

Electronics Recycling Report Card

The Questions and Scoring Explained

The Electronics TakeBack Coalition’s Recycling Report Card evaluates company takeback and recycling programs for computer, television, printer, and game console companies. This report card focuses on the programs available to consumers in the U.S. We rely primarily on information provided on public websites, as of September 15, 2010.

Category	Possible Points	Why Are We Asking This?
Scope of U.S. takeback recycling program	42	
Free, convenient, national takeback program Does the company offer free convenient national takeback and recycling of their branded products for individual consumers? - Convenience requires ongoing physical collection sites as well as mailback options.	13	Some states have passed laws requiring electronics companies to offer free takeback services. But we are evaluating national takeback programs, not just complying with state laws. Therefore, we focus on performance in states with no laws, on states whose programs haven’t started yet, and states with weak laws that set no expectations for manufacturer performance. We look primarily at ongoing collection sites offered, as few people actually use mailback systems for recycling.
Significant collection volumes Does takeback program have significant collection volumes in states where the law does not require it?	16	Some companies have takeback systems that look good on paper, but they have such small volumes coming back (except where strong state laws make them do it) that they are not really effective programs. We reward more points to companies getting significant volumes coming back in states where the state law doesn't make them do it.
Transparent reporting Is the company transparent in reporting on collection volumes, including where they are coming from?	7	Companies that claim to have strong takeback programs should have no problem providing clear annual reporting on total volumes, as well as where the volumes are coming from, that allow comparisons of their efforts to other companies' efforts.
Free not just for consumers Does company offer free national takeback recycling for other customers – not just individual consumers?	1	Most companies take back products from consumers, but some other purchasers just act like consumers when it comes to disposing of old products. A point is awarded where companies also collect from businesses, agencies, schools, non-profits, etc.
Takeback other brands Does program take products from other brands for free or a nominal charge?	1	Consumers often want to get rid of multiple items, not all of the same brand. We are more likely to recycle if we can take all our stuff to one place.
Encourage reuse Does the program encourage responsible reuse of electronic equipment and parts?	4	It's far better to reuse old products than to recycle them, if the reuse is "responsible" and doesn't rely on exporting non-working parts or equipment to developing nations.
SUBTOTAL	42	

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Does program provide responsible recycling?	36	These questions on responsible recycling apply to both voluntary programs and the state mandated programs in states where the manufacturer or its recycling organization selects the recycling vendors.
Are recycling vendors e-Stewards? Does company only use e-Stewards as vendors for all of its consumer recycling, including trade in/buy back programs? For more info, see www.e-stewards.org	22	Because there are no legal standards for e-waste recycling, we must look at conformance to voluntary recycling standards as proof that our old products are actually being handled correctly, and are not being exported to developing nations, or sent to prison recycling shops, or landfills or incinerators. The e-Stewards program is the strongest in the country, and the only one that tough, workable prohibitions on exporting e-waste to developing nations. Therefore we reward high points for manufacturers using vendors who are e-Stewards. While some companies have their own internal auditing processes (to their own requirements), these audits are not public and therefore we can't verify them.
Other public commitment to responsible recycling If the company is not using e-Stewards, does it have another public commitment to not export toxic e-waste* to developing countries, use prison labor or landfill/incinerate toxic e-waste.*	Up to 5 of 22 pts	If a company is not working with e-Stewards, but has made some other very clear statements addressing these same issues, they may receive credit. We do not award credit for using vendors certified to a standard called R2, since R2 permits exporting e-waste to developing countries. * See footnote for definition of toxic e-waste.
Publish vendor requirements Does company publish its full recycling standards (vendor requirements) on company website?	4	Many companies say they have responsible policies, but you really can't tell what they mean until you see how they translate this into what their vendors should, and should NOT do. This is an issue where the devil is in the details, so companies with nothing to hide willingly share their details. Here are two examples of what we are talking about: HP , Dell
Disclosure of recycling vendors Does company disclose all of the electronics recycling and refurbishing vendors, used by the company and its trade-in partners, on company website?	6	Transparency is an important part of responsible recycling. We seek full disclosure about recycling efforts, including which vendors are handling materials/equipment in the various parts of the takeback program. Because some are using trade-in partners as the "front door" for takeback programs, we ask for information about what recyclers those partners are using also.
Disclosure on business takeback streams Do the four disclosures above apply to business streams? While this report card is aimed at consumer streams, company takeback programs for businesses (asset recovery, business trade-ins, lease returns, etc.) comprise a huge volume of some manufacturers' takeback programs.	4	This refers to products coming back from business customers. Business takeback streams are large for some companies (esp. computers). Some companies handle business product takeback (lease returns, asset recovery, trade ins) very differently than their consumer returns. We want to reward those that apply high standards to both.
SUBTOTAL	36	

