

MAPPING OF THE EXISTING R2:2013 REQUIREMENTS TO THE REVISED R2v3 DRAFT REQUIREMENTS

Left column below reflects each numbered requirement under the current R2:2013 Standard. For each R2:2013 requirement, the column on the right indicates the corresponding requirement(s) in the revised version of the standard.

R2:2013 REQUIREMENTS	R2v3
1. ENVIRONMENTAL, HEALTH, AND SAFETY MANAGEMENT SYSTEM	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall document the scope of activities included in the R2:2013 and EHSMS certifications, including any allowance to the R2:2013 standard expressly listed in the R2 Code of Practices and authorized in writing by the Certification Body.	1. (b)
(b) An R2:2013 electronics recycler shall be certified, throughout the duration of its R2 certification, to one or more environmental, health and safety management system standards (EHSMS) that have been approved by SERI ¹ . The R2:2013 electronics recycler shall be certified to the standard(s) and R2:2013 by an independent, Accredited Certification Body.	3. (a)
(c) An R2:2013 electronics recycler shall develop, document, fully implement, review at least annually through internal audits, and update as needed (e.g., as operations, products and/or technologies change) this written EHSMS, which shall include: (1) Written goals and procedures covering, and requiring the organization to systematically manage, its on-site and downstream environmental, health, safety, and data security matters in a manner consistent with each requirement of the R2:2013 Standard, and (2) A list of the activities necessary to conform to each requirement of R2:2013, a list of the documentation necessary to show conformity with these requirements, and a commitment to take corrective action to address any issues of non-conformance.	3. (b)

2. "REUSE, RECOVER, ..." HIERARCHY OF RESPONSIBLE MANAGEMENT STRATEGIES	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall develop in writing and adhere to a policy stating how it manages used and end-of-life electronics equipment, components, and materials – with respect to both on-site activities and the selection of downstream vendors – that is based on a hierarchy of responsible management strategies: (1) <u>Reuse</u> – An R2:2013 electronics recycler shall take all practical steps to direct tested equipment and components to reuse and resale, and to direct equipment capable of repair to qualified refurbishers, unless a customer directs otherwise (See Provision 6 for further discussion). (2) <u>Materials Recovery</u> – An R2:2013 electronics recycler shall take all practical steps to separate as appropriate, through manual dismantling and/or mechanical processing, the materials in equipment and components that are not directed to reuse or refurbishment and direct them to properly-equipped materials recovery facilities. (3) <u>Energy Recovery or Land Disposal</u> – An R2:2013 electronics recycler shall not direct material ² to incineration, energy recovery, or land disposal facilities	2. (a)

¹ As of July 1, 2013, SERI has approved RIOS™, or a combination of both ISO 14001 and OHSAS 18001, to fulfill this requirement. In the future, additional EHSMS standards may be approved. At such time, they will be listed on the SERI website (www.sustainableelectronics.org).

² This includes materials with substances identified in the R2 recyclers' risk assessment of potential hazards in compliance with provision 4(c).

unless no reuse or recycling options are viable. (See Provision 5(d) for the relevant requirements.)	
(b) This policy shall incorporate and be consistent with the Focus Material (FM) Management Plan that the R2:2013 electronics recycler develops in accordance with Provision 5.	2. (b)

3. LEGAL REQUIREMENTS	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall develop a legal compliance plan to maintain full compliance with all environmental, health, safety, and data security legal requirements applicable to its operations, as well as full compliance with all applicable import and export laws covering shipments of FMs and shipments of untested or non-functioning equipment or components containing FMs. This plan shall be included as a section of its EHSMS.	4. (a)
(a) (1) <u>Facility Compliance</u> : The plan shall identify and document the environmental, health, safety, and data security legal requirements that cover the recycler's operations.	4. (b)
(a) (2) <u>Import/Export Compliance</u> : The plan also shall identify and document the legality – under the laws of the exporting, transit, and importing countries – of all international shipments of FMs and untested or non-functioning equipment or components containing FMs, that have passed through the R2:2013 electronics recycler's facility or control ³ . Prior to shipment, the recycler shall identify the countries that are receiving or transferring such shipments, obtain documentation demonstrating that each such country ⁴ legally accepts such shipments, and demonstrate compliance of each shipment with the applicable export and import laws. The documentation shall be in a language understandable to the electronics recycler, and consist of original documentation from the importing or exporting country's Competent Authority or a copy of a law or court ruling, that demonstrates the import country legally accepts such imports, and the export country legally allows such exports.	4. (c)
(a) (3) The recycler shall keep the legal compliance plan up to date, identify and implement the steps necessary to comply with each requirement, and document the implementation of these steps. It shall also periodically audit its compliance with legal requirements, and take corrective action to address any issues of non-compliance.	4. (d)

