SERI COP Advisory 24

Purpose of Advisory

The purpose of this advisory is to allow for a Remote Transition Audit from the R2:2013 Standard to the R2v3 Standard. Remote auditing is not intended to replicate the on-site audit. This is a different approach to verifying the outcomes and ensuring that facilities are meeting the R2v3 requirements. We anticipate that this alternative procedure will provide both R2 Facilities and the Certification Bodies (CBs) with the tools to ensure the safety of all relevant personnel and continued R2 Certification. ***Remote audits alone are not permitted for new R2v3 certifications***.

Disclaimer

These are SERI's rules for the R2 Certification program and SERI has no influence or control over any other certifications utilized by an R2 Facility. R2 Certification does require certification to other standards, such as ISO 14001 and ISO 45001, RIOS, or equivalent as acceptable to SERI (refer Accepted Standards List on SERI's website). The audit and certification requirements of these other standards are to be utilized as applicable for their audit and this document is in no way to be construed as revising the other certification program requirements. CBs will have the ultimate discretion to determine whether a remote R2v3 transition audit is feasible**. *The R2v3 Remote Transition Audit shall be completed as a stand-alone audit***; it is not permitted to use integrated audit time or integrated auditing practices.

Alternative R2 Auditing and Transition Policies

CBs must continue to be able to satisfy the requirements for evidence to determine conformity of the R2 facility when performed remotely. R2 Certification conformity requires evidence demonstrating implementation, not just evidence of policies and plans. CBs will continue to be held responsible for collecting, verifying, and reporting evidence that supports an active R2 Certificate.

SERI will rely on the Accreditation Body (AB) and the accredited R2 CBs to follow the mandatory requirements as identified in the Reference Documents (box above). However, SERI has further defined within this advisory the implementation of alternative auditing and certification methods and policies to issue and maintain R2 Certificates through this R2v3 Transition Process. SERI is in full support of CBs utilizing remote auditing techniques for R2 Certification activities to maintain auditing schedules when audit objectives can be achieved, is feasible and allowed as defined within this advisory. Remote auditing

may not be supported in all scenarios and any decision on whether to use remote auditing will be at the CB's sole discretion based on risk and the CB's ability to effectively audit the R2 Facility remotely.

R2v3 Transition Audits Rules

Significant Changes

If the R2 Facility has undergone any significant changes in their organization since their last audit, the CB must plan for an on-site verification of the changes. However, if there are Government restrictions that prevent an auditor from going onsite due to COVID during the transition period, the CB can assess the changes through the R2v3 Remote Transition Audit, followed by a special on-site audit as soon as it is allowable for an auditor to access the R2 Facility. If this exception is used, the CB must retain the rationale for this approach and make it available for review upon request by SERI and/or the AB.

Reduced Operations

If parts of the operations are not actively running for a particular area or process, it is the auditor's responsibility to ensure adequate evidence is available to demonstrate conformance to the R2v3 Standard and R2 Facility's scope. There may be circumstances where an R2 Facility is unable to demonstrate evidence to meet a particular requirement with current records (since the previous on-site audit). The auditor will record a non-conformity (NC) on this lack of evidence as to ensure evidence will be provided prior to the issuance of the R2v3 Certificate*. An R2v3 Certificate shall not be issued until all R2v3 Remote Transition Audit NCs are verified and closed with objective evidence of closure by the CB.*

Nonconformities

All requirements for handling audit nonconformities continue to apply. Refer to Transition Audit NCs section under Advisory 22 on how to treat NCs issued during a transition audit.

R2 Certified Facility Responsibilities

The R2 Facilities which are R2 Certified, suspended, or in the process of transitioning to the R2v3 Standard must continue to always operate in conformance with the R2 Standard.

