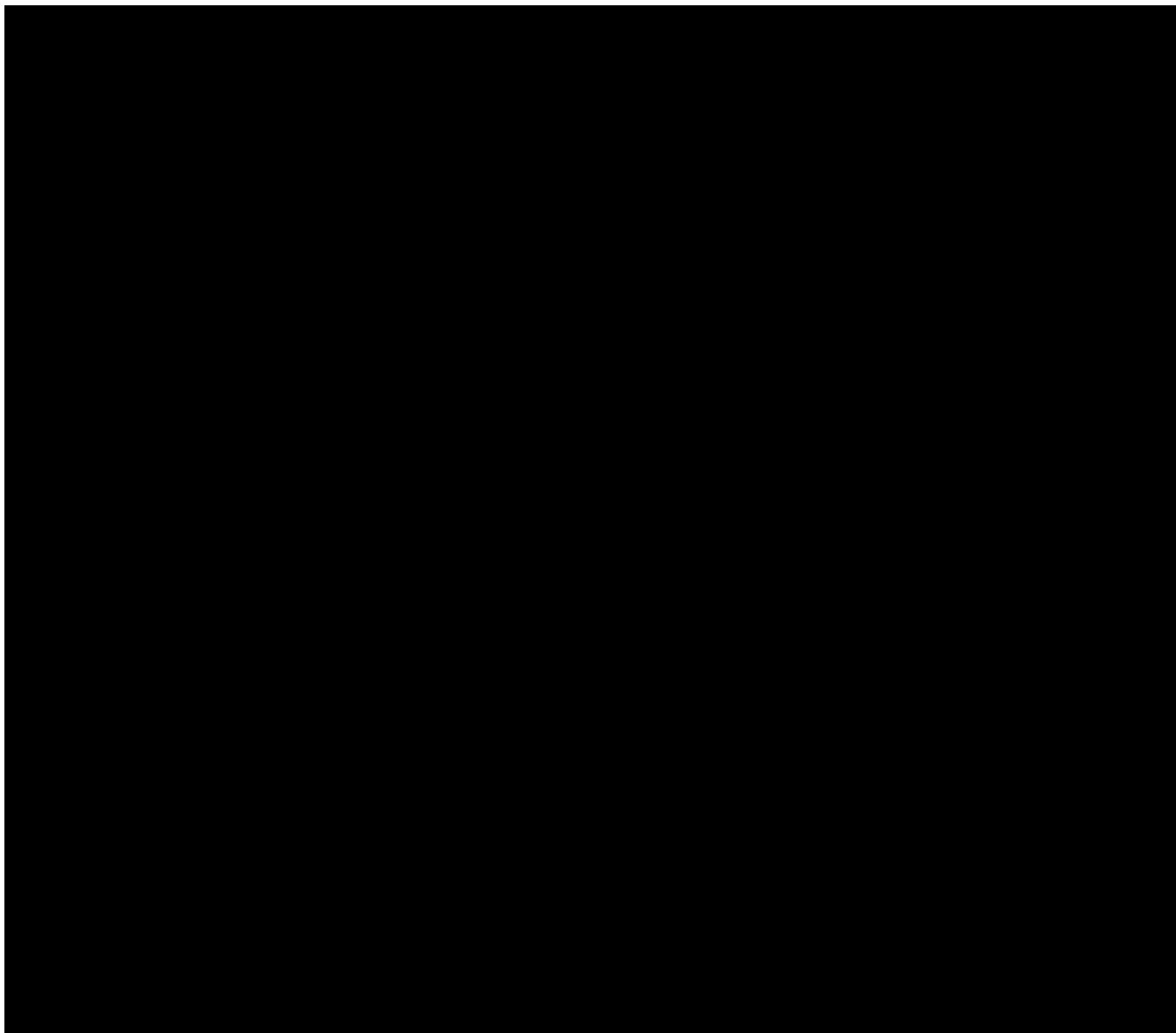
In collaboration with community-based organizations and local service providers, MRM will ensure that collection events are conducted in areas lacking a permanent collection site, prioritizing underserved communities to ensure convenient access to recycling services. MRM has begun conversations with 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.

Events will be planned with as much lead time as possible. MRM will strive to 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.



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

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 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, 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 approved processors, then MRM will allow these CEDs to flow through MRM's network. MRM will not, however, consider these collection sites to apply towards meeting its convenience standard. Neither will MRM advertise these locations as collection sites, as to minimize confusion for Oregonians.

Collection Network Changes

MRM proposes to 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 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 watershed, and with local governments and/or service providers.

