

E-CYCLE WISCONSIN 2025 REPORT

Wisconsin DNR annual report to the Legislature and governor under s. 287.17(10), Wis. Stats.

June 2025



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Executive summary

Wisconsin's electronics recycling law has produced many successes since it took effect in 2010, recycling nearly 420 million pounds of electronics and expanding electronics recycling access for state residents. Most electronics collected under the manufacturer-funded E-Cycle Wisconsin program are processed in the state, contributing to investments and job growth at recycling facilities.

Successes for program year 15 (January to December 2024) include the following:

- Registered collectors took in 18.8 million pounds of electronics, or 3.15 pounds per state resident.
- Nearly all electronics collected under E-Cycle Wisconsin were processed initially in Wisconsin and other Midwest states. Wisconsin recyclers accounted for 70% of weight processed.
- All 72 Wisconsin counties had at least one registered collection site or event. There were at least 52 free, one-day collection events in 35 Wisconsin counties that were open to all county residents or had no residency restrictions. There were also permanent collection sites accepting all eligible electronics for free from all residents in eight counties.
- The Department of Natural Resources awarded more than \$125,000 to 22 projects in 20 counties under its E-Cycle Wisconsin Electronics Collection Grant program, which funds electronics collection in underserved communities. These projects supported development of two permanent collection sites and 22 one-day collection events between September 2024 and September 2025.
- Most manufacturers met or exceeded their recycling targets.

Addressing program challenges

In conversations with the DNR over the past several years, E-Cycle Wisconsin participants have praised many aspects of the law, but noted several areas of concern. These include:

- a lack of affordable, convenient recycling in some areas;
- gaps in consumer awareness about the need to responsibly recycle electronics;
- a need for more actions to deter bad actors;
- economic and safety issues the changing material stream has brought to collectors and recyclers, especially due to fire risk from lithium-ion batteries; and
- the disconnect between sales-based manufacturer recycling targets and the weight of electronics being recycled.

In 2024, the DNR worked to address some of these concerns through its E-Cycle Wisconsin Electronics Collection Grant Program, continued implementation of standards added in 2023 for electronics collection sites and processing facilities, and expanded outreach efforts and conversations with stakeholders that resulted in a March 2024 update to the E-Cycle Wisconsin law, including a new method of calculating manufacturers' annual recycling targets.

Recommendations for potential legislative changes

The electronics recycling law directs the DNR to examine several aspects of E-Cycle Wisconsin within the annual report and make suggestions for possible changes. The following is a list for the Legislature's consideration of changes that could improve the electronics recycling law and ensure its continued effectiveness.

- To make it easier for the DNR and manufacturers to determine whether the law covers newer devices and improve proper management of newer problem components, such as lithium-ion batteries, the Legislature could update and clarify device definitions, and could grant the DNR authority to update the list of covered electronic devices by rule.
- To reduce the risk of injuries, deaths and significant property damage due to fires caused by lithium-ion batteries that power many electronics, the Legislature could consider expanding the list of covered electronic devices and/or eligible electronic devices under E-Cycle Wisconsin, and could provide funding for waste facilities to install or upgrade fire detection and suppression equipment, including systems that monitor 24 hours a day for fires.
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Introduction

Wisconsin's electronics recycling law establishes a statewide program to collect and recycle certain electronics. Under this product stewardship-based law, manufacturers of TVs, computers monitors, desktop printers and similar devices must register with the DNR the brands they sell to Wisconsin households and schools. Those manufacturers also must recycle a target weight of electronics each year based on their sales. Manufacturers contract with state-registered recyclers and collectors to meet their targets. This manufacturer-funded recycling program is called E-Cycle Wisconsin. The law also bans landfill and incinerator disposal of many electronics.

This report fulfills the annual reporting obligation in s. 287.17 (10), Wis. Stats., which specifies several metrics on which the DNR must report to the Legislature and governor. These include the weight of electronics collected and other information provided by program participants, an outline of electronics recycling outside of E-Cycle Wisconsin, a summary of compliance and enforcement actions related to the electronics disposal ban, and suggestions for changes needed.

The report primarily covers E-Cycle Wisconsin's program year 15, which ran from January-December 2024.

Several developments in the past two years are helping to address electronics recycling challenges and policy recommendations the DNR has identified in previous reports.

- The E-Cycle Wisconsin Electronics Collection Grant Program has expanded access to electronics recycling by supporting dozens of collection events and sites in mostly rural counties.
- Registered manufacturers increased their financial support for electronics collection and recycling during program year 14 and 15, sponsoring dozens of free collection sites or events around the state, including in underserved areas. This support made it much cheaper and easier for many Wisconsinites to recycle electronics, especially TVs.
- New rules that took effect in July 2023 expanded the list of devices households and schools can recycle through E-Cycle Wisconsin to include cellphones, video game consoles, and battery-powered phone and video game accessories. It also set minimum standards for electronics collection and recycling that will help protect human health and the environment. The changes will also reduce the likelihood of future costly, taxpayer-funded cleanups of mismanaged electronics.
- Bipartisan legislation signed in March 2024 (2023 Wisconsin Act 108) updated the manufacturer recycling target formula so that targets are tied directly to the weight of electronics recycled through E-Cycle Wisconsin, rather than the weight of new electronics sold, addressing a longstanding DNR recommendation. The law also expanded the list of devices eligible to be recycled through E-Cycle Wisconsin to include video display device peripherals.

