Electronic Product Recycling
June 6, 2006 meeting notes

Meeting Summary:
Information is available at the following web site:
http://www.ecy.wa.gov/programs/swfa/eproductrecycle/rulDev.html

The headings in bold below are links the detailed meeting notes following the summary Point your mouse to the heading underlined below, press CTRL and click to link to the corresponding section in the detailed notes

1. Overview of the law:
- Jay Shepard presented background and current components of the law (available on the E-product web site).
- See notes below for more details about the discussion.

2. Rule making at Ecology:
- Bari Schreiner presented an overview of the rule-making process at Ecology (available on the E-product web site)
- See notes below for more details about the discussion.

3. Electronic Product Recycling Timeline:
- The rule making for implementation of the Electronic Product Recycling Act will have two phases.
    - Phase 1 will focus on: Registration of manufacturers, collectors, transporters, and processors, manufacturer registration fee and brand labeling.
    - Phase 2 will focus on writing rules to implement all of the remaining requirements in the Act.
- Bari presented the rule-making timeline (a revised version based on feedback from the panel is available on the E-products web site)

4. Draft rule language:
- Jay presented the draft rule language.
- See notes below for more details about a specific section of the draft rule.
- **Purpose:**
    - The Panel was satisfied with the content of the purpose statement.
- **Applicability:**
    - Update language to better reflect "manufacturer" as defined in the statute. (see notes below for more details).
- **Definitions:**
    - There was debate over the definition of desktop, television, and white box
    - Ecology will look at adding definitions, providing more clarity and revising those in the draft rule.
    - Ecology needs to clarify the definition of "electronic products" to make it clear that it is a discrete list rather than open to other products beyond what is described in the definition. (see notes for brand labeling)
- **Required brand labeling:**

- Ecology will look at the fertilizer law to determine if there are similar structures we can use to model our rule after especially as it relates to sale of products and depletion of existing stock in retail stores after January 1, 2007.

- **Manufacturer Registration:**
  - Ecology is going to require the form is signed by the individual responsible for implementing the company's requirements under this chapter.
  - There was some timing issues regarding equivalent share notification and concerns over providing plan participation information when a manufacturer registers. Registration is required much earlier than when plans will be in place. Ecology is going to change the language on the registration form to be broader in the rule to say "plan participation information". This will allow Ecology to ask "Within which plan does your company anticipate participation? The standard plan or an independent plan" during first year registration. For all subsequent years Ecology can ask which plan are you participating in?
  - The current draft did not provide enough time for billing.
    - The language will be changed to send out bills 60 days in advance of the due date.
    - Ecology will look at how this can be implemented for the first billing cycle given restrictions in the rule-making process.
  - Ecology is looking into options to make registration forms available on-line, to allow for email submittals, and the possibility of developing a web-based system.
- **Registration Fee:**
  - Ecology will provide our most current list of manufacturers on our web site by the next meeting.
  - Based on the discussion at the meeting, Ecology will update the fee language in draft.
- **Transporter/Collector Registration**:
  - Ecology will remove the language indicating that transporters and collectors need to register by Sept 1 to participate in a plan during the next calendar year.
  - Ecology will add language so that registration can happen any time during the year, however annually each T or C must renew with Ecology between July 1 and Sept 1. If they need to update information at any time during the year they must do it within 14 days of the change.
  - Some panel members would like to see more requirement standards on the registration form.
    - Ecology has added a "certified signature". The form will need to be signed by the Chief Operating Office or designee.
    - Ecology added language linking the registration to compliance with other environmental laws.
    - Now when a T or C registers they are certifying that the information is true and that they are in compliance with environmental laws.

