



# E-Cycle Wisconsin Guidance on Reporting and Recordkeeping for Recyclers and Collectors Working with Other Collectors

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## Purpose

This document provides guidelines on reporting and recordkeeping requirements for recyclers registered with the E-Cycle Wisconsin program, and for collectors registered with E-Cycle Wisconsin that receive eligible electronics from other collectors.

## Collector and recycler definitions and roles

Under Wisconsin's electronics recycling law [s. 287.17, Wisconsin Statutes (Wis. Stats.)], there are separate definitions for a "collector" and a "recycler" of electronics.

A **collector** is a person who receives eligible electronic devices from households, K-12 public schools or Parental Choice Program schools and delivers, or arranges for the delivery of, these items to a registered E-Cycle Wisconsin recycler. Collectors must register with the Department of Natural Resources if they send eligible electronics to a registered recycler that will recycle them on behalf of an electronics manufacturer registered with the DNR.

A **recycler** accepts eligible electronics from registered collectors for the purpose of recycling. "Recycling" means preparing eligible electronic devices for use in manufacturing processes or for recovery of usable materials and delivering the materials for use. Recycling does not include destruction by incineration or other processes or land disposal of recyclable materials, and does not include reuse, repair or any other process through which eligible electronic devices are returned for use by households or schools in their original form.

A recycler must register with the DNR to receive and recycle electronics on behalf of electronics manufacturers—that is, in order for the pounds it recycles to count toward manufacturers' annual recycling targets. If a recycler is also directly collecting electronics from Wisconsin households or covered schools, it must separately register as a collector.

## Collectors receiving electronics from other collectors

The law outlines a straightforward and simple flow of electronics, where registered collectors send whole eligible electronics directly to registered recyclers. In practice, relationships among registered collectors and recyclers have become more complicated as the electronics recycling industry has matured and market conditions have changed. This makes it challenging to accurately track the flow of eligible electronics from a collection site through to final downstream markets, as required by law.

In addition to the straightforward relationship outlined in s. 287.17, current scenarios include:

1. Registered collectors that do not collect any eligible electronics on their own, but receive eligible electronics from other registered collectors, consolidate/repackage them and send them to a registered recycler.
2. Registered collectors that receive material from both their own collection sites and other registered collector(s), and send all materials to a registered recycler.
3. Registered collectors that dismantle devices and receive material from other registered collectors, who view these "mega collectors" as being their recycler. The "mega collectors" divert and dismantle some of the electronics and consolidate the rest, which are sent as whole devices to one or more registered recyclers.

## E-Cycle Wisconsin definitions

Eligible electronic devices include:

- televisions;
- computers (desktop, laptop, netbook and tablet computers);
- desktop printers (including those that scan, fax and/or copy and 3-D printers);
- computer monitors;
- other computer accessories (including keyboards, mice, speakers, external hard drives and flash drives);
- e-readers;
- DVD players, VCRs and other video players (i.e., DVRs); and
- fax machines.

Only electronics from Wisconsin households used primarily for personal use, K-12 public schools and Parental Choice Program schools are eligible. For more details, see Guidance on Definitions of Covered Devices (<http://dnr.wi.gov/files/PDF/pubs/wa/WA1474.pdf>)

Because the collectors described in the third scenario are not dismantling and recycling eligible electronics with the intent of selling those pounds to a registered manufacturer or registered recycler, s. 287.17(8)(a)1. does not require them to register as recyclers. There is, however, still a need to ensure that pounds of eligible electronics are being tracked and reported accurately by all collectors and recyclers in the recycling chain and avoid any double-counting of pounds or counting non-eligible pounds.

These three scenarios illustrate how difficult it can be to track what happens to electronics collected through E-Cycle Wisconsin. As a first step to addressing this, in 2015 the DNR added an option on the collector annual report so that collectors could report if they sent electronics to another registered collector, a registered recycler or both. Beginning with the report for the July 2017-June 2018 program year (due Aug. 1, 2018), the DNR will also require registered collectors that **receive eligible electronics from other collectors** provide more detail on the electronics they have received under the program. This will allow the DNR to ensure that records from sending and receiving collectors match and that pounds can be tracked from the original collector through to a recycler and manufacturer.

