



E-Cycle Wisconsin Guidance on Reporting and Recordkeeping for Recyclers and Collectors Working with Other Collectors

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Purpose

This document provides guidance on reporting and recordkeeping requirements for:

- registered E-Cycle Wisconsin recyclers; and
- registered E-Cycle Wisconsin collectors that receive eligible electronic devices from other registered collectors.

Definitions and roles

Under Wisconsin’s electronics recycling law, there are separate definitions for a “collector” and a “recycler” of electronics. Definitions below are provided to make this document easier to understand. A citation is provided when definitions are specified in law.

A **collector** is a person who receives eligible electronic devices from households or covered schools and delivers, or arranges for the delivery of, these items to a registered E-Cycle Wisconsin recycler [s. NR 287.17 (1) (c), Wis. Stats.]. Collectors must register with the Department of Natural Resources if they send eligible electronics to a registered recycler that will recycle them on behalf of a registered electronics manufacturer registered.

A **collection site** is a physical location where a registered collector collects eligible electronics from the public. Collectors may have multiple collection sites listed on their registration.

A **recycler** accepts eligible electronics from registered collectors for the purpose of recycling [s. NR 287.17 (1) (L), Wis. Stats.].

Recycling means preparing eligible electronic devices for use in manufacturing processes or for recovery of usable materials and delivering the materials for use. Recycling does not include destruction by incineration or other processes or land disposal of recyclable materials, and does not include reuse, repair or any other process through which eligible electronic devices are returned for use by households or schools in their original form [s. NR 287.17 (1) (m), Wis. Stats.].

A recycler must register with the DNR to receive and recycle electronics on behalf of electronics manufacturers—that is, in order for the pounds it recycles to count toward manufacturers’ annual recycling targets. If a recycler is also directly collecting electronics from Wisconsin households or covered schools, it must separately register as a collector [s. NR 530.08 (1) (a), Wis. Adm. Code].

For the purpose of this document, a **super collector** is a registered E-Cycle Wisconsin collector that receives eligible electronics from other registered collectors.

Collectors receiving electronics from other collectors

The law outlines a straightforward and simple flow of electronics, where registered collectors send whole eligible electronics directly to registered recyclers. In practice, relationships among registered collectors and recyclers have become more complicated as the electronics recycling industry has matured and market conditions have changed. This

E-Cycle Wisconsin definitions

Eligible electronic devices include:

- cellphones, other telephones with a video display and phone accessories operated by a battery;
- computers (desktop, laptop and netbook computers);
- desktop printers (including those that scan, fax and/or copy and 3-D printers);
- computer monitors;
- other computer accessories (including keyboards, mice, speakers, external hard drives and flash drives);
- DVD players, VCRs and other video players (i.e., DVRs);
- FAX machines;
- tablets and e-readers;
- televisions;
- video game consoles; and
- video game system components and portable hand-held video game devices operated by a battery.

Only electronics from Wisconsin households and K-12 schools are eligible. For more details, refer to *Guidance on Definitions of Covered Devices (WA-1474)*.

makes it challenging to accurately track the flow of eligible electronics from a collection site through to final downstream markets, as required by law.

In addition to the straightforward relationship outlined in s. 287.17, Wis. Stats., current scenarios include:

1. Registered collectors that do not collect any eligible electronics on their own, but receive eligible electronics from other registered collectors, consolidate/repackage them and send them to a registered recycler.
2. Registered collectors that receive material from both their own collection sites and other registered collector(s), and send all materials to a registered recycler.
3. Registered collectors that divert and dismantle some of the electronics they receive, including electronics received from other registered collectors, and send the rest as whole devices to one or more registered recyclers. Collectors that send material to a collector that also dismantles electronics often view these collectors as their recycler. Collectors described in this scenario are not dismantling and recycling eligible electronics with the intent of selling those pounds to a registered manufacturer or authorized broker, and therefore are not required to register as a recycler under s. 287.17 (8) (a) 1., Wis. Stats.

These scenarios illustrate how difficult it can be to track what happens to electronics collected through E-Cycle Wisconsin. It is important that collectors that fit one of these scenarios follow reporting requirements in s. NR 530.08, Wis. Adm. Code, and contact the DNR with questions about accurately reporting weights under E-Cycle Wisconsin.

Annual reporting requirements

Collectors

Under s. 287.17 (7), Wis. Stats., E-Cycle Wisconsin collectors must re-register and complete an annual report using the DNR's online reporting system by Feb. 1 each year. The collector must report the weight of eligible electronics received from Wisconsin households and covered schools and the names of the registered collector(s) or recycler(s) to which it sent the electronics. Under s. NR 530.08 (2) (b), Wis. Adm. Code, a collector must report separate totals for the weight of eligible electronic devices from rural and urban counties. If a collector does not know the source county, the weight must be counted in the total for urban counties. To determine county status, [check the map available on the DNR website](#).

If a registered collector receives electronics from other registered collectors, it must also report the name of each collector that sent weight and the weight received from each [s. NR 530.08 (2) 3., Wis. Adm. Code]. This ensures weight can be accurately tracked and not double-counted. Refer to Appendix A at the end of this document for a worksheet showing how "super collectors" must report their weights.