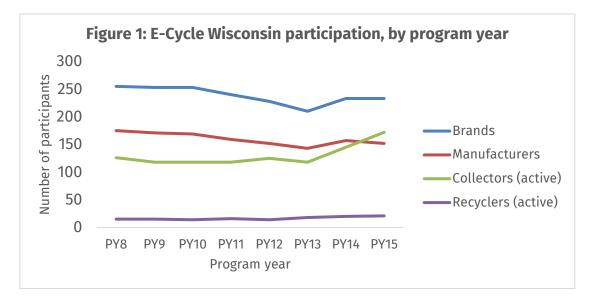
The DNR continues to engage with program stakeholders and the public to get feedback on challenges facing E-Cycle Wisconsin and potential solutions. Input from stakeholders contributed to the sections of this report concerning current challenges and opportunities for addressing them.

Program participation

Table 1 shows program year 15 (January through December 2024) participation, and Figure 1 illustrates trends over time. Recycler registrations increased from 23 to 25, with nine of the 21 active recyclers (recyclers that processed eligible electronics during program year 15) located in Wisconsin. The number of registered manufacturers and brands remained steady.

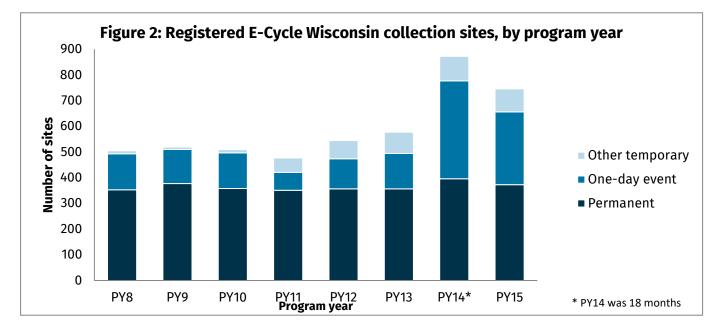
Table 1: Program year 15 participation

Category	Registered	Active
Collectors	184	172
Recyclers	25	21
Manufacturers	152	n/a
Brands	233	n/a



The number of registered collectors that actively collected eligible electronics—including local governments, retailers, other for-profit businesses and non-profits—increased from 145 in program year 14 to 172 in program year 15. This was largely due to increased support from manufacturers for collection site and recycling costs.

As shown in Figure 2, there were 748 registered collection sites during program year 15. This was down from 872 during the 18-month program year 14 but still considerably higher than in previous years. This was primarily due to the 283 one-day collection events, more than double the number during the most recent 12-month program year (program year 13).



During program year 15, there were registered collection sites or events in all 72 Wisconsin counties, thanks primarily to the DNR's E-Cycle Wisconsin Electronics Collection Grant program. Two counties (Chippewa and Shawano) only had sites either open to residents of a specific municipality or that did not accept all eligible electronics. All other counties had at least one permanent collection site or one-day collection event open to all county residents and accepting all eligible electronics during program year 15 (see map in Appendix A).

Collection and recycling totals and analysis

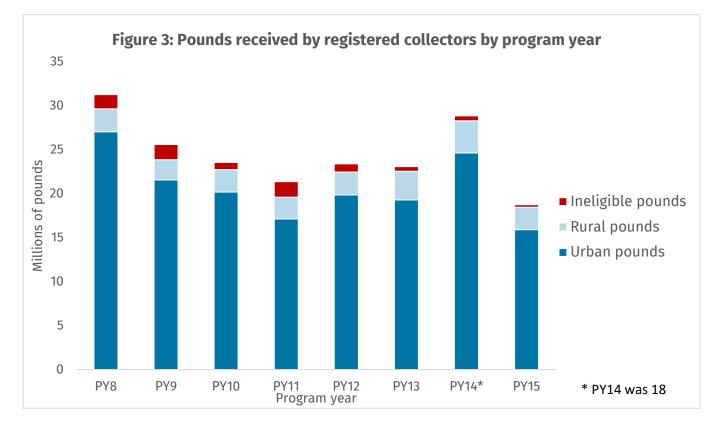
Collectors, recyclers and manufacturers report weights of electronics collected and recycled from counties designated as "urban" or "rural" under Wisconsin's law. The map in Appendix B shows which counties are designated as urban and rural.

Program year 15 was the first program year aligned with the calendar year, running from Jan. 1 to Dec. 31, 2024. During 2024, registered collectors took in 18.8 million pounds of electronics from Wisconsin households and K-12 schools (see Table 2), or 3.15 pounds per Wisconsin resident.

