



SERI COP Advisory 14

Advisory No. 14: Scopes for R2

Reference Document: Code of Practices – Scope of certifications

Date of Release: November 5 2018

Effective Date: Immediately for new certifications. For existing certificates, it should be reviewed and updated as necessary by the next audit (or sooner if being revised).

Purpose of Advisory

The purpose of this Advisory is to clarify the requirements for the R2 scope statement that is included on the R2 Certificate. In the Applicability section of the R2:2013 Standard it states that the standard shall apply to all electronics recycling related activities at a physical address. It is expected, therefore, that the scope on the certificate clearly captures all electronics recycling related activities, and that those activities have all been audited by the CB auditor(s). However, the scope *cannot* include activities that are not eligible for R2 Certification.

Policies

	Policy	Explanation
1.	The scope statement must include all electronics recycling related activities at a physical location (Including reuse, recycling, collection, etc.)	<p>This policy applies to a single company as well as to multiple companies sharing the same facility. See Advisory #11 for more clarification.</p> <p>Electronics recycling related activities include IT asset disposition, refurbishment, repair, brokering, etc. as listed in the Definitions section of the R2 Standard. Where there are multiple entities, the scope of each entity must be clearly defined on the certificate.</p>



	Policy	Explanation
2.	Electronics recycling related activities under the control of the R2 Recycler but not taking place at the physical location must also be included in the scope statement.	R2 Provision 5.a includes offsite activities under the control of the R2 certified facility. This may include activities performed outside of the physical location, such as onsite services, brokering, transporting, storage, etc. that are part of the R2 certified processes at the physical location.
3.	Activities that are not specifically electronics recycling related are not eligible for R2 Certification and not allowed in the scope statement.	<p>Although the electronics recycling process <i>yields</i> different material streams such as plastics and metals, it does not mean that the electronics recycler is R2 certified as a plastics or metal recycler. Including those activities on an R2 scope could wrongly imply that the recycler was R2 certified to collect and process plastics such as water bottles, or scrap metal from old cars – neither of which are electronics related activities.</p> <p>In some cases, electronics recyclers may also engage other types of recycling activities that are not electronics related and fall outside of the scope of the R2 Standard. Non-R2 related activities may be included in the EH&S certificate scopes, but they may not be included in the R2 scope.</p>
4.	Equipment and materials that do not meet the definition of electronic equipment in the R2 Standard cannot be included in the scope.	Examples might include appliances, automobiles, solar panels, etc.



	Policy	Explanation
5.	New equipment is not acceptable in the scope statement.	The R2 Standard covers only used electronics. Since new equipment is considered to be functional and excluded in Provision 6.e, it is not acceptable to be listed in the scope statement since it is not auditable.
6.	Activities in the scope must be active and a primary function of the recycler.	<p>In order to include an activity on the scope, that activity must be currently taking place. A recycler cannot include future or planned activities in the scope. For example, simply having a written process for how a specific electronic device or component would be managed <i>if</i> it came through the door, is not enough to list that activity on the scope. The recycler must be able to demonstrate evidence of <i>implementation</i>.</p> <p>Also, activities that are not a regular or not a primary function are not acceptable to be specifically named in the scope. For example, a facility that shreds electronic devices to recover materials cannot claim they refurbish cell phones just because they receive a few cell phones each year.</p> <p>Sufficient records must be audited for <i>each specific</i> activity or type of equipment/material to include the specific activity or equipment in the scope statement.</p>



Terms Not Permitted in an R2 Scope

These terms are not allowed in the scope based on the Definition of electronic equipment in the R2 Standard. Here are some example terms:

- *“Electrical”* or *“Electrical Waste”* -- The word *“Electrical”* includes equipment that does not meet the definition of Electronic Equipment as defined by the R2 Standard and would therefore be outside the scope of R2. There is a difference between *“electrical”* and *“electronic”*. The acronym *“WEEE”* stands for Waste Electrical and Electronic Equipment. This is often where the confusion is. *Electrical* refers to anything with a power cord and includes products such as white goods and appliances. *“Electronic Equipment”* as defined by the R2 Standard does not include electrical items covered under the WEEE definition. The R2 scope must only include electronic equipment and materials that are specifically covered by the R2 Standard and thereby audited.
- *Metals Recycling* – Recycling of metals is too broad and not certifiable under R2. Examples of scopes that are not acceptable include *“scrap metal recycling”* or *“recycling of precious metals”*. An example of an acceptable scope for an R2 recycler that recovers precious metals might be *“recovery of precious metals from electronics”*. Metals recycling alone would not be sufficient to meet all 13 Provisions of the R2 Standard.
- *Plastics Recycling* – Although the electronics recycling process may *yield* plastics, plastics recycling in and of itself is outside the scope of the R2 Standard as it does not meet the definition of electronics. A plastics broker or plastics processor cannot be R2 Certified.
- *Universal Waste Recycling* – Universal Waste is too broad a term and applies to many materials that do not meet the definition of electronics and are outside the scope of R2. Examples of unacceptable scopes include *“recycling of lamps,” “recycling of bulbs,”* and *“recycling of Universal Waste”* because all of those terms are too broad and could include materials that do not meet the R2 definition of electronics. A more specific description of material such as the *“recycling of Universal Waste Electronics”* could be included in an R2 scope statement.
- *New or surplus equipment* – New equipment is outside the R2 scope of *“used and end-of-life equipment”* as explained in the Introduction of the R2 Standard. While Provision 6.e references new equipment, it is only in the context that excess new inventory or unopened returns could be moving through the reverse logistics chain. *“New”* or *“Surplus”* equipment is not part of the R2 Standard and cannot be part of the scope



statement.

- Use of the word “Compliant” – Use of phrases like “compliant downstream vendors” or “environmentally compliant processes” etc. is not permitted in a R2 scope since the Certification Body is not assessing the recycler’s compliance to EHS laws or regulations, or assessing the downstream vendor’s qualifications. Auditing to the R2 standard is a sampling process. Use of terms like “Comply” or any other derivative is not acceptable on the R2 certificate.

Identification of Scope Statement with Campus Allowance

In a campus scheme, the R2 certificate shall state “Campus Allowance” and identify and name of the main processing location, including its address and scope. The address and scope of each supporting campus site must also be defined - either on the main certificate or as an addendum to the certificate. It is expected that each campus site will have a scope describing services specific to that location, and collectively, the main processing location and supporting sites should represent an interconnected process for the full operation of the organization and conformance to the R2 Standard. If a campus of two or more locations is embedded within a larger multisite group, the sites under the campus should be clearly marked with the campus allowance and defined scope so it can be differentiated from the sites within the multisite arrangement.

Caution on Integrated Audits

R2 audits are typically integrated with other standards such as RIOS or 14001/45001. It is common to see identical wording for the scope statements on the various certificates. This may not always be correct, however, since the R2 standard is restricted purely to electronics recycling activities. The scope on an R2 certificate will often differ from the scopes for the other integrated standards – particularly if the company is engaged in other activities outside the scope of R2. It is important to keep in mind the definition of the “Electronics” in the Definitions section (pg. 15) of the R2: 2013 Standard and the terms section of this advisory when assessing an R2 scope.

Scope Changes

Changes in equipment received, business strategy, or operations all may impact the accuracy of an organization’s scope statement. It is important to notify the Certification Body (CB) of any changes prior to implementing the changes. Failure to coordinate scope changes may result in



nonconformity when the scope of certification is no longer accurate to the activities at the facility.

Steps for Certification Scope Change

1. The recycler shall notify the CB on any scope changes or extensions if there are major changes including but not limited to the following: change in processes, expansions, mergers, etc. This should be part of the recycler's change management process in their certified EH&S management system.
2. The CB will review any changes to documentation and review records offsite to substantiate the proposed change and any EH&S risk evaluations and mitigations. Depending on the nature of changes, CB will determine how much onsite audit time is required for verification of changes at the recycler.
3. The CB will verify records of successful implementation of the scope change prior to changing the scope on the certificate.
4. A revised certificate will be forwarded to SERI and be supported by audit records after the onsite audit.
5. If the documentation review and audit is not successful in verifying the changes, CB will suspend the recycler's certificate until the proposed changes for scope can be verified.

Implementation

- SERI will not accept new/changed certificates if the scope requirements do not meet the requirements outlined in this Advisory.

One certificate per audit

- SERI will accept only one certificate per audit. If there are multiple sites or entities audited under one management system, only one certificate with all the sites and entities identified on it will be accepted. The sub-scope of each entity must be identified on the certificate.