

# R2v3 Compliance Checklist

## Comprehensive Assessment Tool for Electronics Recycling Facilities

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### SECTION 1: R2 CORE REQUIREMENTS

#### Core Requirement 1: Scope

##### 1.1 Scope Documentation and Certification

- ☐ All processes and activities at the facility are identified and documented
- ☐ All electronic equipment, components, and materials managed are identified
- ☐ All external processes, activities, and locations under facility control are documented
- ☐ R2 Certificate accurately reflects scope of operations
- ☐ All applicable R2 Process Requirements (Appendices) are identified and certified
- ☐ All legal names and entities associated with certifiable activities are documented on certificate
- ☐ Any authorized allowances are properly documented per R2 Code of Practices

##### 1.2 Additional Location Disclosure

- ☐ Current listing of all additional locations not R2 Certified is maintained
- ☐ Public communication of non-certified locations handling electronics is current
- ☐ Locations handling used/end-of-life electronics are properly identified

##### 1.3 Deceptive Practices Compliance

- ☐ Facility has not been listed by SERI for deceptive practices within previous 24 months
  - ☐ No history of fraudulent activities affecting R2 certification status
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#### Core Requirement 2: Hierarchy of Responsible Management Strategies

##### 2.1 Policy Development and Implementation

- ☐ Written policy for managing electronic equipment based on hierarchy exists
- ☐ Policy addresses both on-site and off-site activities
- ☐ Policy covers downstream vendor selection criteria
- ☐ Policy is regularly reviewed and updated

##### 2.2 Evaluation and Sorting Process

- ☐ Equipment and components are evaluated for reuse capability
- ☐ Items capable of reuse are directed to appropriate reuse processes

- ☐ Items not capable of reuse are directed to materials recovery
- ☐ Prohibited items (lost/stolen, counterfeit, recalled) are properly identified and excluded from reuse

### **2.3 Focus Materials Management**

- ☐ Focus Materials are not directed to energy recovery, incineration, or land disposal except as legally required
  - ☐ Documented extreme circumstances procedures exist for FM management disruptions
  - ☐ Non-Focus Materials disposal only occurs when reuse/recovery options are exhausted
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## **Core Requirement 3: EH&S Management System**

### **3.1 EHSMS Certification**

- ☐ Valid EHSMS certification from accredited Certification Body maintained
- ☐ Certification covers all R2 facility operations
- ☐ Certificate from IAF MLA signatory AB maintained

### **3.2 R2 Integration**

- ☐ All R2 Standard requirements fully integrated into EHSMS
- ☐ Documents and records demonstrate conformance with each R2 requirement
- ☐ Annual internal audits cover entire scope including all R2 requirements
- ☐ Documents and records readily available and maintained for minimum 3 years

### **3.3 Expertise and Capability**

- ☐ Demonstrated expertise for each type of equipment/material processed
- ☐ Technical capability assessment considers legal compliance and safety
- ☐ Knowledge and capability documented and maintained current

### **3.4 Risk Control and Management**

- ☐ Environmental impacts identified, analyzed, and controlled
- ☐ Health and safety risks identified, analyzed, and controlled
- ☐ Both internal and recycling chain risks addressed
- ☐ Periodic evaluation of hazardous substance exposure risks completed
- ☐ Mercury, lead, beryllium, cadmium, PCBs, phosphor compounds, flame retardants, silica dust, and hexavalent chromium exposure evaluated

### **3.5 Equipment and Material Inspection**

- ☐ Visual inspection process for received equipment and components

- ☐ Inspection identifies conditions that may cause environmental/safety incidents
- ☐ Controls for containment, segregation, and special handling implemented
- ☐ Damaged or hazardous items properly managed

### **3.6 Housekeeping and Facility Standards**

- ☐ Good housekeeping standards maintained in all work and storage areas
- ☐ Housekeeping planned, regularly implemented, and monitored
- ☐ Work areas kept clean and orderly
- ☐ Sanitary facilities provided for workers
- ☐ Food/beverage consumption controlled in contaminated areas

