eCYCLE DC: Frequently Asked Questions

For 2027 Registration Applications due October 1, 2026

This document provides information to assist manufacturers in registering for the eCYCLE DC program for 2027. Registration applications are due October 1, 2026. For more information, see doee.dc.gov/ecycle.

General

1. **Which sections of the D.C. Official Code and regulations govern the eCYCLE DC program?**

   D.C. Official Code §§ 8-1041.01 to .12:
   https://code.dccouncil.gov/us/dc/council/code/titles/8/chapters/10B

   D.C. Municipal Regulations, 20 DCMR §§ 4100 to 4199:
   https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/20%20DCMR%204100%20-%20eCYCLE%20regulations_2022.pdf

Registration Applications

2. **What is the registration deadline in the eCYCLE DC law?**

   District law requires submission of registration applications by October 1, 2026. Failure to meet this deadline is an infraction under Title 16, Section 4013.5, of the District of Columbia Municipal Regulations.

   The registration fee is determined by registration category and the number of units of covered electronic equipment (CEE) sold, or estimated to be sold, in the District in calendar year 2025. See https://doee.dc.gov/service/eCYCLE-DC-Manufacturers for more details.

3. **What process will DOEE follow if an application item is missing or deficient (other than the fee)?**

   DOEE will continue to answer questions, but if DOEE review indicates that there is a problem with an application, DOEE staff will disapprove the application and explain the corrections needed. The manufacturer, partnership, or representative organization will need to make corrections and resubmit the application for DOEE review and approval. Applications must be fully approved by January 1, 2027 for manufacturers to be in compliance at the beginning of the 2027 program year.

4. **What sales data do manufacturers in a representative organization need to report regarding market share?**

   Each member of a representative organization must report the units and weight of sales of CEE in the District to DOEE.

   Representative organizations must provide DOEE with:
   (a) The relative market share, by percentage, of each of its members based on the members' reported CEE sales and
   (b) The total pounds of CEE sold in the District by all manufacturers in the representative organization.
   D.C. Official Code § 8-1041.03(b)(9)(C) and (10).

5. **What should manufacturers report in their registration forms about end markets?**

   D.C. Official Code § 8-1041.03(b)(4) requires manufacturers to report on the location of planned end markets for their electronics recycling program in the upcoming calendar year. D.C. Official Code § 8-1041.03(b)(3)(F) requires manufacturers to report on the end markets used in the previous calendar year.

   For the end markets for hazardous materials or items, manufacturers must summarize the commodity the materials or items are processed into, describe their "End Processor," or note if they are prepared for "Direct Reuse" or if "Final Disposal" is used (the quoted terms are defined in version 4.1 of the e-Stewards standard). Manufacturers may also refer to analogous terms from the R2v3 standard. **Note that DOEE seeks short descriptions of processes that hazardous materials or items go through, as opposed to the names of the facilities where those processes happen.** Downstream vendor material flow/disposition charts may be provided.

   For the location of planned end markets, list the city/state or country where each end market is located.

6. **What should manufacturers report in their registration forms about anticipated recycling processes?**

   One option is to describe the operations for processing CEE, that the recycler anticipates engaging in, that lead to or are part of "Materials Recovery," as defined by e-Stewards. Version 4.1 of the e-Stewards standard defines "recycling" as "operations that lead to or are part of Materials Recovery," and "Materials Recovery" as "Operations that are part of a process to reclaim elements, compounds, or materials and transform them into Commodities." Manufacturers may also refer to analogous terms from the R2v3 standard.

   Additionally, manufacturers must also list the names and business addresses of anticipated recycling facilities and provide a current and valid certificate showing that each anticipated recycling facility has e-Stewards certification or R2 certification.

7. **How does the term "covered entity," as defined in the statute, affect reporting and collection requirements?**

   A covered entity is defined as "a District household or small nonprofit or small business entity that procures covered electronic equipment through retail channels." Representative organizations are required to accept all CEE that covered entities bring to collection sites or events for free. However, sales reported in the registration forms include sales to all people and entities in the District (except to the District and federal government), not only sales to covered entities.

8. **D.C. Official Code § 8-1041.05(d) states: "Beginning January 1, 2017, a manufacturer shall accept for recycling or reuse, on a one-to-one basis with the purchase in the District of the same type of covered electronic equipment, any brand of covered electronic equipment that is offered for return to the manufacturer by a person in the District." How can a manufacturer comply with this requirement (the "one-to-one requirement")?**

   When a person or entity purchases a manufacturer's CEE in the District, the manufacturer must make a process available for the return of any brand of the same type of CEE for recycling or reuse. This must be done on a one-to-one basis. For example, if a manufacturer sells two televisions of its own brand to a person in the District, it must accept a return of two televisions of any brand from that person in the District for recycling or reuse. Therefore, the manufacturer must establish a program to accept a return of any brand of television from a person in the District who bought the manufacturer's television.

