R2v3 QUESTIONS & ANSWERS
May 9, 2019

GENERAL:

Q: Why has the standard been divided into Core and Process Requirements?

A: R2v3 has been restructured to better suit the needs of the diverse electronics reuse and recycling industry. Since different segments of the industry provide different services, it made sense to break out some of the specialty Process Requirements that do not apply to all facilities, rather than providing exemptions to, or allowances for, those specialized processes.

By making the Core Requirements applicable to all R2 Facilities, and the Process Requirements applicable only to those organizations that undertake those activities, R2 Facilities have flexibility to specialize in certain areas and certify for the requirements that best suit their operations and business needs.

Q: Are all of the current R2:2013 requirements covered in the R2v3 Core Requirements, or are some covered in the Process Requirements?

A: Much of the existing R2:2013 requirements are carried over to the R2v3 Core Requirements. However, some of the R2:2013 requirements that are specific to a process or activity that would not be applicable to all R2 Facilities have been moved to Process Requirements.

For instance, the R2:2013 Provision 6 Reusable Equipment and Components requirements have been moved to Appendix C – Test and Repair. In addition, some of the R2:2013 Provision 5 Focus Materials requirements have been moved to Appendix A - Downstream Recycling Chain and Appendix E – Materials Recovery requirements.

Q: How do I know which Process Requirements I need to certify to?

A: In addition to the Core Requirements, an R2 Facility must be certified to all Process Requirements related to the activities it undertakes. An R2 Facility may not opt-out of any Process Requirements, instead, those that are not applicable to the scope of operations would not be included in its R2 Certification.

Q: What will be the biggest challenge for an R2 Facility under R2v3?

A: How R2v3 applies and what is involved in the certification or upgrade process will depend largely on the type of operations the facility undertakes and how closely the operations currently meet the R2 requirements. That is because most of the existing R2 requirements have been carried over to the revised standard, but in some cases, they have been further clarified or strengthened to ensure they are adequately implemented and produce the intended results. In addition, since there are also the Process Requirements, R2 Facilities that undertake those activities will need to ensure that they meet and certify all of those related operations as well.

Q: Do you expect that under R2v3 the audit time for downstreams will be reduced?

A: Yes, since the R2 Certification audit time is currently calculated in part based on the number of downstreams in the recycling chain, audit time for downstreams can be reduced as R2v3 allows an R2 Facility to stop tracking at the next R2.

Q: Has a cost/benefit analysis been done to understand the implications of the R2v3 changes?

A: One of the things that has been recognized under the R2v3 standard is the diversity of the electronics reuse and recycling industry and the various types of operations that it covers. As a result, it would not be possible to assess the specific implications for all possible R2 scenarios.

Instead, what has been done is to change the structure of the standard to have Core Requirements applicable to all R2 Facilities and Process Requirements that are applicable only to those organizations that perform those activities. This gives each R2 Facility flexibility to perform and certify the operations that best suit its business needs, rather than a one-size-fits-all solution, that requires all facilities to perform all services.

Also, in the way that the standard is reviewed and revised through the multi-stakeholder TAC, in addition to the open public comment period, the revision process is designed to ensure broad review and input from across the industry to better understand the implications of any changes.

Q: Who is the TAC?

A: The Technical Advisory Committee (TAC) is a multi-stakeholder group that is comprised of representatives from three broad groups:

- Organizations that can certify under the R2 Standard such as reusers and recyclers;
- Customers that contract for the services of R2 certified organizations; and
- Other interested parties such as regulators, auditors, Certification Bodies and consultants.

The make up of the TAC ensures broad representation from across the industry as part of the standard review and revision process. The TAC has met regularly since 2015 to review and discuss changes to the standard and has now opened that work to public review and comment for additional feedback on the changes.

Q: What is the timeline for the release of the new Code of Practices and Guidance?