Table 2: Pounds collected by registeredcollectors, program year 15

Туре	Pounds
Eligible urban	15,907,667
Eligible rural	2,553,965
Dismantled by collector	51,100
Sent to non-registered recycler	245,535
Total collected	18,758,267

As shown in Figure 3, the weight of eligible electronics collected in program year 15 was the lowest total for a 12-month program year. This is similar to trends in other states with electronics recycling programs and is partially due to electronics becoming smaller and lighter over time. The ineligible weight dismantled by collectors or sent to non-registered recyclers was the lowest since program year 3, thanks mostly to more Wisconsin electronics processing facilities registering as recyclers.



Wisconsin recyclers processed 70% of the total weight recycled during program year 14. Essentially all electronics collected under E-Cycle Wisconsin continue to be processed in the Midwest (see Figure 4).

With the rural credit (1.25 pounds counted toward manufacturer targets for each pound collected in a rural county) included and non-recycled pounds subtracted, Table 3 shows 19.1 million eligible pounds available for purchase by manufacturers—to fund the recycling of the electronics—in program year 15.

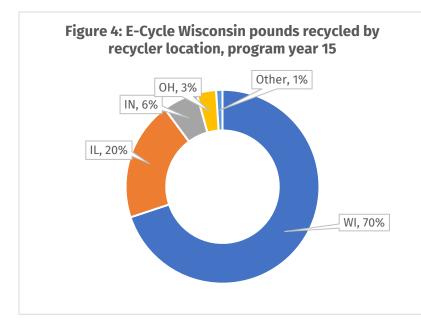


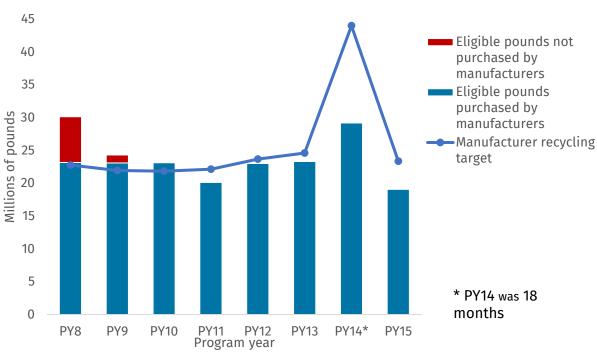
Table 3: Pounds of electronics reportedby registered recyclers, program year 15

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Туре	Pounds
Urban	15,911,687
Rural	2,549,945
Rural credit	637,486
Diverted for reuse	(2,209)
Available for manufacturers	19,096,909
Purchased by manufacturers	(19,095,584)
Not purchased by manufacturers	1,325.00

Manufacturer recycling targets and programs

In March 2024, a new law changed the way annual manufacturer recycling targets are calculated. Previously, a manufacturer's target was 80% of the weight of covered electronics it sold to Wisconsin households and K-12 schools during the 12-month period beginning two years before the start of a program year. For 2024, targets would have been 80% of the weight of covered electronics a manufacturer sold during 2022. Beginning in 2024, the total recycling target for a program year became the weight registered recyclers received for recycling during a recent program year and manufacturer targets are based on their market share percentage of covered electronics sold in Wisconsin during that year.

For 2024, the total target was 23.4 million pounds, the weight recyclers received during the July 2021-June 2022 program year. The DNR calculated each registered manufacturer's market share percentage, based on 2022 sales of covered electronics to Wisconsin households and schools. Each manufacturer's target was its





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market share percentage multiplied by the overall target of 23.4 million pounds. Only manufacturers with a market share of 0.01% or more had a recycling target.

Figure 5 shows manufacturer recycling targets and weight manufacturers purchased from recyclers to meet their targets. It also illustrates the gap between pounds recycled and pounds paid for by manufacturers in the years before program year 11. Due in part to COVID disruptions in 2020 and in part to increasing manufacturer targets combined with fewer heavy TVs being recycled, the weight recycled during program years 11-15 was less than the overall manufacturer target.

Based on information submitted on annual reports and discussions with stakeholders, most manufacturers rely on recyclers or group plan managers to find and/or set up collection networks. Prominent exceptions include the Dell Reconnect program, in which Dell works with several networks of Goodwill stores; Best Buy's in-store and haul-away collection programs; and Apple's recycling program for schools. During program year 15, several manufacturers directly sponsored dozens of collection sites or events, many of them free to residents.

During program year 15, 40 manufacturers with recycling targets participated in collectives—similar to "group plans" in other states—that contracted with recyclers for a large total sum of pounds and distributed the pounds among their members. These collectives were responsible for 56% of pounds purchased by manufacturers.

Most manufacturers continued to meet their sales weight-based recycling targets in program year 15. Fourteen manufacturers recycled more than their targets and therefore earned credits that can be used during the next three program years (see Table 4). Five manufacturers used just over 5,000 credits from previous years to meet their targets. At the end of program year 15, just over 600,000 credits were available to manufacturers for future use.

The 2024 law change meant there were fewer manufacturers with very small (less than 1,000 pounds) recycling targets. This reduced the number of manufacturers that owed shortfall fees, since many manufacturers with very small targets have found it easier to pay the fee than to contract with a recycler. In total, 12 manufacturers paid a shortfall fee as of May 2025. The amounts ranged from \$70 to \$190,341. The DNR granted shortfall fee waiver requests from nine manufacturers that demonstrated good faith progress toward meeting their recycling targets in program year 15, totaling just under \$1.6 million in shortfall fees.

Table 5 summarizes registration and shortfall fees paid under E-Cycle Wisconsin.

Table 4: Program year 15 manufacturer credit transactions

	Credits
Beginning balance	14,329
Credits applied	(5,423)
Credits expired	(1,444)
New credits earned	595,167
Total available for future use	602,033

Table 5: Manufacturer registration and shortfall fees

Program year	Registration fees*	Shortfall fees*
8	\$375,000	\$8,124
9	\$370,000	\$14,066
10	\$338,750	\$9,607
11	\$358,750	\$21,203
12	\$361,250	\$68,845
13	\$317,500	\$52,630
14	\$315,000	\$123,822
15*	\$455,625	\$248,959

* Registration fees for program year 15 were 150% because it followed an 18-month program year. Shortfall fees for PY15 as of May 2025.

Ensuring a level playing field within E-Cycle Wisconsin

Much of the DNR's administration of the electronics recycling law focuses on maintaining a level playing field for E-Cycle Wisconsin participants and identifying problems at collectors or recyclers that might endanger human health or environmental quality.

Manufacturer registration compliance

Manufacturers must comply with Wisconsin's electronics recycling law by registering their covered electronics and paying applicable registration and shortfall fees. During program year 15, the DNR revoked 19 manufacturers' registrations for failure to submit required forms or payments. Seven returned to compliance. The remaining 12 remained out of compliance as of May 2025.

To ensure a level playing field among electronics manufacturers, the DNR continued its effort to bring manufacturers of unregistered brands into compliance. In addition to retailer compliance efforts described below, the DNR contacts manufacturers to inform them of their obligation to register, and communicates with other state programs about brand status. The DNR maintains lists of registered and unregistered brands on its website to help retailers and manufacturers stay up-to-date with registration status. During program year 15, 18 manufacturers completed their initial E-Cycle Wisconsin registration, the majority of them following contacts from the DNR or from retailers the DNR had notified. As of May 2025, there were 243 unregistered brands tracked by the DNR, primarily from manufacturers selling a low volume of covered electronics through online retailers.

Electronics retailer compliance

Under Wisconsin's electronics recycling law, retailers must sell only registered brands to Wisconsin households and schools. They also must inform customers that electronics may not go into the trash and provide information about how to recycle electronics. These requirements apply to brick-and-mortar stores as well as online stores. The DNR reviews electronics retailer inventory online and in stores, and checks stores and websites for compliance with the customer education requirements.

In program year 15, the E-Cycle Wisconsin program conducted one round of online brand checks, consisting of 19 unique online retailers, and resulting in nine retailers receiving a Notice of Noncompliance. Staff conducted 14 in-store inspections at brick-and-mortar stores, resulting in four retailers receiving a Notice of Noncompliance. These retailers took appropriate steps to return to compliance. As mentioned above, several manufacturers registered or re-registered with the program after retailers contacted them based on the DNR's checks. The DNR also continued to follow up with retailers regarding customer education requirements and suggested changes to ensure full compliance with Wisconsin's law.

Registered recycler compliance

All electronics recyclers operating in Wisconsin must comply with solid and hazardous waste regulations. Registered E-Cycle Wisconsin recyclers must meet additional requirements, which apply whether the facility is located in-state or out-of-state. These include maintaining owner financial responsibility (OFR) to cover facility closure and at least \$1 million in pollution liability insurance; reporting to the DNR twice a year; and providing information on the weight of electronics recycled, sources of those electronics, and which downstream vendors received the electronics and their components.

The DNR strives to conduct annual inspections of all in-state registered recyclers. The inspector reviews inventory, shipping and downstream vendor records to determine whether electronics are moving through the facility in a timely manner and ending up at a legitimate end market or properly disposed. The inspector also reviews the facility's closure plan and OFR to ensure the amount of money set aside is adequate to properly close the facility.

Out-of-state recyclers are also subject to inspections, but because of travel constraints, they are infrequently inspected. Instead, the DNR regularly evaluates compliance through annual reports and desktop record reviews. In addition, DNR staff check with recyclers if questions arise regarding downstream vendors, sources of materials received or changes to their recycling process.

During program year 15, the DNR inspected eight out of the nine in-state recyclers. (The recycler not inspected during program year 15 had been inspected in December 2023 and will be inspected in spring 2025.) Two recyclers received a Notice of Noncompliance regarding recordkeeping and reporting practices. Both implemented changes and returned to compliance.

Table 6: DNR inspections, by program year

	Table of Britt mopeletions, by program year			
Time period	Recyclers	Collection sites		
July 1, 2016, to June 30, 2017	8	73		
July 1, 2017, to June 30, 2018	9	60		
July 1, 2018, to June 30, 2019	8	64		
July 1, 2019, to June 30, 2020	3	24*		
July 1, 2020, to June 30, 2021	7	71		
July 1, 2021, to June 30, 2022	10	61		
July 1, 2022, to Dec. 31, 2023**	9	112		
Jan. 1 to Dec. 31, 2024	8	63		

* Includes 13 in-person inspections and 11 phone inspections with collectors due to the COVID-19 pandemic. ** 18 month transitional program year.

