



Electronic Manufacturers Recycling Management Company (MRM)

Recycling Vendor Requirements

Summary	The Electronic Manufactures Recycling Management Company (MRM) is committed to providing ethical, sustainable and environmentally responsible recycling efforts. MRM has developed requirements for all recycling vendors working for MRM. These standards are incorporated into all MRM contracts with recycling vendors.
Latest Revision Date	October 27, 2011
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1. Introduction

- 1.1. MRM is committed to providing environmentally responsible recycling for consumers across the country. MRM engages with a number of recycling vendors and each must understand and adhere to the MRM Requirements. All MRM contracts require vendors and any subcontractors to comply with Standards outlined below.

2. Pre-Selection Screening

- 2.1. Before being selecting as an MRM vendor, MRM recyclers must go through the standard MRM review process:
- 2.2. Demonstrate ongoing regulatory compliance over a period of years.
- 2.3. Make all facilities available for MRM in-person audits.
- 2.4. Share all relevant paperwork regarding end markets for materials processed at recycler facilities, safety records, data tracking and other relevant operations activities.
- 2.5. Demonstrate a sufficient tracking system to ensure that MRM can monitor the disposition of electronic waste under its recycling program.
- 2.6. Work with MRM to perform a Mass Balance assessment to ensure that materials being received at each facility are properly tracked and that the volume of electronics taken into a facility for recycling can be reconciled with outgoing materials sent out. .
- 2.7. Provide proof of sufficient environmental insurance and protection levels.
- 2.8. Ensure that all MRM requirements can be met by any and all subcontractors used in the vendor's process. Subcontractor/vendors do not include commodity buyers.



3. Labor and Businesses Practices

- 3.1. Vendors must not use prison labor for any service performed for MRM.
- 3.2. Vendors must adhere to all applicable federal, state, and local laws, rules, regulations, orders, and ordinances and must obtain all necessary permits, licenses, etc.
- 3.3. Vendors must establish and provide to MRM standard operating procedures for the proper, handling, transport, and recycling/disposal of all Covered Electronic Devices, their parts, and any other items collected by the vendor and its subcontractor(s). Recycling vendors must immediately notify MRM of any proposed or actual change in vendor/subcontractors and provided with up to date description of vendor/subcontractor activity.

4. Recycling and Reuse Process

- 4.1. Vendors are required to process materials in a way that does not result in incineration, land-filling, dumping, exporting for processing, or otherwise disposing of materials. It is understood that the recycling process may produce a de-minimus amount of waste for disposal via land fill or incineration;
- 4.2. Vendors must shred, degauss, and/or impair all electronic storage media incorporated into a Covered Electronic Device, or otherwise overwrite the data located thereon in accordance with the Department of Defense's Level III specifications, such that no information on any storage medium escapes the process in a recoverable condition.
- 4.3. Vendors must demonstrate compliance with the R2 Standard PLUS no use of prison labor and no export of non-working or non-tested electronic products. Vendors must be R2 certified and comply with the additional MRM standards or work with MRM as necessary to complete an independent third party audit using an auditor selected by MRM to ensure compliance with the standard.
- 4.4. If a vendor has a Certification from another organization that has established standards that meet the MRM requirements, such as the Certification from the E-Stewards™ program, MRM will accept that Certification.
- 4.5. Vendors must not store any unprocessed MRM equipment or product for greater than 60 days without written approval from the MRM. This does not apply to processed commodity for sale to the downstream buyers.
- 4.6. Vendors engaged in the collection and transportation of MRM equipment shall do so in accordance with all State and Federal Department of Transportation rules and regulations.
- 4.7. Vendors utilizing contract collectors and/or transporters will ensure the proper permits, licenses, and procedures are in place prior to collecting or hauling MRM equipment.



- 4.8. Vendors must release detailed information on end markets and end market contacts to allow MRM to perform due diligence.
- 4.9. If vendors sort and examine loads for reuse, vendors must ensure that any items selected for reuse are tested and are fully functional as a product. Vendors must maintain a robust written Quality Assurance Program in accordance with MRM testing standards to ensure no non working units are exported.
- 4.10. Vendors may not export any end-of-life electronics to non-OECD countries.
- 4.11. Equipment containing cathode ray tubes (televisions and monitors) may not be considered for reuse and thus may not be exported for any reason.

5. Reporting and Tracking

- 5.1. Vendors must maintain any and all written reports, shipping documentation (e.g., bills of lading), packing lists, and other transactional reporting documentation required by law or regulation and shall ensure that those documents will allow MRM to verify all downstream markets for materials processed by vendors.
- 5.2. Upon request, vendors must provide an accounting to MRM of all MRM material processed. This accounting may include, but is not limited to, mass balance accounting of all material received, processed and disposed; detail on the downstream flow of material through the ultimate disposition of MRM e-waste processed; specific commodities generated and amounts and the ultimate disposition of those commodities.
- 5.3. Vendors must notify the MRM of any regulatory audits, enforcement action, or third party certification status, pending or otherwise, within 24 hours of such audit action. This notification must be in writing, and include a brief summary of the events leading to the enforcement action.

6. Ongoing Audits and Monitoring

- 6.1. All vendors must allow MRM access to any facility at any time for audits. MRM and its auditors will provide 24 hour notice of any visit.
- 6.2. Vendors must agree to annual audits by third-party vendors selected by MRM.
- 6.3. Vendors will authorize all downstream buyers or contract processors to discuss with MRM Management material quantity and description of loads received from vendor.



7. Insurance MRM vendors must maintain, at a minimum:

- 7.1. Workers' Compensation and Employer's Liability Insurance;
- 7.2. Commercial General Liability Insurance;
- 7.3. Comprehensive Auto Liability Insurance; and,
- 7.4. Additional Pollution Liability insurance. MRM requires that recyclers maintain Environmental and Pollution Liability with coverage limits of at least \$2,000,000 per occurrence and \$5,000,000 aggregate.
- 7.5. Vendors must provide the MRM with a certificate of insurance listing the MRM as additionally insured, prior to collection or processing any equipment on behalf of the MRM.
- 7.6. Vendor must provide MRM with written notice of a cancellation of the recycler's policy at least thirty days in advance of such cancellation