### **3.7 Workforce Protection**

- ☐ Same level of care provided to entire workforce (staff, volunteers, consultants, temporary workers)
  - ☐ Qualified employee(s) designated to coordinate health, safety, and environmental protection
  - ☐ Designated individual(s) identified to all employees
  - ☐ Two-way communication system for hazard reporting and response
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## **Core Requirement 4: Legal and Other Requirements**

### **4.1 Legal Compliance Plan**

- ☐ Comprehensive legal compliance plan developed and maintained
- ☐ Plan included as section of EHSMS
- ☐ Environmental, health, safety, and data security requirements identified
- ☐ Import/export compliance requirements documented

### **4.2 Facility Compliance**

- ☐ Environmental, health, safety, and data security legal requirements identified for facility and off-site locations
- ☐ Controls, competence, and monitoring activities defined for compliance
- ☐ Legal requirements covering all activities within certification scope

### **4.3 Import/Export Compliance**

- ☐ Legal requirements of exporting, transit, and importing countries identified
- ☐ Documentation demonstrates legality of international shipments
- ☐ Direct transfers by R2 Facility comply with all applicable laws
- ☐ R2 Controlled Streams shipments (including downstream vendors) comply with laws to final disposition or first R2 Facility

#### **4.4 Compliance Monitoring**

- ☐ Actions and controls implemented to ensure compliance
- ☐ Legal compliance plan maintained consistent with changes
- ☐ Periodic compliance audits conducted by competent auditor
- ☐ Corrective actions promptly implemented for non-compliance issues
- ☐ Certification Body notified within 30 days of regulatory orders/violations requiring action

#### **4.5 Labor Standards**

- ☐ No child labor used (per ILO definition)
  - ☐ No forced labor where workers cannot leave employment freely
  - ☐ Prison labor, if used, is voluntary, compensated, and includes skills training
  - ☐ Non-discrimination policy documented and communicated
  - ☐ Fair and equal treatment process includes discrimination complaint procedures
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### **Core Requirement 5: Tracking Throughput**

#### **5.1 Inbound Material Tracking**

- ☐ Bills of lading or commercially-accepted records maintained for all inbound materials
- ☐ Records include accurate dates, detailed descriptions, types and quantities, supplier names
- ☐ Summary report of all inbound transactions maintained

#### **5.2 Controlled Material Management**

- ☐ Accurate records of R2 Controlled Streams from receipt through shipment maintained
- ☐ Total inventory levels maintained below defined limits per legal requirements, closure plan, and financial assurance
- ☐ R2 Controlled Streams and negative value materials not stored longer than one year (except for specific allowances)
- ☐ Components evaluated and inventoried per Appendix C properly managed
- ☐ Regulatory permit applications properly documented for storage extensions

#### **5.3 Outbound Material Tracking**

- ☐ Bills of lading or commercially-accepted records maintained for all outbound materials
  - ☐ Records include accurate dates, detailed descriptions, types and quantities, customer/downstream vendor names
  - ☐ Summary report of all outbound transactions maintained
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## **Core Requirement 6: Sorting, Categorization, and Processing**

### **6.1 Process Documentation**

- ☐ Documented process for evaluation, sorting, and categorization maintained
- ☐ Process conforms with hierarchy in Core Requirement 2
- ☐ R2 Equipment Categorization (REC) categories included or correlated
- ☐ Data storage devices identification process documented
- ☐ Reuse capability determination criteria defined
- ☐ Re-evaluation steps for changed stream categories included

### **6.2 Categorization Implementation**

- ☐ All equipment, components, and materials identified with REC categories or equivalent
- ☐ Items managed as R2 Controlled Streams unless properly exempted
- ☐ R2 Facility processed categorization recognized when provided
- ☐ Non-R2 facility categorization verified through documented evaluation/sampling
- ☐ Sanitized and functional items properly documented
- ☐ Items no longer meeting R2 Controlled Stream definition properly identified

### **6.3 Evaluation Process**

- ☐ All equipment and components evaluated per defined process
- ☐ Reuse capability determination completed
- ☐ Items directed to appropriate next process based on evaluation

