

## Electronics Recyclers Registration FAQs July 2015

### What is the intent of registration?

- Registration is required by § 130A-309.142.
- Registration of electronics recyclers is part of the state's efforts to ensure that electronics are handled properly to prevent harm to the environment and public health.
- The registration form and process are designed to also ensure that electronics recyclers are aware of applicable laws, regulations, and certifications related to handling electronics, including recent changes to laws on speculative accumulation.
- The proper management of Cathode Ray Tubes (CRTs) is a particular focus of the registration process because of recent related compliance incidents in North Carolina.
- Registration will also determine generally and as comprehensively as possible which companies are involved in handling covered electronic devices in the state.

### What devices are addressed under registration?

- The registration process is focused on "covered devices," with particular concern placed on CRTs. Covered devices include two main categories: computer equipment and televisions.
- DENR is not seeking information about the broader category of "electronic devices." Companies that handle electronic devices but do not handle any covered devices – i.e., they do not handle any computer equipment or televisions – do not need to register.
- Statutory definitions of covered devices can be found in § 130A-309.131(5).

### Who should register?

- Companies doing business in North Carolina that collect, receive, accumulate, or process covered devices should register. As noted above, any company that handles electronic devices but not any covered devices (i.e., computer equipment and televisions) does not need to register.
- Local government recycling programs are effectively registered under the separate annual statutory Local Government Solid Waste and Materials Management Report process.

### What about proprietary information?

- DENR does not anticipate that answers to questions in the report form will require proprietary information. These questions should assist electronics recyclers in understanding their own compliance status in regard to speculative accumulation and other regulatory elements of electronics recycling.
- General information is sufficient in answering the question regarding activities conducted by the registrant, as per the parenthetical example (top of page 2 on the form). The intent of the question is to get a *general sense* of the role a company is playing in the management of covered devices in North Carolina.
- The question about pounds or tons handled by the registrant is indicated as optional.

### **How will registration be enforced?**

- DENR will monitor response to the registration process and remind companies who may be subject to the law to register. Reminders will take the form of compliance assistance in 2015, and will include outreach activities such as general announcements, direct emails or phone calls, or possibly site visits.
- If, during routine inspection activity or in response to complaints, DENR determines a particular facility should register but has not done so to date. This information will be included this in DENR's site visit report.

### **What will DENR do with the registration list?**

- The registration list will be used to gain a broad understanding of electronics handling in North Carolina. DENR does not intend to release the registration in a public document or forum.
- DENR will use the information to provide technical assistance to companies on regulatory or other issues, including certification.
- If DENR conducts any kind of bid process for a statewide electronics recycling convenience contract for use by local government recycling programs and other government agencies, it will require any prospective selected vendor to be registered. NC Department of Administration State Surplus Property may also use the list to check on any vendor proposing or bidding to handle state-owned and discarded electronics.