## Annual reporting requirements

### Collectors

Under s. 287.17(7), by Aug. 1 each year, E-Cycle Wisconsin collectors need to re-register and complete an annual report using the DNR's online reporting system. The collector must report the weight of eligible electronics received from Wisconsin households and covered schools and the names of the registered recycler(s) to which it sent the electronics. Collectors must also provide a description of the procedures used to ensure that eligible electronics from Wisconsin households and schools are tracked separately from other devices or electronics from other sources (businesses, institutions, other states, etc.).

If collectors receive devices from both urban and rural counties, the weights received must either be tracked and reported separately or all listed as urban. To determine county status, check the map available at: <http://dnr.wi.gov/topic/Ecycle/documents/countiesmap.pdf>.

If a registered collector receives electronics not just from its own sites but from other registered collectors, it will need to provide additional details, starting with the annual report it submits in 2018 (covering the July 1, 2017, to June 30, 2018, program year). For a worksheet showing how these collectors must report their weights, see the end of this document.

### Recyclers

Under s. 287.17(8), by Aug. 1 each year, E-Cycle Wisconsin recyclers need to re-register and complete an annual report using the DNR's online reporting system. The recycler must report the weight of eligible electronics received from registered collectors (including the weight it took in as a collector, if applicable), the weight of eligible electronics bought/sold from other recyclers and the weight recycled on behalf of registered manufacturers. Recyclers must also provide a description of the procedures used to ensure that eligible electronics from Wisconsin households and schools are tracked separately from other devices or electronics from other sources (businesses, institutions, other states, etc.).

If recyclers receive devices from both urban and rural counties, the weights received must be tracked separately or all counted as urban. To determine county status, check the map available at: <http://dnr.wi.gov/topic/Ecycle/documents/countiesmap.pdf>.

Registered recyclers may purchase and sell "paper" pounds (credits for processed pounds) of eligible electronics to each other if they meet basic notification and reporting guidelines. For more information, see Guidance on Sale of EED Pounds Among Registered Recyclers (<http://dnr.wi.gov/files/pdf/pubs/wa/wa1476.pdf>).

In addition, recyclers need to list pounds they received that are ineligible for manufacturer credit. This includes the weight of eligible electronics received from registered collectors that were diverted for reuse/refurbishment, rather than recycled. It also includes cathode ray tube (CRT) glass that was not recycled. See Guidance on Requirements for Landfill Disposal of Processed CRT Glass and E-Cycle Wisconsin Eligibility (<http://dnr.wi.gov/files/PDF/pubs/wa/WA1681.pdf>) for more details.

Recyclers must also submit a mid-year report to the DNR by Feb. 1 with the weight of eligible electronics received during the first six months of the program year on behalf of registered manufacturers or in anticipation of attributing them to a

manufacturer. For a worksheet showing how weights must be reported on the annual and mid-year reports, see the end of this document.

## Guidelines for providing weight reports to registered collectors

So that it can accurately report to the DNR under s. 287.17(7)b., it is important that a registered collector receives clear, accurate weight summaries from collectors and recyclers to which it sends eligible electronics. In addition to providing receipts, invoices or certificates of recycling for each load, the DNR recommends that recyclers and receiving collectors send a summary of weights received during an entire program year, so that the original collector can accurately report this information to the DNR by Aug. 1.

**At a minimum, the DNR recommends that receipts or reports a registered recycler or receiving collector sends to the collectors from which it receives eligible electronics include the following elements:**

1. A clear statement of the time period covered by the document. If it is for specific loads, list the date each load was received.
2. Clearly label any material categories as either “eligible” or “non-eligible.” For example, “Eligible TVs,” “Eligible peripherals” or “Non-eligible miscellaneous electronics.”
3. Define any material categories used that are not clear from the labels. For example, “Eligible CRT televisions” would not require a definition, but definitions should be included for “Non-eligible miscellaneous electronics” or “Eligible peripherals 1.”
4. If electronics are received from a collector with locations in multiple states, the report should clearly specify from which state each load came or that it includes only electronics from Wisconsin sources.