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. MRM consulted with Oregon rate-setting experts to better understand how Oregon collection sites are accustomed to calculating material-specific costs, and 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 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

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:

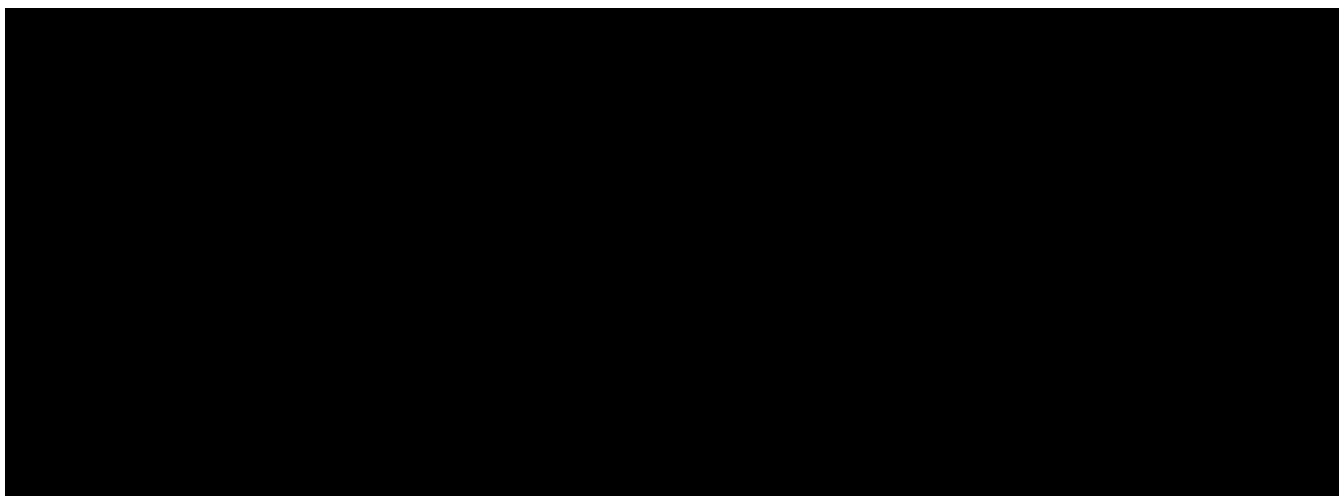
- The secure space dedicated to CEDs, and any supporting capital investments or monthly expenses MRM is contributing to the collector, e.g. an on-site trailer or structure (which will be considered on a case-by-case basis)
- Labor costs to receive, safely sort, and package CEDs.
- Packaging materials 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.

In addition to the operating expenses above, MRM will compensate collection sites on a materials and volume-based system (price per pound of each material type). See Table 2 (“Abbreviated example of compensation detail”) for an example.

Item Type	Price per Pound	Total Pounds	Total Payment
Flat Screen TVs	\$X.XX	A	= \$X.XX * A
Printers	\$X.XX	B	= \$X.XX * B
Laptops	\$X.XX	C	= \$X.XX * C

Table 2: Abbreviated example of compensation detail

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 is developing 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.



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 one-pagers 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 the one pager that summarizes the main interested parties of Oregon E-Cycles can be found in Figure 4. 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. In the event that no other PROs are approved by DEQ, MRM will conduct this assessment on its

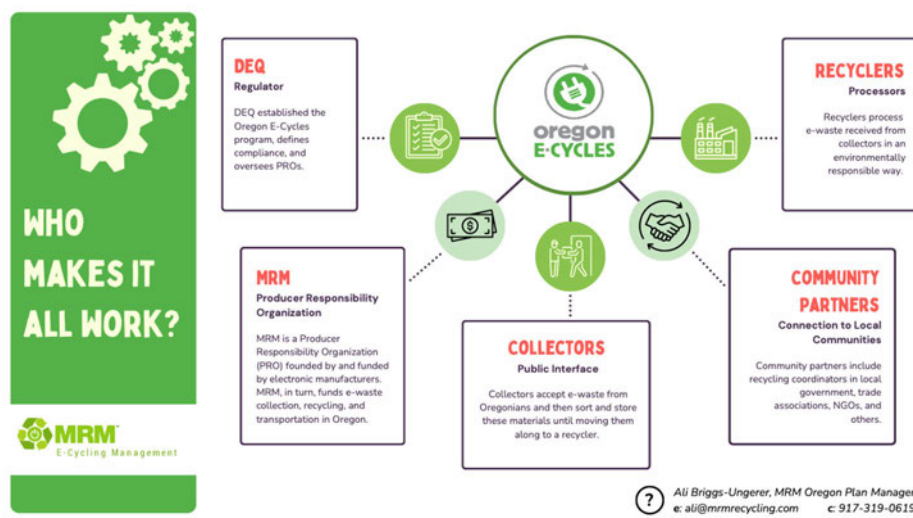


Figure 4: Sample Educational Resource

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 watershed and then consider whether this data necessitates changes in the public awareness strategies.

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 surveys. 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 MRM's 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 pays 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, manufacturers, and the Oregon DEQ 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 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 and DEQ 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 proposes to 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 number.
- The addition of new 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.

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.

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 ²

"I/We hereby declare under penalty of false swearing (Oregon Revised Statute 162.075 and ORS 162.085) that based on the records maintained by this organization, 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."



Patricia A Conroy

² Please note that we have made slight changes to the Certification language. We review the language in all state plans with our Counsel. The changes we made in the paragraph reflect the changes our Counsel has recommended. We understand what the Certification of Compliance language is requiring and make every professional effort to ensure all participants adhere to the requirements.

Appendices

