

## ISRI Position on Electronics Recycling Legislation<sup>1</sup>

### Overview

Electronics recycling is a rapidly growing segment of the private sector recycling industry that has been an essential element of both the economic and environmental life of the United States for more than 100 years. The recycling market is governed by the laws of supply and demand whereby artificial interference in the marketplace can cause significant disruptions to the long term flow of materials. It is in this context that the industry has been working to find a model to successfully recycle the millions of tons of used electronics generated annually in this country.

Legislation at both the federal and state levels intended to address the growing volume of used electronics generated annually is often drafted in such a way that potentially ignores the strength, capabilities and vibrancy of the existing recycling industry. Legislation should promote a market-based, sustainable recycling infrastructure and facilitate the recycling of electronics in an environmentally sound manner. Further, ISRI strongly believes that electronics manufacturers, retailers, collectors, transporters and recyclers must work together to utilize the current reuse

and recycling infrastructure to create an efficient system for dealing with used electronics. Additionally, ISRI acknowledges that in some very limited circumstances, the ability to wait for market

forces to drive the recycling of certain materials, such as used electronics, is limited and hence financial drivers may be necessary to stimulate the recycling of these materials.

### **It is the position of the Institute of Scrap Recycling Industries, Inc. (ISRI) that:**

- Until such time as the market for recycling used electronics becomes economically viable, holds producers financially responsible for the collection, transportation and recycling of used electronics to the recycler where and when necessary to help ensure that used electronics enter the recycling stream. In addition, fees generated should also be used for the development of end-use consumer markets for recycled materials.
- Promotes producer responsibility as described above as the preferred alternative to the imposition of advanced recycling fees (ARFs). Where the legislation implements an ARF over producer responsibility, the existing recycling infrastructure should be given an equal opportunity to participate in the ARF program.
- Consistent with ISRI's Position on Design for Recycling<sup>®</sup>, requires electronics manufacturers to consider, during the design and manufacture stage, the need to ensure that their products can be safely and economically recycled at end of life.

---

<sup>1</sup> As adopted by the ISRI Board of Directors on June 22, 2005

- Promotes the benefits of environmental management systems (EMSs) implemented by electronics recyclers as a means to promote and to ensure the proper handling of used electronics destined for recycling.
- Recognizes the use of specifications such as those found in ISRI's Scrap Specifications Circular and certifications such as ISRI's Recycling Industry Operating Standard™ (RIOS™) as effective means of controlling the quality of recycled electronics.
- Includes a ban on the disposal of used electronics that can be safely and economically recycled using existing recycling technologies and methods.
- Excludes governmental entities or contractors that are not subject to state and/or federal regulations governing wages, worker safety and environmental compliance. A competitive environment is critical to the long term viability of an efficient and rational electronics recycling infrastructure.