Table 6 lists the number of collection site and recycler inspections the DNR has conducted for the last several program years.

Registered collector compliance

The DNR assesses collector compliance through annual reports and inspections. Due to the large number of collection sites (averaging between 350 and 400 permanent sites), E-Cycle Wisconsin staff are unable to inspect all sites on a routine basis, and therefore prioritize inspections on sites where they can have the most impact. This includes inspecting new sites to provide technical assistance during the start-up phase, collectors that receive large amounts of electronics either on their own site or by operating as a consolidation point, and collectors that also dismantle some electronics. In addition, the DNR addresses complaints received about sites through an inspection or phone call. Occasionally, staff inspect non-registered collection sites to provide technical assistance or investigate complaints.

Effective July 2023, electronics collection sites became subject to requirements for electronics transfer facilities under s. NR 502.07 (2d), Wis. Adm. Code. To assist collection site operators in meeting the new requirements, DNR staff provided education and outreach through emails and webinars. During the first year of implementing the new regulations, DNR inspectors used enforcement discretion if sites were not meeting the new requirements and worked with the site operators to understand and implement any necessary changes.

In general, sites that were previously following DNR recommended best management practices for electronics were already managing the materials in a manner that met the new guidelines, or they needed to make minimal changes. The most common areas needing improvements were the types of containers used to store electronics and not covering electronics in a manner to adequately protect from weather and vandalism.

In program year 15, E-Cycle Wisconsin staff conducted 63 in-person inspections at registered collection sites and two at non-registered sites. Sixteen sites received a Notice of Noncompliance (NON). The most common issue was related to recordkeeping, which resulted in nine of the NONs. Five sites received an NON for storage issues; one site was issued an NON for failure to ship material within one year; and one site had multiple issues. All sites, except one, returned to compliance within a timely manner. DNR staff continued to work through the stepped enforcement process with the remaining site and suspended its collector registration at the beginning of 2025.

Electronics recycling separate from E-Cycle Wisconsin

New solid waste processing facility administrative rules took effect on July 1, 2023, with an enforcement date of July 1, 2024. Before that, collectors and recyclers that performed basic disassembly of electronics were exempt from most solid and hazardous waste requirements if the materials were handled appropriately. The rule requires facilities recycling more than 25 electronic devices a year to obtain a DNR solid waste processing approval and license.

During 2023 and 2024, the DNR conducted extensive technical assistance and outreach to identify existing electronics processing facilities that would require solid waste processing approval and licensing. The DNR identified 19 existing facilities that needed to complete the process and two facilities with an existing solid waste processing approval that needed a plan modification to include electronics processing operations. Seventeen of the facilities identified were registered E-Cycle Wisconsin collectors or recyclers.

During 2024, 14 of the identified facilities received DNR solid waste processing approvals and licenses, and two received plan modification approvals to include electronics processing operations. One facility received an approval but ended processing operations before applying for a license. Four facilities failed to apply for solid waste processing approval and received a Notice of Noncompliance. One of these facilities changed ownership in 2025 and ended electronics processing operations. The DNR initiated stepped enforcement action for the other three facilities and is continuing to work with them to return to compliance.

The DNR will continue follow-up with any additional existing facilities it becomes aware of that require solid waste processing approval and licensing.

Illegal disposal and irresponsible electronics processing

During 2024, DNR staff received very few complaints regarding mismanagement of electronics. One complaint alleged that a salvage yard was disposing of TVs by shredding them with vehicles. DNR staff investigated the complaint and there was no evidence to support the claim.

DNR staff often work with municipalities and other DNR programs to address complaints as well. E-Cycle Wisconsin staff have developed outreach materials that are shared with others who are investigating electronics related concerns.

For over a decade, the DNR has worked on an enforcement case against 5R Processors, a business headquartered in Ladysmith that was a registered E-Cycle Wisconsin collector and recycler from 2010 to 2014. 5R abandoned millions of pounds of electronics, hazardous leaded cathode ray tube glass, and other hazardous materials at several sites across Wisconsin.

In spring 2022, the Legislature passed and Gov. Evers signed a bill (2021 Wisconsin Act 234) providing \$2.5 million in state funding to remove waste at sites formerly operated but no longer owned by 5R Processors. The 2023-2025 biennial budget increased the total amount appropriated for the cleanup to \$4.5 million, in addition to the restitution payments from former 5R managers. Five sites located in Ladysmith, Catawba and Glen Flora were cleaned up in 2023 with DNR overseeing the project and contracting with Veolia Environmental Services. Cleanup of the remaining 5R property, located in West Bend, began in fall 2024 and is expected to be completed by summer 2025.