**If the document is a program year summary, the DNR recommends that it also include the following:**

1. The phrase “Summary of eligible electronics received under E-Cycle Wisconsin during program year X (July 1, 20XX, to June 30, 20XX),” with the program year number and dates filled in.
2. A total weight of eligible electronics with the clear label “Total pounds of eligible electronics received during program year X.” There should also be a statement noting that this is the weight the collector should report to the DNR.
3. A clear indication as to whether the pounds are considered urban or rural under s. 287.17(1).

The DNR encourages recyclers or receiving collectors to provide samples of their reports to the DNR to ensure that they are meeting these guidelines. DNR staff may discuss the report format during inspections.

## Recordkeeping requirements for recyclers and collectors

Under s. 287.17(7)(b) and (8)(b), recyclers and collectors registered with E-Cycle Wisconsin are required to maintain records of sources of eligible electronic devices collected in Wisconsin for recycling on behalf of a registered manufacturer, along with information about where electronics go after they leave a collector or recycler’s facility.

For a registered collector, this includes the street addresses of all locations where it collects electronics, along with the names of registered recyclers to which it sends eligible electronics. If some of the weight a collector is receiving comes from other registered collectors, the “mega collector” needs to keep records of the weights received from each of those collectors, in addition to anything it has collected at its own sites. This is to account for the sources of weight sent to registered recyclers and to provide the other registered collectors with totals for their own reporting to the DNR.

For a registered recycler, this includes the weights received from each registered collector it works with (if a recycler is also doing its own electronics collection, it must register as a collector). This information is used both for its own reporting to the DNR and for providing weight totals to collectors for their reports.

For a registered recycler, there are also several recordkeeping requirements related to where electronics go after leaving the recycler’s facility. A recycler shall maintain records of the total weight of materials derived from eligible electronics that it sent to another person or company for use in a manufacturing process or for recovery of useable materials, and the total weight of materials derived from eligible electronics that the recycler sent to be disposed of in a landfill or incinerator because the materials could not be recycled or reused.

In addition, a recycler must track and maintain records of where materials from eligible electronics go for at least two steps downstream. Specifically, the records must identify each vendor that receives from the registered recycler materials derived from eligible electronics. If the first downstream vendor does not use the materials in a manufacturing process, the recycler must maintain records identifying each vendor that receives materials derived from eligible electronics from the first vendor. The registered recycler must also maintain records that show the actions it takes to ensure that the vendors are legitimately recycling the materials—that is, the vendors use the materials in a manufacturing process or for recovery of usable materials.



**Bureau of Waste and Materials Management**  
**Wisconsin Department of Natural Resources**  
P.O. Box 7921, Madison, WI 53707-7921  
[DNRWAe-cycling@wisconsin.gov](mailto:DNRWAe-cycling@wisconsin.gov), (608) 266-2111  
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# DNR reporting worksheet for collectors receiving electronics from other collectors

The tables below show how collectors will need to report these weights in the annual report form. The online system will automatically calculate totals. The total weight collected or received from other collectors (part A) must equal the total weight the collector dismantles or sends off-site for recycling (part B).

If you would like a copy of this worksheet in an Excel spreadsheet format, contact [DNRWae-cycling@wisconsin.gov](mailto:DNRWae-cycling@wisconsin.gov).

## A. Weight of eligible electronics collected or received

*Note: include pounds of eligible electronics you collected at your own sites or events.*

Collector name	Pounds from urban counties	Pounds from rural counties	Total pounds
<b>TOTALS</b>			

Total pounds collected or received \_\_\_\_\_ pounds

## B. Weight of electronics recycled/sent off-site

### *Non-eligible pounds*

1. Eligible electronics included in part A that the collector dismantled: \_\_\_\_\_ pounds

2. Eligible electronics included in part A that the collector sent as whole devices to non-registered recyclers: \_\_\_\_\_ pounds

### *Eligible pounds*

### 3. Pounds of eligible electronics included in part A sent to registered recyclers

Recycler name	Pounds from urban counties	Pounds from rural counties	Total pounds
<b>TOTALS</b>			

Total pounds sent off-site (add #1, 2, 3): \_\_\_\_\_ pounds

**Note: Total from part A must be greater than or equal to total from part B.**

## DNR reporting worksheet for recyclers

The tables below show how recyclers need to report weights in the annual report form. The online system will automatically calculate rural credits and totals. Pounds diverted for reuse and sold to other recyclers will be subtracted from the total pounds eligible for manufacturer purchase. The system will not allow a recycler to submit its form if this "mass balance" is negative—that is, it won't let the recycler report more pounds sold to other recyclers or to manufacturers than it has available from collection.

If you would like a copy of this worksheet in an Excel spreadsheet format, contact [DNRWae-cycling@wisconsin.gov](mailto:DNRWae-cycling@wisconsin.gov).

### A. Weight of eligible electronics received from registered collectors

Collector name	Pounds from urban counties	Pounds from rural counties	Rural weight x 1.25	Total pounds (urban weight + rural weight x 1.25)
<b>TOTALS</b>				

#### *Non-eligible pounds*

Pounds of EEDS included in above totals and diverted for reuse/refurbishment: \_\_\_\_\_ pounds  
 Pounds of CRT glass sent to landfills: \_\_\_\_\_ pounds  
 Pounds of CRT glass in long-term storage: \_\_\_\_\_ pounds

### B. Weight of eligible electronics bought from or sold to registered recyclers

*Do NOT include weight sold to collectives (e.g., MRM, RLGA, 3R Network, WMRA)*

Pounds purchased from another recycler				
Seller name	Pounds from urban counties	Pounds from rural counties	Rural weight x 1.25	Total pounds purchased (urban weight + rural weight x 1.25)
<b>TOTALS</b>				

Pounds sold to another recycler				
Buyer name	Pounds from urban counties	Pounds from rural counties	Rural weight x 1.25	Total pounds sold (urban weight + rural weight x 1.25)
<b>TOTALS</b>				

### C. Summary of eligible electronics eligible for manufacturer credit

Total weight of EEDs received from registered collectors (including rural credits): \_\_\_\_\_ pounds

Total weight of EEDs received diverted for reuse/refurbishment: - \_\_\_\_\_ pounds

Total weight of CRT glass sent to landfill and long-term storage: - \_\_\_\_\_ pounds

Total weight of EEDs sold to other registered recyclers: - \_\_\_\_\_ pounds

Total weight of EEDs bought from other registered recyclers: + \_\_\_\_\_ pounds

Total weight of EEDs available to recycle for registered manufacturers: \_\_\_\_\_ pounds

### D. Weight of eligible electronics recycled on behalf of registered manufacturers

Include weight sold to collectives (e.g., MRM, RLGA, 3R Network, WMRA)

Manufacturer name	Pounds from urban counties recycled	Pounds from rural counties recycled	Rural weight x 1.25	Total pounds recycled (urban weight + rural weight x 1.25)
<b>TOTALS</b>				

Note: Total from last line of part C must be greater than or equal to total from part D.

### Mid-year recycler report

The tables below show the information that recyclers will need to provide on their annual mid-year report, due Feb 1. Totals on this report cover July 1 to Dec. 31.

Pounds of EEDs received for recycling on behalf of a manufacturer				
Manufacturer name	Pounds from urban counties recycled	Pounds from rural counties recycled	Rural weight x 1.25	Total pounds received (urban weight + rural weight x 1.25)

Pounds of EEDs received that may be attributed to a manufacturer (exclude pounds counted above)				
Pounds from urban counties	Pounds from rural counties	Rural weight x 1.25	Total pounds received (urban weight + rural weight x 1.25)	