



**Testimony to Committee on the Environment, Natural Resources & Agriculture
in support of H756/S404, “producer responsibility for collection, reuse and recycling of
discarded electronic products”
Comments on S452, “information technology producer responsibility”
9/29/2015**

The managers who handle the trash and recycling for our fourteen member towns would welcome the shifting of responsibility for proper end-of-life management of electronic waste to the companies that manufacture and sell them.

Our towns’ 300,000 residents have come to expect their local governments to manage an ever-growing and diverse waste stream. Handling the toxic, and increasingly costly electronic waste stream, especially TVs and monitors, is a burden for municipalities.

Our member towns spent over **\$250,000** to properly manage nearly **2 million pounds** of their residents’ electronic waste in FY2015. 90% of the material collected was TVs and computer monitors.

Both H756 and an edited version of S452 would relieve municipal governments of this burden.

H756 would provide relief by appropriately shifting this burden more directly to producers and consumers at point of purchase, rather than to taxpayers or through an unwelcome fee paid at the point of disposal. It would incentivize consumers to recycle these items rather than hiding them in their trash or recycling, or dumping them in woods and wetlands to avoid paying a fee.

The systems created in the two bills referenced are quite different. While our Members would **prefer the one proposed in H756**, passage of either bill could go a long way toward **capturing more valuable yet toxic electronic components from the waste stream** than is currently recovered, with some important caveats.

Most municipalities already have a system in place for recycling residents’ electronic equipment. They would be **valuable partners** in an infrastructure to implement the provisions of these bills. So long as there are safeguards in place that would **enable them to collect material from residents year round** with assurance of **continuous coverage of processing costs**, they would be able to participate in the programs envisioned, and eliminate the fees that many now charge.

Our main concern with S452 is that the collection goals are much too low. Our towns already nearly meet the proposed initial goal of 6 pounds per capita, with a no-fee town at 12.7 lbs/capita. The goal effectively limits the covered volumes, such that **once the manufacturers meet their collection goals, they may cease covering the cost of the processing**. Towns cannot change their fee structures throughout the year, or stop accepting materials, as a result of rapidly changing costs or compensation. There would need to be a **provision either for high enough collection goals** that programs would be

sustained year-round, **or for assurance that municipal partners that are collecting for the manufacturers will not be “shut off” midyear.**

Best Buy sets an excellent example of producer responsibility by taking most end of life electronics and small appliances back from their customers for free. Passage of these bills would ensure its continuation, and facilitate the expansion of more private sector management options.

Estimating a reasonable collection goal

In FY15, the 8 of our fourteen towns that reported electronic waste collection tonnage recycled **5.7 lbs/capita.** (see table below)

In Hingham, the only reporting town that does not charge a fee, the rate was **12.7 lbs/capita** for its 22,000 residents.

In addition to the municipal collections, **many one-day collections were** hosted by local organizations, as well as Best Buy’s model takeback program, for which we have **no data.**

If the manufacturers were to utilize the existing municipal infrastructure, municipalities would be required to cease charging fees to recycle these items. It is thus reasonable to expect that **with no fee to residents, our municipalities would collect up to 12 lbs/capita/year in their existing programs,** most of it TVs and monitors.

Therefore, a 6 lb/capita “goal”, with mechanisms for double counting some items, would likely be attained in the **first half of the year.** What would happen to the rest of the material? Municipalities cannot just shut down a program, or start charging fees for the rest of the year.

If S452 is passed, there needs to be some **guarantee that the materials would be covered year round,** either through a realistically high target or a requirement that materials be covered regardless of whether the collection target has been reached.

The SSRC asks that the Committee report H756/S404 out favorably. The SSRC would also support S452 if the aforementioned issues were addressed.

Respectfully submitted,

Claire L. Galkowski, Executive Director

	Abington	Hanover	Hanson	Hingham	Norwell	Rockland	Scituate	Whitman	
population	16,000	14,000	10,200	22,000	10,300	18,000	18,300	14,500	123300
Total lbs 2014	31,505	81,245	33,725	279,665	68,730	38,955	208,345	73,433	700,135
lbs ewaste/capita	2.0	5.8	3.3	12.7	6.7	2.2	11.4	5.1	5.7
Fee to residents	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	



**SOUTH SHORE RECYCLING
COOPERATIVE**

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