A: The timeline for the release of the R2 Code of Practices and the Guidance has not yet been determined as the R2v3 standard will need to be finalized and approved before either document can be completely updated. Some changes to these documents are already being considered and the updated versions will be released as soon as possible following the publication of the revised standard.

Q: Will time be built into the process to allow certifying bodies to get their auditors trained to perform the audits?

A: Yes, transition timing will be built into the process to ensure that auditors receive the updated training first, and then new audits and re-certifications will be conducted to the revised standard.

Q: Will the information registered with SERI, such as downstreams and closure plans, be made public or visible to others?

A: No, the information registered with SERI will not be made public. This information will continue to be managed by the R2 Facility and shared only with those that are provided access to it by the R2 Facility.

Q: Will all comments and proposed changes submitted through the consultation be made public?

A: Yes, all comments submitted through the public consultation process will be compiled and shared with the TAC for consideration of any changes to the draft R2v3. Following TAC review, a summary of the comments and how they were considered by the TAC or incorporated into the standard will be posted.

Q: There are several areas in the standard that refer to specific 'plans' that are required to be developed and documented by the R2 Facility (Data Sanitization Plan; FM Management Plan; R2 Reuse Plan). Is each plan expected to be a separate, individual document?

A: The specific details and format of each plan will vary depending on the different types of operations undertaken; the structure of the management systems; and any other related requirements that may be included or part of the plan. At minimum, the R2 Facility should maintain a single document or section of the EHSMS to outline the details of the plan and to identify and provide direction to all related hard copies or electronic information that make up the plan.

1. SCOPE

Q: Section 1.(a) indicates that the R2 Facility must include in its certification "any external processes and locations under the control of the R2 Facility and associated with its certification..." Does this mean that all facilities in a company must be certified?

A: No, the certification is facility specific, so a company would not necessarily need to certify all of its facilities. It would however need to ensure that all processes and activities controlled by and related to the R2 Certified Facility are included in the certification. This may include operations such as off-site collection and warehousing.

Q: In requirement 1.(b)(4), what is meant by "in conjunction with"?

A: Sometimes the services of an R2 Facility can be performed outside of the facility but are still related to the operations of that facility. This may include any off-site services like collection, mobile data destruction, or any other services provided at a customer's site.

2. HIERARCHY OF RESPONSIBLE MANAGEMENT STRATEGIES

3. EH&S MANAGEMENT SYSTEM

Q: What are the changes to the Health and Safety requirements?

A: Some of the environment, health and safety requirements under R2v3 have been strengthened to ensure adequate identification and control of potential risks – particularly in the areas of knowledge and technical capability; inspecting equipment; and evaluating exposure to hazardous substances.

Additionally, further EH&S requirements have been added to the Process Requirements Appendix E for Material Recovery to address the higher risk activities conducted through those operations.

Q: Will Industrial Hygiene monitoring now be required by the R2v3 Standard or will this still be covered under ISO/RIOS requirements?

A: Under the Core Requirements, all R2 Facilities will need to maintain a process to periodically evaluate the risk of exposure to hazardous substances, and where an R2 Facility is performing the higher risk materials recovery activities, they will also be required to implement an industrial hygiene monitoring program for sampling and testing key hazards.

Q: Who will be required to have pollution liability insurance? Will there be any exemptions?

A: Pollution liability insurance is not required under the Core Requirements, it is required however, under the Process Requirements for Appendix A – Downstream Recycling Chain, and Appendix E – Materials Recovery.

Q: In requirement 3.(e)(10), what is the definition of a "qualified employee"?

A: Since the health and safety requirements will vary depending on location, types of operations, etc., the qualifications for the worker that coordinates and promotes worker heath and safety is not specifically defined in R2v3. This means that the R2 Facility must define the appropriate qualifications as applicable to its operations.

4. LEGAL AND OTHER REQUIREMENTS

5. TRACKING THROUGHPUT

Q: What information is required in the "Summary report of transactions" under requirements 5.(a)(3) and 5.(c)(3)?

