



E-Cycle Wisconsin

Guidance on Sale of “Paper” Weight Among Registered Recyclers

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Purpose

This document provides guidelines for recyclers registered with E-Cycle Wisconsin to sell or assign “paper” weight of recycled eligible electronic devices to one another during a program year. It does not cover situations where a registered recycler sends whole, unprocessed electronics to another registered recycler for recycling. If you have questions about a particular scenario, contact Department of Natural Resources E-Cycle Wisconsin staff at DNRWle-cycling@wisconsin.gov.

E-Cycle Wisconsin device definitions

For details about which electronics are “covered” or “eligible” electronic devices under E-Cycle Wisconsin, refer to s. 287.17 (1), Wis. Stats., or dnr.wi.gov/topic/ecycle/wisconsin.html.

Background

Under the E-Cycle Wisconsin program created by s. 287.17, Wis. Stats., these groups are directly involved in the collection and recycling of eligible electronic devices. All three groups must register and report annually to the DNR.

- **Collectors** receive eligible electronic devices from Wisconsin households and K-12 schools and send the electronics to a registered recycler.
- **Recyclers** dismantle and recycle material from eligible electronics, and may also operate as collectors.
- **Manufacturers** of covered electronic devices have annual recycling targets, which are based on the weight of covered electronics sold to Wisconsin households and K-12 schools. Manufacturers may contract with collectors and recyclers to meet their targets.

Under the E-Cycle Wisconsin program, eligible electronics move physically from a registered collection site or consolidation point to a registered recycler’s facility, where they are dismantled into components and recyclable commodities such as glass, plastic, aluminum and steel. Registered manufacturers with a recycling target typically contract with a registered recycler to pay an agreed-upon amount (usually a price per pound) to cover recycling costs for the number of pounds of eligible electronics the manufacturer needs to recycle. This is often referred to as “purchasing” pounds, but in this case, the manufacturers are not buying or directly receiving materials from the electronics. Therefore, the pounds manufacturers are purchasing can be thought of as “paper” weight that is equivalent to the pounds of physical materials being recycled.

Section 287.17 (2) (b), Wis. Stats., allows manufactures to work together to carry out the collection and recycling of eligible electronics. Under this provision, several organizations have operated as “brokers” under E-Cycle Wisconsin. A broker purchases or receives paper weight of eligible electronics from one or more registered recyclers on behalf of one or more registered manufacturers. Brokers do not fill out an annual registration form, but do submit a “broker weight summary” to the DNR each year. The summary provides a way for the broker to report how much paper weight it purchased or received and allocate it to manufacturers it works with, so that the manufacturers can then import the information into their report forms.

Based on requests from program participants, the DNR has allowed registered recyclers to buy and sell paper weight among themselves during a given program year. This has helped create a more efficient market to match the supply of recycled weight with manufacturers that need to meet their recycling targets, while allowing recyclers and brokers or manufacturers to maintain existing contracts and relationships.

Updated requirements for recycler-to-recycler transactions of “paper” weight

Over time, the number and complexity of transactions among recyclers, brokers and manufacturers has increased, sometimes leading to confusing and complicated tracking via annual reports submitted to the DNR. To provide more

transparency, clarity and flexibility within the market for paper weight, the DNR is changing the way recycler-to-recycler transactions are handled on annual reports.

Beginning with the annual report submitted under s. 287.17 (8) (b), Wis. Stats., in 2021, covering the July 2020-June 2021 program year, a registered recycler that is purchasing/receiving paper weight from other registered recyclers will do so as a broker, and must submit the annual broker weight summary, in addition to its annual recycler report. This will help to distinguish between pounds of eligible electronics a recycler has physically recycled and paper weight it has purchased or received from others. It will also provide more flexibility for recyclers to purchase paper weight from other brokers or credits from manufacturers.

The following guidelines apply to recycler-to-recycler transactions of paper weight:

1. The recycler selling the paper weight must be registered for the program year (July 1 to June 30) in which the sale happens and have recycled the eligible electronics at a registered facility.
2. The recycler purchasing/receiving the paper weight must notify the DNR it is acting as a broker, so that it can be set up with the role in the DNR's online E-Cycle Wisconsin reporting system.
3. All eligible electronics must have been received from Wisconsin households, covered schools or registered E-Cycle Wisconsin collectors during the program year for which the pounds will be sold.
4. The eligible electronics must be recycled according to all E-Cycle Wisconsin program requirements.

Reporting paper weight sold/assigned to another recycler acting as a broker

A registered recycler that is only selling/assigning paper weight to another registered recycler does not need to fill out an additional broker form, since it is not acting in the role of a broker. A registered recycler that has sold, or assigned, paper weight from recycled eligible electronic devices to another registered recycler acting as a broker will list the weight sold in the same section of the online annual report that it lists weight sold/assigned to registered manufacturers. The drop-down list in this section includes the names of both brokers and registered manufacturers. There is no longer a separate "recycler-to-recycler" section on the annual report.

Reporting paper weight bought/received by a recycler acting as a broker

A registered recycler that has bought, or received, paper weight from eligible electronics recycled by another registered recycler will not list this weight on its annual recycler report to the DNR. Instead, it will have a separate form, called the broker weight summary, to complete in addition to the annual recycler report. On the broker weight summary, the recycler/broker will be able to view paper weight sold/assigned to it by registered recyclers, and report which manufacturer(s) the paper weight was sold/assigned to.

A registered recycler that is planning to also operate as a broker during a given program year should notify the DNR at DNRWle-cycling@wisconsin.gov.



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Disclaimer: This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

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