



CHECKLIST FOR USE WITH THE R2 PRACTICES

I. FACILITY INFORMATION

Include facility name, address, contact information, essential descriptive information about the facility operations.

II. R2 PROVISIONS

Provision 1 – Environmental, Health, and Safety Management System			
#	R2 Requirement	Y/N	Comments
1.	Does the recycler have a written EHSMS? [section (a)]		
2.	Is the EHSMS reviewed at least annually and updated as needed (e.g. as products and/or technologies change)? [section (a)]		
3.	Does the EHSMS include goals and procedures and require the organization to systematically manage its environmental, health, and safety matters? [section (a)(1)]		
4.	Is the EHSMS based on a “plan, do, check, act” model for continual improvement? [section (a)(2) and fn 2]		

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<p>5.</p>	<p>Does the EHSMS include sections setting forth:</p> <ul style="list-style-type: none"> A. a “reuse, recover, dispose” hierarchy of management strategies covering on-site and downstream materials management? [section (a)(3) (A)] B. a plan for complying with the environmental, health, and safety legal requirements relating to its operations, and for assuring it only exports equipment and components containing Focus Materials to countries that legally accept them? [section (a)(3)(B)] C. an analysis and plan for how the R2 Focus Materials (FMs) should be properly managed on-site and downstream; the “FM Management Plan”? [section (a) (3) (C)] D. an EHS hazards identification and assessment of on-site occupational and environmental risks? [section (a) (3) (D)] E. an emergency response plan outlining how it will respond to and report exceptional releases, accidents, spills, fires, explosions, and other out-of-the-ordinary events that pose risks to worker safety, public health, or the environment? [section (a) (3) (E)] F. the activities undertaken to conform to the requirements of these R2 Practices and listing the documentation necessary to show conformity with these requirements? [section (a) (3) (F)] 		
<p>6.</p>	<p>Has the recycler provided the emergency response section of its EHSMS to local emergency responders if appropriate or required? [section (a) (3) (E)]</p>		

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7.	<p>Is the R2 electronics recycler obtaining a certification from an Accredited Certification Body (as defined in the R2 Practices) stating that:</p> <p>A. its EHSMS conforms to the requirements of this provision, and</p> <p>B. its practices conform to the EHSMS and to the requirements of these R2 Practices? [section b]</p>		
Provision 2 – “Reuse, Recover, ...” Hierarchy of Responsible Management Strategies			
8.	<p>Is the section of the recycler’s EHSMS stating its “reuse, recover, disposal” management strategy consistent with the hierarchy set forth in this provision? [section (a)]</p>		
9.	<p>Is the material flow (on-site and downstream) consistent with the hierarchy? [section (a)]</p>		
Provision 3 – Legal Requirements			
10.	<p>Is the recycler fully implementing the section of its EHSMS covering legal requirements and exports? [section (a)]</p>		
11.	<p>Does this EHSMS section identify and document in an up to date manner the federal, state, and local EHS legal requirements that cover its operations? [section (a)(1)]</p>		
12.	<p>Does the recycler have a list of all the countries to which equipment, components, or materials containing FMs that have passed through its facility or control have been exported by it or any of its downstream vendors? [section (a)(2)]</p>		

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13.	<p>Does the recycler have the necessary documentation demonstrating that each non-OECD country—to which equipment, components, or materials containing FMs that have passed through its facility or control have been exported by it or any of its downstream vendors—legally accepts such imports?* [section (a) (2)]</p> <p>* A recycler need not conform to this requirement for shipments of equipment and components containing FMs that will be reused as is or repaired, refurbished, or remanufactured if they satisfy the requirements of Provision 6 Section (c) (1) or (d), or are new and in their original packaging. This is the only exception to the exporting requirements of Provision 3 Section (a) (2).</p>		
Provision 4 – On-Site Environmental, Health, and Safety			
14.	<p>Is there sufficient evidence to reasonably conclude that the recycler has the expertise and technical capability to process each type of equipment, component, and material it accepts in a manner protective of worker safety, public health, and the environment? [section (a)]</p>		
15.	<p>Does the recycler adhere to good housekeeping standards and are all work and storage areas clean and orderly? [section (b)]</p>		
16.	<p>Is there sufficient evidence to reasonably conclude that the recycler identifies and assesses on an ongoing basis the occupational and environmental risks that exist or could reasonably be expected to develop at the facility? [section c]</p>		