   The program must cover each type of CEE the manufacturer sells. A mail-back service or direct pickup service would satisfy this requirement. There is no prohibition on charging for this service. *De minimis* manufacturers are exempted from this requirement.

   Compliance with this requirement will be checked regularly throughout the program year to ensure this information is accurate and included on the required webpages. This information is required to be included regardless of a manufacturer applying individually, or as part of a partnership or representative organization.
   Criteria for compliance with this requirement includes:
   - A service used to accept CEE (i.e., a mailback or direct pickup service);
   - A clear explanation of how people in DC who purchase the manufacturer's CEE may access the service described above (e.g., a website link); and
   - A confirmation that this program did accept during the past reporting year, and will accept during the upcoming year, for recycling or reuse: (a) all types of CEE the manufacturer sells in the District and (b) all brands of that CEE (either the manufacturer's brand or any other brand).

   (all mail-back/direct pick-up service information must be ***easily*** found on or directly linked to the main product webpage.)

   In the annual registration form, each manufacturer is required to provide the location where this information can be found and an example of the language offered. Even if the manufacturer is applying as part of a partnership or representative organization.

   On a related note, DOEE encourages manufacturers that sell large and/or heavy CEE to

offer a direct pickup service for those items, particularly for consumers with mobility challenges.

9. **D.C. Official Code § 8-1041.03(b)(5) requires annual registration applications to include a description of "methods by which the manufacturer will inform District residents and businesses about its electronics recycling program," including the program to comply with the one-to-one requirement in D.C. Official Code § 8-1041.05(d). How do I need to inform District residents and businesses about compliance with the one-to-one requirement?**

The text on a manufacturer's website that discusses the manufacturer's program to comply with the one-to-one requirement needs to be consistent with District law. It must either affirmatively state that the manufacturer will accept any brand of the manufacturer's CEE purchased in the District, for recycling (or reuse), on a one-to-one basis, or at least must not imply that the manufacturer will only accept its own brand. The website must also describe how to access the program that complies with the one-to-one requirement.

- If the manufacturer's recycling webpage indicates that in general, only its brand of CEE will be accepted for recycling (or reuse), the webpage needs to indicate that there is a different policy for the District. This can be done through:
  - Including text on the webpage for District consumers that (a) explains when a person in the District purchases any type of the manufacturer's CEE, the manufacturer will accept for recycling or reuse any brand of the type of CEE that was purchased, and (b) links to the mailback form or another way of accessing the one-to-one program.
  - Including a link labeled "Washington, DC" (or some variation of the city's name) that connects to the mailback form.
- If the manufacturer's recycling webpage does not restrict its recycling program to the manufacturer's own brand, a District of Columbia section is not needed.

DOEE can provide examples of compliant text upon request. In your registration application:

- Provide a link to the webpage on your company's website where your company describes its compliance with the one-to-one requirement, for any brand of any type of the CEE the manufacturer sells (as noted above).
- Provide the description used on the webpage.
- If your company has a way other than your website to let District purchasers know that the company will accept other brands of its covered electronics, describe it.

Note that the information about the manufacturer's compliance with D.C. Official Code § 8- 1041.05(d) does not need to be provided at the point of sale (although the manufacturer may choose to do so). D.C. Official Code § 8-1041.05(d) and D.C. Official Code § 8-1041.05(e) are separate requirements.

10. D.C. Official Code § 8-1041.05(e) states: "Beginning January 1, 2018, a manufacturer or retailer shall provide at the point-of-sale information on how a person can return purchased covered electronic equipment for recycling." How can a manufacturer comply with this requirement?

This provision allows either the manufacturer or retailer to provide point-of-sale information, but the obligation to meet the requirement is on the manufacturer. Under D.C. Code § 8– 1041.03(b)(3)(E) and (b)(6), the registration application must include information about the manufacturer, including "A report disclosing … Compliance with § 8-1041.05" and "If the manufacturer has not attained compliance with § 8-1041.05, a description of how the manufacturer plans to attain compliance."

A manufacturer can attain compliance by providing the point-of-sale information itself or by ensuring that this is done by the retailer(s) where its products are sold. If a manufacturer's products are sold at a physical location, the manufacturer needs to provide the recycling information directly or require retailers to provide it. This information can be provided in the box with the item when it is sold, printed on the sales receipt, or made available at the cash register through a sign or other means. If a manufacturer's CEE is sold online, recycling information may be included on the seller's product page, sales page, recycling page, or elsewhere on the seller's website. A manufacturer may propose another option for DOEE evaluation on a case-by-case basis.

Point-of-sale recycling information must be provided for all types of CEE the manufacturer sells in the District. For products sold at a physical location, where the manufacturer chooses to provide recycling information by listing a website address, sufficient context must be provided around the link so that a consumer knows recycling information can be found at the link. For example, it would be acceptable to state, "To learn how to recycle your [product], go to [web link]."