Recyclers

Under s. 287.17 (8), Wis. Stats., by Feb. 1 each year, E-Cycle Wisconsin recyclers must re-register and complete an annual report. Under s. NR 530.09, Wis. Adm. Code, the recycler must report the weight of eligible electronics received from registered collectors (including the weight it took in as a collector, if applicable) and the recycled weight assigned to registered manufacturers or authorized brokers. In addition, recyclers must list pounds they received that are ineligible for manufacturer credit. This includes the weight of eligible electronics received from registered collectors that were diverted for reuse/refurbishment, rather than recycled. It also includes recyclable materials derived from eligible electronics, such as cathode ray tube glass, that were not recycled. Refer to *Guidance on Determining Whether Materials Are "Recyclable" Under E-Cycle Wisconsin* (WA-1917) for more details.

Under s. 530.09 (2) (a) 2., Wis. Adm. Code, a recycler must report separate totals for the weight of eligible electronic devices. To determine county status, [check the map available on the DNR website](#).

Registered recyclers that purchase "paper weight" (weight of electronics processed by another recycler) of eligible electronics must notify the DNR they are acting as authorized brokers and follow the guidelines in *Guidance on Sale of "Paper Weight" Among Registered Recyclers* (WA-1476). Paper weight is purchased or traded to meet recycling targets for registered manufacturers.

Recyclers must also submit a mid-year report to the DNR by Aug. 1 with the weight of eligible electronics received during the first six months of the program year on behalf of registered manufacturers or in anticipation of attributing them

to a manufacturer. Refer to Appendix B at the end of this document for a worksheet showing how to report weights on the annual and mid-year reports.

Guidelines for providing weight reports to registered collectors

To ensure accurate information is submitted to the DNR under s. 287.17 (7) (b), Wis. Stats., it is important registered collectors receive clear, accurate weight summaries from the collectors and recyclers they send eligible electronics to. In addition to providing receipts, invoices or certificates of recycling for each load, the DNR recommends recyclers and “super collectors” send a summary of weights received during an entire program year, so the original collector can accurately report this information to the DNR by Feb. 1.

The DNR recommends that receipts or reports a registered recycler or “super collector” sends to the collectors from which it receives eligible electronics include the following elements:

1. A clear statement of the time period covered by the document. If it is for specific loads, list the date each load was received.
2. Clearly label any material categories as either “eligible” or “non-eligible.” For example, “Eligible TVs,” “Eligible peripherals” or “Non-eligible miscellaneous electronics.”
3. Define any material categories used that are not clear from the labels, such as “Eligible peripherals,” “Misc. eligible electronics,” etc., by providing a list of the types of items in these categories.”
4. If electronics are received from a collector with locations in multiple states, the report should clearly specify from which state each load came or that it includes only electronics from Wisconsin sources.

If the document is a program year summary, the DNR recommends that it also include the following:

1. The phrase “Summary of eligible electronics received under E-Cycle Wisconsin during program year X (Jan. 1 to Dec. 31, 20XX),” with the program year number and year filled in.
2. A total weight of eligible electronics with the clear label “Total pounds of eligible electronics received during program year X.” There should also be a statement noting that this is the weight the collector should report to the DNR.
3. A clear indication as to whether the pounds are considered urban or rural under s. 287.17 (1), Wis. Stats.

The DNR encourages recyclers or receiving collectors to provide samples of reports to the DNR to ensure guidelines are met. DNR staff may discuss the report format during inspections.

Recordkeeping requirements for “super collectors”

Under s. 287.17 (7) (b), Wis. Stats., collectors registered with E-Cycle Wisconsin must maintain records of sources of eligible electronic devices collected in Wisconsin for recycling on behalf of a registered manufacturer, along with information about where electronics go after they leave a collector facility.

If some of the weight a collector is receiving comes from other registered collectors, the “super collector” must keep records of the weights received from each of those collectors, in addition to anything it has collected at its own site(s). This is to account for the sources of weight sent to registered recyclers and to provide the other registered collectors with totals for their own reporting to the DNR.

Collectors must maintain records required under s. 287.17 (7), Wis. Stats., or s. NR 530.08, Wis. Adm. Code, for a minimum of three years.

Recordkeeping requirements for recyclers

Under s. 287.17 (8) (b), Wis. Stats., recyclers registered with E-Cycle Wisconsin must maintain records of sources of eligible electronic devices collected in Wisconsin for recycling on behalf of a registered manufacturer, along with information about where electronics go after they leave a recycler’s facility. This includes the weights received from each registered collector the recycler works with (if a recycler is also doing its own electronics collection, it must register as a collector). This information is used both for its own reporting to the DNR and for providing weight totals to collectors for their reports.

Recyclers must also keep records related to where electronics go after leaving the recycler's facility. A recycler shall maintain records of the total weight of materials derived from eligible electronics that it sent to another person or company for use in a manufacturing process or for recovery of useable materials, and the total weight of materials derived from eligible electronics that the recycler sent to be disposed of in a landfill or incinerator because the materials could not be recycled or reused.

