

QUALITY PLAN



2015 -2016

Background

In order for SERI to assure the quality of certified recyclers' and auditors' performance, SERI has to engage with all its R2 stakeholders including certification bodies, auditors and recyclers on a number of levels. The following quality plan highlights how SERI plans to undertake this and the overall goals for 2015 -2016.

Purpose

- Improve the value of the R2 standard to recyclers worldwide through the development of educational resources
- Help recyclers and auditors better understand the R2 requirements and expectations
- Raise the integrity of the standard through monitoring processes
- Identify and remove any bad performers from the R2 program

The plan has been divided into 4 sections, three of which focus on a specific stakeholder group: certified facilities, certification bodies and the auditors. A 4th section applies to general action items to be undertaken by SERI, which will impact all stakeholders.

SECTION 1: CERTIFIED RECYCLERS

Action Item	Target Date
<ul style="list-style-type: none"> • Implement Monitoring Plan for Certified Recyclers: Most stakeholders consulted favored adding some kind of random “intermediate check-in witness audits” by SERI on certified recyclers during regularly scheduled audits. These would be focused on key risk areas and categories of actors identified by SERI (e.g., CRT tracking and disposition, downstream due diligence of vendors for FMs, data security, etc.). This program is detailed in the monitoring plan outlined in 2014. 	Began first quarter 2015 and program continues to operate through the year
<ul style="list-style-type: none"> • Developing an Implementation Guide, (by Provision of the standard) to help recyclers manage their conformity to the standard. Some of the key components of the implementation guide will include the following: <ul style="list-style-type: none"> ○ Provision of templates/case studies that facilities can use to develop their management system. ○ Guidance on avoiding/correcting common audit non-conformances ○ Guidance on how to identify acceptable downstream vendors ○ Guidance on proper management of Focus Materials (FMs) ○ Flow charts or mass balance worksheets that will help recyclers keep track of FM products/materials that come in to their facilities and those that leave. 	September 2015

SECTION 2: FOR THE AUDITORS

Action Item	Target Date
<ul style="list-style-type: none"> Dissemination of information on International/domestic legal requirements through webinars: Conduct training on updates related to e-waste laws. 	As needed basis
<ul style="list-style-type: none"> Developing additional guidance for CBs/auditors to help them determine on a consistent basis what constitutes a non-conformance and at what level (e.g., major or minor). This may involve webinars, presentations of exercises/case studies on the website, a module in the Implementation Guide, etc. 	Ongoing
<ul style="list-style-type: none"> Convening discussions with CBs/auditors to address common questions/problems arising in audits and to learn what kinds of additional assistance R2 should provide CBs/auditors to better do their jobs. Ideas include developing uniform checklists or worksheets for auditing, providing regular updates on relevant export laws in key electronics markets, and instructing auditors on what to look for and any red flags that could indicate problems in downstream management of FMs, selection of transportation vendors and implementation of required data security measures. 	Ongoing through 2015

SECTION 3: FOR THE CERTIFICATION BODIES

Action Item	Target Date
<ul style="list-style-type: none"> Work with CBs to figure out how to track <u>auditor performance</u> to identify whether any are consistently underperforming. This will be done via monitoring of major NCs coming out of audits every quarter. 	Ongoing all through 2015
<ul style="list-style-type: none"> Conduct regularly scheduled calls between SERI and certification bodies to discuss any updates, issues and concerns, etc. 	Starting July 2015

SECTION 4: GENERAL ACTION ITEMS

Action Item	Target Date
<ul style="list-style-type: none"> Acquiring ANSI Accreditation for SERI as Standard Developer Organization. 	August 2015
<ul style="list-style-type: none"> Acquiring ANSI Accreditation for the R2 standard to be recognized as an ANS standard. 	TBD but will likely begin in Sept 2015
<ul style="list-style-type: none"> Revising the Code of Practices to clarify requirements for R2 Certified recyclers and Certification Bodies. 	November 2015
<ul style="list-style-type: none"> Develop a Multi-Year Audit Strategy and Database to Identify and Address Poor Performers. SERI needs a credible and strategic approach to identifying and removing bad actors – one that is capable of identifying recurring problems and gaps. This necessitates a multi-year audit protocol which tracks trends in the audit results of each R2 certified recycler over a multi-year period; e.g., are they improving (is corrective action working?), or are they continuing to have troubles at such a level that they are not really committed to “acceptable performance levels” and should be removed from the R2 program. 	Ongoing

<ul style="list-style-type: none"> Establishing a foundation for a Quality Management System for SERI - The Director of Quality will begin putting together a quality management system for SERI, which will include writing out procedures relevant to SERI's scope of activities and streamlining many of its operations, as they are needed. E.g. Complaints procedure, logo usage etc. 	Ongoing till 2016
<ul style="list-style-type: none"> Determining the feasibility for certifying it to ISEAL. 	Ongoing in 2015
<ul style="list-style-type: none"> Develop a training plan for SERI's R2:2013 Lead Auditor training 	September 2015
<ul style="list-style-type: none"> Developing a system to track complaints, witness audit results, and major NCs coming out of CB audits. 	December 2015