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17.	Is there sufficient evidence to reasonably conclude that the recycler implements the hazards identification and assessment section of its EHSMS on an ongoing basis? [section (c)]		
18.	Is there sufficient evidence to reasonably conclude that the recycler manages the hazards and minimize the releases it identifies using an appropriate combination of strategies, consistent with those identified in this provision? [section (d)]		
19.	Is there sufficient evidence to reasonably conclude that the recycler employs appropriate engineering controls? [section (d) (1)]		
20.	Is there sufficient evidence to reasonably conclude that the recycler employs appropriate administrative and workplace practices? [section (d) (2)]		
21.	Is there sufficient evidence to reasonably conclude there is appropriate use of personal protective equipment, including respirators, protective eyewear, cut-resistant gloves, etc. in light of the risks involved in each activity performed at the facility? [section (d) (3)]		
22.	Does the recycler utilize monitoring and sampling protocols to provide assurances that the practices it employs are effectively and continuously managing the risks it has identified? This includes complying with all applicable Federal or State OSHA standards and PELs for sampling and/or monitoring. [section (e)]		

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23.	Is there sufficient evidence to reasonably conclude that the recycler treats its entire workforce, including volunteer workers, temporary workers, and anyone else working under its direction, using the standard of care established pursuant to section (d) of this provision? [section (f)]		
24.	Has the recycler designated a qualified employee or consultant to coordinate its efforts to promote worker health and safety and is two-way communication actively encouraged between employees and this individual regarding potential hazards and how best to address them? [section (g)]		
25.	Is there sufficient evidence to reasonably conclude that the recycler is prepared at all times to implement the emergency response section of its EHSMS? [section (h)]		
Provision 5 – R2 Focus Materials Management and Downstream Due Diligence			
26.	Does the R2 Focus Materials (FMs) section of the recycler’s EHSMS – the “FM management plan” – analyze and plan how each type of FM should be properly managed to protect worker health and safety, public health, and the environment at the facility and throughout the Recycling Chain (note: the R2 definition of “Recycling Chain” includes downstream vendors in other countries)? [section (a) (1)]		
27.	Does the FM plan state how the recycler and its downstream vendors will conform to the requirements set forth in the rest of Provision 5? [section (a)]		

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28.	Is there sufficient evidence to reasonably conclude that the recycler and/or its downstream vendors remove FMs, toner, and toner cartridges from equipment and components prior to shredding, materials, recovery, energy recovery, incineration, or land disposal (other than the FMs excepted from this requirement in section (b) (1) and (2))? [section (b)]		
29.	Is there sufficient evidence to reasonably conclude that the removed FMs are sent to processing, recovery, or treatment facilities that are properly licensed to receive, and that utilize technology designed to safely and effectively manage, the FMs? [section (c)]		
30.	Is there sufficient evidence to reasonably conclude that removed items containing mercury are sent to mercury retorting facilities (that meets the criteria in #28 above)? [section (c) (1)]		
31.	Is there sufficient evidence to reasonably conclude that the removed circuit boards are processed to remove batteries and mercury and sent to a metals recovery facility (that meets the criteria in #28 above)? [section (c) (2)]		
32.	Is there sufficient evidence to reasonably conclude that any items containing PCBs are sent to a facility that uses technology specifically designed for PCB destruction, is licensed under the Toxic Substances Control Act and/or any other applicable law? [section (c) (3)]		
33.	Is there sufficient evidence to reasonably conclude that all toner and toner cartridges are recycled through an OEM or other qualified toner recycler unless it is not economically feasible? [section (c) (4)]		

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<p>34.</p>	<p>Is there sufficient evidence to reasonably conclude that the recycler does not utilize energy recovery, incineration, or land disposal as management strategy for FMs (including FMs that have not been removed from equipment and components per the exceptions in section (b) (1) and (2)), unless circumstances beyond its control disrupt its normal management of an FM (in which case it may consider such technologies to the extent allowed under applicable law)? [section (d)]</p>		
<p>35.</p>	<p>Is there sufficient evidence to reasonably conclude that the recycler sends all its removed FMs, and whole or shredded equipment and components containing FMs that have not been removed per the exceptions in section (b) (1) and (2), to downstream vendors whose on-site practices and selection of downstream vendors are fully consistent with the FMs section of the recycler's EHSMS? [section (e) (1)]</p>		
<p>36.</p>	<p>Is there sufficient evidence to reasonably conclude that the recycler sends all its FMs, and whole or shredded equipment and components containing FMs that have not been removed per the exceptions in section (b) (1) and (2), to downstream vendors that possess and/or conform to:</p> <ul style="list-style-type: none"> The R2 recycler's FM Management Plan, A documented EHSMS, A list of its environmental permits and copies of each, This section (e) of Provision 5 (Downstream Due Diligence), Provision 6 (Reuse), The exporting requirements of Provision 3 (a) (2), and Provision 7 (Tracking 		

