

Elements of Electronics EPR for New England States: CT, ME, NY, RI, VT

June 30, 2025 | Product Stewardship Institute

Electronics US Programs	Connecticut	Maine	New York	Rhode Island	Vermont
Name of the Act / Law	Electronics Recycling Law	Electronic Waste Law	Electronic Equipment Reuse and Recycling Act	Electronic Waste Prevention, Reuse and Recycling Act	An Act Relating to the Recycling and Disposal of Electronic Waste
Date Established & Amendment Dates (if any)	2007	2004 / 2009 / 2011 / 2018	2010	2008 / 2017	2010 / 2011 / 2015 / 2017
Covered Materials / Products Materials/products that are subject to the EPR program.	Computers, monitors, laptops, CRT-based and non-CRT televisions, printers.	Desktop printer, a video game console, a cathode ray tube, a cathode ray tube device, a flat panel display or similar video display device with a screen that is greater than 4 inches measured diagonally and that contains one or more circuit boards.	CRTs, computers (desktop, laptop, tablet, smart display, smart watch, e-reader); computer peripherals (keyboards, mice, monitors (CRT and non-CRT), external hard drive, printers); small electronic equipment (DVD player, video game console, digital music player, VCR); small scale servers, televisions (CRT and non-CRT).	Computers, monitors including CRTs and flat screen, combination units, laptops, tablets, sunset clause on printers if they exceed 20% of total weight of collected electronics, TVs including CRTs, plasma, LCD, and other with a screen 9" or larger and a circuit board. Note: All equipment is only coming from residential sector.	Computer; computer monitor; device containing a cathode ray tube; printer; or television sold to a covered entity. Computer peripherals are accepted as part of the free recycling program for collection, transportation, and recycling, but manufacturers are not charged for these items.
Covered Entities Stakeholders that may use the program, e.g., residents, small businesses, commercial	Households	Households, nonprofit organizations, small businesses with fewer than 100 employees, primary and secondary schools.	Consumers - any person in the state who owns or uses covered electronic equipment, including individuals, businesses, corporations, limited partnerships, not-for-profits, the state, a public corporation, public school, school district, private or parochial school or board of cooperative educational services or governmental entity. Business consumers (for-profit entities with fifty or more full time employees or non-profit entities with 75 or more full time employees) may be charged.	Households, public and private elementary and secondary schools.	Household, charity, or school district in the state, or a business in the state that employs 10 or fewer individuals.
Responsible (obligated) Party (Parties) -- "Producer" Defines who is responsible for funding and managing the EPR program.	Manufacturers of covered electronic devices that it sells into the state under a brand it licenses or owns/owned, manufacturers of unbranded covered electronic devices. Tiered definition assigns responsibility to resellers under own brand, first importers, and then others if no brand or manufacturer is responsible.	Brand owners (Manufacturers) of covered electronic devices; tiered definition that starts with brand manufacturing its own devices, then brand selling devices produced by suppliers, then the first importer, then the licensor of the brand. All covered electronic devices sold into the state must have label affixed clearly identifying the brand.	Tiered definition as follows: Entity that assembles or substantially assembles covered electronic equipment for sale in the state, then manufacturers of covered electronic equipment selling into the state under their own brand name or under any other brand name for sale in the state; then the licensor, then the first importer, then the manufacturer of unbranded covered electronic equipment.	Has a physical presence in the U.S. and is a manufacturer of covered electronic products under a brand it owns or licenses. If no such manufacturer, tiered definition assigns responsibility to brand selling covered devices produced by a supplier, then licensee, then first importer, then retailer. All manufacturers must have brand label affixed to covered electronics sold in the state.	Brand owners (Manufacturers) of covered electronic devices; tiered definition that starts with brand manufacturing its own devices, then brand selling devices produced by suppliers, then the first importer, then manufacturer of unbranded electronic devices.
Stewardship Organization	Multiple PROs and individual compliance permitted	Multiple PROs and individual compliance permitted.	Multiple PROs and individual compliance permitted	Individual compliance or as a group, as long as the group comprises 5% or more of combined market and group share.	Standard plan established by the secretary of state. One or a group of manufacturers may opt-out and submit an Individual Plan as long as the plan complies with all standards established under the law and its approved by the secretary of state.