R2 Facilities are required to cooperate fully with the CB audit team during the scheduled remote transition audit to support an efficient and effective audit by providing evidence, supporting interviews, and live streaming of activities. Evidence must be promptly provided at the time of request without delay. Any missing evidence or refusal to show the auditor areas of a facility or interviews with employees will be considered nonconforming and grounds for termination of the remote audit.

Auditor and APR Competence Requirements

CBs are required to ensure the auditors they select to perform Remote Transition audits have at least 10 R2 audit days experience over the last 3 years. Additionally, each auditor shall successfully complete the R2v3 Remote Transition Audit course prior to conducting R2v3 Remote Transition Audits. Audit Package Reviewers must be qualified per Advisory 22 in addition to successfully completing the R2v3 Remote Transition Audit course.

Quality Control

CBs are required to continue internal quality control processes required under Audit Package Review Criteria, R2v3 COP 8.13. SERI will continue to review audits performed remotely as part of the SERI's oversight program under Audit Package Review R2v3 COP 19.2.

R2 Remote Transition Audit Procedure

Contract Review

As part of the Contract Review for a R2v3 Remote Transition Audit, the CB shall determine the R2 Facility's R2v3 scope of certification in accordance with Contract Review – Determining Eligibility and Certification Scope, R2v3 COP 5.1.

Notification to SERI

The CB must notify SERI of every R2v3 Remote Transition Audit prior to conducting the audit. SERI is not looking to insert itself in the approval process, communication is to provide transparency of the R2v3 Remote Transition Audits.

Audit Time for R2v3 Remote Transition Audits

The minimum audit time for any Transition Audit shall be calculated using the "Certification R2 Audit Time" for new R2 Certifications as defined in the R2v3 Code of Practices (COP). Non-Integrated Audit time shall be followed because the R2v3 Remote Transition Audit is required to be conducted as a stand-alone audit; not integrated with QMS or EHS Standards. Phase 2 of this procedure requires an additional minimum of 0.25 days to be added for auditor verification of information uploaded by the R2 Facility. However, if the CB determines more time needs to be added for any reason, it will be done at their discretion.

Scope of Remote R2v3 Transition Audits

All R2v3 Core Requirements and applicable R2v3 Process Requirements must be audited during the remote R2v3 Transition Audit. ***The R2v3 Remote Transition Audit shall be planned and conducted as a stand-alone audit.***

Audit Plan

The R2v3 Remote Transition Audit Plan shall clearly record audit time spent on Core Requirements, and the applicable R2 Process Requirements (Appendices). Activities conducted by the Auditor, as required in the audit phases, shall be identified in the Audit Plan.

R2v3 Transition Audit Phases

Considering both the opportunities and the risks, the Phases in this Advisory take a new approach to incorporate activities with added benefits to both the R2 Facility and the CB. This approach is outlined in the following 6 phases:

- Phase 1 – Pre-Qualification
- Phase 2 – Information Gathering
- Phase 3 – Opening Meeting, Facility Tour

- Phase 4 – Documentation and Record Review
- Phase 5 – Interviews, Follow-up
- Phase 6 – Closing Meeting

Typically, each phase is successfully completed before starting the next phase. However, it is understood that Phases 4 and 5 are iterative and may be conducted non-sequentially if objectives of each phase and the audit can be achieved. In Phase 4, the auditor may be required to interview the R2 Facility to gain a better understanding of documentation and records being reviewed. The auditor may also move to Phase 5 interviews to test and verify information assessed through Phase 4. It is highly recommended to be flexible with the scheduling of Phase 4 and 5; scheduling should be based on the flow of records and documents between the auditor and the auditee, and accommodate additional time as needed.

Phase 1 – Pre-Qualification

Phase 1 ensures that the R2 Facility meets the following set of pre-requisites as confirmed by the CB.