Disposal ban compliance

In addition to the cases of irresponsible recycling discussed above, the DNR continues to receive reports of electronics being dumped on public lands, in ditches and in vacant lots, along with reports of electronics put in the trash. Often, these are cases of an individual dumping one or two items, most commonly TVs, and are difficult to track in a systematic way.

In winter 2025, the DNR hired a contractor to conduct a study looking at consumer awareness of electronics and battery recycling options and how consumers dispose of these items. The research consisted of online voice interviews of 200 Wisconsin residents, with participants largely reflecting state demographics. The study identified the following management choices for unused electronics:

- Study participants were most likely to store unused electronics, followed by recycling, selling, or donating them.
- A relatively small percentage put electronics in the trash.
- Participants were more likely to recycle non-working unused electronics rather than store them, and were more likely to dispose of non-working devices than devices that were working out unused.
- Younger Wisconsinites (age 18-34) were more likely to donate or sell unused electronics, or put them in the trash, than to recycle them.

Addressing program challenges

In addition to analyzing program data, the DNR gathers input through surveys and conversations with program participants, other stakeholders and the public when evaluating whether changes are needed to make the electronics recycling law function better. Challenges the DNR and stakeholders have identified in recent years include:

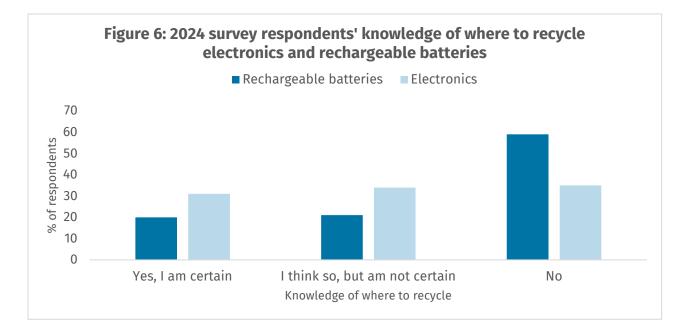
- Continued lack of affordable and convenient electronics recycling options for residents in many parts of Wisconsin.
- A lack of consumer awareness of which electronics to recycle and how to do so.
- Challenges for manufacturers in meeting their annual recycling targets due to increasing sales (especially during the pandemic) that led to higher targets at the same time the weight of electronics collected for recycling was decreasing.
- Threats to Wisconsin's recycling and waste collection and processing infrastructure caused by the fire risk of improperly managed lithium-ion batteries, including those that cannot be easily removed from electronic devices.

The DNR has worked with the Legislature, Gov. Evers and program stakeholders to identify and implement policy solutions for these challenges, and the DNR's E-Cycle Wisconsin staff have focused their work on addressing barriers to electronics recycling and providing technical assistance.

Identifying and addressing electronics recycling barriers

The DNR's household recycling surveys have asked respondents about reasons they were unable to recycle electronics despite wanting to do so. The DNR's 2024 survey and 2025 follow-up study identified a lack of awareness about where and how to recycle electronics, concern about actual or perceived recycling costs, a lack of convenient collection sites and/or convenient site hours, and concerns about data security as the top barriers to electronics and battery recycling. Figure 6 shows 2024 survey respondents' awareness of where and how to recycle electronics.

The 2025 study explored these barriers in more detail. It found that even participants with some general knowledge about electronics recycling were unsure about specific details for recycling electronics, including locations and the logistics of recycling, such as hours and costs, which devices are accepted and specific methods by device type, and how to safely recycle, including devices with personal data. Some participants noted that many recycling locations are further away or outside of their typical daily routine. Others said there are restrictions on days and hours they can bring items to sites, often conflicting with work or other responsibilities.



To address the barriers of lack of awareness, cost and lack of convenient recycling locations, the DNR continues to maintain and promote its online list of registered E-Cycle Wisconsin collection sites and manufacturer mail-back programs.

The DNR's 2024 public outreach campaign used digital advertising, paid search ads, paid and unpaid social media, sponsorship messages on Wisconsin Public Radio and ads on Spanish-language radio stations to drive Wisconsin residents to the DNR's list of registered collection sites and mail-back programs. This included targeted posts on NextDoor and Facebook to promote free collection events around the state. Overall, the DNR's electronics and battery recycling webpages received nearly 536,000 visits during 2024.

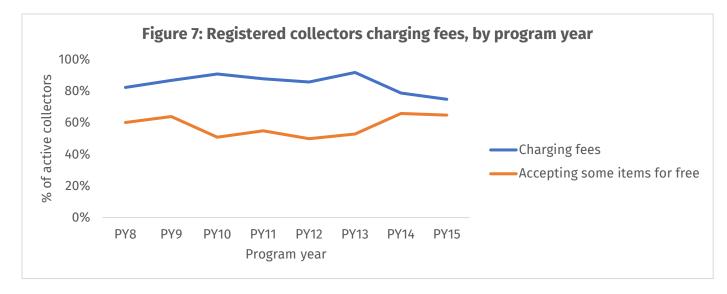
In 2025, the DNR's outreach will focus on reaching younger Wisconsinites and providing more detailed information about how to recycle specific types of electronics, such as mobile devices. It will also provide updated resources to help local government recycling programs meet their requirements to educate residents about electronics and battery recycling.