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Funding Inputs & Allocation How funding enters the EPR system. Includes cost-internalization vs. eco-fees and material fees (including eco-modulated fees).	Manufacturers of covered electronic devices must fund reasonable costs of collection, transportation, and processing/recycling, including covering reasonable costs charged by certified electronic recyclers for their covered services. Agency Oversight: A one-time initial registration fee of \$5,000 + 1% of the prior year's total share of orphan devices (lbs) multiplied by 50 cents is paid to the state. Annual registration fees are based on market share and paid to the state annually to cover oversight expenses. Annual fee regulation link: https://eregulations.ct.gov/eRegsPortal/Browse/RCSA/Title_22aSubtitle_22a-630(d)_HTML/	Manufacturers must pay reasonable operational costs of consolidating/collecting, transporting, and processing covered devices, including cost of ensuring convenient access statewide as determined by Maine DEP. Costs must be allocated among manufacturers based on national market share. Maine DEP determines each manufacturer's recycling share annually based on national market share data submitted with the manufacturer's annual registration form. There is no de minimus; all manufacturers must register and pay annual fees to sell into Maine, regardless of market presence). Manufacturers must pay consolidators / collectors within 90 days of receipt of an invoice. Agency Oversight: Registration fees paid to state. \$750 for manufacturers with less than 0.1% national market share, after including EPEAT and takeback credits, as determined by the market share calculation performed with data submitted during annual registration; \$3,000 for all others.	Manufacturers of covered electronic devices must fund reasonable costs of collection, transportation, and processing/recycling. Agency Oversight: One-time registration fees paid to state - \$5,000 for individual manufacturers and \$10,000 for collective electronic waste acceptance programs. Annual reporting fee of \$3,000 required from each manufacturer.	Manufacturers of covered electronic devices must finance, manage, and conduct a statewide program to collect, transport, and process in environmentally sound ways all covered electronic devices from covered entities, including advertising and promotion. Agency Oversight: Oversight is divided between RI DEM and the quasi state agency that runs the RI Resource Recovery Corporation, RIRRC. A \$5,000 annual registration to RIDEM for OEMs with greater than the <i>de minimis</i> quantity of TV market, or computer return share. RIRRC sets the de minimus quantity, and RIDEM approves and enforces it. OEMs who fall below the <i>de minimis</i> quantity may still register with RIDEM to be included on the listserv and website without the statutory requirements of the <i>de minimis</i> program.	Manufacturers of covered electronic devices must fund costs of collection, transportation, and processing/recycling. Manufacturers must pay a registration fee, calculated by multiplying the manufacturer's market share by the cost of the Agency to administer the program. Manufacturers seeking coverage under the Standard Plan must pay a quarterly implementation fee, calculated by multiplying the manufacturer's market share by the cost of implementing the program in the prior quarter. Agency Oversight: Registration fee of \$1,250 for manufacturers selling no more than 100 covered electronic devices in previous year, and \$5,000 for all other manufacturers. Manufacturers seeking coverage under the Standard plan must pay a quarterly implementation fee to the state to operate the program.
Performance Standards Requirements and metrics to gauge the success and progress of the EPR program.	Every 3 years the commissioner shall establish state-wide per-capita collection and recycling goals. Currently CT DEEP has established a statewide collection goal of 4 pounds per capita. Recycler Certification: In order to legally operate under the program recyclers must apply to the CT DEEP to become an approved "Covered Electronic Recycler" (CER). Only approved CERs are allowed to transport and recycle CT's covered electronic devices and receive reimbursement from manufacturers.	Recycler certification: In order to legally operate under the program recyclers and dismantlers must hold R2 and e-Stewards certifications, and must retain these certifications for at least 3 years, and must submit them to Maine DEP within 24 hours upon request.	Statewide recycling or reuse goal (weight targets) for all electronic waste is the product of the base weight multiplied by the goal attainment percentage. The base weight is either a 3-year average of actual recycling weight reported, or 3-year average weight under initial targets (whichever is higher). Manufacturer-specific recycling obligations are calculated through multiplying the annual statewide goal with the manufacturer's market share. Recycler Certification: New York's law does not require recyclers to have any form of certification to legally operate under the program. However, the law does require recyclers to register with the New York State DEC. The law outlines facility standards and record-keeping requirements that recyclers must comply with to operate under the program. Facilities must comply with all federal, state, and local laws and regulations.	RIDEM sets target per Capita goal annually with input from stakeholders. Currently 4.5 LBs/capita. Must meet +/-10% carry over rule. If the balance is less than 90% of the OEM's goal, those pounds must be purchased from the State Program weight. 10% above the allotment may be carried over for the next year. Any pounds over 110% are lost. Recycler Certification: To legally operate under the program, recyclers and collectors must submit annual registration forms and signed certifications affirming compliance with all applicable state regulations.	Recycling goal based on weight (the average weight of all electronic waste collected in the previous two program years) multiplied by a goal attainment percentage. Recycler Certification: In order to legally operate under the program, recyclers must hold R2 and e-Stewards certification. Additionally, recyclers must register with the state; registration is valid for up to five years and must be renewed as specified by the state. Recyclers must also follow the "Procedure for the Environmentally Sound Management of Electronic Devices" established by the state.

