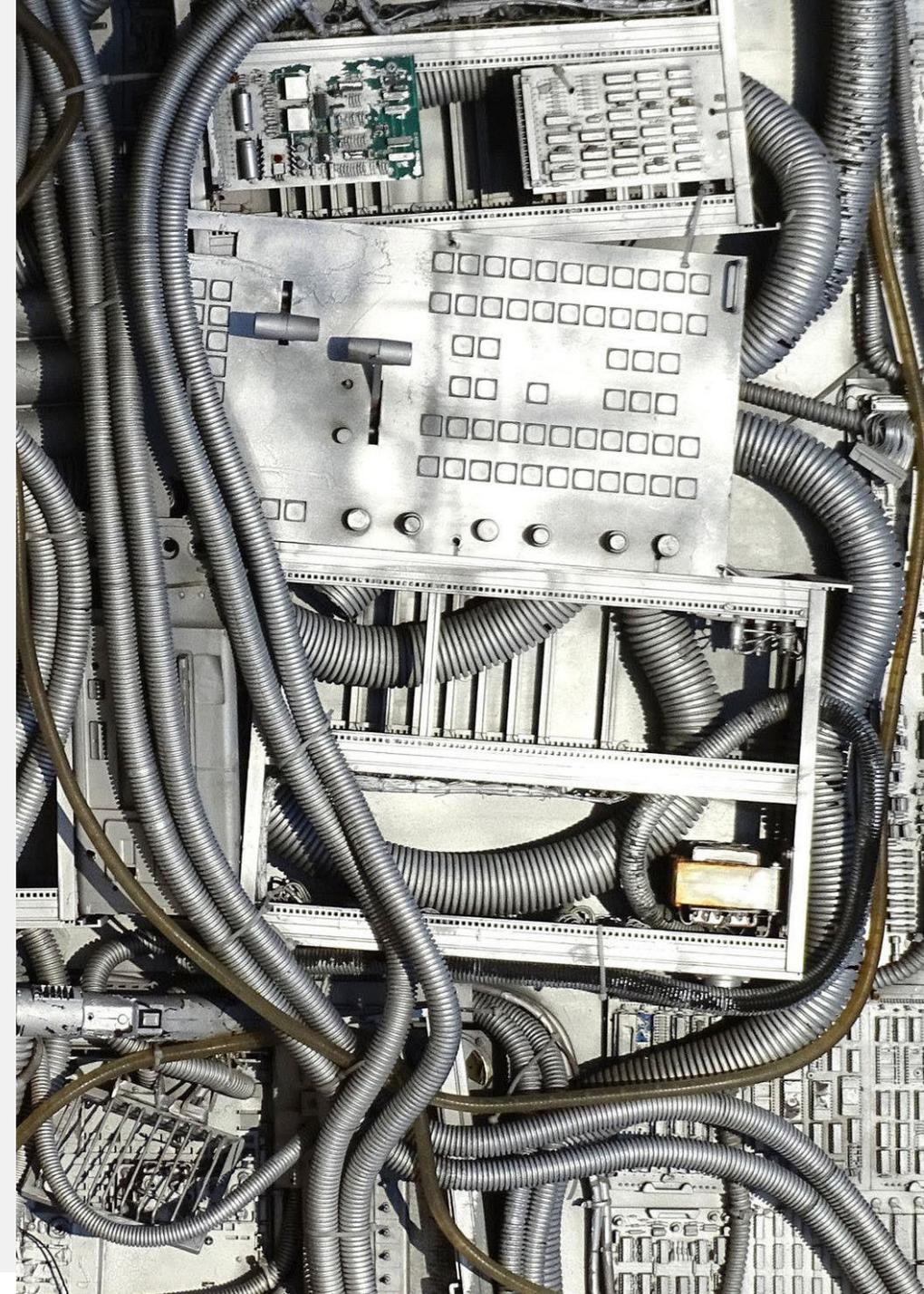


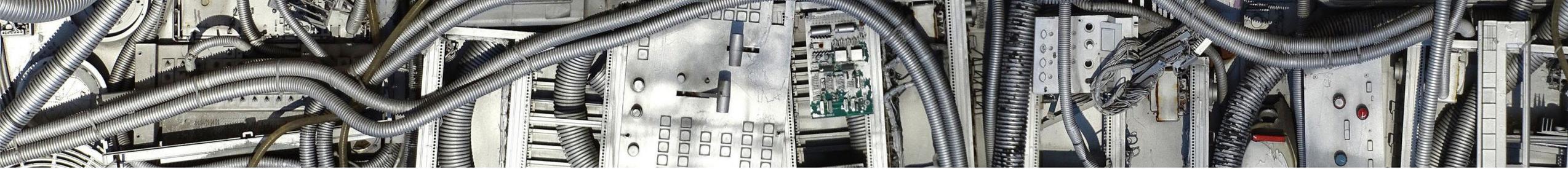


ERRO Manufacturer Clearinghouse Program

January 2022

Jason Linnell, National Center for

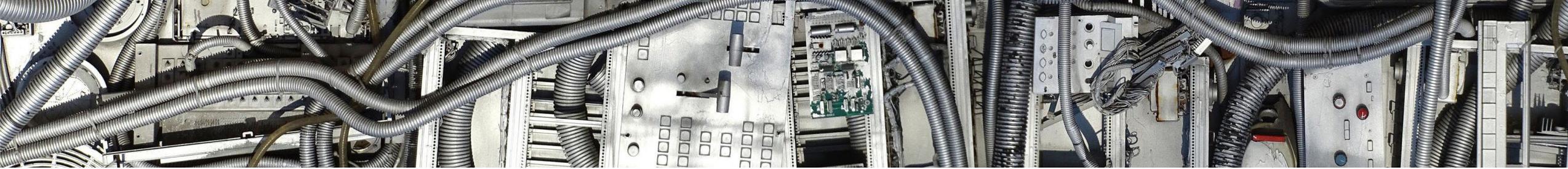




National Center for Electronics Recycling:

- Non-profit 501c3, est. 2005, in Vienna, WV
- Involved in Federal, State & Association Projects
- Conduct Research, Run Collection Programs
- Partner with NERC on Electronics Recycling Coordination Clearinghouse (ERCC)
- Manage Oregon State Contractor Program, Vermont State Standard Plan, administer ERRO Illinois Manufacturer Clearinghouse
- Our Mission: Dedicated to the development and enhancement of a national infrastructure for the recycling of used electronics in the U.S.





Electronics Recycling Representative Organization

- ERRO
 - Non-profit with manufacturer board formed in 2014, initial program 2015 in SC,
 - no staff, office, etc.
 - Promotes responsible electronic waste recycling, researches electronic waste recycling legislative policy options, and where appropriate provides electronics manufacturers and electronic waste recycling programs the opportunity to operate or participate in electronic waste recycling programs under specific state laws.
- In response to CERA, ERRO formed CERA Clearinghouse in 2018, issued RFP, selected administrator

Actors and Roles under CERA and Clearinghouse

- **Manufacturers:** entity with obligations under to CERA to transport/recycled residential CEDs for opt-in counties, meeting convenience requirements
 - Can do this individually OR through Clearinghouse, AND
 - Per Clearinghouse Rules, can receive county assignments individually if over 1% of the obligation OR through a group plan
- **Group Plan:** entity contracting with multiple manufacturers to carry out obligations under Clearinghouse. Manufacturers select and inform Clearinghouse of group plan designation
 - 2019 -2022: ALL registered manufacturers in Clearinghouse and complying through one of 5-7 group plans
 - Group plans choose transporters and recyclers to service counties assigned by Clearinghouse, as well as collectors/consolidators/others

Who are the Group Plans?

- Either management groups or recyclers. Worked for manufacturers under the previous versions of the law and continue to in other states
- Clearinghouse assigns opt-in counties to group plans based on manufacturer obligation percentage formula (sum of manufacturers in group)
- Group plans make ultimate decisions on sites/events/transporters/recyclers to be used, starting with Opt-In form info, existing programs in place
- Work on deviations from standard – i.e. 4 events substituting for 1 site, sometimes fewer than required sites/events
- Must offer bulk transportation, recycling, and packaging materials. Other issues can be negotiated

