



A New Guide for Electronics Recyclers:

How to Scam the R2 Standards and Keep On Exporting E-Waste!

Electronics recyclers –

Are you worried that you'll have to choose between getting R2 certified and continuing your lucrative e-waste export business?



Worry no more!

You, too, can get certified to the R2 standards, and keep on exporting that e-waste! Just follow the simple instructions below and you'll have no problems.

Here's How You Can Keep On Exporting!

Scam #1: Use The Ruse of Reuse.

Some recyclers thought they might have to start performing “downstream due diligence” on the vendors they sell their e-waste to. But relax, under R2, if you export electronics that will be reused, repaired, refurbished, or remanufactured, you have much easier “due diligence” requirements, or none at all.

Here's all you have to do:

1. Find a waste trade broker who will get a “recipient vendor” in China to sign a little contract and send you the following email for each shipment of electronics received. (This may cost you a little, but it's well worth it.)

Sample E-mail You Ask The Vendor To Send You

*Dear [Insert Your R2 recycler name],
This letter is to confirm that your shipment of [insert number] CRT monitors, [insert number] laptops, and [insert number] CPUs has been received and these products are going to be sold for reuse only. Their key functions are functioning properly. Because -100% of the untested equipment is working properly now that it has arrived, there are no residual materials left over from any repairs (such as bad batteries or mercury lamps) that would have to be managed in any special way. This equipment fully meets our specifications. It's a pleasure to continue to do business with you, as usual.*

Sincerely, [Name of downstream vendor, in whatever country they're in]

2. Keep those emails for three years, and show them to your R2 auditor.
3. File a notice to the EPA that you are exporting for **Reuse**. This is a one-time notice (under the EPA's CRT rule) and it lasts for as long as you use that vendor. No details required!!

Don't believe us? Take a look at what little R2 requires in order to be exempt from all export requirements when sending untested or non-working equipment to any 'recipient vendor' for "reuse:"

R2 Requirement for Reuse Vendor	Did you comply with R2?
<i>"Confirm through an appropriate combination of contractual agreements, detailed materials tracking and recordkeeping, and auditing that:</i>	<input checked="" type="checkbox"/> Since "appropriate combination" isn't defined here, your emails and a minimal contract with the vendor should suffice:
<i>(A) The equipment or components meet the specifications of the recipient vendor, and</i>	<input checked="" type="checkbox"/> The vendor's email will state this
<i>(B) The recipient vendor sells the equipment or components for reuse, with their Key Functions functioning properly, and</i>	<input checked="" type="checkbox"/> The vendor's email will state this
<i>(C) The recipient vendor manages all residual Focus Materials resulting from refurbishing operations in a manner that conforms to the R2 Practices."</i>	<input checked="" type="checkbox"/> The vendor's email will state that you have no residuals.

View complete R2 Guidelines here: <http://www.decideagree.com/R2%20Document.pdf>

Scam #2: Looking For Laws In All The Wrong Places

R2 doesn't actually require that e-waste exports not violate the laws of importing countries. It just says that R2 recyclers have to document the legality and then adhere to that documentation. So just be sure you document it wrong.

1. Figure out which countries you want to export to.
2. Do a little web browsing to find a copy of those countries' domestic laws or court rulings (don't worry, your R2 auditor doesn't read Chinese either) that might indicate that they'll accept electronics.
3. Add this information to your management plan that says you personally have determined that it's legal to export to those countries.
4. Go ahead and export. Even if it's technically illegal, you can't fail your audit because you have complied with the terms of R2! Easy!

Scam #3: Shred It! Ship It! Forget It!

R2 sets up some downstream "due diligence" requirements for your vendors, but these only apply to shipments of focus materials themselves, or "equipment and components containing Focus Materials." If you SHRED IT, it's no longer either "equipment and components" or focus materials! So shred it, ship it and forget it!