



## HEALTH & COMMUNITY SERVICES ENVIRONMENTAL HEALTH BUREAU

### MEMORANDUM

**DATE:** October 21, 2005  
**TO:** US EPA Region 5  
**FROM:** Tom Dewhirst, Facility Manager Kalamazoo County HHW  
**SUBJECT:** Great Lakes E-waste Policy Development Initiative

---

Kalamazoo County government greatly appreciates the opportunity to provide comment on the proposed "Act Providing for the Recovery and Recycling of Used Electronic Devices."

Our comments are divided into two categories: 1. General Comments and 2. Regional Cooperation.

1. **General Comments:** Kalamazoo County, as a local government representative, supports the efforts of US EPA Region 5 to help develop a regional approach to electronics recycling. From local government's point of view, our best bet is to develop a statewide or regional solution rather than wait for a national solution to emerge. Chances for national legislation are bleak at best.

**Well Written Act:** The 'Act' is well written and incorporates most of the elements that the Michigan Electronics Waste Task Force had identified as key points for any new legislation in Michigan. It appears to be a very workable document.

**Advanced Recycling Fee:** The majority of county governments in Michigan support some type of advanced recycling fee as a means of funding electronics recycling in Michigan. We acknowledge that each and every financing option has its strengths and weaknesses, but are in favor of moving forward with an ARF-based program rather than waste several more years on agreeing that we disagree on the financing mechanism.

**“No New Taxes” Argument is Faulty** In lieu of a national or state solution to e-waste, many local governments in Michigan have ‘stepped up to the plate’ by acknowledging the existence of a growing waste problem and have taken steps to initiate local electronics recycling programs. Local governments are expending hundreds of thousands of dollars in taxpayers’ money to help solve the e-waste problem. And while manufacturers and retailers of electronics devices continue to disagree about the best solution, local government continues to shoulder the financial burden.

And yes, we are spending tax dollars to do this. So when we hear retailers are opposing an ARF-based financing scheme, we find it ironic that the main tactic is to label the fee as a new tax. Call it what you want, we view an ARF as a reallocation of resources that would allow local government to recoup some of its costs for e-waste recycling and free up tax dollars to deal with other pressing issues such as methamphetamines. **Local government is a willing partner and important part of any solution to e-waste recycling, but we would like to be compensated for our effort.**

**Local Recyclers:** In order to help spawn the growth of local infrastructure, we would like to see the addition of language in the Act that says, “The Corporation will hire in-state, regional and local recyclers to collect and recycle e-waste.”

As an example of what not to do: under the current pilot project with Dell and Goodwill Industries, all collected electronics are sent to an Ohio recycler. It would be better is some of that business went to Michigan companies.

**Individual Responsibility under Option A:**

As a local e-waste recycler, I shudder to think of a statewide or regional program where each major manufacturer has its own recycling program for only its own brands. The real loser is the case would be the public – the average citizen who needs a little encouragement to do the right thing and needs recycling to be as simple and straightforward as possible. It is hard to imagine a low-cost, easy to use program, unless all of the manufacturers teamed up to provide collection points where the public can drop off any brand of device.

The issue of orphan waste would also need to be addressed. Would each manufacturer get assigned a target percentage of orphan waste?

**2. Regional Cooperation**

If we could get most of the states in EPA Region 5 to adopt the proposed Act, the Midwest would be transformed into the biggest leader (mover and shaker) in the national scene and would leverage a huge amount influence in shaping national policy on e-waste.

We would like to have Michigan’s borders covered - in the sense that our neighboring states would have the same policies and fees associated with

electronics recycling. This would eliminate the temptation of a consumer to shop outside the state for a new television or computer in hopes of avoiding a recycling fee.

**Regional Processing Centers:** States within the region are losing manufacturing jobs at an alarming rate. Michigan needs to create new jobs. In order to help the local economy, we encourage the development of regional processing centers, with at least one in each state that passes the act. We must demonstrate an economic benefit to passing this legislation.

Thank you.