### **6.4 Processing Requirements**

- ☐ All equipment and components evaluated for data presence
- ☐ Data sanitization status identified per REC
- ☐ Equipment with potential data secured and controlled until processing
- ☐ Prohibited items (per commercial agreements) identified and properly managed
- ☐ Equipment prohibited from reuse directed to data security and materials recovery

### **6.5 Reuse Processing**

- ☐ Reuse-capable equipment assigned unique identifiers or batch identifiers
- ☐ Internal testing, refurbishing, repair conducted per Appendix C
- ☐ Downstream vendor qualification per Appendix A completed
- ☐ Specialty electronics processing per Appendix D implemented where applicable

### **6.6 Materials Recovery Processing**

- ☐ Non-reuse equipment processed per Appendix E or transferred to qualified downstream vendor
- ☐ Downstream vendor qualification per Appendix A completed

## **6.7 Output Management**

- ☐ Unrestricted Streams properly identified and managed separately
- ☐ Demonstrated justification for unrestricted classification maintained
- ☐ Adequate tracking records for unrestricted streams maintained

## **6.8 Functioning Product Transfer**

- ☐ REC categories disclosed to buyers (Functioning Product, Data Sanitization Status, Cosmetic Condition)
- ☐ Unique identifiers referenced in commercial sales and shipping records
- ☐ Import/export compliance verified for international shipments
- ☐ Equipment packaged and protected per Core Requirement 10
- ☐ Product return policy available to buyers per Appendix C

## **6.9 Collectible and Specialty Electronics**

- ☐ Transfer without testing limited to 1% of total units with documented return policy, or
  - ☐ Processing per Appendix D for Verified Specialty Electronics
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# **Core Requirement 7: Data Security**

## **7.1 Data Sanitization Plan Documentation**

- ☐ Data Sanitization Plan documented and maintained
- ☐ Security controls for data protection defined (secured areas, authorized access)
- ☐ Types of data storage devices accepted identified
- ☐ Types of data to be sanitized defined
- ☐ General information not requiring sanitization declared
- ☐ Network service associations identified
- ☐ Contractual requirements for non-sanitization documented
- ☐ Legal, supplier, and data sanitization requirements identified
- ☐ Sanitization methods for each device type defined
- ☐ Planned sanitization durations documented
- ☐ Downstream vendors/contractors for data sanitization identified
- ☐ Required records for effectiveness demonstration defined
- ☐ Access authorization and monitoring process documented

## **7.2 Data Security Policy**

- ☐ Written data security policy documented and maintained
- ☐ Unauthorized access prohibitions clearly defined
- ☐ Competent Data Protection Representative assigned
- ☐ Security breach reporting procedures established
- ☐ Training and confidentiality agreement requirements mandated
- ☐ Non-compliance penalties identified

### **7.3 Security Training and Competency**

- ☐ Regular training provided to all workers
- ☐ Competency verification consistent with authorization levels
- ☐ Training covers policies and procedures for data security

### **7.4 Security Program Implementation**

- ☐ Security program controls access appropriately
- ☐ Risk of theft and unauthorized access considered
- ☐ Security authorization levels developed and implemented
- ☐ Authorizations granted by Data Protection Representative based on documented evaluations
- ☐ Secured areas clearly identified and labeled
- ☐ Security controls implemented and monitored
- ☐ Individual acknowledgements of data protection responsibility maintained
- ☐ Incident response procedure created and implemented

### **7.5 Data Processing Requirements**

- ☐ Supplier confirmation provided for equipment receipt, sanitization method, and processing location
- ☐ Data sanitized in timely and effective manner using approved methods
- ☐ Internal data security and sanitization audits performed annually by competent, independent auditor

### **7.6 Supplier Notifications**

- ☐ Process maintained to provide information on downstream vendor changes
- ☐ Security breach notification process implemented

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## **Core Requirement 8: Focus Materials**

