



Please support our proposal calling for on-site recycling of large consumer electronics

As You Sow's proposal to Target asks the company to report on policy options to minimize the environmental impacts of its electronics recycling activities by providing mechanisms for take back of all electronics sold, promoting reuse of working equipment and preventing export to non-OECD countries of hazardous e-waste and untested or non-working equipment or components.

As the company notes in its statement in opposition "the substance of the proposal is to ask us to cover larger electronics, such as televisions, game consoles and appliances, in our guest-facing recycling program." Target is essentially correct in stating that our main concern is that the company does not offer take back and recycling of large end-of-life electronics. However, we are focused on consumer electronics, not large appliances.

According to Dealerscope, Target was the fourth largest brick and mortar retailer of electronics in the U.S. in 2012 with \$7 billion of sales of consumer electronics. A substantial amount of these sales are televisions and computers. The Target website offered 103 different models of TVs (some as large as 70") and 93 models of desktop/laptop computers for sale as of May 14, 2013. The company accepts small electronics such as music players and wireless phones but will not accept large electronics like TVs or computers.

The company states it does not believe that "such an expansive recycling program is common among general merchandise retailers." The key issue is whether large electronics retailers should offer on-site recycling services. Target is a general merchandise retailer but also a large electronics retailer. Staples, for example, sells a wide variety of office supplies and equipment but is also a large electronics retailer which offers free take back of all sizes of electronics.

The company statement in opposition to our proposal fails to explain how it justifies taking back small electronics but not large electronics. It is far easier to find alternative outlets for the small devices it takes back such as wireless phones than for large electronics. All major wireless carriers offer on-site take back even though, like Target, they are not the manufacturer of the phones but the retailer.

The company says an expanded program for large electronics take back "would be ... less efficient relative to other alternatives available to guests for disposal of such items, including the availability of local government-run recycling facilities." The company does not explain how local government-run facilities would be more efficient. Government-run facilities vary greatly in availability from state to state. There are 25 states with no producer financed programs which often have far fewer take back options.

Target, like its peers, thrives to the extent it provides both goods and services to customers that they find valuable. The company gives no indication of having done any customer outreach or polling to determine if customers would value on-site recycling of large electronics.

Even with 25 states with formal programs mandating some form of producer responsibility for electronics recycling, overall U.S. electronics recovery rates still lag badly at less than 20%, so other options like retailer take back are essential. Recycling needs to be convenient for



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consumers to participate in higher numbers. Many government-run programs are not conveniently located. The convenience offered to consumers to drop off end-of-life electronics at nearby stores where they shop regularly like Target or Walmart could greatly increase national recovery rates.

Electronics take back could also help boost Target's business. Best Buy has told proponents its take back program helps drive new business from customers after they drop off old equipment. The report sought by the proponent would explore the feasibility of such take back systems, and its potential to be highly valued by customers and to generate additional store traffic. The economic potential alone justifies the cost of such a report.

We urge all Target shareholders to support this proposal.