



ELECTRONIC PRODUCTS RECYCLING ASSOCIATION (EPRA)

RECYCLER QUALIFICATION PROGRAM (2015)

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PART A

ELECTRONICS RECYCLING STANDARD (ERS)

All recyclers seeking to operate under an EPRA program must be audited and approved by the Recycler Qualification Office (RQO) under the Electronics Recycling Standard (ERS) prior to use.

Recycler requirements are determined based on the type of operations undertaken in alignment with the following three categories: primary recyclers; downstream recyclers of focus material; and downstream recyclers of non-focus materials.

All recyclers may be subject to annual audit of the defined requirements as well as an on-site operational review.

1.0 PRIMARY RECYCLERS

R2:2013 certification is a prerequisite for RQO approval under ERS 2015. Primary recyclers must also:

- 1.1 Demonstrate active material processing through established and sustainable processes certified under R2:2013.
- 1.2 Maintain policies and practices to prohibit the use of child or prison labour.
- 1.3 Possess workers' compensation coverage and a minimum of \$2M general liability insurance.
- 1.4 Maintain a documented procedure to provide notice of reportable incidents within 5 business days including: changes in name or ownership; fines or regulatory orders; spills; fires; or reportable injuries or changes in R2 Certification status.
- 1.5 Maintain closure plan financial assurance, based on the maximum material capacity as follows:
 - 1.5.1 Maximum capacity less than 50 MT = \$25k minimum;
 - 1.5.2 Maximum capacity of 50 to 149 MT = \$75k minimum;
 - 1.5.3 Maximum capacity of 150 to 499 MT = \$100k minimum;
 - 1.5.4 Maximum capacity of 500 MT or greater = \$125k minimum; or
 - 1.5.5 Where the facility is owned by the recycler, provide an approved Commitment and Waiver Letter accepting full responsibility and liability to cover all costs in the event of a closure.
- 1.6 Process all EPRA material in accordance with the RQO defined scope of approval and downstream flow.

2.0 DOWNSTREAM RECYCLERS OF FOCUS MATERIALS

- 2.1 Demonstrate active material processing through established and sustainable processes in conformance with a Focus Material Management Plan.
- 2.2 Maintain policies and practices to prohibit the use of child or prison labour.
- 2.3 Possess adequate workers' compensation coverage and a minimum of \$1M general liability insurance.
- 2.4 Maintain a documented procedure to provide notice of reportable incidents within 30 business days including: changes in name or ownership; fines or regulatory orders; spills; fires; or reportable injuries.
- 2.5 Process all EPRA material in accordance with the RQO defined scope of approval and downstream flow.

3.0 DOWNSTREAM RECYCLERS OF NON-FOCUS MATERIALS

- 3.1 Define the scope of operations and demonstrate active material processing through permitted and sustainable processes.
- 3.2 Maintain policies and practices to prohibit the use of child or prison labour.
- 3.3 Possess adequate workers' compensation coverage and a minimum of \$500K general liability insurance.

PART B

IMPLEMENTATION GUIDE

The Implementation Guide supplements the ERS by providing guidance on the application of the requirements and the minimum best practices required.

- IG.1 The recycler must be able to demonstrate materials are actively being processed through sustainable, ongoing methods and not stockpiled or otherwise stored without processing and/or shipment downstream. All processes undertaken for handling the electronic materials must be covered under the recycler's R2 scope of certification or where applicable defined in an approved focus material management plan.
- IG.2 The use of child and/or prison labour is prohibited for any functions associated with the processing, transportation or handling of EOLE. The minimum age requirement for workers should be either the local legal minimum age or 14 years old, whichever is higher. Job description requirements, hiring policies, interviews or regulatory requirements may be used to define minimum job requirements and prohibitions for child or prison labour.
- IG.3 Adequate worker's compensation coverage is dependent on the size of the work force and the type of operations undertaken. Coverage must be sufficient to insure all workers in the event of need. Coverage may be obtained through provincial program or through a private insurance policy, and evidence of coverage may be in the form of an insurance certificate from the Recycler's insurance company or broker, or confirmation of participation in the provincial workers' compensation plan, or equivalent.
- IG.4 Comprehensive or general liability insurance coverage in the amount of \$2 000 000 is considered the minimum acceptable coverage to suitably mitigate the potential risks associated with the processing of EOLE and materials, however, consideration should also be given to maintaining environmental pollution liability coverage in the amount of \$5 000 000. Recyclers should assess and determine any additional coverage necessary commensurate with the size and scope of their particular operations. In doing so, Recyclers should not only assess coverage limits, but should also consider the need for supplementary coverage such as first party and third party pollution coverage, professional liability coverage for data security breaches, and crime coverage for theft of contents.
- IG.5 The documented procedure to notify the RQO within 5 days of receiving any fines, orders or other reportable incidents should detail:
- The timeline and individual/position responsible for issuing the notification, to ensure that it is completed within the 5 day timeframe;
 - How the fine/order/incident will be identified or flagged internally to the individual(s) responsible

for notification; and

- The actual method to notify (email, letter, etc.).