### **8.1 FM Management Plan Development**

- ☐ FM Management Plan analyzed, planned, reviewed, and updated regularly
- ☐ Plan included as section of EHSMS
- ☐ Demonstrated expertise and capabilities for each FM type documented

- ☐ Planned methods and demonstrated capacity documented
- ☐ Flowchart of downstream recycling chain provided to final disposition or first R2 Facility
- ☐ International movements identified in flowchart

## **8.2 Non-Focus Materials Management**

- ☐ Print cartridges managed per Core Requirement 2 through qualified facilities
  - ☐ Print cartridge facilities meet regulatory requirements and use appropriate technology
  - ☐ Non-FM equipment/components/materials managed per Core Requirement 2
  - ☐ Non-FM items integrated into EHSMS for legal compliance and safety protection
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## **Core Requirement 9: Facility Requirements**

### **9.1 Processing and Storage Requirements**

- ☐ All processing operations conducted indoors unless outdoor risks assessed and controlled
- ☐ R2 Controlled Streams stored with weather protection
- ☐ Storage in accordance with legal compliance plan
- ☐ Security from unauthorized access provided
- ☐ Clearly labeled containers and/or storage areas maintained
- ☐ Reuse equipment stored in enclosed environment unless intended for outdoor use

### **9.2 Insurance and Risk Management**

- ☐ Risk evaluation completed considering scope, operations changes, and material volume
- ☐ Insurance or reserves demonstrated appropriate for operations and locations
- ☐ Work-related injury and illness coverage provided
- ☐ Process insurance requirements per R2 Standard met

### **9.3 Closure Planning and Financial Assurance**

- ☐ Current written closure plan developed and maintained
- ☐ Plan includes commercial businesses for equipment/material management
- ☐ Risks identified including potential equipment/materials under certification scope
- ☐ Reasonably foreseeable costs included in financial instrument
- ☐ Financial instrument established for closure including abandonment scenario
- ☐ Process and closure requirements from other R2 sections included

### **9.4 Financial Instrument Exemptions**

- ☐ If claiming exemption: total closure cost less than \$10,000 USD documented
- ☐ If claiming exemption: building size less than 1,000 square meters documented



- ☐ If claiming exemption: prohibition on mercury, CRT glass, lithium primary batteries, PCBs documented and maintained
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## **Core Requirement 10: Transport**

### **10.1 Packaging Requirements**

- ☐ Electronic equipment, components, and materials packed appropriately considering risks
- ☐ Packaging level of care warranted by intended use
- ☐ Security measures per Core Requirement 7 implemented
- ☐ Legal requirements per Core Requirement 4 compliance maintained

### **10.2 Data-Containing Equipment Transport**

- ☐ Security measures implemented as planned
- ☐ Transportation tracking appropriate for data sensitivity and supplier requirements
- ☐ Contracts enforced with transporters conforming to requirements
- ☐ Additional security controls conceal package contents and prevent unintended access

### **10.3 Documentation and Compliance**

- ☐ Shipping documentation uses accurate codes and descriptions
  - ☐ Labeling consistent with regulatory requirements
  - ☐ Import/export declarations accurate and complete
  - ☐ Transporters meet legal requirements per Core Requirement 4
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## **SECTION 2: R2 PROCESS REQUIREMENTS (APPENDICES)**

### **Appendix A: Downstream Recycling Chain**

*Required for facilities managing R2 Controlled Streams to downstream vendors*

#### **A.1 Downstream Chain Management**

- ☐ R2 Controlled Streams managed through downstream recycling chain using REC
- ☐ Conformance to Appendix A confirmed for each downstream vendor
- ☐ Negative value equipment/components/materials identified and managed appropriately

#### **A.2 Insurance and Financial Requirements for Negative Value Materials**

- ☐ Pollution liability insurance maintained for negative value materials
- ☐ Negative value materials included in closure plan and financial instrument calculations

### **A.3 Transboundary Movement Compliance**

- ☐ Import/export compliance verified for each international shipment per legal compliance plan
- ☐ Regulated waste determination documented for export, transit, and import countries
- ☐ Hazardous waste determination completed if regulated waste identified
- ☐ Other required information/documentation per applicable law maintained