4. ON-SITE ENVIRONMENT, HEALTH, AND SAFETY	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall demonstrate the expertise, knowledge, and technical capability to process each type of equipment, component, and material it accepts in a manner that is legal and protective of worker safety, public health, and the environment.	3. (e)(1)
(b) An R2:2013 electronics recycler shall adhere to good housekeeping standards, including keeping all work and storage areas clean and orderly. Housekeeping for all areas of the facility shall be planned, regularly implemented, and monitored.	3. (e)(5)
(c) An R2:2013 electronics recycler shall conduct on an ongoing basis (e.g., as new types of materials are processed or new processes are used) a hazards identification and assessment of occupational health and safety and	3. (e)(2) - (4) Appendix E - (5)

³ This includes shipments made by any downstream vendors.

⁴ This includes both OECD (Organization for Economic Co-operation and Development) and non-OECD countries.

<p>environmental risks that exist or could reasonably be expected to develop at the facility. Such risks could result from any sources, including but not limited to emissions of and/or exposure to substances⁵, noise, ergonomic factors, thermal stress, substandard machine guarding, cuts and abrasions, etc. The hazards identification and assessment shall be captured in writing and incorporated as a component of the recycler's EHSMS.</p>	
<p>(d) An R2:2013 electronics recycler shall manage the environmental, health and safety hazards, minimize the risks it identifies, and prioritize the use of appropriate strategies to implement and maintain controls, including but not limited to:</p> <p>(1) Engineering controls such as:</p> <p>(A) Substitution (e.g., replacing a toxic solvent with one less toxic)</p> <p>(B) Isolation (e.g., automating a process to avoid employee exposure)</p> <p>(C) Ventilation and, if appropriate, capture (e.g., fume hood)</p> <p>(D) Dust control, capture, and clean up</p> <p>(E) Emergency shut-off systems</p> <p>(2) Administrative and work practice controls, including appropriate combinations of:</p> <p>(A) Regular, documented environmental, and health and safety training that covers information from the hazards assessment, as well as safe management handling, spill prevention, engineering controls, equipment safety, and use and care of personal protection equipment along with training for new hires and refresher courses for all employees that is understandable to them given language and level-of-education considerations; and</p> <p>(B) Job rotation as feasible given workforce size, and</p> <p>(C) Safe work practices, and</p> <p>(D) Medical surveillance, and</p> <p>(E) Safety and environmental meetings.</p> <p>(3) Personal protective equipment, including respirators, protective eyewear, cut-resistant gloves, etc., as appropriate for the risks involved in the tasks being performed.</p>	3. (e)(2)
<p>(e) An R2:2013 electronics recycler shall use monitoring and sampling protocols as applicable to provide assurances that the practices and EHSMS controls it employs are effectively and continuously managing the risks it has identified. This includes complying with all applicable environmental and health and safety regulations and permissible exposure limits (PELs) for sampling and/or monitoring.</p>	Appendix E – (1)(i)-(l)
<p>(f) An R2:2013 electronics recycler shall treat its entire workforce, including volunteer workers, consultants, temporary workers, and anyone else performing activities under its direction, using the standard of care established pursuant to Section (d) of this provision.</p>	3. (e)(9)
<p>(g) An R2:2013 electronics recycler shall designate a qualified employee(s) or consultant(s) to coordinate its efforts to promote worker health and safety and environmental protection. This designated individual(s) shall be identified to all employees and two-way communication shall be encouraged between employees and this individual regarding potential hazards and how best to address them.</p>	3. (e)(10)
<p>(h) An R2:2013 electronics recycler shall identify probable emergency situations and exceptional circumstances. R2:2013 electronics recyclers shall prepare, periodically test, and update, as appropriate and necessary, an emergency plan(s)</p>	3. (e)(11)