Each manufacturer is required to describe its compliance with the point-of-sale requirement in the annual registration form, even if the manufacturer is applying as part of a partnership or representative organization. This description must include:

- How in-store point-of-sale information will be provided to consumers for each type of CEE sold in the District, if any;
    - If the information is provided in a product manual, confirm whether or not the manual is included with the product when sold.
    - Provide the actual recycling language used.
- How online point-of-sale information is or will be provided to consumers, including the specific website link, for each type of CEE sold in the District, if any.

Note that to comply with this requirement, manufacturers only need to provide information on how to return the *manufacturer's* CEE for recycling, not any brand of CEE for recycling. D.C. Official Code § 8-1041.05(d) and D.C. Official Code § 8-1041.05(e) are separate requirements. The manufacturer may, however, address the requirements together if it chooses to do so.

11. What is your DPW Solid Waste Collectors Registration Number? How do I get this number?

The eCYCLE DC program requires all manufacturers under the program to certify they are following all local, state, and federal laws. The District Department of Public Works (DPW) requires all haulers, including electronics haulers that operate in the District, to be registered with DPW. D.C. Official Code § 8–1031.01(15). To ensure manufacturers under the eCYCLE DC program are fulfilling this requirement, the eCYCLE DC Program has included a question in the registration form confirming compliance with both DPW and DOEE programs.

Manufacturers, Partnership Leads, and Representative Organizations do not have to register with DPW. Only the organization designated to transport collected electronic waste under your submitted recycling plan needs to register. Registrants will be asked for their waste hauler's registration number to confirm that their hauler has registered with DPW. To learn more about DPW Solid Waste Collector Registration and Reporting please go here.

12. Can manufacturers purchase pounds from other manufacturers or recyclers to meet their minimum collection shares?

A manufacturer subject to a minimum collection share must either directly collect CEE and recycle it or arrange for the collection and recycling or reuse of the CEE (see D.C. Official Code § 8-1041.05(a)(1)-(2)). Accordingly, an individual manufacturer or partnership may purchase pounds of CEE from other manufacturers or recyclers, as long as the pounds are: (a) collected in the District, (b) collected and recycled or reused in the calendar year in which they are being applied to the minimum collection share, and (c) not claimed as collected, recycled, or reused in any other jurisdiction, for any other program years, or on behalf of any other manufacturers.

Recycling and Reuse Certifications

13. How did the certification requirement for recycling or reuse vendors change in 2023?

The DC Council amended the electronic stewardship law through the Battery and Electronic Stewardship Amendment Act of 2022 to require *either* e-Stewards *or* R2 certification for vendors recycling or reusing CEE collected under the manufacturer's waste management program. This change took effect in March 2023 and applies starting with the 2024 program year.

So that DOEE can evaluate compliance, registrants must attach to their application a current and valid certificate showing that each anticipated recycling or reuse facility has e-Stewards or R2 certification.

This amendment reverses a 2021 change to the eCYCLE DC law that the DC Council made to require only e-Stewards certification starting with the 2022 program year.

To find e-Stewards or R2 certified recyclers, visit https://e-stewards.org/find-a-recycler/ or https://sustainableelectronics.org/find-an-r2-certified-facility/.

Payment options

14. What are my options for paying a registration and/or shortfall fee?

Payment can be made online—via ACH/eCheck (with no transaction fee) or credit card (with a transaction fee)—or by mailing a paper check.

For payment instructions, visit https://doee.dc.gov/service/eCYCLE-DC-Manufacturers.

Online payments are preferred, but if you pay by paper check, be sure to list the correct payee and mail the check to the correct address as shown on the above webpage.

Sales to the Federal or District Government:

15. Do manufacturers need to report sales to the federal and District governments?

The DC Council amended the eCYCLE DC law through the Fiscal Year 2018 (FY18) Budget Support Act to **exclude** equipment sold to the federal and District governments from the definition of CEE, so those sales need not be reported on registration forms.

Manufacturers that sell to only the federal and District governments should not register with the eCYCLE DC program.

16. A manufacturer collected electronic equipment from the federal or District government. Can the manufacturer count this weight toward its minimum collection share?

No, as of 2018, manufacturers can no longer count collections from the federal and District governments towards minimum collection shares because this equipment is not CEE.

17. What entities are considered part of the Government of the District of Columbia?

Other than regional bodies and residents, any entity shown in the Government of the District of Columbia's Organizational Chart is part of the District Government. This includes executive, legislative, and judicial branches, as well as independent agencies and charter independent agencies. The current organizational chart can be found here.

Equipment sold to these entities is not CEE, per the FY18 Budget Support Act.

Have additional questions? E-mail productstewardship@dc.gov.