A: The specific details of the summary reports have not been defined, but it would be expected that at minimum the reports would specify a defined reporting period, any items inbound/outbound for that period, and the associated quantities.

6. SORTING, CATEGORIZATION, AND PROCESSING

Q: What is does the term Controlled Equipment refer to?

A: Controlled Equipment is defined in Table 1 of the R2 Equipment Categorization (REC) and it is used to identify the specific types of equipment and materials that are subject to the R2 requirements and must be managed in accordance with the standard.

Controlled Equipment includes any equipment or material received by the R2 Facility that has not yet been evaluated for functionality or reuse potential, as well as items that have been evaluated and determined to either be Materials for Recovery or Equipment for Test and Repair.

Q: Does all "equipment, components, and materials" received need to be considered controlled equipment upon receipt?

A: Yes, all equipment, components, and materials received must be treated as controlled until evaluated in accordance with the defined process and directed to the next appropriate processing step. Some equipment, components, and materials may be evaluated and determined to be Exempt Equipment, in which case, it must be managed in accordance with 6.(e)(1).

Q: What are the "follow up actions" referred to in 6.(a)(5)?

A: After equipment, components, or materials are evaluated and processed, one or more of the defined REC categories for the equipment, components, or materials may change. As a result, all processing outputs must be re-evaluated in accordance with the REC and directed to the next applicable R2 process.

Q: Under requirement 6.(b)(1) how can equipment be “identified” with its corresponding R2 equipment category if a physical label is not required, and how would this be audited?

A: R2 Facilities sometimes use bar codes or other means of identifying and tracking individual items. Through these codes or tracking numbers, the facility often can identify the location and processing status of that equipment. When this is the case, the facility can map their current categories and statuses to those identified in the REC in order to demonstrate the appropriate categorization.

However, while these categories can be applied to individual pieces of equipment or components, they are not required to be, and alternatively, the R2 Facility can identify the status of batches of equipment or components, or specific storage areas.

Q: In order to secure and control data containing items under requirement 6.(d)(2), is additional separation required beyond the existing facility security?

A: Each R2 Facility will need to determine the best means to secure and control access to data containing equipment for its operations. This may depend on several factors such as the type of electronic equipment handled, sensitivity of data on storage devices, and the needs of the suppliers served. The R2 Facility can secure the entire facility or specific areas within the facility, but it must clearly identify the secured areas and maintain appropriate authorizations for accessing any secured areas.

Q: Would an R2 Certified facility be able to use Appendix D – Speciality Electronics Reuse for any reuse amounts over the 1%?

A: The requirements under Appendix D – Speciality Electronics Reuse are separate from the 1% collectible and specialty reuse and are in intended to provide additional verifications and controls for reuse of highly specialized electronic equipment (such as telecom, scientific, and medical equipment), where full testing of the equipment may not always be feasible outside of a live working environment, or where testing is impractical due to the cost or limited availability of specialized testing devices.

Items sold for reuse under Appendix D must be specific parts required by a known buyer, meet all required verifications, and may not be auctioned or otherwise distributed without intended use.

Q: Requirement 6.(b)(2) uses the term ‘R2 Certified supplier’, is there a different set of criteria to become an R2 Certified "supplier" as opposed to a "recycler"?

A: No, the reference to an R2 Certified supplier means a certified R2 Facility as defined in the R2v3 Standard. This requirement is intended to facilitate arrangements where an R2 Facility accepts equipment, components, or materials from another R2 Facility.

7. DATA SECURITY

Q: What is the difference between the “Data Security” and “Data Sanitization” requirements?

A: Under the Core Requirements, all R2 facilities are required to develop a Data Sanitization Plan and define the types of devices and data that need to be sanitized, methods for sanitization, etc., and also implement a security plan to secure and control access to any data devices.

