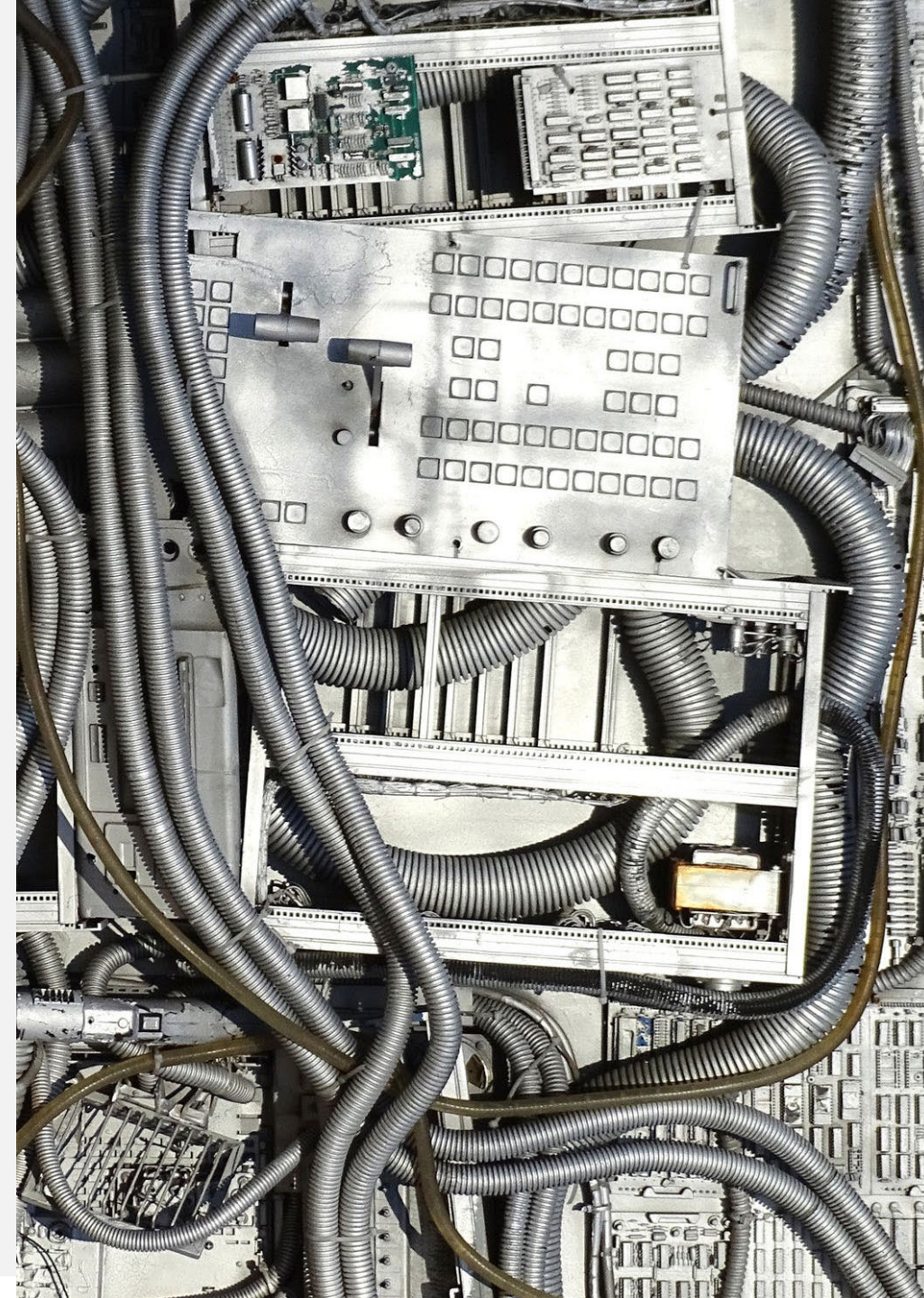




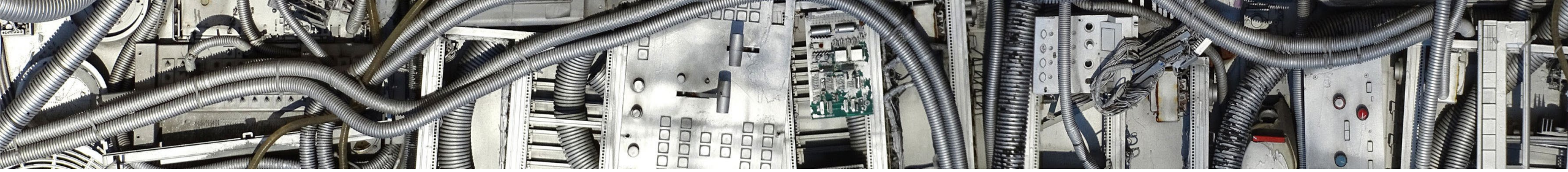
# *ERRO Manufacturer Clearinghouse Program*