⁵ Risks posed by exposure to substances may arise in a variety of situations – sometimes involving substances that do not under ordinary conditions pose a risk to worker safety or the environment. Such substances may include mercury, lead, beryllium, cadmium, PCBs, some phosphor compounds, certain brominated flame retardants (i.e., polybrominated biphenyls, pentabrominated diphenyl ether, and octabrominated diphenyl ether), silica dust, chlorinated or brominated dibenzodioxins and dibenzofurans, and hexavalent chromium. Special attention should be given to potential lead and cadmium exposures during the creation or handling of broken CRT glass, as well as where lead solder is melted during chip recovery.

for responding to the identified emergency situations and exceptional circumstances to protect workers (subject to Section (f)), the public, and the environment. Occurrence of emergency events, including exceptional releases, accidents, spills, fires, and explosions shall be reported to the required authorities.	
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5. FOCUS MATERIALS	CORRESPONDING ELEMENTS IN THE REVISION
<u>Development and Adherence to an FM Management Plan</u> (a) An R2:2013 electronics recycler shall analyze, plan, regularly review, and update as necessary how the FMs that pass through its facility or control will be properly managed both on-site and down the Recycling Chain (and include this analysis and plan as the “FM Management Plan” section of its EHSMS). The FM Management Plan shall state how the recycler and its downstream vendors shall conform to the requirements set forth in the rest of this Provision 5.	8. (a)
<u>Removal of FMs</u> (b) Prior to shredding or materials recovery of equipment or components, FMs (as well as print cartridges) shall be removed using safe and effective ⁶ mechanical processing or manual dismantling, with two exceptions: (1) Items containing mercury if: (A) They are too small to remove safely at reasonable cost, and (B) Workers are protected from the potential risks of handling mercury, and (C) The materials recovery occurs in facilities that meet all applicable regulatory requirements to receive and process mercury, and that use technology designed to safely and effectively manage equipment or components containing mercury. (2) CRTs, batteries, and circuit boards contained in equipment or components destined for materials recovery need not be removed prior to shredding and/or materials recovery if the shredding and/or materials recovery occurs in facilities that meet all applicable regulatory requirements to receive these FMs, and that use technology designed to safely and effectively manage equipment or components containing these FMs.	Appendix E – (3)
<u>Processing, Recovery, and Treatment of FMs</u> (c) An R2:2013 electronics recycler shall send removed FMs to processing, recovery, or treatment facilities that meet all applicable regulatory requirements to receive the FMs, and that use technology designed and operated to safely and effectively manage the FMs. This shall include: (1) For items containing mercury – mercury retorting or other legal methods, excluding incineration, (2) For circuit boards – removal of batteries and mercury, and processing for metals recovery, and (3) For items containing polychlorinated biphenyls (PCBs) – technology specifically designed for PCB destruction, occurring in facilities that meet all applicable regulatory requirements, and that use technology designed to safely and effectively manage equipment or components containing these FMs.	Appendix E – (4)
<u>Prohibition on Energy Recovery, Incineration, and Land Disposal of FMs</u> (d) An R2:2013 electronics recycler shall not use energy recovery, incineration, or land disposal as a management strategy for FMs or equipment and components containing FMs unless applicable law requires the use of a specific technology	8. (d)

⁶ See Provision 4 for a discussion of “safe and effective” practices and controls.