The Process Requirements for Data Sanitization are specific to the methods of sanitizing media, either through physical destruction or logical sanitization, and includes requirements for maintaining records of sanitization activities, and quality controls for verifying the effectiveness of the sanitization.

Q: In the Core Requirements for Data Security, it seems there is a need to have separate areas for data containing devices and non-data containing items, with a lot more training and documentation for the data containing items. Is this correct?

A: The R2 Facility is required to maintain a security program to control access to the facility and equipment. The security controls can be implemented across the entire facility, or specific parts of the facility depending on the types of equipment handled and the level of data security required. The facility must also establish security authorizations to control access to any secured areas and train all workers in the data security policies and procedures.

Q: What are the requirements for a downstream for data containing items?

A: When data sanitization is not performed by the R2 Facility, all data containing items must be transferred to an R2 downstream vendor certified to Appendix B – Data Sanitization.

Q: What is meant by 'personal liability' under the data security policy?

A: Under some data protection legislation individuals may be held personally responsible for data breaches. As a result, when the R2 Facility defines the "penalties" to any individual for non-compliance with the data security policy, they must also include any penalties related personal liability.

Q: How is "competent" defined as it applies to a Data Protection Manager in 7.(a)(2)(B)?

A: Competency is not specifically defined within R2v3 as the competency requirements will vary depending on the specific data sanitization plan and processes undertaken. Leaving this requirement intentionally broad provides the R2 Facility flexibility to define the appropriate competency requirements as applicable to the role and operations.

Q: Under 7.(b)(2), could background checks be used as part of the "documented evaluations"?

A: Yes, where permissible under local law, background checks may be used as part of the documented evaluations.

Q: Under 7.(b)(5), what types of incidents would need to be disclosed?

A: The R2 Facility would need to define within its security program exactly the types of incidents that would need to be disclosed, but these may include items such as known or suspected data breaches, or criminal convictions.

Q: According to the footnote on page 19, related to requirement 7.(d)(1)(A), does data need to be sanitized even when the supplier requests otherwise?

A: By default, all data must be sanitized with the only exception being when the customer specifically requests and contractually requires that it not be sanitized. However, the R2 Facility should always recommend that data be sanitized and is not permitted to use things such as blanket statements or other general agreements to waive its responsibility for data sanitization.

Q: Can data containing equipment be reused?

A: All data containing equipment must first be sanitized in accordance with Appendix B – Data Sanitization, after which it may be considered for reuse.

8. FOCUS MATERIALS

Q: In the batteries section of the Focus Materials definition, the proposed standard states "except alkaline batteries that do not contain mercury." What are the disposal expectations for alkaline batteries under the new standard?

A: Under requirement 8.(c), the R2 Facility is required to manage all non-focus materials in accordance with the Core Requirement 2. Hierarchy of Responsible Management Strategies, as well as in full legal compliance. Alkaline batteries would still need to follow this hierarchy and be handled in accordance with all applicable legal requirements.

Q: Why did the Focus Materials definition for circuit boards change to require all circuit boards, even those that are lead-free, to be classified as FMs?

A: When assessing which materials should be classified as a Focus Material, consideration was given to both the potential hazards associated with the material itself, as well as the risks associated with processing the material. In terms of circuit boards, it was determined that the additional Focus Material controls would be beneficial to ensure that the boards are processed only through legal, safe, and permitted operations.

Q: What is the difference between the disposal under 8.(d) “documented extreme and rare circumstances” and the 2.(a)(3) disposal option?

A: The 2(a) requirements refer to overall hierarchy for handling all materials and their disposition. The R2 Facility must develop a plan to manage all materials in accordance with the hierarchy to ensure the use of the most responsible management strategies as part of its ongoing operations. And, for regular, ongoing operations, energy recovery, incineration, and land disposal may not be used for the treatment of FMs.

Under 8(d), alternate treatment and handling of FMs would only be permitted as a temporary measure, during rare and unforeseen issues that affect the normal operations of the R2 Facility, and only for the time until the R2 Facility is able to resume normal operations.

