MASS DEP | EPR COMMISSION ELECTRONICS ADVISORY GROUP MEETING 2

Monday, July 28, 2025 | 1–3 p.m. via Zoom

Attendees

- Avery Fitzgerald
- Alex Baker, National Electronic Manufacturers Association
- Scott Cassell, Product Stewardship Institute
- Emily Enas, Apple
- Andrew Ferrera, Berkshire Environmental Action Team
- John Fischer, Deputy Division Director, Solid Waste, MassDEP
- Phil Goddard, Town of Bourne, MA
- Jennifer Haugh, GreenerU, facilitator
- David Huelbig, Panasonic
- Jason Linnell, National Center for Electronics Recycling
- Julie McNeill, Attorney, Bureau of Air and Waste, MassDEP
- Madeline Montgomery, Zero Waste Program Manager, City of Boston
- Amanda Nicholson, Product Stewardship Institute
- Catherine Ratte, MARPA-PVPC
- Katie Reilly, Consumer Technology Association
- Bill Rennie, Retail Association of Massachusetts*
- Andrea Serlin, Serlin Haley Law Firm
- Waneta Trabert, City of Newton, Sustainable Materials Management Division, and MassRecycle*
- Sarah Vular, MassToss

Meeting goals

- Review content supplied since prior meeting
- Assess any missing data
- Discuss preliminary pros and cons of an electronics EPR approach

Summary of meeting notes

- EPR Commissioner Waneta Trabert is awaiting the results of a survey on municipal costs of electronics recycling in three categories: (a) CRT TVs, (b) flat-screen TVs and monitors, and (c) other electronics (cell phones, DVD players, video games, etc.). August 1 is the deadline for survey-takers.
- For the purposes of this discussion, the suggestion is that the definition of "electronics" be "anything with a circuit board." Products with a cord have no downstream value.
- Illinois has a <u>best practices document</u> on electronics EPR. While there is no formal producer responsibility organization (PRO) for electronics, Illinois has a group plan that is close.

^{*} EPR Commission members

- Both Oregon and Illinois have made recent changes to their electronics EPR laws and may provide helpful direction on lessons learned.
- Unlike with paint, mattresses, and batteries, there is no single producer responsibility organization
 (PRO) that has coalesced around electronics EPR. The National Center for Electronics Recycling
 (NCER) manages the Electronics Recycling Coordination Clearinghouse (ERCC), which is a onestop location for stakeholders to view requirements across U.S. state electronics recycling laws.
- The technology industry perspective on why no single PRO exists is that industry wants to keep rates competitive among the electronics recycling market. They want the continued flexibility of being able to choose among recyclers.
- Similarly, electronics EPR program elements across the United States and their results vary significantly.
- In Massachusetts, no two municipalities manage electronics waste recycling the same way. Arguments in favor and/or elements of an electronics EPR program in Massachusetts may include the following:
 - O Cohesive messaging on appropriate electronics disposal state-wide and avoiding consumer confusion
 - O Diverting valuable materials from the waste stream
 - o Recovering high-value materials for reuse to avoid mining for virgin materials
 - o Preventing damage to the environment and the creation of adverse health effects
 - o Alleviating cost burdens on municipalities through a sustainable funding mechanism
 - o Increasing convenience of an electronics collection system for consumers
- Issues members of this group felt electronics EPR program elements should include:
 - O Program metrics other than static weight-based targets, as they do not recognize product innovation
 - O Convenience standards for electronics recycling, acknowledging the role that Staples and Best Buy have played and would continue to play in accepting electronics waste
 - o Avoidance of having complex or overly burdensome regulations
 - o Avoidance of allowing electronics recyclers to be undercut by producers' prices
 - O Avoidance of using advanced recovery fees (point-of-sale fees for consumers) to pay for program costs / a discussion of the pros and cons of upfront fees vs. embedded fees (acknowledging that program costs will be reflected somewhere)
 - Adequate staffing at the state regulatory level within MassDEP to oversee this and other EPR programs in Massachusetts
 - o Clear electronics EPR program goals
 - Open dialogue with the full range of stakeholders: municipalities, producers, retailers, consumers, and more