

## ***Electronics Recycler's Pledge of True Stewardship***

*We, the undersigned recycling company, agree to uphold the following as a pledge of true stewardship of electronic wastes:*

I. We will not allow any hazardous e-waste\* we handle or control to be sent to solid waste (non-hazardous waste) landfills or incinerators for disposal or energy recovery, either directly or through intermediaries.

II. Consistent with decisions of the international Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, we will not allow the export of hazardous e-waste we handle or control to be exported from developed to developing countries\*\*, either directly or through intermediaries, throughout final disposition.

III. We will not allow any e-waste we handle to be sent to prisons for recycling either directly or through intermediaries.

IV. We assure that we have an “environmental management system” in place that is either certified or otherwise adequate for the nature and size of the company’s operations, and that our operation meets best practices.

V. We commit to ensuring that the entire recycling chain, including downstream intermediaries and recovery operations such as smelters, are meeting all applicable environmental and health regulations. Every effort will be made to only make use of those facilities (e.g. smelters), which provide the most efficient and least polluting recovery services available globally.

VI. We agree to provide visible tracking of hazardous e-waste throughout the product recycling chain. The tracking information should show the final disposition of all hazardous e-waste materials. If there is a concern about trade secrets, an independent auditor acceptable to parties concerned can be used to verify compliance with this pledge.

VII. We agree to provide adequate assurance (e.g. bonds) to cover environmental and other costs of the closure of our facility, and additionally to provide liability insurance for accidents and incidents involving wastes under our control and ownership. Additionally we will ensure due diligence throughout the product chain.

VIII. We further agree to support design for environment and toxics use reduction programs and/or legislation for electronic products.

**\*“Hazardous electronic waste” or “hazardous e-waste”** means electronic equipment, parts, and materials destined for recycling or disposal but not for direct reuse, that contain, consist of, or are derived from:

- Cadmium-, lead- or beryllium-containing circuit boards;
- Cathode ray tubes (CRTs);
- CRT glass (processed and unprocessed);
- Batteries containing lead, mercury, and/or cadmium and/or are flammable;
- Mercury-, beryllium- and Polychlorinated Biphenyl-containing materials, components, lamps and devices; and/or
- Non-working parts and whole equipment or devices exported for repair or reuse unless assurances exist that hazardous electronic waste (such as CRTs, batteries, mercury lamps, or circuit boards) will not be disposed of in the importing country as a result.

The definition of “hazardous electronic waste” does not include:

- New equipment going for use or sale (as opposed to recycling or disposal); or
- Fully functional equipment and parts that are adequately tested, certified and labeled as working, packaged to protect reusability, and that are not intended for disposal or recycling, but for donation, re-use and/or resale; or
- Non-hazardous waste such as copper unless it is contaminated with a Basel Convention hazardous waste such as lead, cadmium, beryllium, PCBs, mercury, etc. (constituents listed in Basel Annex I); or
- Electronic equipment or materials that are to be used as a direct feedstock in manufacturing without further processing or preparation (e.g. cleaned, furnace ready, CRT cullet), and the ‘competent authority’ of an importing country makes a written determination that the material is not a waste, and therefore not a regulated waste under Basel. Such a determination provided in writing by the legitimate ‘competent authority’ and provided to BAN will be required to exercise this exemption.

The term 'hazardous electronic waste' as used in this Pledge does not pertain to, nor is synonymous with any current legal US or other national definitions of 'hazardous waste', but is meant for the purposes of this Pledge only.

\*\* Developing countries: Following the definitions of the Basel Convention and its Basel Ban Amendment, developing countries are any country not belonging to either the European Union, the Organization for Economic Cooperation and Development (OECD) or Liechtenstein. For a complete list of OECD countries see [www.ban.org/country\\_status/country\\_status\\_chart.html](http://www.ban.org/country_status/country_status_chart.html) and find countries shaded in gray, or go to [www.oecd.org](http://www.oecd.org).

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