### **A.4 Transparency and Tracking**

- ☐ Complete downstream recycling chain tracked and demonstrated to final disposition, OR
- ☐ Downstream recycling chain registered with SERI including changes prior to shipment
- ☐ Supplier information provided upon request (downstream vendor names/locations, vendor changes)
- ☐ R2 Controlled Streams receipt verified with commercially-accepted records

### **A.5 R2 Certified Downstream Vendor Qualification**

- ☐ Active R2 Certification verified for R2 certified downstream vendors
- ☐ Certification scope consistent with equipment/components/materials and processes
- ☐ Applicable Process Requirements verified in downstream vendor's scope

### **A.6 Non-R2 Downstream Vendor Qualification**

- ☐ Annual verification and documentation through audits or formal review completed
  - ☐ Capabilities conformance to FM Management Plan demonstrated
  - ☐ Documented environmental, health, safety risk management system verified
  - ☐ Legal compliance demonstration and current permit list maintained
  - ☐ Data sanitization requirements verified (if applicable)
  - ☐ Test and repair requirements verified (if applicable)
  - ☐ Materials recovery conformance verified (if applicable)
  - ☐ Brokering conformance verified (if applicable)
  - ☐ Throughput tracking requirements verified
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## **Appendix B: Data Sanitization**

*Required for facilities performing enhanced data security and physical/logical data sanitization*

### **B.1 Enhanced Data Sanitization Plan**

- ☐ Methods to distinguish sanitized from data-containing devices documented
- ☐ Quality controls to assess and verify sanitization effectiveness documented
- ☐ Monitoring activities for continued plan effectiveness documented
- ☐ Competency requirements for sanitization and verification documented

## **B.2 Traceability and Records**

- ☐ Unique identifier tracking maintained from control point through sanitization
- ☐ Alternative tracking methods implemented if unique identifiers not used

## **B.3 Worker Competency**

- ☐ Data sanitization workers trained and evaluated for competency
- ☐ Training updates provided for process, device, and method changes
- ☐ Competency maintained for specific authorized sanitization methods

## **B.4 Device Preparation**

- ☐ All user associations, markings, and activity logs removed or destroyed

## **B.5 Enhanced Security Controls**

- ☐ Security controls appropriate for most sensitive media classification implemented, tested, and maintained
- ☐ Locked and alarmed access points during working and after hours
- ☐ Enclosed, secured work and storage spaces maintained
- ☐ Closed circuit camera systems with 60+ days recordings covering all data areas
- ☐ Active monitoring of security cameras, access points, and security controls
- ☐ Regular effectiveness tests of security controls conducted
- ☐ Inventory tracking to identify physical location of any recorded device maintained

## **B.6 Off-Site Services**

- ☐ Data sanitization services outside certified facility performed in conformance with Appendix B and Core Requirement 7

## **B.7 Physical Sanitization (Destruction)**

- ☐ Physical destruction per Table 1 methods, NSA Storage Device Sanitization Manual, or independently verified effective method
- ☐ Customer, legal, or sensitivity requirements implemented when more stringent
- ☐ Video recordings of physical destruction maintained for at least 60 days

## **B.8 Logical Sanitization (Erasure)**

- ☐ Electronic records of data sanitization maintained for each unique identifier
- ☐ Data sanitization software configured to sanitize all user-addressable locations
- ☐ Software configured to fail media if locations cannot be sanitized
- ☐ Software maintained with patches and verified as currently supported version

- ☐ All logins, passwords, locks, and remote service connections removed
- ☐ Minimum 5% routine sampling by competent, independent party for data recovery testing
- ☐ Sample size adjustments based on results (decrease to 1% if no issues, increase if issues found)
- ☐ Unsuccessful logical sanitization items physically destroyed per requirements