Phase 1: R2 Facility Responsibilities:

- Have certification to the necessary EHS systems, acceptable to SERI, (refer Accepted Standards List on SERI's website). ***As well as issued by a CB that is accredited by an AB that is an IAF MLA signatory.***
- If applicable, have certification or is in the process of certification, to a Quality Management System (QMS) acceptable to SERI, (refer Accepted Standards List on SERI's website). ***As well as by a CB that is accredited by an AB that is an IAF MLA signatory.***
- Maintain an R2 Certification and License Agreement in good standing.
- Have completed a full-system Internal audit of the entire scope of its operations, including all R2v3 Core Requirements and applicable R2v3 Process Requirements.
- Internal audit corrective actions have been implemented for any identified NCs from R2v3 Internal Audit.
- Have completed a compliance audit by a *competent* auditor knowledgeable in the operations and all applicable requirements.
- 100% due diligence of all approved downstream vendors to the *new* R2v3 Requirements.
- Completion of a Data Sanitization Plan, as applicable.
- Completion of an R2 Reuse Plan, as applicable.
- Evidence of required insurance(s), as applicable.
- Continue to operate within the verified scope of certification.
- Continue to operate at the same address as listed on the existing R2:2013 Certificate. Any moves must be planned after the remote transition audit is completed and certificate has successfully transitioned form R2:2013 to R2v3 for a given address.
- Not have undergone any significant changes. If the R2 Facility has undergone any significant changes in their organization, the CB must plan for an on-site verification of the changes.
- Maintain an electronic file sharing application or system where the R2 Facility can securely share documents with the auditor. (Some examples are DropBox, Box, Google Drive, etc.) and/or applications containing evidence (Some examples are CycleLution, Makor, RazorERP, etc.).
- Provide the auditor read access to all relevant documentation and records, in the electronic file sharing application, ***at least 10 days BEFORE Phase 3 of the remote transition audit.***

- Collect and allow access, in the electronic file sharing application, to documents and records in the file sharing application, throughout all phases of the audit in accordance with this Advisory, without limitations for the auditor to explore and follow audit trails on their own. A sampling of specific documents and records required are identified in Phase 2 and are only a starting point for the auditor. The auditor may request additional records and documents at any time during the audit process.
- Utilize a portable video sharing application (FaceTime, Google Duo, WhatsApp, MS Teams, etc.) capable of conducting live, on the job, worker interviews, and a visual tour(s) and assessment(s) of all areas indoors and outdoors at the R2 Facility's location(s).
- Establish and be able to support a reliable and secure connection for all document, record, and video sharing.
- Test all areas of the site for adequate connectivity (cellular or Wi-Fi) and ensure there are no dead spots where video or other information sharing is limited or not possible, including outdoor areas of the property (e.g., storage, parking lot and perimeter).
- Ensure all necessary employees are available for participation in the remote audit to support the audit objectives and scope.

Phase 1 CB Responsibilities:

- Confirm the accuracy of Names, Employee Count, DSV Count.
- Confirm operations are at the same address(es) as listed on the R2 Certificate.
- Confirm that no significant changes have taken place. If the R2 Facility has undergone any significant changes in their organization or operations, the CB must plan for an on-site verification of the changes.
- Test and confirm suitable functionality of file sharing applications.
- Test and confirm suitable functionality of video sharing applications.
- Ensure that the R2 Facility will provide online access to documents and records 10 days prior to the Phase 3 of the scheduled remote audit.
- Verify the audit time allocated for the R2v3 Remote Transition audit is adequate. It is imperative to be able to add time as needed, to ensure an effective audit including consideration of any additional time needed for using ICT. Integrated audit time with other management systems is not permitted.

Breaks, pauses or other adjustments in audit time or format may be necessary to fully complete the remote transition audit, especially when there are technical issues. The CB must add time to the audit to accommodate adjustments and ensure full audit time is accomplished. Timely R2 Facility responses for information are required throughout the audit process.

Phase 1 Milestones: Pre-qualification authorization completed. A record of review that the R2 Facility qualifies for a remote transition audit is to be maintained by the CB.