9. FACILITY REQUIREMENTS

Q: In R2v3 will pollution insurance be required for all R2 Certified facilities? Are there any exceptions?

A: Under R2v3, pollution liability insurance is not included in the Core Requirements and therefore is not required for all facilities. Instead, the requirement for pollution insurance has been moved to specific Process Requirements where risks are more likely including Appendix A – Downstream Recycling Chain, and Appendix E – Materials Recovery.

10. TRANSPORT

PROCESS REQUIREMENTS

Appendix A

Q: How often will SERI allow updates to the Downstream Vendors for a given recycler?

A: An R2 Facility will need to register the downstream recycling chain and maintain it current with any updates or changes prior to any related shipment. The downstream chain may be updated whenever changes occur, and that frequency will be dependent on the number and frequency of changes by the R2 Facility.

Q: What happens if you don't know the entire downstream chain?

A: The R2 Facility is no longer required to know the entire downstream recycling chain, if the equipment or materials are going to an R2 Certified downstream vendor.

If, however, the R2 Facility does want to know the downstream recycling chain until final disposition, then any R2 Certified downstream vendors are required to provide that information.

Q: When the downstream recycling chain is registered with SERI, will the R2 certified companies be able to view the entire downstream chain?

A: Each R2 Facility will be required to maintain its own downstream recycling chain and will have access to only the information that it registers with SERI.

Appendix B – Data Sanitization

Q: If data is degaussed is it always required to verify 10% regardless of the number of drives that have been sanitized?

A: When degaussing is used as a data sanitization method, 10% of the devices are typically required to be sampled for data recovery, unless the device is a hard drive that is crushed immediately following the degaussing.

Q: What are the qualifications for the data protection manager?

A: The qualifications for the Data Protection Manager can vary, depending on the levels of security required and the types of sanitization performed by the facility. At minimum, the DPM must be competent in all applicable data security requirements, including legal requirements, and must also be knowledgeable of the proper methods of sanitization as applicable for the types of devices managed, and the appropriate means of verifying sanitization.

Q: In R2v3 is there still the option of sending data-bearing equipment/material with reuse potential to a *non*-R2 Certified facility?

A: If the R2 Facility does not perform the data sanitization, then the data containing equipment must be sent to an Appendix B R2 Certified downstream for sanitization.

Q: Will continuous camera monitoring and active alarms be required for data containing items?

A: Each R2 Facility will be required to develop a security program to control access to the facility and equipment. The details of the security program will be facility specific depending on the types and levels of controls required.

In addition, for those R2 Facilities that are certified to Appendix B – Data Sanitization, they will be required to maintain alarmed access points and video recordings of areas where data devices are received, stored, or handled.

Q: Under quality controls for Data Sanitization, it requires facilities to notify suppliers of any discrepancies. This is very broad - how do you envision this will be implemented?

A: When quality controls reveal that the approved data sanitization processes were not used, the sanitization was not effective, or there are other discrepancies between the quantities processed versus received, the supplier must be notified of the issue.

Q: What is the definition of a "competent" auditor?

A: Competency is not specifically defined within R2v3 as the competency requirements will vary depending on the specific data sanitization processes undertaken. Leaving this requirement intentionally broad provides the R2 Facility flexibility to define the appropriate competency requirements as applicable to the role and operations.

Q: Which sub-requirement is Appendix B. (17) referring to?

A: The reference in B. (17) should indicate (16)(a)-(c), not (19).

Q: What is meant by the "most sensitive classification of media accepted at the facility" in Appendix B (5)?

A: There may be instances where a customer or legal requirements identify particularly sensitive data that requires a higher level of security and controls. In these cases, the security controls must meet the most stringent requirements.

Q: What is meant by the term "active monitoring" in Appendix B (5)(d)?

