



Clarifications to R2 Code of Practices

To: R2 auditors/ R2 Certification Bodies

Originator: SERI

Reference Document: R2 Code of Practices, VIII.C

Date: July 10, 2017

Effective Date: Immediately

Purpose: Rescinding Co-location allowance

The Introduction to the R2 Standard defines the scope of recycling activities that must be included in the R2 Certification of an organization. It requires each of the thirteen provisions to be satisfied by the recycler, unless an allowance (listed in the R2 Code of Practices Section VIII) is applicable and approved by the Certification Body program management. Furthermore, the R2 Standard defines in the Applicability section that the R2 Standard applies “to all electronics recycling related activities at a physical address”.

Sometimes more than one business may share a physical address, thus causing confusion as to what activities are R2 Certified. In this scenario, the risk increases for diverting used electronics or Focus Materials through the non-certified business, which could be “off the books” of the R2 Certified business.

The co-location allowance does not allow for one business processing used electronics to become R2 Certified while the other co-located business also performing R2 certifiable activities at the same physical address not be R2 Certified. For example, a non-certified electronics recycler could not share the building with an R2 Certified refurbisher. The Applicability section of the R2 Standard establishes that all electronics recycling related activities at a physical address must be certified. Both businesses in this case would need to be R2 Certified for one to be certified (certification of the businesses can be under the same certification body or different certification bodies).

The co-location allowance was intended to apply when another business at the same physical address does no electronics recycling activities that could be R2 Certified. For example, when an electronics recycler is co-located with an automotive recycler. Automotive recycling would not meet the definition of electronic equipment and therefore would be out of scope and not certifiable to R2.

The co-location allowance was created with the intention to clarify that if an electronics recycler was sharing a location with a non-certifiable business, the electronics recycler could be certified with the co-location allowance. However, since the other company’s activities are not certifiable anyways, this co-location allowance has created more confusion than it has clarified. Thus, the co-location allowance is hereby discontinued and will be removed from the R2 Code of Practices in future revisions.

The removal of the co-location allowance does not impact the requirements of the R2 Standard. R2 Certified Recyclers will still be required to ensure conformance to all requirements of the R2 Standard. Auditors will continue to ensure that all electronics recycling activities at the physical address on the R2 Certificate are included in the scope and audited for R2 Certification.