



SERI COP Advisory 16

Advisory No. 16: Competence Criteria for Audit Package Reviewers and Requirements for CB Audit Package Review Process

Reference Document: Code of Practices – Section VB. Personnel Training

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Purpose of Advisory

This Advisory defines the criteria of competence for those making certification decisions for R2 certifications in the R2 accredited certification bodies. For the purpose of this Advisory, we will call such persons Audit Package Reviewers (APR). Keeping in line with the requirements in Clause 9.5.1.1 of 17021:2015 an APR is a person or committee that makes the decisions for granting or refusing certification, expanding or reducing the scope of certification, suspending or restoring certification, withdrawing certification or renewing certification different from those who carried out the audits.

1. *Competence criteria of Audit Package Reviewers (APR)*

The APR has to meet the following minimum criteria before he/she begins reviewing packages and making certification decisions:

- Has successfully completed the SERI auditor course.
- Is an R2 Auditor qualified in accordance with the CBs auditor qualification process. The goal of a CB should be to use APRs who are auditors, with extensive experience in order to provide guidance and technical advice to auditors in the field.
- Completes at least 5 R2 audit days in a calendar year, of which at least one audit has to be a full system audit (Stage 2 or Recertification).
- Has maintained auditor credentials by successfully completing the SERI annual training by the deadline stipulated by SERI.



APR qualification records for all of the above shall be maintained by the CB. If any of the criteria above are not met, the APR shall not review audit packages and make certificate decisions until they comply with all requirements.

2. *Package Review*

SERI requires R2 audit packages for all audits to be reviewed by a competent APR. This includes packages for the following audits:

- Stage 1 and Stage 2
- Surveillance
- Re-certification
- Transfers/Facility Moves
- Revisit/Special/Unannounced

3. *Audit Package Attachments*

Auditors are expected to include in the following in the Audit Package:

- SERI Acknowledgement
- Focus Materials Management Plan
- Downstream Vendors (Recycler’s Listing – Names and Locations of All FMs)

4. *Criteria to be included in APR’s form/checklist.*

The completed audit package assessment shall be maintained as a record of the certification program records for a minimum of three years.

Each CB shall include the following criteria into the document they use for recording the audit package review. In the case of a surveillance audit, APR shall include criteria as relevant to the provision audited per the audit plan.

Recycler Name	<p><i>Verify name of the Recycler matches the following:</i></p> <ul style="list-style-type: none"> • R2 Certificate • Name used in the audit report • Name on the Recycler’s website • Name on the License Acknowledgement • Applicability of additional names used
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	<ul style="list-style-type: none"> • Applicability of additional recyclers at the location
Location of recycler	<p><i>Verify the location of the Recycler matches the following:</i></p> <ul style="list-style-type: none"> • R2 Certificate • Location used in the audit report • Location used in the audit plan • Location on the Recycler’s website • Location on the License Acknowledgement • Additional locations under Recycler’s control connected to the process
Scope	<p><i>Verify the acceptability of the certificate scope based on Advisory 14 and the following:</i></p> <ul style="list-style-type: none"> • R2 specific scope. (Related ONLY to electronics recycling activities) • Scope as applicable to the FM Plan. • Scope as applicable to website/marketing material. • Scope processes audited in audit package notes and evidence of implementation. • Allowances in accordance with the Code of Practices and R2 Requirements. Allowance must be qualified with evidence at each audit and recorded in the Audit Report. No exclusions are allowed without ample evidence provided by the auditor. Concerns with FM Processor Allowance should be verified against Clarification 1: Clarify the applicability of the Focus Materials (FM) Processor Allowance
Provision 2 Reuse, Recover, Hierarchy of Responsible Management practices	<p><i>Verify evidence of Reuse. Provision 6 is not excludable without strict evidence that Allowance is applicable under FM Processor. Refer to Clarification 1: Clarify the applicability of the Focus Materials (FM) Processor Allowance.</i></p> <p>If an exclusion of any provision is stated, it MUST be backed by evidence in the auditor’s package, technical review of the recycler’s website, marketing information, scope and R2 Certificate.</p> <p>If auditor mentions land disposal (landfilling), energy recovery, or incineration, verify these processing techniques are used because</p>