Notification of fines, orders or other reportable incidents does not require the disclosure of confidential or other business information that may be subject to an investigation or other review. However, following such an incident, the RQO may request a summary of any internal investigation of the situation, any actions taken to mitigate any health, safety or environmental impacts as a result of the incident as well as any preventive actions to prevent any further occurrence of the incident.

IG.6 Recyclers must calculate the applicable level of financial assurance required based on the maximum capacity of the location, and provide evidence such as a bond, insurance policy or letter of credit to demonstrate that the necessary funds are available in the event of closure.

IG.7 Recyclers must continue to process material within the defined scope of approval, including the materials processed, methods undertaken and downstreams used for resultant materials. Any proposed changes to operations or downstream must also be applied for through the application process to the RQO and approved prior to the Recycler implementing the changes for processing program material.

PART C

APPLICATION AND APPROVAL PROCESS

Prior to consideration for use under any EPRA program, the Recycler's operations, as well as the operations of all Downstream Recyclers that handle material generated from the end-of-life electronics (EOLE) must be audited and approved by the RQO.

For recyclers currently approved under the RQP 2010, evidence of conformance with the requirements of the RQP 2015 must be provided to the RQO by no later than December 31, 2016 in order to maintain RQO approval. For primary recyclers, this includes providing evidence of current and valid R2 certification.

For any new recyclers, or changes in scope of approval after December 31, 2016, an ERS 2015 application form must be completed and submitted to the RQO with the non-refundable \$1 500 (plus applicable taxes) application fee. A reduced fee of \$1 100 (plus applicable taxes) will apply to any applications submitted by a registered not-for-profit organization.

Failure to provide a complete application with supporting information may result in closure of the application. Should it be determined that the recycler has provided false information or misrepresented any part of the organization, recycling operations or processes undertaken, the application will immediately be rejected and the audit process terminated. Application for re-audit may only be submitted after one year from the date of the rejection.

PART D

AUDIT PROCESS

The purpose of the audit process is to determine conformance with the above defined recycler requirements.

Upon submission of an ERS 2015 application, the RQO will review the information supplied to determine if sufficient detail has been provided to warrant further audit. Recyclers will be notified of and provided an opportunity to re-submit any missing or incomplete information within 60 days, after which any application that remains incomplete will be closed.

Where sufficient information has been submitted, the RQO will contact the recycler to schedule an on-site audit for detailed review of the recycler requirements. During an on-site audit, a physical walk-through of the site, facility and operations review will also be conducted.

The auditor will define the scope of audit including the location, processing methods, and materials processed to be reviewed. Any approval granted under the RQP 2015 will be valid for the defined scope of approval only.

Any issues identified through the audit or observational review will be recorded by the auditor and reported to EPRA. EPRA will identify a timeframe for addressing the identified issues, and confirm whether a follow up site audit is required to re-assess the issue. The issues identified and corrective action timeframe will be reported to the recycler.

Upon successful completion of the audit, including addressing any identified issues within the provided timeframe, the recycler will receive ERS approval and be permitted for use. Failure to address all requirements within the allotted timeframe will result in closure of the audit and the recycler will only be permitted to re-apply for approval one year following the closure.

Once approved recyclers may be subject to an annual on-site audit by the RQO and must provide objective, verifiable evidence of conformance with each of the requirements.

PART E

APPROVED RECYCLERS

Once audited by the RQO and confirmed to be operating in conformance with the requirements of the ERS, the recycler will be provided with a detailed scope of approval and downstream flow, based on the operations audited. This approval will define the location, operations undertaken and materials processed, as well as the downstream recyclers approved to handle the resultant material streams.

Primary recyclers will also be listed on the RQO's website (www.RQP.ca).

Recycler approval is valid for a maximum period of 1 year and limited to the defined scope of approval, after which the primary recycler must be re-audited and approved.

All recyclers must continue to operate in conformance with all ERS requirements during the term of the approval. Failure to maintain adequate evidence of conformance with the ERS, or provision of false or misleading information will result in the forfeiture of approval.