



Responsible Electronics Recycling: A Guide for Electronics Recycling Collectors and Recyclers in Unincorporated San Mateo County

January 2019

1. The County of San Mateo's Responsible Recycling of Electronic Waste Ordinance

In October 2017, the County of San Mateo (County) adopted the Responsible Recycling of Electronic Waste Ordinance (Ordinance). The Ordinance requires that all electronics recyclers located in unincorporated areas of San Mateo County (SMC) be certified by a third-party organization approved by the County. Electronics collectors holding events/providing service in the unincorporated areas of SMC are also required under the County Ordinance to deliver their electronics to recyclers that are certified by a third-party organization approved by the County. The two third-party certification options accepted currently by the County's Office of Sustainability (OOS) are e-Stewards and the R2 Standard.

<i>e-Stewards</i>	<i>Responsible Recycling (R2) Standard</i>
 <p>e-Stewards is a program created by a non-profit organization called the Basel Action Network (BAN). In 2003, BAN launched the e-Steward Pledge program (Pledge) to stop exporting hazardous electronic waste to developing nations. Over 40 electronics recyclers with 100 locations across the United States and Canada pledged to use only globally responsible, safe means to process electronic waste. BAN then started efforts to transition the Pledge program into an independently audited certification program to focus on bigger, more holistic solutions, which is now known as e-Stewards. There are currently approximately 100 e-Stewards certified facilities around the world.</p>	 <p>Responsible Recycling (R2) Standard is a program administered by a non-profit organization called Sustainable Electronics Recycling International (SERI). The R2 Standard was developed through a U.S. Environmental Protection Agency - convened multi-stakeholder process involving the public, private, and non-profit sectors. The R2 Standards development process took three years from start to finish. It was released in 2008. R2 certification is now being utilized by repair and recycling facilities in over 20 countries worldwide.</p>

2. Accepted Electronics Recycling Certification Snapshot

The R2 Standard and e-Stewards both provide guidelines and standards for:

- Proper reuse and recycling of electronics;
- Minimizing exposure to human health or the environment;
- Ensuring safe management of materials by downstream handlers; and
- Requiring destruction of all data on used electronics.

For additional information on both certification programs, please visit:

- e-Stewards: <http://e-stewards.org/>
- R2 Standard: <https://sustainableelectronics.org/r2-standard>

3. Are You An Electronics *Recycler* Located in Unincorporated Areas of SMC?

Who is an Electronics Recycler?

An “electronics recycler” means any person, partnership, corporation or other entity that recycles electronics as part of its operations.

Please note: If an entity is both an electronics collector and recycler, the entity must follow steps detailed in Sections 3 and 4 of this guide.

If you are an electronics recycler located in unincorporated areas of SMC, please follow these steps:

- **Step 1:** If you are not yet e-Stewards and/or R2 certified, research both programs’ guidelines, requirements, and specifications to determine which program best meets your objectives and needs. Websites for both programs are provided in the “Resources” section found at the end of this guide and in Section 2 above. If you are already e-Stewards and/or R2 certified, then please skip to Step 3.
- **Step 2:** Once you have selected a certification program, follow their requirements to become certified.
- **Step 3:** Once certified, please inform and email a copy of your third-party certificate to OOS staff. OOS staff will then contact you on an annual basis for a renewed certificate. Contact information for OOS can be found at the end of this guide.

4. Are You An Electronics *Collector* Providing Collection Service in Unincorporated Areas of SMC?

Who is an Electronics Collector?

An “electronics collector” means any person, partnership, corporation, or other entity that collects electronics for recycling, processing, or delivery to a recycler. Electronics collectors can collect electronics at collection events such as scheduled pickups, parking lot drop-off events (including one-time events), and permanent collection locations.

Please note: If an entity is both an electronics collector and recycler, the entity must follow steps detailed in Sections 3 and 4 of this guide.

If you are an electronics collector providing collection service in unincorporated SMC, please follow these steps:

- **Step 1:** Find a R2 or e-Stewards certified recycler (preferably in/around the Bay Area) who will be able to properly process the items that you collect. Listings of existing certified recyclers are provided on e-Stewards and R2 programs’ websites. Please check the “Resources” section at the end of this guide or Section 2 above for the programs’ websites.
- **Step 2:** Once a certified recycler has been selected and confirmed, submit a *Notification Form* to the OOS informing OOS staff about your confirmed certified recycler and collection event/service. The *Notification Form* can be found here:
<https://www.smcsustainability.org/NotificationForm.pdf>

You are required to submit the *Notification Form* to the OOS *at least 10 days* before your event/start of your service.

