



PWIA RESPONSE

DEP's White Paper on Managing Pennsylvania's Electronic Waste

March 2022

The Pennsylvania Waste Industries Association (PWIA) shares DEP's concern about illegal dumping in Pennsylvania, particularly the blight and environmental consequences caused by the dumping of electronic or "covered" wastes. PWIA has consistently stated that we would **welcome a seat at the table if changes to the Covered Device Recycling Act (CDRA) are considered.**

As an industry, **we want to be able to continue to collect certain electronics for recycling.** Efforts to improve the management of Pennsylvania's e-waste should **focus on investment in infrastructure and incentives to create new markets for recycled materials.**

Our industry **supports the continued landfill ban on electronic devices that was enacted in 2013** and would strongly oppose the landfilling of these devices, including the unrealistic suggestion of retrievable landfill cells for e-waste disposal.

On the collection side, **requiring that covered device recycling be managed by device manufacturers would be an impractical and ineffective approach** to the problem. Producers should be responsible for designing sustainable packaging, but the waste and recycling industry is in the best position to collect these items.

As DEP has noted, there is a cost for collection, transportation and processing for solid waste, e-waste, and recyclables. **PWIA would not oppose a consumer fee charged at the point of sale for electronic devices to support the eventual disposition of these items.** At this time, manufacturers are not permitted to charge consumers for the collection, transportation or recycling of a covered device. E-waste fees could be used to promote education and enforcement, improve the existing collection and processing infrastructure, support e-waste cleanup and potentially develop outlets for their reuse.

Challenges with recycling have resulted in increased efforts to pass legislation at both the federal and state level advocating for extended producer responsibility (EPR). While well intentioned, **many EPR proposals fail to address the root of the problems and overlook existing recycling programs and how these can be modernized to meet today's challenges, such as moving away from weight-based measurements** as part of the manufacturer's collection requirement.

ABOUT PWIA

The Pennsylvania Waste Industries Association represents the private sector companies that collect and process recyclables and collect and dispose of municipal solid waste in Pennsylvania. We work closely with the National Waste & Recycling Association to advance safe practices in waste collection, processing and disposal. For more information, visit www.pawasteindustries.org.

#