



SERI COP Advisory 18

Advisory No. 18: Facility Moves

Reference Document: R2 Code of Practices

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Purpose of Advisory:

A facility move is defined as one when a certified recycler moves from one address to another address provided the facility at the previous address is no longer operating as a recycler eligible for R2 certification.

This advisory defines the process to be followed by a certified R2 recycler and the Certification Body (CB) during a facility move.

1. At no time shall an R2 certificate be valid when the R2 recycler is not operating at the address on the certificate.
2. To maintain conformance to R2 during a facility move, a recycler should notify the CB at least 6 months in advance of closing the previous facility (earlier notification is advised to ensure the CB is able to schedule an audit). When a CB is notified by a recycler of a change in facility address, the CB shall inform SERI's Director of Quality in writing of the move. The CB shall maintain communication of when they were informed of the move.
3. During the move process, the activities at the new and previous address shall both be controlled under the management system of the current R2 Certified facility.
4. The new facility shall complete a CB audit and be issued a revised certificate by their CB prior to closing the former facility location. If a revised certificate for the new facility has



not been issued before leaving the former facility, the R2 certificate for the former facility shall be suspended by the CB.

5. The following is a list of the minimum tasks that shall be verified and documented by the CB audit of the new facility. Additional tasks may be necessary to maintain conformance under the R2 Standard.
 - a. The scope of activities at the new facility are the same as the former facility. If not, an on-site audit is required.
 - b. The Downstream Vendors are the same as evidenced by a review of shipping records from the new facility. If not, downstream vendor due diligence must be reviewed by the CB auditor.
 - c. All equipment and materials are removed from the former facility.
 - d. The former facility closure plan is being executed.
 - e. Environmental aspects (footprint) are updated to reflect those of the new facility and controls are implemented.
 - f. Health and safety risks (footprint) are updated to reflect those of the new facility and controls are implemented.
 - g. The legal compliance plan is updated to reflect the legal requirements of the new facility.
 - h. Insurance policies are updated to include the new facility.
 - i. Closure plans are updated to reflect the risks of the new facility and the financial assurance is adjusted (if necessary based on the risks).
 - j. A legal compliance audit of the new facility is completed by a qualified compliance auditor and any non-compliances identified are corrected.
 - k. Internal EH&S and R2 audits are completed at the new facility and corrective actions implemented for any non-conformances.

6. If the CB is not able to resource an onsite audit in an effective and timely manner, the CB can consider a remote audit. If a remote audit is conducted, the CB will retain records to support why the onsite audit was not able to be achieved. The remote audit shall include a tour of the new and old facilities guided by the recycler via video conferencing (Skype, Facetime, Google glasses or any other suitable means). The CB shall be able to view and audit remotely all relevant operations at the new facility being certified. The CB shall also be given access to interview employees as necessary to fulfill audit trails. Should the auditor find that videoconferencing is not an effective method to verify a facility move, he/she has the right to require an on-site audit for further verification. If any of the above tasks (5 a-k) are not satisfied or able to be verified by remote audit, the CB shall conduct an **on-site audit** of the new facility and auditing implementation of the closure plan for



the previous facility to assure the objectives are achieved. The CB will determine the amount of time required for the on-site audit.

7. An audit (onsite or remote) to verify the move and change the R2 Certificate does not replace the annual/recertification audit. However the audit of the move could be combined with an annual/recertification audit. If a remote audit is conducted, then an onsite audit shall be completed within 6 months of the move. If there are restrictions imposed (owing to COVID only) by the region where recycler is located, that prohibits an auditor to go onsite within 6 months of the remote audit, the CB shall conduct the onsite audit when the restrictions are removed. The CB must maintain documentation (e.g. state ordinance, country mandates etc.) to support the decision to delay the onsite audit.
8. After the CB has completed the audit to verify the move to the new facility address, the CB shall revise the certificate to reflect the change in address (and scope if necessary). A copy of the revised certificate shall be provided to SERI within 5 days of issuance.
9. The CB shall accept a current SERI R2 Facilities license acknowledgement from the previous facility to also cover the new facility during the move. When SERI receives the revised certificate from the CB for the new facility, a revised license agreement with the new address will be sent to the recycler for signature.
10. SERI will update the website directory after receipt of revised certificate, and issuance of the license agreement and payment of fees (if applicable).
11. If the issuance of the certificate for the new facility is not completed within 6 months of the move, the certificate for the old address shall be withdrawn, unless documented restrictions, as per section 7 above, are in place. After a certificate is withdrawn, the recycler will have to conduct a new registration audit to be certified at the new facility.

Revision No.	Change	Date of Release/Revision
1.1	Removing the time frame of 6 months to do an onsite audit after completing a remote facility move audit (owing to COVID).	November 17 2020