(e.g., thermal destruction of PCBs). However, if documented extreme and rare circumstances beyond the control of the R2:2013 electronics recycler disrupts its normal management of an FM, it may consider using these technologies to the extent allowed under applicable law until normal management is again possible.	
<u>Selection and Ongoing Due Diligence of Downstream Vendors for FMs⁷</u> (e) For shipments of removed FMs, and shipments of equipment and components containing FMs, an R2:2013 electronics recycler shall select both domestic and international downstream vendors that: (1) Conform to the R2:2013 electronics recycler’s FM Management Plan (developed in accordance with and including the requirements set forth in Sections (b) - (d) above), and (2) Adhere to a documented system to manage environmental, health, and safety risks and legal requirements. The management system shall include at a minimum the components of Provision 3 (Legal Requirements and Provision 4 (On-Site Environmental, Health, and Safety), and (3) Comply with all applicable environmental and health and safety legal requirements and maintain a current list of its environmental permits and copies of each, and (4) Conform to this Section (e) and Section (f) below, or allow the R2:2013 electronics recycler to confirm this information with each of its relevant downstream vendors, thereby establishing that each facility in the Recycling Chain conforms to these subsections, and (5) Conform to Provision 6 (Reuse), if applicable, and (6) Conform to Provision 7 (Tracking Throughput), documenting the flow of all FMs down the Recycling Chain, and (7) Conform to Provision 10 (Physical Security), ensuring security of the equipment down the recycling chain.	Appendix A – (8)-(9)
(f) An R2:2013 electronics recycler shall confirm at least annually and document, through audits or other similarly effective means, that each downstream facility to which Section (e) applies continues to conform to the requirements of Section (e) for as long as it receives FMs directly or indirectly from the R2:2013 electronics recycler.	Appendix A – (8)-(9)
(g) If the R2:2013 electronics recycler uses an R2:2013 certified downstream facility, then verification of conformance to 5(e)(1) and 5(e)(6) satisfies the due diligence requirements of 5(e) and 5(f).	Appendix A – (8)
<u>Non-Focus Materials Requiring Specific Management</u> (h) An R2:2013 electronics recycler shall manage print cartridges in accordance with Provision 2 through print cartridge remanufacturers, recyclers, or Original Equipment Manufacturers (OEM), in facilities that meet all applicable regulatory requirements to receive these print cartridges, and that use technology designed to safely and effectively manage print cartridges, including both ink and toner.	8. (b)

6. REUSABLE EQUIPMENT AND COMPONENTS	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall not allow equipment or components to be sold or donated for reuse if contrary to commercial agreements with those from whom the equipment or components were received.	6. (d)(3)
(b) An R2:2013 electronics recycler shall, with respect to equipment and components it ships downstream:	6. (d), (e) Appendix C – 4.

⁷ The R2:2013 electronics recycler is only responsible for due diligence related to the Focus Materials shipped by the R2:2013 electronics recycler.

<p>(1) Label and sort each shipment in a manner sufficient to track throughput in conformity with Provision 7, and</p> <p>(2) Ensure that all data is sanitized in conformity with Provision 8, and,</p> <p>(3) Handle and package shipments to prevent damage in conformity with Provision 12.</p>	
<p>(c) An R2:2013 electronics recycler shall, prior to shipping used electronics equipment and components that contain FMIs, either domestically or internationally, assure and identify each shipment as either: (1) <i>Tested for Full Functions, R2/Ready for Reuse</i>; (2) <i>Tested for Key Functions, R2/Ready for Resale</i>; and/or (3) <i>Evaluated and Non-Functioning, R2/Ready for Repair</i>.</p> <p>(1) <u>Tested and Full Functions, R2/Ready for Reuse</u>⁸</p> <p>An R2:2013 electronics recycler, prior to shipping equipment and components that contain FMIs to an end user, and that will be identified and shipped as Tested for Full Functions, R2 /Ready for Reuse shall:</p> <ul style="list-style-type: none"> (A) Use effective test methods to confirm that all functions for equipment and components are working properly and ready for reuse, including properly configured with appropriate legally licensed software where required for operation of equipment and components, and device specific drivers within the product’s hardware, and (B) Implement a written Quality Assurance Plan and policy (or maintain current certification to ISO 9001 or RIOS) to verify the accuracy of test methods, testing equipment (e.g., calibration) and maintain records of effective testing methods, equipment and results, and (C) Implement a written Product Return Plan and policy appropriate for the final destination of the equipment and components, and (D) Ensure that all equipment and components are clean and free of major cosmetic defects, as defined in Section (c)(1)(B), and (E) Ensure that the equipment or components meet the requirements of the recipient. 	<p>6. (c) - (e) Appendix C</p>
<p>(c) (2) <u>Tested for Key Functions, R2/Ready for Resale</u>⁹</p> <p>An R2:2013 electronics recycler, prior to shipping equipment and components that contain FMIs to a recipient vendor or end user, and that will be identified and shipped as Tested for Key Functions, R2/Ready for Resale shall:</p> <ul style="list-style-type: none"> (A) Use effective test methods and testing equipment to confirm that the Key Functions of the equipment or components are working properly, and (B) Implement a written Quality Assurance Plan and policy (or maintain current certification to ISO 9001 or RIOS) to verify the accuracy of test methods and testing equipment (e.g., calibration), and maintain records of effective testing methods, equipment and results as appropriate, and (C) Disclose in writing to buyers any functions that are not working properly and provide a description of cosmetic defects and missing components for each shipment as applicable, and (D) Implement a written Product Return Plan and policy appropriate for the final destination of the equipment and components, and (E) Ensure that the equipment or components meet the specifications of the recipient vendor or the end user. 	<p>6. (c) - (e) Appendix C</p>

⁸Tested, fully functioning used equipment that is “out-of-the-box” ready for use by end-users.