    - Ecology will research whether or not we have the authority to include financial assurances on this form.
    - Ecology will combine the transporter/collector form with the existing forms for transporter registration.
- Processor Registration:
    - Ecology will remove the language indicating that you need to register prior to contracting with a plan. Rather, we will ask for a letter of capacity to provide processing services. Manufactures would like to have a list of processors prior to submitting recycling plans.
    - Ecology will add language requiring registration upon completion on contracts with plans.
    - Some panel members would like to see more requirement standards on the registration form.
        - Added are signature requirements from the processor and the authority or authorized party certifying compliance with applicable laws and regulations.
        - Ecology added language linking the registration to compliance with other environmental laws.
        - Now, upon registration, the plan and the processor are certifying that the information is true and that they are in compliance with environmental laws.

5. Audience Comments:

- Click here to see audience comments on the draft rule language: Audience

6. Next steps:

- Click here to see audience comments on the draft rule language: Next Steps

Overview of the law (PowerPoint presentation)

- Why was June 2007 chosen as the date for the initial return share announcement? To help manufacturers decide what they want to do – participate in the standard plan or an independent plan. If you don't know what your obligations are it is hard to decide what you are going to do.
- Why was there a restriction "new entrant" – what is the sale of products? In the US? In WA? Why was it a 10 year restriction? If we are open to competition as motivator, it seems it is the opposite of what we want to do?
    - It was a concern that a new brand would be sold on market and then leave, with longer term manufacturers left holding the costs for those products at end of life. The intent was to allow companies that have demonstrated a stable and long term sales history to write independent plans
    - The 5 years and 10 years in the market relates to sales in WA state
- John Merrell voiced a concern that this seemed very strange and non-competitive.
- Sego: Additionally, if a new entrant was allowed to write an independent plan, they would have nothing to collect initially.
- John Merell – We make televisions for Advent, a company that has been in the audio business for years but has recently entered the television market. Prima has been manufacturing televisions for years.
    - Jay S – The law says that if a company has been active in the electronics market and begins manufacture of additional products as a logical expansion and diversification of their business, they would not be considered new entrants. E.g. HP sells computers with monitors, they now sell televisions – they would not be considered a new entrant for televisions.
- Mark Johnson – can we get copy of presentation
    - Jay S: yes it will be posted on the web
- Mo McBroom: Bill process of much negotiation – compromise piece
- John Merrell – we are the largest TV manufacturer in WA but we weren't contacted
- Member of EIA/CEA
- Cullen: it was not the intent to target PRIMA with this restriction – It is our intent to work with you to make this work. It was really targeting companies that come in put them in the market and then dump them and leave.

- Phase 1 and Phase 2: the law has specific dates over time in order to meet date requirements Phase 1 registration manufacturers and fees and including Collectors, Transporters and Processors in place by mid-November so that manufacturers can register and pay fees. Phase 2 will address all the other requirements in the bill.
- Audience: no questions.

Rule making and timeline:

- Mo: What analysis is done – how does that fit with the statute that may have created inequities?
    - Bari: we analyze in context of the statute
- Facilitator: what is the average time for a rule making?
    - Bari: 18 months (but many are over 3 years). This one is REAL FAST.
- Phase 1 or 2: scope questions? Rule in phases? How much $?
- The group wanted it clarified that Phase 1 was talking about registration fees.

Set up advisory meeting dates....

Review of the draft rule language:
Purpose Section:

- the first part of purpose statement was extracted from the law. The second part describes Ecology's reason for writing the rules.

Applicability Section:
Comments

- Are you intending to capture every garbage collectors, there is no ban
    - Add in language to say "for recycling" in (b)
- Part A seems more limiting than what is in the bill.....make it match definition
    - "Any manufacturer, of covered electronic products as defined in WAC 173-900 that are sold in WA"
- © processors "Any processor who intends to participate in a plan must register" can be in or out of WA
- D – is it clear enough "any retailer as defined in this chapter"?
- See if this language should apply to a and b?