A: "Active monitoring" is an intentionally broad term to provide the R2 Facility flexibility on how best to implement security controls based on factors such as the overall facility security, operational setup, and technology in place. The intent of active monitoring is to ensure there is real-time monitoring and analysis of security controls, versus reactive or passive monitoring of activities that may have already taken place.

Q: Is it actually anticipated that the Data Protection Manager will perform a 100% verification of all destroyed media and sign off on every single asset that is sanitized?

A: The Data Protection Manager is expected to verify 100% of the data sanitization records for successful sanitization.

Appendix C – Test & Repair

Q: Is ISO 9001 a new requirement for R2v3?

A: Certification to a Quality Management System (QMS), such as ISO 9001 or RIOS, is not part of the Core Requirements, but is required for certain Process Requirements such as Test and Repair, and Brokering.

Appendix D – Specialty Electronics Reuse

Q: In the Process Requirements for Specialty Electronics Reuse, can the R2 Facility sell to brokers or only end users?

A: Only where a specific part is requested by a customer may it be sold under the Specialty Electronics Reuse requirements. The customer may then sell the part to the end-user but must maintain records demonstrating the sale to the end user. Specialty Electronics Reuse equipment may not be auctioned or otherwise sold without intended use.

Appendix E – Materials Recovery

Q: Will any use of a non-enclosed shredder require an industrial hygiene program regardless of the amount of material shredded?

A: Yes, shredding of focus materials or items containing focus materials is an activity that requires the implementation of an industrial hygiene monitoring program. However, the frequency of sampling can be determined based on the past results and any trends in the results.

Q: Has any consideration been given to the size of an operation, as related to the industrial hygiene requirements for shredding operations?

A: Under Appendix E – Materials Recovery, there is a requirement for an industrial hygiene monitoring program, for any R2 Facility that undertakes shredding, breaking, cutting, melting, or chemical processing of focus materials or items containing focus materials, regardless of the size of the operations. However, the frequency of testing and size of sampling can be adjusted based on any trends or results identified.

Appendix F – Service Only

Q: Under the Appendix F – Service Only requirements, when the owner of the equipment directs the flow of the equipment and materials following a service, does the R2 Facility need to perform due diligence on the downstreams?

A: Yes, the R2 Facility must include the customer selected downstream R2 Facility in its downstream recycling chain and due diligence activities.

Appendix G – Brokering

Q: Who does the Brokering Process Requirements apply to?

A: Appendix G – Brokering applies to any R2 Facility that sources used electronic equipment, components or materials and controls their delivery to the downstream vendor, without physically receiving or processing the items. Brokering may be part of the operations of an R2 Facility, or the only R2 related activity.

R2 EQUIPMENT CATEGORIZATION (REC)

Q: Is the R2 Equipment Categorization (REC) auditable?

A: No, the REC itself does not contain any auditable requirements, but it must be used in the sorting and categorization of all controlled equipment and materials, in order to define the proper processing pathway and applicable R2 requirements for any equipment or materials, at any point in the process.

Q: What does "F – Service only" mean on Table 1 Common Evaluation Stage Categories (REC)?

A: This refers to the Appendix F – Service Only requirements in R2v3. These requirements apply when an R2 Facility performs any range of processing activities for used electronics but does not own the equipment and therefore does not control the downstream disposition of the electronics or associated materials following the completion of the contracted service.

Q: For who does it serve to have cookie cutter naming and classifying of equipment outside of what a business classifies theirs as?

A: The intent of the REC and the categorization process is to ensure consistency in how equipment is evaluated and categorized across the industry. This will provide efficiencies between organizations by allowing an R2 Facility to accept the categories assigned to equipment by another R2 Certified Facility. This will also provide customers with a clearer understanding of the condition and level or functionality of equipment for reuse.

And, while the categories of the REC need to be reflected in the operations, an R2 Facility can continue to use any existing categories and classifications as long as they can clearly map the existing categories to those in the REC.