

Draft Proposal for Reuse Inclusion in Electronics Recycling Legislation

Our goal is to get a computer reuse layer included in state, and eventually, a US electronic recycling system in a way that encourages reuse and recycling industries. We hope to consistently divert readily refurbishable IT equipment from collection streams to refurbishers, and to also stimulate donations of the under seven-year-old equipment being discarded so it can be refurbished and put back in use by schools, nonprofit charities, libraries, and low-income families – rather than for all of the material collected to go to recycling. Reuse is different from recycling. Reuse involves refurbishing computers and adding another 2-3 years of life to them. Recycling is grinding, shredding and smelting them to recover some of the glass, metals, and plastics in them. Experts in the computer recycling field -- from Robert Tonetti of the US EPA, to Ted Smith of Silicon Valley Toxics Coalition -- acknowledge that reuse is the highest and best use of IT discards and that a robust computer reuse system is a core environmental necessity. It's much better for the environment to extend computer life and then recycle than to recycle computers and buy new ones every 3 to 4 years.

Definitions

By refurbishable IT equipment, we mean computers, printers and peripherals that are under 84 months (7 years) old that appear to be largely whole and reusable.

We advocate for:

- 1) A collection system that makes it easy and preferable for owners of refurbishable IT equipment to dispose of it in a manner that allows it to be refurbished, e.g., by giving it directly to a refurbisher, or by dropping it at a collection point which will transfer it to a concentration point where the refurbisher can cull it.
- 2) A collection system that permits the collection, sorting, and diversion of refurbishable IT equipment multiple times prior to cancellation and recycling of materials.
- 3) Incentives for anyone disposing of refurbishable IT equipment to leave the equipment whole, especially keeping memory and hard disks in discarded units.
- 4) Incentives for large computer users (businesses and institutions) to dispose of refurbishable IT equipment by transferring it to the refurbishers by a method that has lower breakage and loss rates during collection and transit. For example, shipping of large quantities of shrink-wrapped, palletized IT equipment usually has lower breakage and loss than shipping of individual items. In addition, each time an item is handled, packed, and shipped there is risk of breakage and loss, so reducing the number of handling, packing, and shipping steps between the original user and the refurbisher will reduce breakage and losses.
- 5) Incentives for end-of-life collectors to make it easy and preferable to transfer refurbishable IT equipment to refurbishers. We also advocate that refurbishers make it easy and preferable to transfer all end-of-life material to recyclers so that all electronics goods are responsibly processed, eventually.
- 6) Incentives to make it preferable for working refurbished computers with operating systems to go to charitable use, e.g., to nonprofits, schools, libraries, low-income families, micro-enterprises and exported to specified users in the developing world.
- 7) Incentives to support and fund training and skills development through refurbishing
- 8) Appropriate export of refurbishable IT equipment for reuse in developing countries such that equipment is certified to be 7 years old or newer, in working condition, and is shipped in a way to minimize breakage.
- 9) Formal definitions specifying who in the chain of entities that manufacture, sell, use, transfer, and dispose of IT equipment has responsibilities and liabilities for data security errors, and whether and how these responsibilities and liabilities can be transferred from one entity to another.
- 10) A tax benefit for businesses to donate fully depreciated computers. There is virtually no tax benefit under current IRS law combined with standard accounting practices for US businesses to donate fully depreciated computers.

The electronics reuse industry has good job creation potential, charitable electronics reuse is in demand by the public, and there is significant US demand for low-cost computer equipment in schools, charities, libraries, and families. Diverting readily refurbishable IT equipment from collection streams is the highest and best use of this resource – and is also quite probably the best environmental option.