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	Throughput)? [section (e) (1)-(8)]		
37.	Is there sufficient evidence to reasonably conclude that the recycler has confirmed, through audits or other similarly effective means, that each such downstream vendor's on-site practices and selection of downstream vendors continue to meet the requirements of section (e) of this provision for as long as the recycler continues to ship it FMs? [section (f)]		
Provision 6 – Reusable Equipment and Components			
38.	Is there sufficient evidence to reasonably conclude that the recycler does <u>not</u> sell or donate equipment or components for reuse if contrary to commercial agreements? [section (a)]		
39.	Is there sufficient evidence to reasonably conclude that the recycler labels and sorts equipment and components it ships downstream in a manner sufficient to track throughput in conformity with Provision 7, and handles and packages each shipment in conformity with Provision 12? [section (b)]		

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40.	<p>Is there sufficient evidence to reasonably conclude that the recycler, prior to shipping equipment and components that contain FMs and that will be reused as is or repaired, refurbished, or manufactured, have either:</p> <p>Utilized effective testing methods to confirm that the Key Functions are working properly, or</p> <p>Determined that the recipient vendor is R2 certified, or</p> <p>Confirmed through appropriate documentation and auditing that the equipment and components meet the vendor's specifications and that the vendor sells it for reuse with Key Functions working properly and manages all residuals FMs resulting from refurbishing activities in a manner that conforms to the R2 Practices.</p> <p>[section c]</p>		
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Provision 7 – Tracking Throughput			
41.	Is there sufficient evidence to reasonably conclude that the recycler possess copies of commercial contracts, bills of lading, or other commercially-accepted documentation for all transfers of equipment, components, and materials into and out of its facility, as well as for any brokering transactions, during the last 3 years? [section (a)]		
Provision 8 – Data Destruction			
42.	Is the recycler sanitizing or destroying data on hard drives and other data storage devices consistent with the practices described in the NIST Guidelines for Media Sanitation: Special Publication 800-88 or another current generally-accepted standard (or is it certified by a generally-accepted data-sanitation certification program) unless otherwise requested in writing by the customer? [section (a)]		
43.	Are the data destruction procedures documented? [section (b)]		
44.	Do employees involved in the data destruction receive appropriate training on a regular basis? [section (c)]		
45.	Are the data destruction processes reviewed and validated by an independent party on a periodic basis? [section (d)]		
Provision 9 – Storage			
46.	Does the recycler store all FMs, and equipment and components going to reuse, in a manner that protects them from adverse atmospheric conditions and floods? [section (a) (1)]		

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47.	Does the recycler's storage areas for these items include catchment systems where warranted? [section (a) (1)]		
48.	Are the recycler's storage areas for these items secure from unauthorized entrance? [section (a) (2)]		
49.	Are the recycler's storage areas and containers clearly labeled? [section (a) (3)]		
Provision 10 – Facility Security			
50.	Does the recycler have a functioning security program that controls access to all or parts of the facility in a manner and to a degree appropriate given the type of equipment handled and the needs of the customers served? [section (a)]		
Provision 11 – Insurance, Closure Plan, and Financial Responsibility			
51.	Does the recycler possesses adequate Comprehensive or Commercial General Liability Insurance including coverage for bodily injury, property damage, pollutant releases, accidents and other emergencies? [section (a)]		
52.	Does the recycler have an up-to-date written plan and a financial instrument intended to assure proper closure of the facility and to assure against abandonment of any electronics recycling products, components, or materials? [section (b)]		
Provision 12 – Transport			
53.	Does the recycler appropriately package all equipment, components, and materials to be transported in light of the risk they could pose during transportation to public health or the environment and the level of care warranted by their intended use? [section (a)]		

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54.	Does the recycler have written documentation or a third-party certification indicating that transporters have all the necessary regulatory authorizations and no significant violations of relevant legal requirements during the past 3 years? [section (b)]		
Provision 13 -- Recordkeeping			
55.	Does the recycler maintain in a single location each piece of documentation called for by the R2 practices or necessary to show conformity to the practices? [section (a)]		