Phase 2 – Information Gathering

Phase 2: R2 Facility Responsibilities:

The R2 Facility gathers and uploads the documents in Table 1 for the auditor to access, in the file sharing application. The auditor in Phase 2 is only ensuring the documents are available to be able to begin Phase

3. If some documents and records are in paper copy format, the R2 Facility scans and uploads these documents to the File Sharing application.

Table 1 lists the expected documentation and records that are to be uploaded, by the R2 Facility, at least 10 days prior to Phase 3. These documents and records must remain available during all the phases. *Sharing documents and records, as required in Table 1, via video conferencing is not permitted.*

Table 1: Electronic Documents

R2 Requirement	Documents to Review
1	• Website Addresses: Sales Sites (eBay, Amazon, etc.); Advertising Sites; Company Websites (LinkedIn, Facebook, Corporate Sites, etc.); All areas where an R2 Facility publicizes or conducts related business. *Core 1(b)(4)*
2	• Hierarchy of Responsible Management Strategies Policy *Core 2(a)*
3	• Environmental Health and Safety Management System Certificate (refer Accepted Standards List on SERI's website). *Core 3(a)* • R2v3 Internal Audit Results (Plans, Reports, NCs, Corrective Actions) *Core 3(b)* • Hazards Identification and Assessment (Environmental, Health, and Safety) *Core 3(d)(2) and (3)*
4	• Legal Compliance Plan/List of Compliance Requirements. *Core 4(a) and (b)* • Evidence supporting the legality of transboundary shipments made by the R2 Facility and its downstream vendors through the entire recycling chain or the first R2v3 Certified DSV. This includes all shipments including any non-working or untested equipment and components. *Core 4(c)* • Legal Compliance Audits, not facility inspection reports. (Plans, Reports, NCs, Corrective Actions) *Core 4(d)(3)* • Competency records of legal compliance auditor *Core 4(d)(3)* • Regulatory orders or notices of violation, received in the 3 months prior to the R2v3 Transition Audit. *Core 4(d)(5)* • Non-Discrimination Policy *Core 4(g)*
5	**Summary of ALL incoming and outgoing transactions.** Summary should include at a minimum, transaction dates, descriptions of types and quantities, supplier/buyer/DSVs. *Note: A summary of transactions is NOT a sample of*

R2 Requirement	Documents to Review
	transactions; it is a complete listing of all inbound and outbound transactions (shipments, sales, etc.) during the last 12 months. **Core 5 (a) and (c)**
6	• Documented Process for evaluation, sort, and categorization. ***Core 6(a)(1)-(5)***
7	• Data Sanitization Plan and Destruction Procedures – All Forms of Destruction (Physical and Logical) ***Core 7 (a)(1)(A)-(M)*** • DSV Qualification Records for Data Destruction ***Core 7(c)(2)(C)*** • Records of Data Destruction Process Validation for the last 12 months. (Not to be interchanged with data destruction records or quality control records). ***Core 7c) (3)***
8	• FM Management Plan – Must be clear as to which DSVs are R2v3 vs. Non-R2. If designation of R2v3 and No-R2 DSVs is not in the plan, include a list of DSVs designating R2v3 and Non-R2. ***Core 8(a)(1)-(3)*** • DSV Flow (list of vendors through the entire recycling chain – this includes all equipment and components containing FMs). ***Core 8(a)(3)***
9	• Closure Plan ***Core 9(e)(1)-(5)*** • Financial Instrument, Required. ***Core 9(e)(4)*** • Financial Instrument, Not Required. If an R2 Facility is claiming an exclusion under Core 9(f). ***Evidence of meeting all three requirements must be uploaded.*** ***Core 9(f)(1)-(3)*** • Insurance Policy Declaration(s) ***Core 9 (d)(1)-(2)***
10	• Qualified Transporters (All Types; Land, Air, Train, Ship) ***Core 10(d)***
Appendix A	• Registration Letter of DSVs with SERI, if applicable ***Appendix A (4)(b)*** • Qualification Records for Non-R2 DSVs; only R2v3 DSVs are considered "R2 Certified" ***ALL evidence of qualification of Non-R2 DSVs.*** ***Appendix A (8)(a)-(h)*** *Note: Refer to Advisory 22 for further clarification on R2 Certified DSVs.*
Appendix B	• Data Sanitization Plan ***Appendix B (1)(a)-(d)***

R2 Requirement	Documents to Review
	• Test results for Data Security Controls *Appendix B(5)(e)*
Appendix C	• Quality Management System Certificate or equivalent (refer to Accepted Standards List on SERI's website). *Appendix C (1)* • R2 Reuse Plan or other as identified below: Test and Repair Instructions Competency Requirements for test, repair, and verification of equipment Product Safety Plans Test Plans Quality Assurance Plans Product Return Plan *Appendix C(2)(a)-(f)*
Appendix D	• Specialty Equipment Verification Procedures *Appendix D(2)(b)*
Appendix E	• Industrial Hygiene Monitoring Program *Appendix E(4)(i)* • Pollution liability insurance, guaranteed reserves, or government guarantee *Appendix E (8)*
Appendix F	Quality Management System Certificate or equivalent (refer Accepted Standards List on SERI's website). *Appendix F(1)(c)*

Phase 2: CB Responsibilities:

The CB shall provide *a min. 0.25 days* to the auditor to verify that the required information has been uploaded prior to Phase 3. The auditor is not expected to audit the details or check for the completeness of the documents/records. This audit time is in addition to the calculated R2v3 Remote Transition Audit time. ***The auditor ensures all required documents and records are reviewed at least 7 days before Phase 3.*** The audit shall not proceed if the R2 Facility is unable to make any of these documents and records available during Phase 2. The auditor may also request additional documents and records not listed in Table 1. Table 1 is meant to be a representative list, not a comprehensive list of documents that will be reviewed during the audit process.

Phase 2 information gathering, and compilation process is not part of the calculated R2v3 Remote Transition audit time per Advisory 22. The added time for Phase 2 covers only the verification of the upload of the required documentation by the auditor.

Phase 2 Milestones: Documentation and records are gathered electronically and made accessible to the auditor by the R2 Facility and the auditor has confirmed all required documents are uploaded. *If any documentation is missing and/or are not uploaded, the audit cannot proceed to Phase 3.*

Phase 3 – Opening Meeting, Facility Tour

Phase 3: R2 Facility and CB Responsibilities:

Phase 3 begins when the Phase 2 milestone is achieved and will officially start with the Opening Meeting. After the opening meeting, the auditor conducts a comprehensive virtual tour of the facility. The tour is meant to be a thorough review of the activities and processes of the R2 Facility. The auditor should be clear about the operations and scope upon finishing of the tour. After the tour, the auditor should notify the R2 Facility of any additional records or documents that may need to be reviewed.

Phase 3 Milestones: Opening meeting and in-depth/all-inclusive virtual facility tour have been completed.

Phase 4 – Documentation and Record Review

Phase 4: R2 Facility and CB Responsibilities:

Phase 4 is intended to provide the auditor time to review the records and documentation that have been uploaded and document conformance in the R2v3 Audit Report. The intent is for the auditor to conduct a detailed enough review in Phase 4 to gather sufficient background information and identify audit trails to plan and guide the follow-up interviews and other audit activities. Auditors will also begin sampling from Summary of Transactions or the actual transactional records (shipments, sales, invoices, etc.) to identify audit trails for verification.

Transaction samples for each audit trail are documented on the SERI provided "Transaction Sheet" audit trails template (available on SERI's website under Audit Tools section of Knowledge Base). All shipment and transaction samples and reviewed records are verified to be consistent with both the Scope of certification statement on the R2 Certificate, the documented activities in Core Requirement 1 and any other written risk analysis, policies, and process documentation.

