

Convenience Standards White Paper

Prepared for the Oregon Product Stewardship Stakeholder Group

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A. Convenience Standards

In the context of product stewardship, convenience standards refer to the nature and extent of requirements to provide opportunities to the consumer for the collection of a discarded product for the purpose of end-of-life management. The concept relates to the product stewardship principle that a producer of a product is responsible for addressing the end-of-life management of that product. One aspect of fulfilling that responsibility is to finance and provide for some standard of convenient collection for the covered product.

A convenience standard for collection of the discarded product helps to ensure that the goal of recovering the waste product is accomplished. It helps to assure that the public has available and convenient option(s) to discard the unwanted/used product. A convenience standard for collection enables the consumer to fulfill their responsibility of bringing the product to a collection point at the end of its useful life. If the stewardship program being implemented includes the principle of providing environmentally sound management of the waste product, then a convenience standard for collection can help assure the consumer that the waste product is being managed in an environmentally safe manner if they are using a collection point provided by the stewardship program for the covered product. The more convenient a program collection point is for the consumer, the higher likelihood they will use that collection option.

Generally convenience standards in product stewardship programs may include some or all of the following elements:

1. Free to the consumer at point of collection
2. Statewide coverage, including both urban and rural areas
3. Collection point open/available reasonable and convenient hours
4. Collection services/locations established based on population centers/population density, and/or some standard geographic distribution
5. End-of-life collection options should be as convenient as it is convenient to purchase the product
6. Depending on the product, collection points may include some or all of the following: municipal drop off sites, collection events, household hazardous waste facilities, retail stores, mail-back options, Goodwill and other nonprofit drop off sites, recycling centers, and transfer stations.

B. Convenience Standards used in existing Oregon solid waste programs:

- **ORS 459.015** states that every person in Oregon should have the opportunity to recycle.
- **1983 Opportunity to Recycle Act:** Required curbside recycling collection at least once a month in towns with a population of 4,000 or more.
- **1991 Oregon Recycling Act:** Includes requirements in 1983 law and added a menu of other collection service options to select from such as provision of weekly curbside, collection from multi-family dwellings and collection from commercial generators of waste.
- **2007 Oregon E-waste Law:** Requires convenient service in every county in the state and at least one collection site for any city with a population of at least 10,000. Collection sites must be staffed and open to the public at a frequency adequate to meet the needs of the area being served. Collection is provided free of charge. The law allows for supplemental “premium service” at a charge.
- **2009 Paint Pilot Program Law:** Requires convenient and available statewide collection of paint in urban and rural areas of the state. It is to be free of charge for the consumer at the point of collection.
- **2009 Oregon Bottle Bill Expansion:** 1) Collection/ redemption programs covered under the law require all retailers of 5,000 square feet or more to take back all sizes and brands of covered beverage containers they sell. Consumers are limited to 144 containers per day. 2) Retailers of fewer than 5,000 square feet may accept brands and sizes they sell. Consumers are limited to 50 containers per day.

C. Convenience standards used in other programs:

- **Canada:** 1) British Columbia, Manitoba, New Brunswick paint regulations, and the Saskatchewan tire, paint, and e-waste regulations simply require stewardship programs to provide “reasonable and free consumer access throughout the province.” 2) The Saskatchewan regulation for used oil requires a prescribed level of service for each region of the province. Some regions must provide permanent collection depots and some can provide alternatives including collection events, return-to-retail and at door pick-up. 3) The Nova Scotia paint program requires producers to assure return to retail in locations that sell paint or provide depot collection throughout the province. Collection services must be open regular business hours and accept any quantity and brand of paint returned by the consumer.
- **Other United States:** Most other legislated product stewardship programs do not prescribe detailed convenience standards.
- **Norway:** Electronics program requires all businesses who sell products to accept waste products and all municipalities to provide collection programs. The producers cover the cost of the collection programs.

- **European Union:** For electronics and electrical products, 18 of the 27 EU countries require distributors/retailers to collect waste products from consumers, 14 of the countries require municipalities to offer collection options, and 13 require producers to provide options. Depending on the country, there are different combinations of retailers/distributors, municipalities, and producer collection options. The WEEE directive does not require a minimum number of collection points, but only requires member states to set up efficient collection schemes that achieve a high level of collection and minimize disposal in general garbage.

D. Consideration of a Convenience Standard:

BENEFITS	CONCERNS
<ul style="list-style-type: none"> • Equity for consumers who pay for end-of-life management service when they purchase the product. • Consumer has reasonably convenient options for “disposing” of the product when they are through using it. • Higher rate of recovery of waste products. • Reduce disposal and illegal dumping. • Collection/return options in both urban and rural parts of the state. 	<ul style="list-style-type: none"> • Increase the cost of the collection program. • Retailer space and staffing problems if return to retail is provided. • Extent and use of existing collection infrastructure. • Potential losses of revenue for existing infrastructure if not part of the stewardship collection program or collection costs are not covered by the stewardship program. • Markets for materials, if strong, can help create a robust collection system and reduce costs. If weak, can increase the need for collection standards and increase overall costs of collection and end-of-life management. • Coordination of collection points for various products.

Other general considerations:

- Public expectation and need
- Strength of current collection infrastructure
- Strength of the market for the collected materials. Is it enough to drive a robust collection program without a standard?
- Existence of quantitative performance goal for the amount of product collected.

- Environmental risks of illegal disposal or poor end-of-life management practices due to the nature of the product or the nature of the existing infrastructure.

E. Input needed from the Stakeholder Group:

- What are the most important purposes for a convenience standard?
- What are the most important attributes of a convenience standard?
- Are there products and circumstances where a convenience standard is not needed or should not be a priority concern for the success of a stewardship program in Oregon?
- Using product examples of e-waste, paint, carpet, and batteries, how could the need and specific attributes of convenience standards differ?
- How important is it to assure, in a legislated program, that collection services are reasonably available in both urban and rural areas of the state? What can be considered reasonably available?
- Are there products and programs where other convenience or service standards besides collection should be considered? What would those standards be in general?

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