Definitions:

White box

- Hole for unbranded products TV side OK the white box definitions excludes "white box manufacturers from the definition of manufacturer
- What is the intent with "white box"? The intent is to get them to label and participate
- White box definition was included to put white box in the standard program because they wouldn't have a return share – so from January 2007 on they would be captured under the definition of manufacturer because as of that date they must label.
- What happens to those built by individuals for personnel use? It was recognized that there are some we won't be able to capture. The approach adopted will capture the most of all options considered.
- John Merrell -

The definition of covered electronic product as a flat panel monitor is incorrect. The preferred definition for both computer monitors and televisions would be "video display." The FCC has a definition of what a television is: a video display with a tuner. Computer monitors are video displays without tuners.

Ecology will make sure that televisions and computer monitors are defined as video display devises, make it compatible with the law and look into the FCC regulations and definitions.

- Mo – we need to make sure that the legislative intent is captured – Ecology can work with John directly

Vinay Goel brought up the definition of "**Desktop**"

- Apple believes that a computer is the computer and monitor and does not include keyboards, mousse or speakers. Game equipment like the X-Box is just the same as a personal computer inside. It has all the same components and should be included, too.
- Mike Watson– We would like to avoid creating boxes and boxes of peripherals (speakers) to our CPU
- Mike Watson - Mother board, memory, power supply speakers if built into a screen would make up a computer
- John Merrell – plenty of product where speakers are attached but can be detached
- Larry King – level playing field issue
- John Merrell – Televisions are manufactured with speakers and will be covered 100%, so why would there be an exclusion for computer speakers?
- Sego – I don't remember the discussion – how does this play out for the public – people don't think the mouse is separate from computer. Printer they can get it, but mouse they don't separate Do Dell, HP, Apple exclude the little peripheral
- Mike Watson: We consider a computer to be a monitor and a CPU. We never reject anything that comes back to us (Dell recycling program)
- Vickie Austin: Why was the definition of Desktop added – Jay S. Clarity
- John Merrell – There is a convergence in this industry of TV and computer manufacturer. Is a clear mandate for a TV manufacturer to be responsible for the entire product (speakers shipped with branded product) should be defined in law that they are responsible to take care of speakers.
- How do we match the public expectation with the precise definition manufacturers use
- Vinay: Apple accepts anything that is returned in the box
- Mike W. IF we keep the definition concise, and understand that we will accept what ever comes in
- John Merrell – sees a loophole for monitor manufacturers
- Need more work on desktop definition – "of the same brand"
- Sego – This is an important exchange. However, John this wouldn't work from the collection end.
- John Merrell: Side speakers attached to video displays most people don't detach them
- Jay S: when samples are taken to determine return share it wouldn't be practicable to separate by brand...
- Vinay: Who would cover Logitech keyboard? Jay S maybe we need to fold into rule.

- Mo: as E works on this aware the term desktop feeds into manufacturer, and I think we don't want to expand it to include manufacturer to cover those who make "mice"
- Vickie: How would a transporter bill for service if they accept the peripheral but it is not part of the definition of covered product? Would they eat the cost of handling those peripherals?

After Lunch break Jay Shepard presented this alternative:

- Since ESHB 2488 or the current law provide not further clarification as to the definition of what is a "covered electronic product".
- Based on what has been said consider this:
- The computer is the box, we can exclude keyboard, mouse and keyboard for the purposes of determining return share and equivalent share . That would also require that those items are not included in the tonnage reported as recycled by the plans. . What has been said by Apple, HP and Dell is that you do accept those items when they are returned to your recycling programs. So, we will allow them to be collected, transported and processed in these programs, but not be counted in the tonnage.
- John Merrell, We need to be clear in the definition what is included and what is not.
- Vicki Austin - Collectors can not restrict the collection of these products. When the get dropped off. If they can not included them in the total weight, how will they be compensated.
- Larry King – Forcing manufacturers to take something that is not a covered product won't work.
- Vicki: Collectors and transporters need to be compensated for the services they provide as described in the plans.
- Craig: Since the whole universe of electronic products are not covered we are going to be in the situation turning down non-covered electronic products anyway.
- Vicki: This needs to be negotiated with the plans when we agree to provide the services.
- John – Television manufacturers wouldn't want pay for the cost of computer peripherals recycling.
- Rich – would you collect them, and the plan must recycle it?
- Jay S – For the purposes of the rule would have to collect it but when determining return share, equivalent share and determining balancing wouldn't be included.
- John Merrell - If you took the pile of product (peripherals) and divide it between the participants? That means the TV people are paying for computer peripherals.
- Apple accepts it because it is the least costly once we have the item. It would cost too much to mail the items back.
- Craig: None of us are worried about one keyboard, but 10,000 is another issue. Who is going to pay for them?