IL CERA Review and Updates  
February 4, 2020

Jason Linnell, National Center for  
Electronics Recycling



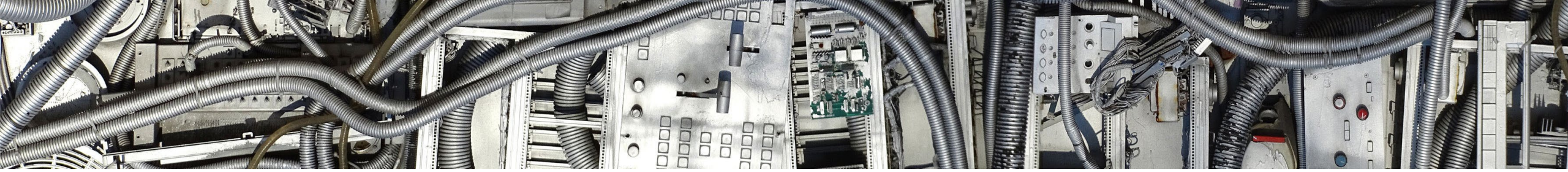




# National Center for Electronics Recycling:

- 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.
  - Hired NCER with MRM to manage the Illinois Manufacturer Clearinghouse in 2018

# 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 and 2020: ALL registered manufacturers in Clearinghouse and complying through one of 6-7 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. Work for manufacturers under the previous versions of the law and in other states
  - Many with pre-CERA existing relationships with collectors, asked for and looked at preferences
- 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, 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

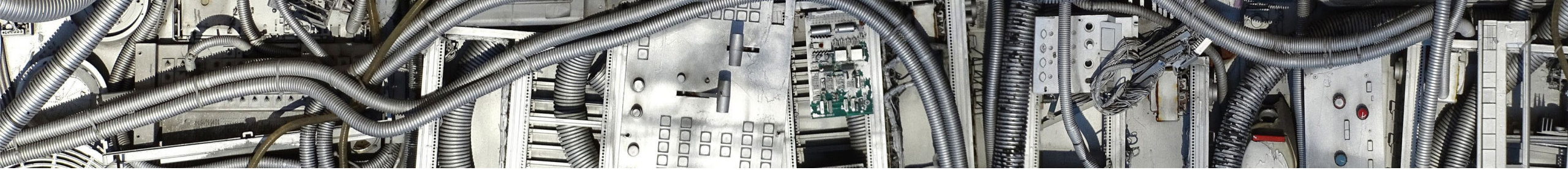
# Group Plans and Recyclers 2019-20

- **Group Plans** with County Assignments based on Participating Manufacturer Obligation  
[These are **NOT** necessarily the recyclers!]
  - DNA Group
  - Dynamic (2020)
  - ERI
  - MRM
  - RLGA
  - Sims Recycling Solutions
  - URT
- **Recyclers** chosen by Group Plans for 2019-20 (many work with multiple plans)
  - Com2
  - Dynamic
  - ERI
  - eWorks
  - SSI
  - URT
  - USMe



# Manufacturer Clearinghouse

- In response to CERA, ERRO formed CERA Clearinghouse in 2018, issued RFP, selected NCER with MRM
- Worked with manufacturer committee to set rules on:
  - 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 1% obligation eligible
  - Reporting
  - Private programs and eligibility
  - True-up process for measuring actual collections vs estimates



# What the Clearinghouse Does/Doesn't Do

- **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 (for 2019 all contracts will be made 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 Tasks

- Agreed to method for allocation of counties/municipalities, then developed assignments for 2019 and 2020
- Requested all manufacturers to be in group or have individual allocation (if over 1%). Resulted in 6 groups 2019, 7 in 2020
- Requested groups to submit existing relationships and preferences for current collectors
- Estimated collection pounds per county based on existing data and estimated product category breakdown
- Developed Manufacturer Participation Agreement, all manufacturers must sign and return to participate
- Assigned opt-in counties to group plans based on estimates

# 2019 ERRO Manufacturer E-Waste Program

- 56 Counties submitted opt-in forms by the 3/1/18 deadline
  - 58 jurisdictions total – 3 for Cook, incl City of Chicago and Northern Cook County (SWANCC)
  - 49 Counties, 51 jurisdictions total participated in 2019 after opt-outs
- 2019 Total population covered – 89% of IL population
  - By Opt-in Counties only – private programs in and outside opt-in counties
- 87 Registered Manufacturers for 2019 (18 over 1% of 2019 obligation targets) – 83 with reported 2017 sales and therefore obligations under Clearinghouse