	<p>no reuse or recycling options are viable, or law requires such methods. If the auditor states that law requires land disposal, energy recovery or incineration. The auditor must describe in detail the specific legal requirements requiring these methods. A simple statement that a government requires or allows these methods or a reference to a law is not sufficient evidence. The R2 Standard does not allow land disposal, energy recovery, or incineration unless there is no viable option. If any legal requirement supersedes the R2 Standard it must be clearly proven in every audit report.</p>
<p><i>Provision 3</i> Legal Requirements</p>	<ul style="list-style-type: none"> • Verify auditor reviewed legality of export shipments of FMs for the entire recycling chain. A statement by the Auditor that the Recycler, “does no direct exports,” is not acceptable. • Verify auditor recorded key import/export requirements, and audited their implementation. • Verify auditor ensured a compliance audit was completed by a competent auditor and covered the applicable legal requirements for environmental, health and safety, and import/export compliance (including shipments by downstream vendors).
<p><i>Provision 4</i> On-site Environment, Health & Safety</p>	<p>Verify the auditor detailed audit of processes and this information is reflective of an accurate certificate scope. Auditor notes should provide details to as which processes were audited live. Verbiage on the certificate scope should be relatable to the audit notes.</p>
<p><i>Provision 5</i> Focus Materials</p>	<p>Attachments Required: FM Plan and Approved DSV Listing (names and locations of all FM streams)</p> <ul style="list-style-type: none"> • Verify DSVs were identified by the auditor from audit trails in tracking throughput. Note: DSVs should not be sampled from the FM management plan or other lists. DSVs should be identified when reviewing the shipping records for Provision 7, and then used to follow the audit trails for conformance to due diligence requirements under Provisions 5.e, 6.c.3, and 8.h.



	<ul style="list-style-type: none"> • Verify 100% of DSVs were audited by the auditor before Stage 2. This should be compared to the FM Plan. • Verify the DSVs audited are acceptable based on the scope of materials and activities. • Verify the exported FMs by DSVs were audited and reviewed as part of the audit of legal compliance plan, as required in Provision 3. • Verify the FM Plan and DSV Listing are consistent with the shipments recorded by the auditor to include the entire recycling chain to the end of life. • Verify the auditor provided detailed notes on how each one of the sampled DSVs were qualified by the Recycler. • Verify that DSVs include vendors receiving equipment and components containing FMs.
<p><i>Provision 6</i> Reusable Equipment and Components</p>	<ul style="list-style-type: none"> • Verify the auditor reviewed tracking throughput records (Provision 7) to identify audit trails from reuse shipments. • Verify the auditor recorded specific shipments of each of the categories (reuse, resale, and repair) as applicable. • Verify the auditor records demonstrate accurate identification on records based on type of equipment sampled and shipped. • Verify the auditor used shipments for reuse (from tracking throughput records) for verification of the testing process. • Verify the auditor recorded specifics on how testing was conducted, as well as the results of testing, qualifications of personnel, etc. • If auditor notes product is sold R2/Ready for Repair, verify records related to the qualification of the DSV/Refurbisher (6.c.3 & 5.e).
<p><i>Provision 7</i> Tracking Throughput</p>	<ul style="list-style-type: none"> • Verify auditor recorded shipments & invoices related to the scope. • Verify the sample covers the DSVs as noted in the FM Plan, and as related to the equipment/components containing focus materials and focus material recorded in the auditor report.



	<ul style="list-style-type: none"> • Verify auditor made a correlation between products received and Provision 5 and 6 shipments. Audit trails for each type of shipment should be identified and followed since the previous audit.
<i>Provision 8</i> Data Destruction	<ul style="list-style-type: none"> • Verify the auditor included detail with regards to the unique types of equipment being received and their data. • Verify audit report specifies how the unique types of data destruction processes are controlled. • Verify if audit report specifies how the unique types of data destruction processes are validated. • If the data destruction is being conducted externally (upstream or downstream), verify the auditor included specifics on how the external source was qualified, including records of data destruction sample. • If the data destruction is being conducted internally verify the auditor sampled the data destruction records, for the unique data destruction processes.
<i>Provision 9</i> Storage	<ul style="list-style-type: none"> • Verify the audit report reflects that the auditor spent time in the plant verifying storage requirements specific to recyclables (hazardous waste, universal waste, storm water).
<i>Provision 10</i> Security	<ul style="list-style-type: none"> • Verify the audit report reflects that the specific security controls and maintenance of those controls.
<i>Provision 11</i> Insurance, Closure plan & Financial Responsibility	<ul style="list-style-type: none"> • Verify the auditor recorded specifics related to the Environmental Pollution Policy. • Verify the auditor include specifics related to how the closure is carried out, by which independent third party. • Verify the auditor reviewed the closure plan and financial assurance to be consistent with the risks for the types of equipment received and the processing techniques used.
<i>Provision 12</i> Transport	<ul style="list-style-type: none"> • Verify sample of trucking company qualifications, correlate to shipments as recorded in the audit report. • Verify the auditor included detail on how each of the sampled transporters were qualified.



AUDIT REPORT QUALITY

Verify the responses do not appear to be copied from other packages.
Verify the evidence is specific to the recycler.
Verify the evidence is backed by objective records which are detailed unique information about the Recycler.
Verify that the R2 requirements were audited as recorded in the Audit Plan.
Verify that the DSV Count was accurate, counting all DSVs in the entire chain.
Verify the audited provisions and focus of the audit are consistent with the scope, activities of the recycler, the types of equipment managed, and recyclers past performance.
Verify the auditor accepted an appropriate FM Plan, consistent with the scope, activities of the recycler, the types of equipment managed, and recyclers past performance.
Verify the auditor accepted an appropriate DSV Listing, consistent with the scope, activities of the recycler, the types of equipment managed, and recyclers past performance.