Category	Possible Points	Why Are We Asking This?
Other	12	
Disclosure of what is closed loop recycled Does company disclose information about what streams from its takeback program are closed loop recycled? Closed loop recycling means recycling material streams back into other products the company makes or products of equal value (not down-cycling).	2	Manufacturers will often say their products are "fully recyclable." But to some, that may mean "recycling" plastics into filler for asphalt roads, or "downcycling" it into plastic decking or other lower grade products, or simply sending it off to some "recycler" in China, with no idea whether it's really recycled or not. Some consider burning plastics in "waste-to-energy" as recycling. (We don't!) We want to see companies reporting on the volumes recovered and fed into "closed loop" recycling - back into products they make, or products of equal value (not downcycled).
Disclosure of how much is closed loop recycled Does company report on the volume of material that is recycled into closed loop recycling?	5	This first question asks for disclosure of all the company's closed loop recycling, and the second evaluates the volume of electronic equipment that is closed-loop recycled. Using generic post-consumer recycled content is a good thing, but that's not what we are asking about here – we want to see companies recycle materials from their own products back into new products, and design products that maximize this possibility.
Recycling info easy to find? Is it easy to find recycling information on company website?	3	Starting from the company's home page, users should be able to easily find information on the company website about how to use their takeback programs.
Recyclable Packaging Does the company ship products using packaging made from materials that are typically easily recyclable for most U.S. households (cardboard, but not Styrofoam/polystyrene)?	2	Consumers typically have access to recycling for cardboard, soft plastics, compostable packaging, but not styrofoam. Full points will go for "no polystyrene/styrofoam packaging" declarations. Packaging can be substantial by volume, especially with larger electronics products. With few easy options for recycling polystyrene, most people put it in the trash. It's made from petroleum and is very toxic in production.
SUBTOTAL	12	
Public policy	10	
Does company have a statement in support of strong state legislation for producer takeback, with drivers for manufacturers to collect high volumes, and does company actively support these bills in the States?	5	Collection volumes in voluntary programs are very low for many manufacturers. It's the state laws that are driving higher volumes more than voluntary efforts for many companies. Yet some companies lobby against these strong state laws. We believe that leadership companies should support such laws.

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Does the company have a statement of support for federal legislation to ban the export of toxic electronic waste to developing nations and does the company actively support it?	5	State laws can't restrict exports of toxic e-waste to developing nations, only federal laws can do that. We seek public statements of support for legislation that would ban the export of e-waste, including non-working or untested products. If appropriate legislation is introduced, we will give full credit only for public support of the specific legislation (rather generic policy statements).
SUBTOTAL	10	
TOTAL SCORE	100	
Possible Penalty Points There may be some cases in which a company's actions warrant "penalty points" to be deducted from the overall score. Here is one example.		
Is company supporting weak federal takeback legislation that would pre-empt state laws?		Many companies want to see a weak federal takeback law introduced and passed that would pre-empt the state laws. But it's the strong state laws that are pushing most of the companies to actually take back their products. So companies supporting a weak federal bill will be penalized on the report card. No hiding behind industry associations. Membership in industry associations which support such a bill will earn the penalty points unless member companies publicly indicate that they don't support the association position.

Grading Scale: A: 65-100 B: 45-65 C: 32-44 D: 16-31 F: 0-15

* Toxic 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;
- Components, lamps and devices containing mercury-, beryllium- and Polychlorinated Biphenyl antimony, barium, cadmium, chromium, lead, thallium, beryllium, arsenic, or selenium; and/or
- Non-working or untested parts and whole equipment or devices exported for repair or reuse