## **B.9 Quality Control**

- ☐ Verification that received equipment processed as planned
  - ☐ Quantity matching between processed and received confirmed
  - ☐ Supplier notification of discrepancies implemented
  - ☐ Data storage devices approved for release by Data Protection Representative
  - ☐ Records retained for all quality control activities
  - ☐ Corrective actions implemented when quality control issues detected
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## **Appendix C: Test and Repair**

*Required for facilities testing, repairing, or refurbishing electronic equipment*

### **C.1 Quality Management System Certification**

- ☐ Valid QMS certification from accredited Certification Body maintained throughout R2 certification
- ☐ QMS scope includes all equipment, components, and processes under Appendix C
- ☐ Certification from IAF MLA signatory AB maintained

### **C.2 R2 Reuse Plan Documentation**

- ☐ Written instructions for each Appendix C requirement applicable to facility operations
- ☐ Competency requirements for testing, repairing, and verifying workers documented
- ☐ Product safety plans demonstrating safety investigation and verification procedures
- ☐ Test plans verifying equipment/component functions including functions definition, testing methods, pass/fail criteria, documentation methods, and REC categorization
- ☐ Quality assurance plans ensuring test effectiveness including accuracy verification, quality monitoring, failed equipment management, category verification, and data sanitization verification
- ☐ Product return policy appropriate to final destinations documented

### **C.3 Processing Timeline**

- ☐ R2 Controlled Streams tested, repaired, and refurbished within one year of receipt from suppliers
- ☐ Components evaluated and inventoried for future repair use properly managed

### **C.4 R2 Reuse Plan Implementation**

- ☐ Data sanitization per Appendix B completed on equipment/components being tested

- ☐ Worker competency in functionality testing and effective test methods ensured
  - ☐ Testing, repair, cleaning, refurbishing, and configuration per R2 Reuse Plan to determine REC functional category
  - ☐ Product safety plans executed to assess safety of all functional equipment/components
  - ☐ Test results records generated and maintained for each function tested per unique identifier
  - ☐ Non-functioning equipment/components identified, repaired/retested, harvested for components, or evaluated per Core Requirement 6
  - ☐ Functioning equipment/components identified with appropriate REC categories, quality assured, and managed per Core Requirement 6 based on new category assignment
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## **Appendix D: Specialty Electronics Reuse**

*Required for facilities processing specialty electronics that cannot be fully tested*

### **D.1 Appendix C Certification Requirement**

- ☐ Facility certified for Appendix C - Test and Repair maintained

### **D.2 Competent Technician Requirements**

- ☐ All testable specialty electronics tested per Appendix C - Test and Repair
- ☐ Non-testable specialty electronics verified and documented from prior user (no known functional defects)
- ☐ Physical inspection for damage, defects, corrosion, and missing parts completed
- ☐ Part numbers, unique identifiers, and serial numbers verified for accuracy
- ☐ Data sanitization by source per Appendix B verified, or data storage capability confirmed as non-existent
- ☐ Failed verification items: components harvested and remaining equipment processed per Core Requirement 6
- ☐ Passed verification items: tracked with unique identifier, handled/packaged/stored for protection, labeled with facility name/contact information, identified as Verified Specialty Electronics per REC

### **D.3 Storage and Market Requirements**

- ☐ Verified Specialty Electronics stored indefinitely only while positive resale value and reuse market maintained
- ☐ Items without positive value/market processed per R2 Standard requirements

### **D.4 Sales Requirements**

- ☐ Sales limited to customer requests for specific part numbers/unique identifiers
- ☐ Each unique identifier/part number listed on sales receipts consistent with customer request

- ☐ Customer acceptance of terms demonstrated on purchase orders: equipment inspected/verified but not tested, customer accepts without testing, customer returns non-working equipment for refund, customer sells only to end-users, customer provides end-user sales records upon request, customer accepts returns and offers no-charge recycling returns
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## **Appendix E: Materials Recovery**

*Required for facilities conducting materials recovery operations*

### **E.1 Hazards Identification and Assessment**

- ☐ Regular hazards identification and assessment conducted for occupational health, safety, and environmental risks
- ☐ Assessment conducted by individual trained in risk assessment and knowledgeable of materials recovery hazards
- ☐ Assessment captured in writing and incorporated into EHSMS
- ☐ Assessment addresses additional EHS criteria incorporated into EHSMS to level defined through assessment