# 2020 ERRO Manufacturer E-Waste Program

- 58 Counties submitted opt-in forms by the 3/1/18
  - 61 jurisdictions total – 3 for Cook: Cook outside SWANCC, City of Chicago and SWANCC
  - 52 Counties, 54 jurisdictions total participated in 2020 after 6 opt-outs
- 2020 Total population covered –88% of IL population
  - By Opt-in Counties only – private programs in and outside opt-in counties
- 95 Registered Manufacturers for 2020 Plan (19 over 1% of 2020 obligations) – 90 with reported 2018 sales and therefore obligations under Clearinghouse

# Clearinghouse Private Programs

- Apart from CERA E-Waste Program, but ERRO rules agreed to 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 monitor quarterly data from County and private program sites, use data for a true-up compared to manufacturer obligation percentages

# 2019 Results – Product Types

CERA Product Category	Actual 2019	2019 Estimate	Diff w 2019 Est	2020 Estimate Used in 2020 Plan Obligations	2020 Est Diff w Actual 2019
Computers and Small-scale servers	7.33%	8.0%	-0.67%	9.0%	-1.67%
Computer Monitors	6.06%	6.0%	0.06%	6.5%	-0.44%
TVs	53.74%	56.0%	-2.26%	54.0%	-0.26%
Print/Fax/Scanners	15.75%	11.0%	4.75%	14.0%	1.75%
DVD /VCR	9.28%	7.0%	2.28%	9.0%	0.28%
Game consoles	0.36%	1.0%	-0.64%	0.5%	-0.14%
Cable/sat equipment	3.05%	6.0%	-2.95%	2.0%	1.05%
Peripherals	4.43%	5.0%	-0.57%	5.0%	-0.57%



# 2019 Results – Total Lbs

Total CY 2019 LBs Recycled: **29.5 million lbs**

- % Opt-In Programs: **51.2%**
- % Private Programs: **48.8%**
- Does NOT include:
  - Non- Opt-in counties, those who opted out (unless reported as private programs). Municipal programs not in Opt-In program
  - Private and other programs not reported to Clearinghouse

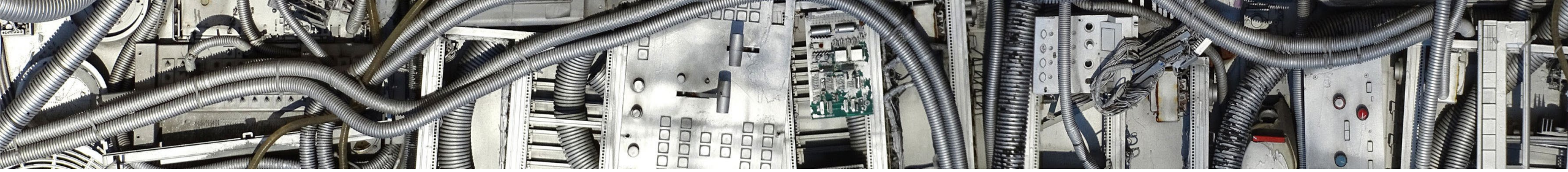
# Clearinghouse Auditing Program

- Ongoing by Clearinghouse and 3<sup>rd</sup> party to ensure reported CED pounds are legitimate
- Reviewing data, conducting interviews
- Some on site spot check audits based on data review and desktop audit
  - observe and assess the traffic into a site and its origins and review on-site paperwork
  - Review paperwork as received by recycler

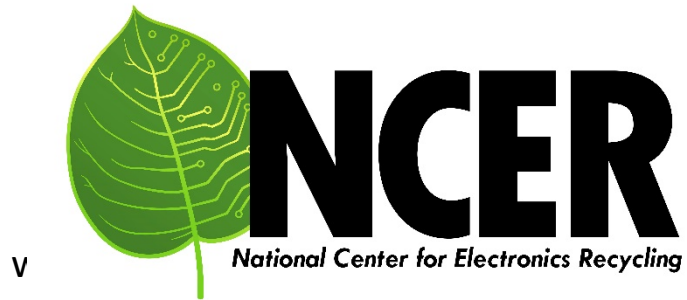
# Upcoming Deadlines

- Calculating true-up pounds from all group plans
  - Over/under goes on 2021 plan assignments
- 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, assign counties to groups/manufacturers
- July 1 – submit 2021 Clearinghouse Plan





# Thank You!



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