In addition, a recycler must track and maintain records of where materials from eligible electronics go for at least two steps downstream. Specifically, the records must identify each vendor that receives materials derived from eligible electronics. If the first downstream vendor does not use the materials in a manufacturing process, the recycler must maintain records identifying each vendor that receives materials derived from eligible electronics from the first vendor. The registered recycler must also maintain records that show the actions it takes to ensure that the vendors are legitimately recycling the materials—that is, the vendors use the materials in a manufacturing process or for recovery of usable materials.

Finally, s. NR 530.09 (5), Wis. Adm. Code, requires recyclers to use a bill of lading for transporting electronic devices and their components from the point of collection or consolidation to a recycler's facility, and for transporting electronic devices and their components from the recycler's facility to other recyclers or end users of the material.

Each bill of lading must include:

- the date the load was picked up from the originating facility and a description of the load, including the type of materials and number of pallets or containers;
- either the weight of the load, if a scale is available, or the estimated weight of the load; and
- signatures from both the shipper and the receiver.

If no one is available at the collection or consolidation point to sign the bill of lading when the load is picked up, the person picking up the load (the “receiver”) should leave a copy for the collection site owner or operator (the “shipper”) to sign and send back to the recycler. The collection site representative should verify the information on the bill of lading is accurate before signing. It is the recycler's responsibility to retain a signed copy of the bill of lading for each load that is picked up.

Recyclers must maintain records required under s. 287.17 (8), Wis. Stats., or s. NR 530.09, Wis. Adm. Code, for a minimum of three years.

More information

More information for E-Cycle Wisconsin registered recyclers and collectors, including links to other guidance documents mentioned above, is available on the DNR website. Go to dnr.wi.gov and search “ecycle.” For help registering or accessing the online reporting system, contact DNR E-Cycle Wisconsin staff at DNRWle-cycling@wisconsin.gov.



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Appendix A: DNR reporting worksheet for collectors receiving electronics from other collectors

The tables below show how collectors will need to report these weights in the annual report form. The online system will automatically calculate totals. The total weight collected or received from other collectors (part A) must equal the total weight the collector dismantles or sends off-site for recycling (part B).

A. Weight of electronics collected or received

Note: include pounds of eligible electronics you collected at your own sites or events.

Collector name	Pounds from urban counties	Pounds from rural counties	Total pounds
TOTALS			

Total pounds collected or received _____ pounds

B. Weight of electronics recycled/sent off-site

Non-eligible pounds

1. Electronics included in part A that the collector dismantled: _____ pounds

2. Electronics included in part A that the collector sent as whole devices to non-registered recyclers: _____ pounds

Eligible pounds

3. Pounds of eligible electronics included in part A sent to registered recyclers

Recycler name	Pounds from urban counties	Pounds from rural counties	Total pounds
TOTALS			

Total pounds sent off-site (add #1, 2, 3): _____ pounds

Note: Total from part A must be greater than or equal to total from part B.

Appendix B: DNR reporting worksheet for recyclers

The tables below show how recyclers need to report weights in the annual report form. The online system will automatically calculate rural credits and totals. The system will not allow a recycler to submit its form if this “mass balance” is negative—that is, it won’t let the recycler report more pounds sold or assigned to brokers or to manufacturers than it has received from collection.

A. Weight of eligible electronics received from registered collectors

Collector name	Pounds from urban counties	Pounds from rural counties	Rural weight x 1.25	Total pounds (urban weight + rural weight x 1.25)
TOTALS				

Non-eligible pounds

Pounds of electronics included in above totals and diverted for reuse/refurbishment: _____ pounds
 Pounds of recyclable materials sent to landfills: _____ pounds
 Pounds of recyclable materials sent to incinerators: _____ pounds
 Pounds of recyclable materials in long-term storage: _____ pounds

B. Summary of eligible electronics eligible for manufacturer credit

Total weight of EEDs received from registered collectors (including rural credits): _____ pounds
 Total weight of EEDs received diverted for reuse/refurbishment: - _____ pounds
 Total weight of recyclable materials sent to disposal and long-term storage: - _____ pounds
Total weight of EEDs available to recycle for registered manufacturers: _____ pounds

C. Weight of recycled eligible electronics sold or assigned to brokers or registered manufacturers

Include weight assigned to brokers, including other registered recyclers acting as brokers.

Manufacturer/broker name	Pounds from urban counties recycled	Pounds from rural counties recycled	Rural weight x 1.25	Total pounds recycled (urban weight + rural weight x 1.25)

Mid-year recycler report

The tables below show the information that recyclers will need to provide on their annual mid-year report, due Aug 1. Totals on this report cover January 1 - June 30

Pounds of EEDs received for recycling on behalf of a manufacturer or broker				
Manufacturer/broker name	Pounds from urban counties recycled	Pounds from rural counties recycled	Rural weight x 1.25	Total pounds received (urban weight + rural weight x 1.25)

Pounds of EEDs received that may be attributed to a manufacturer (exclude pounds counted above)			
Pounds from urban counties	Pounds from rural counties	Rural weight x 1.25	Total pounds received (urban weight + rural weight x 1.25)