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Collection & Convenience The minimum level of collection convenience that a stewardship plan must provide to Covered Entities. Includes locations where materials are collected, and convenience standards.	Collection and recycling opportunities must give priority to convenience and accessibility for residents.	Emphasis on requiring manufacturers to ensure that consolidation facilities are geographically located to conveniently serve all areas of the state.	The program must provide collection, handling, and recycling or reuse that is convenient to consumers. The following methods shall be considered reasonably convenient: mail or ship back return programs; collection events; fixed, permanent collection sites. All counties in the state, and all municipalities with a population greater than 10,000 must have at least one method of collection available to residents.	RI, second only to New Jersey, is an extremely populated state with citizen's who do not want to drive long distances. For our program to succeed, we have 1 or more collection sites in every city or or town, in the state as well as mail-back, drop-off events. We all so do free clean outs for K-12 schools.	At least three permanent collection facilities must be established in each county in the state, and at least one permanent collection facility must be located in each city or town with a population of 10,000 or greater.
Stewardship Plan Contents Minimum components of a stewardship plan describing how Responsible Parties will implement the EPR program.	Manufacturers participating through a private program, rather than the statewide municipal collection system, must submit a detailed plan to DEEP, which must be updated annually.	Annual plan/registration must describe how the manufacturer will fulfill its obligations.	Manufacturers operating collectively, or individually, must submit an electronic waste acceptance program plan which must describe how the manufacturer will fulfill it's obligations. The program plan does not need to update annually.	Annual plan must describe how the manufacturer will fulfill its obligations, including financing, collection infrastructure, education and promotion, and environmental sound managment (including following Universal Waste Regulations). The plan must include information on whether products contain PBDEs and PBBs.	Manufacturers must either participate in the Standard Electronic Waste Recycling Plan that is developed by the state, or can operate under an Opt-Out Individual Plan. The Standard plan must be revised and adopted every five years. The standard plan sets forth convenience standards, education and outreach obligations, and financing.
Outreach & Education Requirements Provisions to ensure that consumers, retailers, and other key stakeholders are informed about the EPR program.	Municipalities (or regional authorities) that host collection programs must educate residents on when and where collection opportunities occur and educate them about what electronic devices are covered under the program. Retailers who sell covered electronic devices are required to provide buyers with DEEP's standardized educational materials.		Manufacturers must implement a public education program, which must be developed in collaboration with each collection site operator, that includes a website and toll-free number, and written materials in product manuals or at the point of sale.	Retailers must disseminate state-approved recycling information at the point of purchasing a covered electronic device. The state also maintains and publishes informational resources on its website, and specifically targets outreach to households and schools to reinforce the landfill ban.	Both the Standard Electronic Waste Recycling Plan and individual manufacturer plans must provide an explanation about how the public will be educated and informed about the program.
Enforcement & Penalties for Violation Measures to ensure compliance with the EPR law. Includes disposal bans and retail/sales prohibitions for non-compliant covered materials.	Sales prohibition; State can seek civil action against an eligible manufacturer that has been noncompliant, and has been notified of their noncompliance, for 90 days.	Sales prohibition; State can seek cost reimbursement for noncompliant manufacturers and pursue civil action.	Sales prohibition; Surcharge for underperformance of manufacturer acceptance programs; civil action.	Sales prohibition; State can seek civil action against a noncompliant manufacturer - up to \$1,000 for first offense, and up to \$5,000 for subsequent offenses.	Sales prohibition; state can seek civil action against noncompliant manufacturers.
Annual Report Requirements Minimum components of an annual report that Responsible Parties will submit to the state	Annual reporting and registration.	Annual reporting and registration.	Annual reporting for all registered entities.	All PROs and RIRRC (that runs the State pr) report quarterly on templates designed by the director. Each quarter is additive with the annual report containing all four quarters of the previous year, due February 2nd.	Annual reporting for manufacturers operating outside of the state's Standard Electronic Waste Recycling Plan. Annual registration for all manufacturers. No audit requirement.

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Additional Components & Definitions	Anti-trust: not addressed Preemption: not addressed Disposal Ban: no	Anti-trust: not addressed Preemption: not addressed Disposal Ban: yes Other: State may participate in a multi-state clearinghouse to help fulfill its obligations.	Anti-trust: not addressed Preemption: Any local law, ordinance, rule, or regulation governing covered electronics collection, reuse, or recycling is expressly preempted by the state law. Disposal Ban: yes	Anti-trust: not addressed Preemption: not addressed Disposal Ban: yes	Anti-trust: not addressed Preemption: not addressed Disposal Ban: yes