### **E.2 Enhanced EHS Criteria Implementation**

- ☐ Wash facilities for decontamination established
- ☐ Clean eating/drinking areas and transition areas to prevent contamination transfer established
- ☐ Food/drink prohibition in materials recovery areas unless IH records show no detectable risk
- ☐ Work clothes/shoes home prohibition unless IH records show no detectable risk
- ☐ Personal protective equipment cleaning and care procedures implemented
- ☐ Cleaning procedures for contaminant removal from equipment/work areas implemented
- ☐ Hazardous energy control procedures (lockout/tagout) implemented with trained, competent workers
- ☐ Physical safety guards used on mechanical equipment
- ☐ Pre-use safety inspections per manufacturer specifications implemented
- ☐ Industrial hygiene monitoring program (air, noise, wipe sampling) implemented at frequency consistent with results/trends
- ☐ Mechanical separation process risks re-evaluated annually
- ☐ Air quality monitoring for mercury in areas where fluorescent lamps dismantled/removed
- ☐ Medical monitoring program for worker exposures to mercury, lead, toxic substances consistent with hazards and monitoring trends

### **E.3 Focus Materials Removal**

- ☐ Controls maintained in disassembly areas to minimize environmental/health/safety incidents

- ☐ FMs and print cartridges removed prior to shredding/materials recovery using safe, effective mechanical processing or manual dismantling
- ☐ Mercury processing exceptions: worker protection from risks, regulatory compliant facilities, demonstrated mercury recovery
- ☐ CRTs, batteries, circuit boards exceptions: worker protection through designed technology, regulatory compliant facilities, demonstrated effective recovery

#### **E.4 FM Processing, Recovery, and Treatment**

- ☐ Removed FMs sent to processing/recovery/treatment facilities meeting regulatory requirements with appropriate technology
- ☐ Mercury items: mercury retorting or other legal methods excluding incineration
- ☐ Circuit boards: battery/mercury removal and metals recovery processing unless conformance to requirements demonstrated
- ☐ PCB items: PCB-specific destruction/disposal technology in regulatory compliant facilities

#### **E.5 Environmental Incident Assurance**

- ☐ Pollution liability insurance, guaranteed reserves, or government guarantee maintained per Core Requirement 9

#### **E.6 Continued Processing**

- ☐ Output streams from materials recovery evaluated and re-categorized per REC
  - ☐ Continued processing per Core Requirement 6 implemented
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### **Appendix F: Brokering**

*Required for facilities managing R2 Controlled Streams directly to downstream vendors without physical receipt*

#### **F.1 Brokering Activity Requirements**

- ☐ All brokering activities declared and documented in R2 scope per Core Requirement 1
- ☐ Downstream vendors receiving R2 Controlled Streams included in audited activities per Appendix A
- ☐ Valid QMS certification maintained throughout R2 certification with scope including brokering activities

#### **F.2 R2 Controlled Streams Brokering**

- ☐ Legal requirements conformance identified and demonstrated per Core Requirement 4
- ☐ R2 Controlled Streams movement managed through downstream recycling chain using REC
- ☐ Data and physical security responsibility maintained throughout transport per Core Requirement 10
- ☐ Throughput tracking requirements per Core Requirement 5 implemented

- ☐ Packaging requirements provided to seller/transporter prior to shipment per Core Requirement 10

### **F.3 Facility Requirements Exemption**

- ☐ If no R2 Controlled Streams pass through broker facility: Core Requirement 3 and 9 exemption properly applied
  - ☐ Exemption documentation maintained and justified
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## **Appendix G: Photovoltaic (PV) Modules**

*Required for facilities handling or processing PV modules (solar panels)*

### **G.1 PV Module Classification and Management**

- ☐ PV modules managed as R2 Controlled Streams
- ☐ PV modules managed per all applicable R2 requirements as electronic equipment

