

AUDITOR’S CHECKLIST FOR THE R2 PRACTICES

I. FACILITY INFORMATION

Include facility name, address, contact info, essential descriptive info re facility operations.

II. R2 PROVISIONS

1. Environmental, Health, and Safety Management System

	Y/N	Auditor Comments
Does the recycler have a written EHSMS? [section (a)]		
Is the EHSMS reviewed at least annually and updated as needed (e.g. as products and/or technologies change)? [section (a)]		
Does the EHSMS include goals and procedures and require the organization to systematically manage its environmental, health, and safety matters? [section (a)(1)]		
Is the EHSMS based on a “plan, do, check, act” model that identifies and assesses environmental and occupational risks, implements operational controls, and provides corrective action procedures? [section (a)(2)]		
Does the EHSMS include written procedures for identifying and evaluating the environmental, health, and safety impacts of downstream vendors, and for utilizing this information in the selection of downstream vendors? [section (a)(3)]		
Does the EHSMS include a plan listing the activities undertaken to conform to the requirements of these R2 Practices and identifying the documentation necessary to show conformity with these requirements? [section (a)(4)]		

2. **“Reuse, Recover, ...” Hierarchy of Responsible Management Strategies**

	Y/N	Auditor Comments
Is there a written policy stating how the recycler manages used and end-of-life electronics equipment, with respect to both on-site activities and the selection of downstream vendors, that is consistent with the hierarchy set forth in this provision? [section (a)]		
Is the material flow (on-site and downstream) consistent with the hierarchy? [section (a)]		

3. **Legal Requirements**

	Y/N	Auditor Comments
Is there substantial evidence that the recycler is knowledgeable of Federal, State, and local environmental, health, and safety requirements—and, if it exports, those of all transit and recipient countries—that are applicable to the operations and transactions in which it engages? [section (a)]		
Is there substantial evidence that the recycler has the necessary environmental, health and safety permits and authorizations from all Federal, State, local and foreign governments that are applicable to its operations and transactions? [section (a)]		
Are there any unresolved notices of violation or other written evidence of non-compliance with the environmental, health and safety requirements of any government (domestic or foreign) applicable to the recycler’s operations and transactions? [section (a)]		
Is there evidence that the recycler has not		

made available, upon request by customers, notice of any material fines, regulatory orders, or violations relating to environmental, health, or safety legal requirements in the previous 3 years and within 60 days after any subsequent fines or regulatory order? [section (b)]		
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4. **On-Site: Environmental, Health, and Safety**

General

	Y/N	Auditor Comments
Is there evidence that the recycler is lacking 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)]		
Does the recycler adhere to good housekeeping standards and are all work and storage areas clean and orderly? [section (b)]		

Workforce and Environmental Protection

	Y/N	Auditor Comments
Is there a written hazards identification and assessment of occupational and environmental risks as described in this provision? [section (c)]		
Is the hazards identification and assessment a component of the recycler’s EHSMS, and is this implemented on an ongoing basis (as new types of materials are processed or new processes are utilized)? [section (c)]		
Does the recycler manage the hazards and minimize the releases it identifies using an appropriate combination of strategies, consistent with those identified in this		

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provision? [section (d)]		
Is there evidence that the recycler has taken informed steps to determine that engineering controls are sufficient, and no evidence of insufficiency? [section (d)]		
Do administrative and workplace practices appear to be sufficient? [section (d)]		
Does reasonably available evidence indicate that there is sufficient use of personal protective equipment, including respirators, protective eyewear, cut-resistant gloves, etc. as appropriate for the risks involved? [section (d)]		
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)]		
Does reasonably available evidence indicate that the recycler treats its entire workforce, including volunteer workers, temporary workers, and anyone else performing activities in its facilities, using the standard of care established pursuant to section (d) of this provision? [section (f)]		
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)]		

Exceptional Releases

	Y/N	Auditor Comments
Is there any evidence that the recycler is not prepared at all times to implement the		

practices set forth in its EHSMS for responding to and reporting 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 (h)]		
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5. **On-Site: Appropriate Management of Certain Items**

	Y/N	Auditor Comments
To be written following further discussion of the requirements of this R2 provision.		

6. **On-Site: Refurbishing, Testing, and Packaging of Equipment and Components Going to Reuse**

	Y/N	Auditor Comments
Is there evidence indicating that the recycler sells or donates any equipment for reuse that it received from an entity that directed otherwise? [section (a)]		
Does the recycler refurbish as needed the equipment it sells or donates for reuse? [section (a)]		
Does the recycler conform the requirements of the R2 practices in its refurbishing activities? [section (a)]		
Does the recycler utilize appropriate testing procedures to confirm that equipment or components containing CRT glass, toner cartridges, batteries, mercury-containing fluorescent lamps and switches, any items that contain PCBs, or circuit boards that it sells or donates for reuse are functioning properly for their intended reuse? [section (a)]		

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Accurately label the equipment and components, and package and ship them in a manner that will minimize damage during transport? [section (a)]		
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7. On-Site: Storage

	Y/N	Auditor Comments
<p>(Does the recycler store items removed to conform with provision 5, as well as equipment and components destined for reuse, in a manner that:</p> <ul style="list-style-type: none"> (1) Protects them from adverse atmospheric conditions and floods and, as warranted includes a catchment system, and (2) Is secure from unauthorized entrance, and (3) Uses clearly labeled containers and/or storage areas? 		

8. On-Site: Tracking Throughput

	Y/N	Auditor Comments
Does the recycler possess copies of commercial contracts, bills of lading, or other commercially-accepted documentation for the 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)]		
Is there any evidence of such transfers of equipment, components, or materials for which commercially-accepted documentation is missing? [section (a)]		

9. **On-Site: Data Destruction**

	Y/N	Auditor Comments
Is the recycler, unless otherwise directed by the customer in writing, 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? [section (a)]		
Are the data destruction procedures documented? [section (b)]		
Do employees involved in the data destruction receive appropriate training on a regular basis? [section (c)]		
Are the data destruction processes reviewed and validated by an independent party on a periodic basis? [section (d)]		

10. **On-Site: Facility Security**

	Y/N	Auditor Comments
(a) 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)]		

11. **On-Site: Insurance, Closure Plan, and Financial Responsibility**

	Y/N	Auditor Comments
Does reasonably available evidence indicate that 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)]		
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)]		

12. Downstream: Appropriate Downstream Vendors and Due Diligence for Various Types of Equipment, Components, and Materials

	Y/N	Auditor Comments
To be written following further discussion of the requirements of this R2 provision.		

13. Downstream: Compliance with other Countries’ Import Laws when Exporting

	Y/N	Auditor Comments
Whenever exporting toner cartridges, CRT glass, batteries, mercury-containing fluorescent lamps and switches, any items that contain PCBs, and circuit boards, or equipment or components containing any of these—except equipment or components going for reuse in conformity with Provision 6—has the recycler either requested and received documentation, prior to shipping, from the Competent Authority ¹ of each transit and/or import		

¹ In countries that have ratified the Basel Convention the “Competent Authority” is the entity that provides documentation concerning the legality of transboundary transactions involving equipment or components that the country classifies as Basel wastes. In countries that have not ratified this treaty, responsible recyclers acquire the necessary documentation from the national government entity legally responsible for determining the legality of

<p>country, that clearly verifies that the country legally accepts such imports, or requested and received prior to shipping confirmation—that each transit and/or import country legally accepts such imports—from the United States Environmental Protection Agency, which in turn will communicate with the other country’s Competent Authority to get a determination. [section (a)]</p>		
<p>Has the recycler contractually obligated its downstream vendors to conform to this provision – including the requirement to contractually obligate their downstream vendors – and to provide documentation every two years sufficient for an auditor to confirm their conformity. [section (b)]</p>		

14. **Transport**

	Y/N	Auditor Comments
<p>Does the recycler ensure that all equipment, components, and materials to be transported are packaged appropriately 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)]</p>		
<p>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)]</p>		

15. **Recordkeeping**

_____ such transboundary transactions.

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Y/N	Auditor Comments
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)]	