



SERI COP Advisory 11

Advisory No. 11: Shared Space at a Physical Address

Reference Document: R2 standard and R2 Code of Practices

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Purpose: Clarify how the R2 Standard applies to shared space at a physical address.

The Introduction to the R2 Standard states “The R2:2013 Standard shall apply to all electronics recycling related activities at a physical address.” The starting premise is that all certifiable electronics recycling activities in rooms, units, suites, buildings or otherwise with a common address must be R2 Certified, regardless of any subdivision by rooms, fences, walls, suites, etc. The scenarios below seek to provide clarification on how this is applied to different scenarios where a physical address is sub-divided or shared. The Certification Body shall be responsible for fully vetting and verifying the scope of certification and documenting justifications where sub-divisions of a physical address are excluded from the required auditing and R2 certification.

Rooms within an R2 Certified area

Rooms or otherwise separated areas within an R2 Certified area performing R2 certifiable activities are always required to be audited and certified.

Multiple suites, rooms, buildings, etc. used by the same organization.

The scope of the R2 Certification must include all certifiable activities of the business in any of the suites, rooms, buildings, etc. at the same physical address and each must be audited.



Multiple suites, rooms, buildings etc. used by different organizations that are affiliated with common ownership.

Each organization performing R2 certifiable activities must be R2 Certified for the affiliated organization to be R2 Certified at the same physical address.

Physically separate standalone units/suites/buildings at the same address with unaffiliated ownership.

When a building has separate units/suites that can be leased and operated independent of one another according to local law and is occupied by different and unaffiliated organizations, then a case could be demonstrated that a suite could be certified for one business without certifying another suite that performs certifiable activities. For example 100 Main Street has five suites with independent access, security, etc. Suite 102 could be R2 Certified, without certifying Suite 105. The Certification Body should verify this independence of the organizations through public records registering each business without common ownership and verify all business permits for their legal operation are in-effect and align with the purported structure. Any movement of equipment or Focus Materials to these unaffiliated organizations would require due diligence and qualification as a downstream vendor as applicable by the R2 Standard.

RISKS that should be considerations in evaluating shared buildings:

1. Organizations use multiple suites in the same building to hide activities so they are not audited.
2. Organizations transfer equipment between multiple companies with joint ownership in different suites of the same building to hide activities so they are not audited.
3. Organizations use affiliated companies to receive problematic materials (like CRTs) outside of the audited activities of the R2 organization.