The DNR will continue to work with collectors and recyclers to ensure residents can find the information they need to recycle electronics and explore ways to make electronics recycling more convenient.

Improving access to responsible electronics recycling in underserved areas

Access to convenient and affordable electronics recycling has been uneven across Wisconsin. A handful of rural counties have had only sporadic collection events, and both urban and rural areas have at times lacked collection opportunities open to all residents. The DNR's E-Cycle Wisconsin Electronics Collection Grant Program, authorized by a 2021 law, is helping to improve access in many areas.

In August 2024, the DNR awarded its third round of grants. The program, funded by manufacturer shortfall fees, aims to improve access to electronics recycling in underserved areas of the state by funding one-day collection events or establishing a permanent collection site in counties that have lacked registered collection sites or events. The DNR awarded more than \$125,000 to 22 projects in 20 counties. These projects supported development of two permanent collection sites in Dane and Portage counties, and 22 one-day collection events (most of them free) between September 2024 and September 2025. In total, the DNR awarded more than \$265,000 to projects in 30 counties during its first three grant rounds (see map in Appendix C).



Reducing costs for consumers and collectors

As shown in Figure 7, the percentage of collectors charging consumers fees dropped beginning in program year 14. In program year 15, 75% of active collectors charged a fee for at least some eligible electronics, the lowest since program year 6. Nearly two-thirds of active collectors accepted at least some eligible electronics for free. The most common items with a charge were TVs and monitors.

These positive changes were due both to the DNR's grant program and more financial support from manufacturers, who have increased payments to recyclers and directly sponsored free collection sites or events. During 2024, there were at least 52 free, one-day collection events in 35 counties that were open to all county residents or had no residency restrictions. There were also permanent collection sites accepting all eligible electronics for free from all residents in eight counties (see map in Appendix D).

Ensuring safe management of lithium batteries in consumer electronics

Lithium-ion batteries—used in many portable electronics—can retain a considerable charge even after a consumer has discarded a device and can spark and cause fires if damaged. Lithium-ion batteries from devices thrown in trash or recycling bins have caused thousands of fires nationally in the last several years. Although the DNR does not have a way to track specific numbers, it has received several reports of fires likely or definitively caused by lithium-ion batteries in recycling/trash collection trucks and at transfer stations, recycling facilities and landfills in Wisconsin. Recyclers are spending additional money to train workers, revise procedures and invest in fire-suppression systems. The challenge will grow as more electronics containing these batteries enter the waste stream.

The DNR's household surveys identified widespread confusion among Wisconsin residents about how to manage lithium-ion batteries. The 2024 survey found more than half of respondents who disposed of a household rechargeable battery put it in the trash, and 20% put it in a recycling bin or cart. Both of these disposal methods can lead to fires in collection trucks or at facilities. Only 28% took batteries to a recycling drop-off location. The 2025 study found four out of 10 participants were unsure how to identify whether an electronic device contains a lithium-ion battery. Some said they might have inadvertently thrown lithium-ion batteries out due to this lack of awareness.

The DNR has increased outreach efforts to better inform Wisconsin residents of how to safely manage used batteries and electronics that contain them. At the end of 2024, the U.S. Department of Energy (DOE) awarded the DNR a \$1.6 million, four-year grant to improve battery and electronics recycling access and awareness. As of May 2025, the DNR had not yet received these funds and was awaiting further information from DOE. DNR staff have also provided input on potential state legislation to improve battery recycling access for residents. The DNR will continue to work with stakeholders to increase public outreach about batteries and identify potential additional policy solutions.

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Recommendations for potential legislative changes

Based on the first 15 years of implementation and positive feedback from stakeholders, most of the fundamental elements of Wisconsin's electronics recycling law are sound and have proven effective. Despite recent positive changes, some challenges remain that could best be addressed through additional legislation. These ideas for the Legislature's consideration, submitted under s. 287.17(10), Wis. Stats., are based on extensive conversations with stakeholders over the last several years, in addition to analysis of program data.

Consider updating device definitions to address today's consumer electronics

As technology changes, it has been difficult for the DNR to determine whether devices are covered by the definitions in s. 287.17(1), Wis. Stats. Examples of these "gray area" products include smartphones, digital picture frames, photo printers and portable DVD players. Device definitions and program requirements could be revamped to:

- Update the definition of consumer computer so that it is easier to determine whether new or updated products with video displays smaller than 7 inches are included.
- Broaden the definition of video display device so that it includes items with screen sizes greater than 7 inches, such as portable DVD players, that are very similar to TVs and monitors but not currently included.
- Grant the DNR authority to update the list of covered electronic devices by rule, similar to its existing authority under s. 287.17 (10) (i), Wis. Stats., to update the lists of eligible electronic devices and devices banned from disposal.

