



IN FOCUS

DOWNSTREAM EVALUATIONS



RECYCLER QUALIFICATION OFFICE

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SUMMARY OF REQUIREMENT

Electronics Recycling Standard, Section 12.0:

- Recyclers shall maintain a documented process to evaluate downstream recyclers.

Purpose:

- To assess the ability of the downstream to handle material in a safe, secure and environmentally sound manner.

DOCUMENTING THE PROCESS

- The ERS requires that the downstream evaluation process be **documented**
- Documenting the process enables the evaluations to be conducted in a **planned manner**, allowing for a **repeatable process** that can provide adequate and consistent results

ELEMENTS OF THE PROCESS

In order to ensure an effective evaluation, the process must include:

- Detailed instructions on how to conduct the assessment
- Specific criteria that will be evaluated
- Minimum acceptable examples of conformance for each of the assessment criteria

EVALUATION PROCESS

The downstream evaluation process must define:

- Who is responsible for conducting the assessment
- How the assessments will be conducted
- When on-site reviews are required
- What types of information or other assurance are required where an on-site review is not conducted
- How the results of the assessment will be evaluated
- Who is ultimately responsible for approving the downstream

EVALUATION CRITERIA

- Many of the downstream evaluation criteria are already defined in the ERS
- The recycler must augment these with any other applicable requirements, such as site specific or material specific regulatory requirements
- When defining these specific requirements, consideration should be given to the type of material, location of processing, processing methods, and any resultant material streams generated by the downstream recycler

EVALUATION CHECKLIST

- A checklist should be developed to define the evaluation criteria and minimum acceptable requirements, and also to record any evidence of conformance with the requirements or any identified issues

Requirement	Minimum Acceptable	Examples / supporting Evidence
<i>Insurance</i>	<i>\$2M general liability</i>	<i>Certificate of Insurance #111 XXX</i> <i>Coverage: \$X</i> <i>Valid until date:</i> <i>dd-MMM-YY</i>
<i>Permits:</i> <i>Waste</i>	<i>Permit to accept and handle waste materials</i> <i>...</i>	<i>Permit #AAABBB</i> <i>Issued: dd-MMM-YY</i>
<i>Permits:</i> <i>Air</i>	<i>...</i>	<i>...</i>

EVALUATION PROCESS

- After gathering the necessary supporting information, it must be thoroughly evaluated and an assessment of conformance to the requirements made
- Where any required information is not attained or available, other suitable evidence must be maintained to demonstrate that adequate alternate controls are in place to otherwise address the requirement
- Results of the evaluation must be recorded and maintained along with all supporting evidence

PERIODIC SURVEILLANCE

- In addition to conducting an initial downstream evaluation, a process must be in place to conduct periodic surveillance reviews to verify continuing conformance with the requirements
- The surveillance process should be suitably designed to be able to identify any changes in operations at the downstream that would require additional review
- In addition, a process must be maintained to obtain any required updates from the downstream such as for insurance coverage; permit renewals; etc. to ensure they are current

CONFORMANCE CHECK

- ❑ Downstream assessment criteria and a detailed evaluation process have been documented
- ❑ Downstreams have been evaluated
- ❑ Periodic updates and re-assessments are conducted
- ❑ Evidence is maintained of the downstream recycler's current regulatory permits and approvals; insurance coverage; etc.

CONTACT US

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