For on-going service providers (e.g., permanent collection locations, scheduled pickups, etc.), if you change your certified recycler, please inform the OOS by submitting an updated *Notification Form* within 10 days of the change in recycler. OOS staff will also contact you on an annual basis to update changes to your service and/or recycler, if any.

- **Step 3:** At your electronics drop-off site/collection location, you must prominently post the information below:
 - The name of the certified electronics *recycler* to which all collected electronics will be delivered; and
 - The electronics *collector’s* name, address, telephone number, and website.

Any public notices and advertisement of the collection event/service must also include the same information detailed above regarding the recycler and collector’s information.

- **Note:** OOS staff may conduct a site visit/audits and provide technical assistance.

- a) **One-time Collection Event:** If you are holding one-time electronics collection events (e.g., parking lot drop-off events, etc.), OOS staff will contact you to provide technical assistance and answer any questions that you may have prior to the event. On the day of the event, OOS staff may stop by the event location to conduct a site audit to assess if you are in compliance with the County Ordinance.
- b) **On-going Collection Service:** If you offer on-going collection service (e.g., permanent collection locations, etc.), OOS staff will contact you to schedule a site visit. OOS staff will provide technical assistance and answer any questions that you may have during the site visit. Within 90 days of the site visit, OOS staff will conduct a site audit of your collection service facility to assess if you are in compliance with the County Ordinance. OOS staff will reach out to you on an annual basis to provide additional technical assistance and schedule site visits.

Additional Tips for Electronics Collectors

The steps provided in Section 4 above are requirements for electronics collectors to comply specifically with the County's Responsible Recycling of Electronic Waste Ordinance. Below are some additional steps that are required by the State of California, if you are an electronics collector:

- **Designated Approved Collector:** If you are a collector holding an event/starting service in unincorporated areas of SMC, you may request the OOS for a *Designated Approved Collector (DAC)* status under the California Department of Resources Recycling and Recovery's (CalRecycle) electronics waste management program.

For a collector/recycler to receive Covered Electronic Waste (CEW) payment that is provided through California's Electronic Waste Recycling Act of 2003 (Senate Bill 20), the collector is required to provide collection logs (e.g., name and address of source of materials) to CalRecycle. This system is to verify that all the CEW collected during the collection is sourced from California residents. In lieu of collection logs, the collector/recycler may request the OOS to submit a *Proof of Designation (POD)* to CalRecycle, officially designating the collector/recycler as a DAC.

To be considered for this designation, please contact the OOS to provide the necessary information for OOS staff to consider and submit a POD form to CalRecycle for your collection service/event. PODs must be submitted *by the OOS to CalRecycle at least 30 days prior* to the start of the collection service/event. The POD can be found here:

<http://www.calrecycle.ca.gov/electronics/Forms/CalRecycle184.pdf>

If you provide one-time electronics collection events (e.g., parking lot drop-off events, etc.), you must contact OOS staff *at least 45 days* prior to your event to request a POD submission by the OOS to CalRecycle.

If you provide on-going collection services (e.g., permanent collection locations, etc.), please contact OOS staff as soon as possible for a POD submission. You must contact the OOS to request POD submissions to CalRecycle on an annual basis.

As a DAC, you are required to report electronics collection activities to OOS staff *annually on or before September 1st* for the period of July 1 through June 30. The information you provide will be integrated into OOS' annual report to CalRecycle.

For additional information, please visit:

<http://www.calrecycle.ca.gov/Electronics/Locals/Designations/default.htm>

- **Notice of Intent:** A *Notice of Intent (NOI)* will need to be filed *at least 30 days* prior to your event/service with the California Department of Toxic Substances Control (CDTSC). You (collector) or the recycler may file the NOI. For additional information, please visit:
<http://www.dtsc.ca.gov/HazardousWaste/EWaste/>

For additional steps required by the State of California, please visit CalRecycle and California Department of Toxic Substances Control's (CDTSC) websites listed in the "Resources" section of this guide.

6. Resources

- CalRecycle's electronics waste management page: <http://www.calrecycle.ca.gov/electronics/>
- California Department of Toxic Substances Control (CDTSC): <http://www.dtsc.ca.gov/HazardousWaste/EWaste/>
- e-Stewards: <http://e-stewards.org/>
- R2 Standard: <https://sustainableelectronics.org/r2-standard>

7. Questions?

Contact the County of San Mateo's Office of Sustainability:

- Hotline: 888-442-2666
- Email: sustainability@smcgov.org
- Website: <http://www.smcsustainability.org/>