

# ***Life*** ***pan***

## ***Technology Recycling***

**Ethics in Recycling  
Best Practice Trends**

January 2009

## Agenda

- “Ethics in Recycling”
- Vendor Certification Programs
  - IAER (International Association of Electronics Recyclers)
  - ISRI (Institute of Scrap Recycling Industries)
  - NAID (National Association of Information Destruction)
- EPA R2 – Responsible Recycling Initiative

## “Ethics of Electronics Recycling” Influencer of the Industry

- Basel Action Network
- Created the “New Electronics Recycling Industry”
- Expose
  - China – Digital Dump
  - Africa - Exporting Harm
  - 60 Minutes
- Experts in publicity, press, and influence on public policy
- Evolving



Source: Basel Action Network  
BAN.org

## Heart of the Issue

### **Materials of Concern:**

Developing countries lack environmental controls in extracting:

- Precious metals – Circuit boards
- Lead – Cathode Ray Tubes

### **Solution:**

Domestic Disassembly – Demanufacturing

- Hard to control if you can't go and see it
- Refining performed by recognized experts

No Prison Labor (Pragmatic Reasons)

- Security
- Safety

## **How do you know who is doing what?**

### **Certification Program**

- Government
- Association

### **Key Points**

- Documented Program
- 3<sup>rd</sup> Party
- Independent
- Accredited

## **Certification Programs**

### Common Themes:

- Ability to provide an all encompassing – seal of approval
- Total Quality Management (TQM) / ISO 9001
- Environmental Management System / ISO 14001
- Health & Safety
- Security (IEAR/NAID)
- Independent, 3<sup>rd</sup> party audit

## Certification Programs

### IAER “Certified Electronics Recycler®” Highlights:

- 1<sup>st</sup> program in the world – Specifically Electronics
- Environmental Management System (EMS)
- Business requirements – Security & Financial
- Operational requirements – Operations, Personnel, Facilities, Equipment
- Exhaustive Audit Process
  - 3<sup>rd</sup> Party Independent **Accredited** Auditor  
(typically ISO)

## **Certification Programs**

### ISRI RIOS (Responsible Industry Operating Standard) Highlights:

- Covers all recycle/scrap materials
- Reaction to increased Regulatory scrutiny
- Improve the U.S. industry's competitive position
- Closely resembles EPA – EMS system – Plan, Do, Check, Act
- Intent to be the overall management system
- Adoption of EPA Initiative

## **Certification Programs**

### NAID AAA Certification Highlights:

- Detailed Audit - Physical Destruction and Sanitization
- Detailed attention to Chain of Custody
- Specific Requirements for Employee background checks and drug testing
- Highest level of operational and physical security
- Security / Threat Prevention - Auditor

## **EPA R2 – Responsible Recycler**

### Facilitated by EPA

- Not driven by regulations
- Establishment of Best Practices

### Multi-stakeholder

- OEM's
- State & Federal Government
- Asset Management / Recyclers
- Trade Associations
- Non-profits / Activist

(AITP) Association of IT Professionals  
Adopted - April of 2008

## **EPA R2 – Responsible Recycler AITP Stds. of Responsibility**

- 1.** Establish both **environmental and privacy statements** and goals regarding how they will commit to manage end-of-life electronics, as well as **establish a written account of their management practices.**
  
- 2. Manage operations and downstream** vendor/technology selections in accordance with a hierarchy of **responsible management strategies** for end-of-life electronics equipment.

## **EPA R2 – Responsible Recycler AITP Stds. of Responsibility**

3. Maintain compliance with all applicable **environmental, health, and safety legal requirements.**
4. Employ an IT asset retirement solution that will utilize their internal or their vendor's Environmental, Health, and Safety Management System(s) (**EMS**) to ensure effective management of the environmental and health and safety impacts of their operations.

## **EPA R2 – Responsible Recycler AITP Stds. of Responsibility**

- 5. Maintain documentation** sufficient to demonstrate the management and material flow of the equipment, components, and **materials that pass through their facilities.**
  
- 6. Utilize practices at their facilities that protect worker safety, public health, and the environment.**

## **EPA R2 – Responsible Recycler AITP Stds. of Responsibility**

7. Obtain written assurances that **downstream vendors** that receive **Materials of Concern** – e.g., lead, PCBs, mercury, and other hazardous materials contained in electronic equipment – utilize practices that protect worker safety, public health, and the environment.
  
8. Ensure that their business practices comply with all **legal requirements of each transit** and **recipient country** to which Materials of Concern are shipped, and require assurances that downstream vendors' **business practices are also compliant.**

## **EPA R2 – Responsible Recycler AITP Stds. of Responsibility**

9. Ensure the equipment and components that they and their **downstream vendors send for reuse or refurbishment are appropriate for reuse**, and that any such equipment or components containing Materials of Concern that are not reused are managed in adherence to legal and ethical business practices.
  
10. Ensure that all **equipment and components that are impracticable** to reuse (or contrary to the organizations explicit direction are managed properly in accordance with # 2, using technologies that **are protective of health, safety, and the environment.**)

# EPA R2 – Responsible Recycler AITP Stds. of Responsibility

- 11. Transport** all equipment, components, and materials using entities that have the necessary regulatory authorizations and in a **manner protective of public health and the environment**
  
- 12.** Ensure that recyclers possess **insurance** that is adequate to cover the potential **environmental and privacy** risks and liabilities associated with the nature and size of the company's operations.

## **EPA R2 – Responsible Recycler AITP Stds. of Responsibility**

13. Work with recyclers that have assurances in place regarding the **proper closure of their facilities**.
  
14. Employ current generally-accepted **data destruction procedures** unless otherwise directed by the organization.
  
15. Follow **physical security** measures appropriate for the equipment they handle and maintain.

## Contact:

***LifeSpan Technology Recycling*** has principal offices in Boston, Omaha, Denver, and San Diego providing I.T. investment recovery and recycling services through a network of 20 processing facilities nation wide.

LifeSpan's focus is to reduce their customer's environmental, privacy, and reputation risks associated with IT asset disposal by using best management practices.

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