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**Testimony of the Electronic Industries Alliance
Richard Goss, Director of Environmental Affairs
before the
Subcommittee on Superfund and Waste Management
United States Senate
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Introduction

Thank you Chairman Thune, Senator Boxer and members of the Subcommittee. My name is Richard Goss, and I am the Director of Environmental Affairs for the Electronic Industries Alliance (EIA). EIA is the leading advocate for the \$400 billion U.S. high-tech and electronics industries. Our 1,300 member companies provide products and services ranging from microscopic electronic components to state-of-the-art defense, space and industry high-tech systems, as well as the full range of telecommunications, information technology and consumer electronics products.

EIA appreciates the opportunity to provide the views of our membership concerning the end-of-life management of our products. We commend the Subcommittee for holding this hearing and advancing the dialogue on this important issue. We would also like to thank Senators Wyden and Talent for their efforts and leadership in this area.

Industry Commitment

EIA and our member companies support the safe and appropriate recycling of used electronics products to help meet the important environmental goal of increasing resource conservation and recovery. As manufacturers, we recognize that we are a key partner in the process, and we will continue to work with Congress, federal agencies, the states and involved stakeholders to address this challenge.

The ongoing commitment of our member companies to product stewardship, environmental design and recycling can best be demonstrated by listing some of our industry's concrete achievements:

- Through a combination of direct corporate efforts and innovative partnerships – including U.S. EPA's Plug-in to eCycling campaign – EIA member companies have been involved in the proper recovery and management of well over one million tons of used electronics products. In addition, EIA member companies use significant quantities of recycled materials, including glass, metals and plastics, in new generations of their products.

- EIA member companies are on target to be in compliance with the European Union Directive on the Restriction of Hazardous Substances (the RoHS Directive), which will take effect on July 1, 2006. Since electronics products are manufactured for global sale and distribution, U.S. consumers will have broad access to products that comply with the new EU requirements.
- As a result of our members' long-standing dedication to product stewardship and technological innovation, the electronics industry continues to achieve significant and sustained environmental progress throughout the entire product lifecycle: from design, through beneficial use, to end-of-life. On the whole, every year our products become more energy efficient, use fewer materials of potential environmental concern, and become easier to upgrade, disassemble and recycle.

EIA is currently compiling a record of member-company achievements in the areas of product stewardship and design for the environment, and we will be happy to share this document with the Subcommittee once it is completed.

In summary, we support electronics recycling as a way to conserve and reclaim resources. However, this is a complex challenge that will require the coordinated efforts of all the key stakeholders to resolve.

General Recommended Approach

Given the complex nature of the challenge, EIA supports efforts to establish a viable recycling infrastructure in which all the major stakeholders – manufacturers, government, retailers, non-governmental organizations (NGOs) and recyclers – participate based on their unique expertise and capabilities. The combined goal of these institutional stakeholders should be to develop a recycling infrastructure that is convenient for the residential consumer. Implementing a system based on principles of shared responsibility will increase the efficient collection of electronics and ensure economies of scale by taking advantage of existing infrastructure. EIA supports equitable, flexible and cost-efficient solutions that encourage the proper management of used electronics while limiting additional costs to the public for these popular products.

Environmental Discussion

EIA believes it is essential to consider the science related to electronics products as part of any public policy discussion regarding recycling. Certain compounds are present in electronics products, such as lead and mercury, that provide clear safety, performance and energy efficiency benefits. These compounds should be appropriately managed at the end of life. U.S. EPA shares this view, and has consistently stated that used electronics products, when properly managed, do not represent a human health or environmental concern. The agency considers electronics recycling as fundamentally a solid waste management and resource conservation issue. Likewise, our member companies recognize that reusing and recycling electronics at the end of life is the most environmentally preferable option, and we support reasonable efforts to develop the recycling infrastructure.

Suggested Federal Role

As you know, three states have already enacted three very disparate statutes which address electronics recycling. Numerous other states, and even some localities, have either developed special regulations for the handling of used electronics, or are actively considering their own electronics recycling legislation. These approaches often include significant variations in terms of financing mechanisms, the scope of covered products, the roles and responsibilities of key participants, and the overall regulatory structure.

Industry and other stakeholders are rightfully concerned that a potential confusion of state recycling laws and regulations will prove costly, inefficient and perplexing. There is clearly a role for the federal government to play in bringing national consistency to this emerging field.

Federal action can help promote safe and environmentally sound recycling by creating a streamlined and uniform regulatory framework that removes artificial barriers and instead encourages the free flow of used products for proper management. Specific steps include:

- Establishing consistent regulatory definitions of key terms, and strictly defining the scope of covered products through the application of fixed criteria;
- Considering the establishment of a flexible third party organization that can help with roles such as data reporting, compliance, and financing;
- Ensuring broad consistency in labeling, product information, and regulatory reporting requirements; and,
- Assessing whether additional recycling regulations or standards are necessary to ensure the safe and environmentally sound management of used electronics.

EIA and our member companies stand ready to work with the Subcommittee on these and other initiatives. Thank you again for the opportunity to share industry's position on this important issue. I would be pleased to respond to any questions.