- Dan: At some point there needs to be box around what you collect i.e. routers, wireless networks, cameras, etc. that list is going to get larger. Need a limit. Seems that the CPU box and monitor is a logical place to draw the box.
- Vicki: Peripheral disposal costs is borne by the plan. Don't necessarily have control over what is collected, it will be very similar what is being mailed in now. May want to be very specific about what is put in the box.
- Mike Watson: inviting peripheral manufacturers in to participate is the right thing to do, having TV and computer manufacturers be responsible for peripherals is not right.
- Rich Vernam: people are going to leave peripherals, put in a dumpster and drive it to the landfill
- Vicki: There is a cost and the expectation should be built into the cost of contracting with the plan.
- Sego: Don't mind defining box but needs to be logical box so that it is easy for the consumer to understand. Clearly, it does not include printers, people don't think of printers as being a part of a computer. But people do think the little things are part of the computer like the mouse, keyboard, speakers and cables. When a retailer provides collection services we can't have store checkers arguing with people that a mouse doesn't count and can't be accepted. That won't work and the consumer won't understand why.
- Craig: There has to be mechanism to bill for collecting the peripherals.
- Suellen: Check into Maine's program
- Vinay: Allow peripherals and charge for them, but manufacturers should no compensate for the cost.

Definition of Manufacturer:

- John Merrell: for (a) and (c) under it's own "or licensed brands"
    - Jay S: So in 15 years, Advent no longer licenses with you, what happens?
    - John: Maine shows two manufacturers as responsible. Three manufacturers are making Advent products right now.
    - If you keep the definition as the responsible party selling that product you are OK
    - Jay _so who makes that determination?
    - John: Maine is going through that process right now
    - Wouldn't it be smarter to let them work that out and keep the state out of it?
    - The biggest problem is the collector won't be able to tell which model to charge to which manufacturer so it should stay with the brand and not the licensee.
    - John Merrell: If that is the case, the licensor is defined as the manufacturer.

    - I want to make sure, you know you will be unique. Currently acceptable by me, I am a licensee. It needs to be clarified.

(Added note: The definition of manufacturer in the law clearly refers to owner of the brand being the manufacturer. Further, section 10 continues to support that the manufacturer in the current owner of the brand).

Required Brand Labeling:

- Should there be an end date associated with (3) requiring that retailers liquidate there stock by a certain point in the future?
- Sego- I think they should be able to sell.
- How do we make a determination that in compliance.
    - Invoice and other records
    - Do they have that much stock
- Wasn't meant to to be punitive to retailers.
- Larry: wasn't this mirrored after the fertilizer law?
- Suellen: big picture question: implementation. Is there any use for opportunity for comment or just sticking with rule making?
    - Jay S just sticking with rulemaking
- Are you going to create a whole sleugh of little labels? Are you basically saying they can no longer sell unbranded
- Do you mean all electronic products must be labeled?
- Need to clarify "electronic products" to limit it to the list rather than making it broader right now says "includes" needs to say limited to: this is the only definition that uses "includes"

Manufacturer Annual Registration:

- Vinay: Program administrator or person delegated authority to manage the program to sign the form.
- Mike: Adding COO doesn't add much value
- John: Corporate Executive Officer
- Cullen: COO or their designee
- Suellen – work on the language related to directly selling in the state
- Larry: the timeline when Ecology is going to provide first equivalent share comes after first registration. Need the return share information to determine what plan you want to participate in
    - (d) change plan participation to be more flexible "Plan participation information"
- Mike Watson: having a web based registration process would make it easier and keep it away from hard copy would be preferable.
- John Merrell: If the decision is made that the licensor is responsible for dividing up product among all licensees it may result in long legal delays. i.e. Thomson owns the RCA brand as it relates to television, and has left the consumer television business and transferred the RCA license under agreements with TCL. In the state of Maine as an example Thomson is responsible for RCA sets before 2004 and TTE/TCL beginning in 2004. This is an example of how the same brand can have dual responsible parties but one

licensor. A similar situation exists with our company using Advent and Jensen from AudioVox, but with AudioVox still producing some TV equipment with those names, and Thomson also using those names on audio and accessory related products.

- Jay: This concerns the issue of new entrants. Example: I go to China and order Shepard TVs and then bring them back to USA and sell them. Then I decide I am not going to sell them anymore. Who is responsible for the products?
- John: Shepard should sign up for plan participation
- Jay: If I contacted someone else to market it I should still be responsible for the products
- John: Yes, but I am concerned from a litigation perspective
- Frank: The timing of the billing notice going out in Nov. and the fee due January is not reasonable.
- Larry: should be no less than 60 days.

Registration Fee Structure:

- Where did the $475, 000 come from?
    - Fiscal note
- IF there were TV manufacturers in this room there would be riot going on. The problem with TV data is if you took total market share may look strong on CRT but isn't producing much in the way of new technology. Need to do market share by type of product: i.e. CRT and all other
- We don't know where our products end up. It is the distribution of those products by the retailers. They have better data and they should be responsible to providing the data. Concern of consulting firm, or NPD if NPD doesn't include Wal-Mart. We build Sanyo brand but guarantee that not reported even though report to Wal-Mart. Firestorm of companies that say we refuse to pay: your data is off. Retailers have no reason to lie.
- Vinay: ask that it is done by weight.
- Bill said the fee has to be current market sales which could be dollars or units. We chose to use units because of conservation issues.
- Unfair for computer manufacturers who make lighter products that are easier to recycle.
- Mo: sliding scale: started with flat fee, changed to sliding scale because concern about small manufacturers ability to pay the same as the large manufacturers – they would be paying far more than their share. Idea was to do multiple levels so that you did not need to be concerned about the exact market share so then the data does not become so crutial.
- MO $475,000 if don't spend that much does it credited or refunded?
    - It would be revenue in the fund couldn't spend it without legislative approval
    - If off by $20 -50,ooo not worry about it.
- MO: annual sales, why not dollar amounts? I see Mike is shaking head no...
- Why can't retailers provide the information?
- Mark Johnson: As representative of retailers, I support Ecology using national data, impartial third party, support what Ecology is suggesting
- Elenore: We should be talking about market segment share not market share.