Consider actions to reduce fire risk from battery-containing devices in the waste stream

Fires caused by lithium-ion batteries, including those embedded in electronic devices, are causing injuries, deaths and significant property damage, including devastating fires in waste collection and processing operations. To help address and alleviate the risk from battery-containing devices, the Legislature could consider the following actions:

- Expand the list of covered electronic devices under s. 287.17 (1), Wis. Stats. This would require manufacturers of these devices to help fund recycling of their devices. This would work best for consumer electronics that are already collected as eligible electronics under the program, or similar devices that could be handled by the same electronics recycling facilities.
- Provide funding for waste facilities to install or upgrade fire detection and suppression equipment, including systems that monitor 24 hours a day for fires.
- Add more battery-containing devices as eligible for manufacturer recycling obligations under E-Cycle Wisconsin, and/or ban such products from landfill and incinerator disposal under s. 287.07 (5), Wis. Stats. This could help drive public education and perception about not putting battery-containing devices in trash or recycling bins and might increase recycling of battery-containing devices by making them eligible for current manufacturer financial support under E-Cycle Wisconsin. This could also provide more weight to help manufacturers meet their recycling targets.

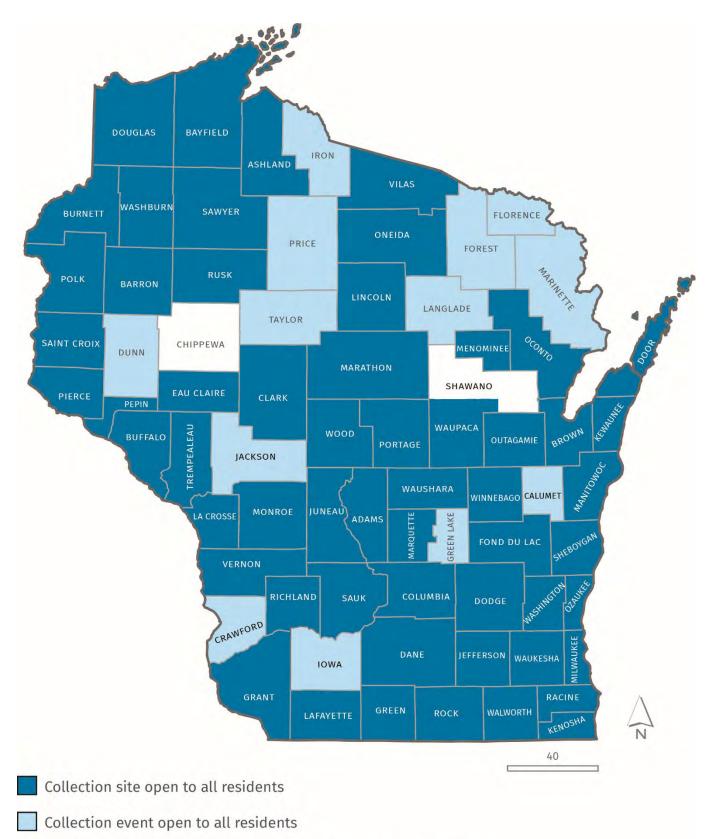
Wisconsin Department of Natural Resources Bureau of Waste and Materials Management

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Appendix A: Counties with collection sites or events accepting all eligible electronics from all residents, 2024 program year



No site or event accepting all eligible electronics from all residents

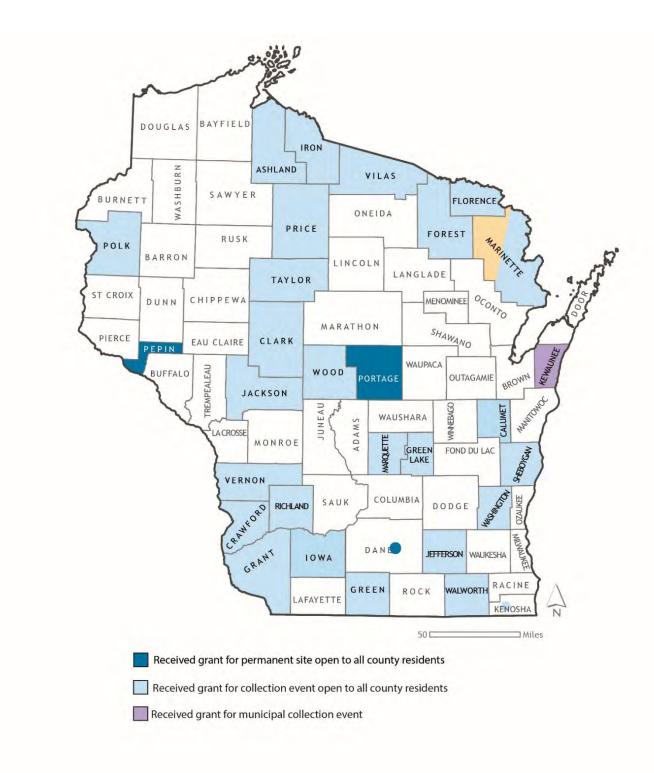
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Urban and Rural Counties Under E-Cycle Wisconsin

Appendix C: E-Cycle Wisconsin Electronics Collection Site Grant awards, 2022-2024



Appendix D: Counties with free collection sites or events for all eligible electronics, 2024 program year

