

Accountability Hotline Case 495: Prioritize ethical requirements to set the reuse program up for success

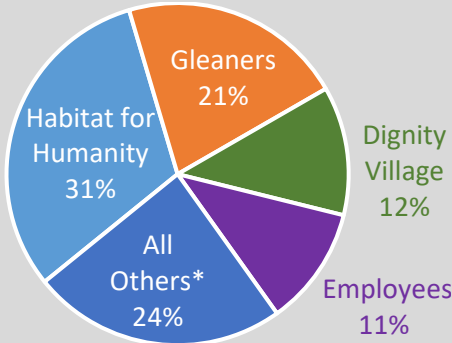
Why this audit is important

An anonymous report to the Accountability Hotline raised concerns about how Metro followed handling protocols for electronic waste. The report alleged that an employee at Metro's Central Transfer Station took a laptop and other electronic waste that was dropped off by customers.

Human Resources investigated and confirmed the series of events described in the report. The employee thought they were allowed to take materials as part of the Reuse Standard Operating Procedure (SOP).

This audit was initiated to determine if the SOP met ethical requirements and whether electronic waste procedures were followed.

Metro employees took 11% of all reused materials from January to June 2025



Source: Auditor's Office analysis employee reuse logs at Metro Central and South Transfer Stations.

*Includes contractor employees; Helping Hands, Growing Gardens; St. John's Food Share; Scrub; Gleaner artists; Virginia Johnson Training Stables; NW Biofuel; and seven individuals.

What we found

The audit found that employee reuse violated Metro Code and the Employee Ethics policy. The SOP also increased the chance that a Metro employee could violate Oregon law. All three prohibit public officials from using their position for financial gain or to avoid financial costs. Although several layers of management in Waste Prevention and Environmental Services and Human Resources were aware of ethical concerns related to employee reuse practices, they were not paused until after the entrance meeting for this audit.

In addition to not being aligned with ethical requirements, the SOP was not followed. The laptop and other electronic waste were not approved materials for reuse. In some cases, employees did not get approval for the items they took, and employee liability waivers were more than a year old. These discrepancies showed several layers of management in Waste Prevention and Environmental Services did not provide effective oversight.

Reuse procedures were not followed consistently

Reuse SOP Requirement	Partially Followed	Not Followed
Approval signature	X	
Authorized approver	X	
Employee liability waiver	X	
Employee liability waiver updated annually		X
Organization liability waiver	X	

Source: Auditor's Office analysis of Metro Central and South reuse logs and waivers from January 2025 through June 2025 in comparison to the 2015 Reuse Standard Operating Procedure requirements.

Besides ethical and compliance risks, stronger oversight of the reuse program was needed to ensure Metro's services were transparent to the public. For example, Metro's services for electronic waste state that it will be recycled, not reused. As such, customers may be concerned if material they drop off is not recycled. As Metro seeks to refocus waste management toward greater reuse, effective implementation of environmental, financial, and legal standards will be critical to build public trust.

The investigation report omitted the Office of Metro Attorney's conclusion that the incident likely violated the SOP and ethics requirements. The omission showed a willingness to prioritize past practices over existing policies and Metro Code requirements. When management does not take prompt action it increases risks for Metro and its employees.

What we recommend

The audit included six recommendations. Four were designed to strengthen controls for the reuse program. Three focused on improving compliance with ethical requirements.