⁹ Tested to assure that key functions are working and that non-functioning attributes are clearly documented for customers.

<p>(c) (3) <u>Evaluated and Non-Functioning, R2/Ready for Repair</u>¹⁰</p> <p>An R2:2013 electronics recycler, prior to shipping equipment and components that contain FMs to a recipient vendor, and that will be identified and shipped as Evaluated and Non-Functioning, R2/Ready for Repair shall:</p> <p>(A) Implement a written Quality Assurance Plan and policy to evaluate equipment and components to ensure the condition, functionality, and sales price of the unit or component is capable of repair and refurbishment in the destination market, and</p> <p>(B) Confirm through an appropriate combination of contractual agreements, detailed materials tracking, recordkeeping, and auditing that equipment and components containing FMs are only shipped to:</p> <p>(i) Electronics recycler(s) that are certified to R2:2013 and verified in accordance with Provision 5(g), or</p> <p>(ii) Recipient vendor(s) that can assure that all equipment and components shall be resold in conformance with Section (c)(1), R2/Ready for Reuse or Section (c)(2), R2/Ready for Resale, and</p> <p>(iii) Recipient vendor(s) that can manage all equipment and components containing FMs and residual FMs resulting from repair and refurbishing operations in conformance with Provision 3 and 5,</p> <p><i>and,</i></p> <p>(C) Ensure that the equipment or components meet the specifications of the recipient vendor.</p>	<p>6. (c) - (e) Appendix C</p>
<p>(d) An R2:2013 electronics recycler need not conform to Section (c) for sales of “Collectible Electronics” and their associated components or “Specialty Electronics” that the R2:2013 electronics recycler does not possess the technical capability to test or repair. Such sales are restricted to 1% of total individual units by quantity sold on a rolling 12 month average. Sales under this provision must include returns at no cost to the buyer.</p> <p>(1) An R2:2013 electronics recycler shall conform to the legal requirements (including export) in Provision 3 for these sales/shipments.</p> <p>(2) An R2:2013 electronics recycler need not conform to the downstream requirements of Provision 5 for these sales/shipments.</p>	<p>6. (e)(3)</p>
<p>(e) An R2:2013 electronics recycler need not conform to the downstream requirements of Provision 5 and the exporting requirements of Provision 3 for shipments that are Tested/Full Function, R2:2013/Ready for Reuse in Section (c)(1), or Tested/Key Functions, R2:2013/Ready for Resale in Section (c)(2), or are new and in original packaging.</p>	<p>6. (e) Footnote 3</p>

7. TRACKING THROUGHPUT	CORRESPONDING ELEMENTS IN THE REVISION
<p>(a) An R2:2013 electronics recycler shall maintain for at least three years commercial contracts, bills of lading, or other commercially-accepted documentation for all transfers of equipment, components, and materials. An R2:2013 electronics recycler does not need to track non-FMs beyond the first tier downstream vendor.</p>	<p>5. (a), (c)</p>

¹⁰ Evaluated to assure that equipment is repairable for key functions and suitable for its intended market.