- What are the cost drivers for Ecology? What drives having 2 vs 10
    - Partly number of plans
    - Registration and payment management
    - Equivalent share and return share work
    - Balancing (True-up) between plans
    - Reporting
    - Enforcement – monitoring, inspections,
- Driver, is number of manufacturers.
- Larry: if costs/workload does not depend on units sold then costs to implement for all manufacturers is similar
    - Make it very basic : set up categories
- Jay S: small manufacturers may only do 50 to 150 units a year
- Sego: agree with Larry and Mo, come up with a series of levels could build in that extreme. Wonder if CEA or EIA may have a model how they scale their membership fees
- CEA has a model and John Merrell would be willing to see if they are willing to share.
- Vinay: believe categories way to go recommend weight or types of products sold, break it up by laptop, CRT,
- Jay S – Ecology's costs will not vary based on the type of product
- John Merrell: support proposal to break down by category Orphan issue will come up. Exemptions in some states to allow small volume producers to be exempt if the cost of the orphan product is greater than own product
- Vinay: Maine defines that if Return share is than 1% then they are considered de-minimis and are exempt
- Rich Vernam: different categories :
    - If different levels Ok
    - Think it complicates it to assign different costs based on costs of recycling which has no bearing on cost to implement
- Rich: what is covered electronic product: DLP was covered in survey so sending them a bill
- Rich: how are you going to figure out little people, and where did the list come from?
- Will the list be made public.
- We took the state of Maine's list and then did research to identify more businesses in WA
- Dan Phillips: balance between the administrative costs is inverse to benefits this derives
- Suellen: A lot of conversation during 2488 was about free riders and try to close it as much as possible. In support of bracketing approach and have the lowest bracket have small fee so there is no disensitve to participate. We want them to register.
- Vinay: If a bill is sent to manufacturers and they don't pay, what will you do?
- Jay S: Rebill and send a notice that they can't sell product in the state.

- Frank: We would like to see what is sold in WA but would not like to see us spend that much on a study. ($200,000 to $350,000). We would like to see Ecology come up with a way to get the data and not rely on national data
- John Merrell: post it on web site for the manufacturer list
- Cullen: doesn't tell us who we don't know about
- Want to see list of manufacturers so that we can see who is on the list and who is not on list.
- Jay S – heard desire for WA level data but are you willing to get it for $350, 000?
- Mark Johnson: what is wrong with national data
- John Merrell: no national data that includes WalMart getting the data through consultants which is not a good idea
- Mo: where to get the data? From retailers? It was robustly debated during session? The legislature said not to go to retailers.
- Vinay: there are areas in US that are more prone to buy Apple products The Consumer Electronic Retailers Coalition indicated in the NEWMOA process that if a state was purposing market share they would hand over data
- John Merrell: I put getting data from retailers back on the table
- Mark Johnson: first off I am supporting Ecology's recommendation. Retailers are very different. Wal-Mart may be able to tell you exact data, how do you compile this information from different sources into one? I am happy to approach CERC about this.
- John Merrell: when I have a product safety issue I can get it broken down by the exact store
- Jay S: I am hearing that you are uncomfortable with the national data at low-ball price. Who is uncomfortable? John, Frank, Rich, and Vinay (conditional)
- Mike Watson: is it possible to see what the national data would produce?
- Mark: What would it take to get that data?
- Jay S: We would have to spend $4000 to get the data?
- Mark: Manufacturers would like to see the data to decide if they are comfortable?
- Ellenore: National data with combo of tiering would help with some of the concerns.

Transporter/Collector Registration:

- Vicki: current process being implemented that requires transporters to be registered. Wants the form required by 5788 to be consolidated with this form.
- Cullen – we can get this fixed for you. Doesn't say we will use the form. We will figure out how to use the form.
- Suellen: needs to be simple. The definitions of transporter may be different. Why is there a need for a deadline in the rule?
- Sego, need an annual registration date but don't tie it to participation in the plan the next year.
- Vinay: who pays for the processing of these forms?