### **G.2 Hazards Assessment and Electrical Safety**

- ☐ Periodic hazards identification including electrical safety risks assessment conducted
- ☐ Electrical safety controls identified through assessment implemented

### **G.3 FM Management Plan Integration**

- ☐ PV modules included in FM Management Plan

### **G.4 Electrical Safety Process**

- ☐ Documented process to protect PV modules from conducting electricity during transport, handling, storage, and processing developed and maintained

### **G.5 Damaged Module Storage**

- ☐ Damaged PV modules not stored/processed outdoors unless risks assessed and environmental release controls established

### **G.6 Evaluation Process**

- ☐ PV modules evaluated per Core Requirement 6(a) process to determine reuse capability
- ☐ Evaluated PV modules directed to appropriate next process

### **G.7 Reuse Processing**

- ☐ Reuse PV modules tested, refurbished, repaired internally per Appendix C, with disclosure of total power output in watts (STC), power output ratio to original design percentage, repairs made, and appropriate REC categories; OR



- ☐ Transferred to qualified downstream vendor per Appendix A for testing/repair/refurbishing, operating in conformance with Appendix G requirements

### **G.8 Materials Recovery Processing**

- ☐ Materials recovery PV modules processed by facility per Appendix E; OR
- ☐ Transferred to qualified downstream vendor per Appendix A operating in conformance with Appendix G requirements

### **G.9 Brokering PV Modules**

- ☐ PV module brokering operates in conformance with Appendix F
  - ☐ Downstream vendors receiving PV modules included in audited activities per applicable Appendix G requirements
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## **SECTION 3: AUDIT PREPARATION CHECKLIST**

### **Pre-Audit Documentation Review**

- ☐ All required certificates current and valid (EHSMS, QMS where applicable)
- ☐ Internal audit completed covering entire R2 scope within last 12 months
- ☐ Legal compliance audit completed by competent auditor
- ☐ All corrective actions from internal/compliance audits completed
- ☐ FM Management Plan current and complete
- ☐ Data Sanitization Plan current and complete
- ☐ 100% downstream vendor due diligence completed
- ☐ Closure plan and financial instruments current
- ☐ 3 months implementation records available demonstrating R2 conformance

### **Document Availability for Audit**

- ☐ R2 License Agreement signed and current
- ☐ SERI License Acknowledgement (proof of fee payment) current
- ☐ Transaction summary reports (last 12 months inbound/outbound)
- ☐ Sample transaction sheets prepared for audit trail verification
- ☐ Downstream vendor qualification records organized and accessible
- ☐ Training records for all personnel current and complete
- ☐ Insurance policies/certificates current and appropriate for scope

### **Operational Readiness**

- ☐ All processes within certification scope operational and demonstrable

- ☐ Equipment/materials available for process demonstration
  - ☐ Key personnel available for interviews
  - ☐ Facility areas accessible and properly labeled
  - ☐ Security measures operational and demonstrable
  - ☐ Record keeping systems operational and current
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## ASSESSMENT SCORING GUIDE

### Critical Items (Must Pass)

- Valid EHSMS and QMS certifications (where required)
- Active R2 License Agreement and current fee payment
- Complete FM Management Plan with downstream chain documentation
- 100% downstream vendor due diligence current
- Data security plan and implementation
- Legal compliance plan with periodic audit
- Financial assurance for closure

### Scoring Framework

- **Yes (Full Compliance):** Requirement fully met with appropriate evidence
- **Partial:** Requirement mostly met but some gaps or improvements needed
- **No:** Requirement not met or significant deficiencies present
- **N/A:** Requirement not applicable to facility's scope of operations

### Readiness Levels

- **90-100%:** Certification Ready - Proceed with formal audit
  - **75-89%:** Minor Gaps - Address specific issues before audit
  - **60-74%:** Significant Gaps - Systematic improvements needed
  - **Below 60%:** Major Work Required - Comprehensive program development needed
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*This checklist is based on R2v3 Standard Version 3.1 and should be used in conjunction with the complete R2v3 Standard documentation and applicable formal interpretations.*