



## Clarifications to R2 Code of Practices

**To:** R2 auditors/ R2 Certification Bodies

**Originator:** SERI

**Reference Document:** R2 Code of Practices, VIII.D

**Date:** July 14, 2017

**Effective Date:** N/A – No Change

**Purpose:** Clarify the applicability of the Focus Materials (FM) Processor Allowance

This memo does not change any requirements for the FM Processor Allowance. It is intended to clarify the existing requirements. The FM Processor Allowance is intended to allow focus material processors that are downstream vendors of electronics recyclers to become R2 Certified. These processors do not receive whole electronics that need to be dismantled. They receive and process only the extracted FM. In other words, they recycle only the batteries, or CRT glass, or mercury, or circuit boards. FM Processors are part of the Recycling Chain as defined in the standard because the standard requires management of the FM until it is no longer an FM. The FM Processors are often, but not always, the final processor of the Focus Material.

“An FM Processor is an organization that only provides specific processing of a Focus Material in the recycling chain and does not provide full electronics recycling or refurbishment.”

A recycler does **not** qualify for the FM Processor Allowance:

1. When the recycler chooses not to perform reuse or data destruction internally.
2. When the recycler does not receive equipment capable of reuse.
3. When the recycler does not receive equipment containing data.
4. When the recycler only has customers who require recycling only.
5. When whole electronics or components are processed, regardless of whether the equipment contains only one focus material. For example, a recycler of printers only containing circuit boards does not qualify.