- The law did not establish a registration fee for collectors, transporters or processors. The costs are to be covered be the administrative fee.
- Vicki: should be same information required to register under this bill and 5788. I agree there should be a way to allow transporters andcollectors to registerall year but not allowed to work until approved by Ecology. We (WRRA) have supported a transporter fee and a requirement to provide financial assurance so that you don't end up with a mess when don't do it right.
- Mike Watson: We have worked hard to raise the bar, for transporter We don't want state standards to lower the bar. Is there any way to put assurances back in to the process.
- Cullen This fall, in Phase 2, is the way to do it.
- Mike: being able to complete form without any standards does not seem way to go.
- Sego: Registration should be allowed throughout the year. We did not wanta fee to prevent people from participating.
- Mike: We are still moving sensitive materials and we get no assurances that it is handled responsibly.
- Jay S: We will look at existing requirements and see where the gaps and fill them if it is needed.
- Mike: Can we add some sort of measurement that says they meet standards?
- Suellen: The way the bill was written it does not put the oneness on Ecology to ensure transporters, collector and processors are meeting standards, but rather on manufacturers through the plans. Plans would implement tools to make sure standards were met.
- Vicki – There are lots of things that should be in performance standards. But, financial assurance should be part of registration. Need to hold these companies responsible for doing the right thing.
- Cullen: We will look into this to see if we can include financial assurances.
- Need to include a way to remove bad actors.
- Sego, how does it play out for a variety of collector types, Staples, Goodwill, haulers?
- Vicki: we have had issues that says we are a collector that leave the property in a mess and the state has to pick up the tab. We need to fix this now.
- Suellen: we can add a reference to the standards in the registration. Or, includes "standards of service"

Processor Registration:

- Do you want to have list prior to writing the plan?
    - John Merrell: yes
    - Mike Watson: yes
    - Rich: yes
    - Vinay: yes
    - Frank: yes
- Sego, I think this is a disaster. Anyone can sign up.
- Mike/John: we want a list of processors with standards.

- Sego: set up so that the due diligence was manufacturers to make sure processors meet standards.
- Mike Watson: 2 opportunities 1. what is the min. standards hold people accountable for. 2. Then I need to evaluate that list and choose from your list. This is how Maine set it up. Can we do that here?
- Suellen: It is not the way the bill is written. Ecology is to set up perfomance standards, and then the manufacturer is to submit documentation within the plan that shows they audited the processor and they met the standards. Fiscal note did not include costs for Ecology to audit facilities.
- Mike : Basic ticket to get in and then there is a more difficult
- Cullen: We already have recycling standards, we can put those in here "Minimum Functional Standards" I can only do it for WA.
- So add in language..."documentation that they meet the minimum recycling standards"
- Jay S – These entities have to be in compliance standards that now exist or may be promulgated in the future.
- Craig: As a business I would support high standards. Part 1 is developing rules to establish list and Part 2 is where we establish standards
- Vicki: I agree with Craig except that I believe that there is a minimum body of info that should be included to prove that they are a legitimate business so that you can feel confident when contracting with them. (Jay will call off line)
- Suellen: If this is a list where manufacturers chooses processors, there needs to be a way to ensure that they are meeting the standards. Ecology would need to audit.
- Suellen:Option 2: manufacturers do due diligence, and then they prove that in the plan, and then the list on web site would show who is being used.
- Sego: List was also provided so that can see how services were being used.

Audience:
Mark RE-PC in Seattle: accreditation of who takes back the products. 3000 financial assurance we have to have. How do we fit in? We are a retail recycler? We are a processor, collectors, and resale? Since the off-shore recycling line item veto, Can we even discuss that?

- First question: you could be all three
- Second question: we are not going to discuss off-shore recycling

Prima technology: Use off-shore processorer. Gov vetoed section 26, she is telling Ecology to look at it, and to be prepared with options. So if being re-utilized it is ok to send it off-shore (HWTR policy)?

Re-PC: what do manufacturers want? What type of assurances do you need?
We won't know that until the rule is developed.
What about the export of hazardous electronic products to foreign countries?

- Gov vetoed this language in the bill but her veto message provided language of other things that can be done to address that. Other opportunities to look at to address this in the rule making process.

Pitch in for definitions: desktop

- Gets very complicated when start to include speakers, mouse, keyboard. Public already understands that need to pay for that equip i.e. $.50 or can throw it away.
- What is your experience with take-bake network? They bring everything back.

Next steps:

- Trying to re-schedule. Looking into an alternative date. Leaving it as June 23.
- Take comments back and incorporate into language and send it out for review for next meeting.
- May be a quick review but we will try to get info out ASAP.
- We will iron out issues brought up today.