(b) An R2:2013 electronics recycler shall provide, to each customer that is R2 certified or in the process of R2:2013 certification, upon request and with appropriate intellectual property and commercial controls as legally appropriate and required by the discloser, the names and locations of all downstream vendors in the recycling chain that handle said customer's FMs.	Appendix A – (5)
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8. DATA DESTRUCTION	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall sanitize, purge, or destroy data on hard drives and other data storage devices (the National Institute of Standards and Technology's (NIST's) Guidelines for Media Sanitization – Special Publication 800-88 ¹¹ lists categories of devices which need sanitization consideration), unless otherwise requested in writing by the customer. The R2:2013 electronics recycler shall adhere to the data sanitization, purging, or destruction practices described in the NIST Guidelines for Media Sanitization: Special Publication 800-88 (rev. 1) or another current generally-accepted standard ¹² , or be certified by a generally-accepted certification program.	7. (d)(2)
(b) An R2:2013 electronics recycler shall document its data destruction procedures and include this documentation as part of its EHSMS.	7. (a) Appendix B – (1)
(c) Employees involved in data destruction shall receive appropriate training on a regular basis and be evaluated for competency in data destruction processing.	7. (a)(3) Appendix B – (1)(h)
(d) Data destruction processes shall be reviewed and validated by an independent party on a periodic basis as defined in the documentation called for in Section (b).	Appendix B – (14)
(e) Quality controls shall be documented, implemented, and monitored internally to ensure effectiveness of data sanitization, purging, and destruction techniques.	Appendix B – (16)
(f) Security controls that are appropriate to the most sensitive classification of media accepted at the facility shall be documented, implemented and maintained. Security controls shall consider physical security, monitoring, chain-of-custody, and personnel qualifications.	Appendix B – (5)
(g) Adequate records of data destruction shall be maintained by the R2:2013 electronics recycler and each downstream vendor conducting data destruction.	Appendix B – (1)(b)
(h) If data destruction is handled by a downstream vendor: (1) The R2:2013 electronics recycler shall maintain responsibility for data destruction and ensure appropriate security, controls, and processing techniques continue to conform to Provision 8 through audits or other similarly effective means. (2) Media or devices containing media with data must be tracked and secured during transportation, storage, and processing. (3) Each downstream vendor must adhere to the requirements of Provision 8.	7. (d)(2)(c)

9. STORAGE	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall store items removed pursuant to Provision 5, and equipment and components destined for reuse, in a manner that: (1) Protects them from reasonably foreseeable adverse atmospheric conditions and floods and, as warranted, includes a catchment system, and (2) Is in full legal compliance, and (3) Is secure from unauthorized access, and (4) Is in clearly labeled containers and/or storage areas.	9. (b)

¹¹ See current link to NIST Special Publication 800-88 rev.1 at www.sustainableelectronics.org

¹² Examples include National Association for Information Destruction (NAID) and Asset Disposal & Information Security Alliance (ADISA).

10. SECURITY	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall maintain a 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, sensitivity of media containing data, and the needs of the customers served.	7. (b)(1)
(b) An R2:2013 electronics recycler shall consider and include necessary controls to secure electronic equipment upon acceptance of said equipment.	6. (d)(2)

11. INSURANCE, CLOSURE PLAN, AND FINANCIAL RESPONSIBILITY	CORRESPONDING ELEMENTS IN THE REVISION
(a) The R2:2013 electronics recycler shall be able to demonstrate that it has evaluated the risks arising from its certification activities and that it has adequate insurance or reserves to cover liabilities, including environmental pollution and worker health and safety, arising from its operations in each of its fields of activities and the geographic areas in which it operates.	9. (d) Appendix A – (2) Appendix E – (6)
(b) An R2:2013 electronics recycler shall develop and maintain a current, written plan and a sufficient financial instrument that assures proper closure of the facility and assures against abandonment of any electronic equipment, and components and materials from such equipment. (1) Financial instruments must be assigned to an independent party or corporate parent with responsibility for closure, and the assignment must be consistent with applicable law, and (2) Financial instruments shall consider the risks identified in Section (a) and applicable law, including reasonably foreseeable costs of processing remaining inventory, sampling for environmental contamination, and site remediation to restore premise to sellable condition, and (3) Closure plans shall consider the risks identified in Section (a) including details assigning responsibility for closure, funding information, and plans for inventory processing, environmental sampling, and site remediation as needed.	9. (e)

12. TRANSPORT	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler must 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 its intended use and secured in accordance with Provision 10.	10. (a)
(b) An R2:2013 electronics recycler must verify that its transporters, including its own fleet, have all the necessary regulatory authorizations, maintain adequate insurance coverage consistent with the material and method of transportation, and maintain an acceptable vehicle and driver safety record during the previous 3 years.	10. (c)

13. DOCUMENTATION AND RECORDKEEPING	CORRESPONDING ELEMENTS IN THE REVISION
(a) An R2:2013 electronics recycler shall have access at the certified facility to documents and records necessary to demonstrate conformity to each requirement of this document.	3. (c)-(d)