



Checklist for the Selection of an Electronics Recycler

Updated: 7/2/2012

PURPOSE

This checklist is designed to aid Federal Electronics Challenge (FEC) partners in the initial evaluation of an electronics recycler. This checklist will guide you in answering some basic questions about an electronics recycler and can be completed over the phone.

BACKGROUND

Executive Order (E.O.) 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, requires agencies to employ environmentally sound practices with respect to the agency's disposition of all agency excess or surplus electronic products. Additionally, the U.S. General Services Administration (GSA) Federal Management Regulation (FMR) Bulletin B-34, *Disposal of Federal Electronic Assets*, strongly encourages the use of certified recyclers and refurbishers for the recycling of electronic equipment labeled for abandonment and destruction.

If a federal agency or facility opts to use an electronics recycler certified through either the Responsible Recycling (R2) Practices for Use in Accredited Certification Programs for Electronics Recyclers, or the e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment®, they do not need to perform additional due diligence to ensure compliance with E.O. 13514 and GSA FMR Bulletin B-34. Due diligence activities have been performed through the third-party certification process to ensure these recyclers follow environmentally sound recycling practices.

IMPORTANT NOTE: Recycling facilities are certified at the facility level. A multi-facility or national organization must independently certify each of their locations. Due to the length of time required for certification, these multi-facility or national organizations may have some facilities that are certified and some that are not yet certified. Check to determine which facility location will be used to recycle your electronics, and ensure that specific facility is certified.

The FEC encourages all federal agencies and facilities to use a certified recycler for recycling of federal electronics. Federal agencies and facilities that choose not to use a certified recycler may choose and contract with a local recycler that meets their needs. When selecting a different recycler, federal agencies and facilities must practice due diligence to ensure that the electronics recycler they select utilizes environmentally sound practices, in accordance with E.O. 13514.

In order to ensure due diligence, the FEC has an additional resource to help partners perform a more in-depth, onsite review of an electronics recycler, available at: <http://www2.epa.gov/fec/guidelines-site-reviews-electronics-recyclers-722012>.

The checklist provided in this resource is organized as a series of questions on recycler operations and management practices so that you can make an initial selection of a recycler. You may pick and chose from among the questions based on your priorities and on the level of service you are seeking.

DISCLAIMER

This checklist is not meant to substitute or override Federal, state, or local laws and regulations.

REFERENCES

The text of Executive Order 13514 is available at: <http://www.fedcenter.gov/programs/eo13514/>.

The text of GSA FMR Bulletin B-34 is available at: http://www.gsa.gov/graphics/ogp/FMR_Bulletin_B-34.pdf.

Information about the R2 Practices is available at: <http://www.r2solutions.org/>.

Information about the e-Stewards Standard is available at: <http://e-stewards.org/>.



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Federal regulatory requirements are described at EPA's eCycling website:
<http://www.epa.gov/epawaste/conservation/materials/ecycling/rules.htm>

The National Center for Electronics Recycling provides a list of electronics recycling laws in effect at their website: <http://www.electronicrecycling.org/public/ContentPage.aspx?pageid=14>.

CONTACT INFORMATION

If you have questions related to this resource or need other assistance with the Federal Electronics Challenge, please contact your Regional Champion: <http://www2.epa.gov/fec/technical-assistance>.

Visit the FEC online: <http://www2.epa.gov/fec/>

E-mail the FEC: fec@epa.gov

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QUESTIONS TO ASK AN ELECTRONICS RECYCLER