Most of the auditor's time is expected to be used in Phase 4. Phases 4 and 5 are iterative and may be conducted non-sequentially to enable the auditor to move to Phase 5 interviews to test and verify information assessed through Phase 4 if the objectives of each phase and the audit can be achieved. Phase 5 time may require adjustment based on Phase 4 based on quality and complexity of the documentation and records uploaded by the R2 Facility. ***The focal point for Phase 4 audit trails should be based on the sample of transactions recorded from Core 5 Summary of Incoming and Outgoing Transactions.***

Phase 4 Milestones: Opening meeting and virtual facility tour have been completed. Uploaded Phase 2 documents and records have been reviewed by the auditor. Audit trails are identified in the Transaction Sheet template and audit report. Audit report is intended to be partially completed in Phase 4. Updated audit plan and schedule interviews based on audit trails.

Phase 5 – Interviews, Follow-up

Phase 5: R2 Facility and CB Responsibilities:

Using the audit trails identified in Phase 3 and 4, the auditor will further inspect the information reviewed in Phase 4, verify the records sampled, and confirm the information with interviews and virtual tours. The length of Phase 5 is dependent upon the audit trails requiring follow-up from Phase 3 and 4. Auditor reviews live operations to corroborate already reviewed records, and documents from Phase 4.

The R2 Facility shall ensure all operations are actively running, as applicable to the scope of the audit, and it is the auditor's responsibility to ensure adequate evidence is reviewed to demonstrate conformance to the R2v3 Standard and R2 Facility's scope. If operations are unavailable or not evident, the auditor will record an NC to ensure sufficient evidence will be provided prior to issuing an R2v3 Certificate. It is possible to reduce the scope if processes are not operational within the allowed time.

Phase 5 Milestones: Interviews are complete. Auditor prepares any NCs as recorded in the audit documentation and audit report.

Phase 6 – Closing Meeting

Phase 6: CB Responsibilities:

The audit outcomes are provided during the Closing Meeting. The auditor communicates NCs as recorded in the audit documentation and audit report.

Phase 6 Milestones: Closing meeting is complete.

Additional Expectations at a R2v3 Remote Transition Audit

- An in-depth virtual tour of the site and all processing operations is completed, as directed by the auditor, through a live video stream. This includes all campus locations and controlled activities not at the R2 facility, for example, off-site data destruction.
- The auditor interviews any relevant personnel as appropriate throughout the remote audit phases.
- R2 Facility makes available any personnel the auditor chooses to speak to during the remote audit.
- Open internal audit NCs will be re-written by the auditor as an NC as part of the remote RC.
- During any phase of the remote transition process, the auditor or the CB may choose to verify additional records and therefore has the discretion to add additional time, and/or determine an on-site audit is necessary.
- Corrective actions and technical review process will follow requirements in the Code of Practices and the CB's procedures. An R2v3 Certificate shall not be issued until all R2v3 Remote Transition Audit NCs are verified closed with objective evidence of closure by the CB.
- Under the SERI Oversight Program, SERI may witness any remote transition audit to monitor effectiveness.

Additional Expectations for Confidentiality

To make remote auditing successful, R2 Facilities need to electronically share records and documentation to allow the auditor to remotely review. The auditor may need to take copies of some records to include in the audit documentation as evidence of conformity.

All audit evidence and information will be treated as confidential as defined within the CB's processes.

Revision History

Revision No.	Change	Date of Release/Revision
1.1	• Removed words "facility and operations" from Phase 1 CB Responsibilities • Changed the wording in part 5 of Table 1: *Note: A summary of transactions is NOT a sample of transactions; it is a complete listing of all inbound and outbound transactions (shipments, invoices, sales, etc.) during the last 12 months.* • Added "C" in Core 7c3 in Table 1 – part 7.	February 23, 2022