Group Plans and Recyclers 2021-22

- **Group Plans** with County Assignments based on Participating Manufacturer Obligation
[These are **NOT** necessarily the recyclers!]
 - Dynamic
 - ERI
 - MRM
 - RLGA
 - Sims Recycling Solutions
- **Recyclers** chosen by Group Plans for 2021-22 (many work with multiple plans)
 - Com2
 - Dynamic
 - ERI
 - eWorks
 - SSI
 - URT
 - USMe

Manufacturer Clearinghouse

- Under ERRO, all manufacturers sign an agreement, and choose a Group Plan
- Clearinghouse has specified Rules for:
 - Methodology for setting manufacturer percentage obligations
 - Market share by return share category
 - How to allocate sites, and to whom (individual manufacturers or groups)
 - Groups and manufacturers over 3% obligation eligible
 - Reporting
 - Private programs and eligibility
 - True-up process for measuring actual collections vs estimates

What the Clearinghouse Does

- **DOES** help manufacturers collectively meet the requirements to implement a statewide “manufacturer e-waste program” in Illinois through a joint Plan
- **DOES** administer manufacturer obligation percentages within the Program Plan, request existing relationship preferences, and then allocate opt-in counties to individual manufacturers or groups
- **DOES** set rules for manufacturer or designated group participation
- **DOES** establish an auditing program for verifying reported pound totals and collector practices
- **DOES** compile information required and submit Program Plan to IEPA

What the Clearinghouse *Doesn't* Do

- **DOES NOT** contract with recyclers, collectors or other service providers (handled by group plans)
- **DOES NOT** decide which collection site/s or events will be included in the final Program Plan
- **DOES NOT** decide which entities (collectors, super-collectors, recyclers) are used in meeting the required minimum sites for convenience standard (all entities must meet requirements in law and those by contract)
- **DOES NOT** mandate whether assigned groups/manufacturers agree to include all proposed sites/events from opt-in forms, including those beyond minimum required under convenience standard

Clearinghouse Private Programs

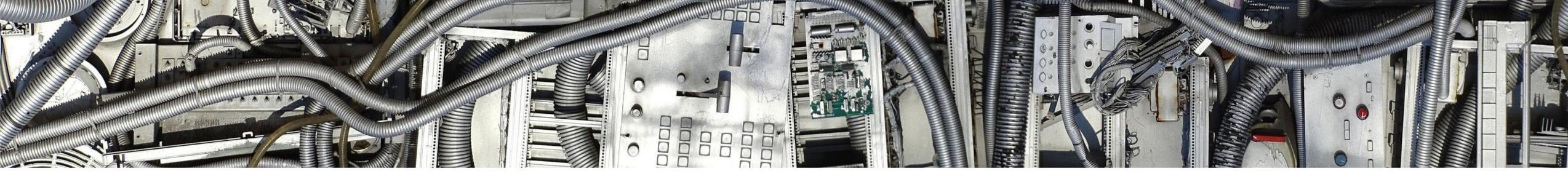
- Separate from CERA E-Waste Program, but ERRO rules include
 - No registration requirements if just in private programs
- Eligible sites include:
 - retail collection sites (as defined in CERA); curbside collection programs; manufacturer-sponsored collection events; non-opt in county and municipal programs; and mail back collection programs.
- Manufacturers/groups can reduce their county-assigned obligations by reported eligible private program, and continuing those collection options
 - HOWEVER, this does not reduce the overall Clearinghouse obligation to service CERA County sites.
- Clearinghouse receives quarterly data from County and private program sites, use data for a true-up compared to manufacturer obligation percentages

What to Expect as a Service Provider

- Clearinghouse uses registration form data and preferences to assign each opt-in County/jurisdiction to a Group Plan
 - Factors include size of Group Plan, preferences from form, existing relationships, geographic location, etc.
- Group Plans choose their service providers to carry out obligations in assigned counties
- Group Plans also select and submit private programs to Clearinghouse
- Final lists combined and sent to IL EPA by July 1 deadline
- Contact Clearinghouse if interested in working as a service provider for one of the Group Plans

Upcoming Deadlines

- Receive County Opt-In Form by March 1 deadline
- Manufacturers register and submit market data for 2021 by April 1
- May-June – calculate manufacturer obligations, receive group plan designations and private programs, assign counties to groups/manufacturers
- July 1 – submit 2023 Clearinghouse Plan



Thank You!



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