Is the recycler certified under either or both the Responsible Recycling (R2) Practices for Use in Accredited Certification Programs for Electronics Recyclers, or the e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment®?	Yes No
Can the electronics recycler give a general description of its business? This type of information may include: <ul style="list-style-type: none"> • Point of contact • Number of employees • Years in business and ownership history • Facility site information and history • Summary of operations and services offered 	Yes No
Does the electronics recycler accept the products you want recycled?	Yes No
Does the electronics recycler service your geographic area and type of organization?	Yes No
Can the electronics recycler clearly describe its fees for various types of equipment?	Yes No
Can the electronics recycler offer additional services that you may require? Additional services may include: <ul style="list-style-type: none"> • On-site collection support • Transportation support • Product reuse or refurbishment • Product tracking • Recycling guarantee or certificate 	Yes No
Is the electronics recycler equipped to provide needed media sanitization and destruction services for your electronic equipment and components? Does the electronics recycler audit this portion of their services for quality assurance?	Yes No
Can the electronics recycler identify its federal, state, and local environmental agency contacts?	Yes No
Is the electronics recycler geographically located in an area that is regulated by a State and/or local electronics recycling law? If so, can the electronics recycler provide a description of those laws?	Yes No
Can the electronics recycler provide information on its compliance history? This type of information should include recent criminal (past five years) or civil (past three years) violations, and how they were, or are, being addressed.	Yes No

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<p>If the electronic recycler exports 1) cathode ray tube (CRT) monitors for reuse; and/or 2) mixed CRT glass for recycling, are they able to provide documentation that they are in compliance with the export section of the CRT rule (i.e., notification letter to EPA; consent letter for export from EPA)?</p>	<p>Yes No</p>
<p>Does the electronics recycler have environmental, health and safety management systems and/or plans in place?</p> <p>Management systems and/or plans may include:</p> <ul style="list-style-type: none"> • Environmental management system (EMS) • Environmental, health, and safety (EH&S) system or plan • Environmental risk management plan • Hazardous materials management plan • Emergency prevention, preparedness, and response plan 	<p>Yes No</p>
<p>Can the electronics recycler provide a description of its processes?</p> <p>An electronics recycler should be able to provide an overview of its procedures for:</p> <ul style="list-style-type: none"> • Demanufacturing • Reuse/Resale/Donation • Secure media destruction • Disposal and waste handling • Product remanufacturing • Storage 	<p>Yes No</p>
<p>Can the electronics recycler provide a description of what it does with the electronic equipment it receives?</p> <p>An electronics recycler can utilize a variety of processing methods, including:</p> <ul style="list-style-type: none"> • Brokering (matching buyers and sellers) • Resale of whole units (selling of whole units) • Remanufacturing (refurbishing equipment) • Demanufacturing (disassembling into parts and subassemblies) • Material recovery (physical separation to capture plastics, metals, glass, etc.) • Material processing (shredding and grinding) • Donation (school systems, non-profit organizations, etc.) 	<p>Yes No</p>
<p>Can the electronics recycler provide the names and/or locations of the downstream businesses to which it sends equipment or components?</p>	<p>Yes No</p>
<p>Does the electronics recycler, or its downstream vendor(s), export equipment outside the U.S?</p> <p>If so, can the electronics recycler supply you with information on the legality of such exports?</p>	<p>Yes No</p>
<p>Does the electronics recycler practice due diligence for its end-markets, either via audit, questionnaire, or other measures?</p>	<p>Yes No</p>
<p>Does the electronics recycler send materials for disposal in landfills or for incineration?</p>	<p>Yes No</p>



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<p>Can the electronics recycler supply you with documentation or certification of final disposition?</p>	<p>Yes No</p>
<p>Does the electronics recycler maintain appropriate insurance/assurance?</p> <p>Types of insurance/assurance may include:</p> <ul style="list-style-type: none"> • General liability insurance • Environmental liability insurance • Financial assurance (e.g., bonding) 	<p>Yes No</p>
<p>Will the electronics recycler allow you to verify this information through an on-site evaluation?</p> <p>The FEC has an additional resource to help partners perform more in-depth, onsite reviews of electronics recyclers, available at: http://www2.epa.gov/fec/guidelines-site-reviews-electronics-recyclers-722012.</p>	<p>Yes No</p>
<p>Can the recycler provide references and contact information for other businesses that have used their services?</p>	<p>Yes No</p>

ADDITIONAL COMMENTS

REVIEWER INFORMATION

Facility Name:

Name:

Date: