



(DRAFT) EXPORT STANDARDS AND PRACTICES FOR ELECTRONICS RECYCLING BUSINESSES:

March 25, 2002

For copies of the White Paper with background and justifications leading up to these suggested business practices, contact exports@retroworks.com

1) All material exported must be for positive revenue (not a dump fee) and must be specifically allowed by the importing country.

UNCTAD, OECD and Basel Convention delegates may not always agree on copper bearing scrap and repairable commodities, but there is a general agreement that the difference between a "commodity" and "waste" is whether the recipient pays money for it, or the shipper pays money to dispose of it. This same rule has been used in US court cases to classify "waste" as opposed to "secondary scrap material".

2) All material exported must be individually manifested by category and item.

Some companies wish to export legitimate commodities, but have no alternative capacity for junk. The temptation for these exporters is to send the junk "along for the ride" (and accept less payment for the scrap). Depending on the way they were collected for recycling, as few as 20% of TVs or monitors are typically working or repairable. A reputable exporter can document domestic recycling for the other 80%. Legitimate recyclers should offer each monitor for sale individually; most foreign repair markets expect to see manifests showing screen size, make, SIC code, model, year and condition of each monitor. If there is any monitor the importing country doesn't want (proprietary technologies such as Apple, Sun, or Wang, for example), the exporter must allow the importer to exclude those from the purchase. The export price should average \$10 per monitor (or a price which can't be sustained by breaking off the copper yoke and tossing the CRT in the canal). Metal scrap should be sold by manifest of category, chemistry and grade (yoke, degaussing coil, etc.).

3) Mandatory Processing Capacity for state contracts: Recyclers must employ at least 1 staff per 500,000 lbs. of material received per year.

Domestic companies which do asset recovery and repair may process as few as 100,000 lbs. per employee. There are other US exporters shipping to China who have 2 employees and ship 40 million pounds per year.... those companies cannot possibly remove HW or unwanted junk like CRT tubes (and some may throw Harley Davidsons in some of the containers to keep them moving). The difference in employment figures among electronics recycling processors and electronics junk exporters is obvious. Just as MRFs must document capacity to bid on curbside material, electronics recyclers must document capacity to process e-scrap.

4) Generators should maintain an evolving list of items never to be exported.

While there are many grey areas in export rules, there are also practices which most people agree can be stopped immediately. For example, no broken, black-and-white, or screen burned CRT tubes should be exported to developing nations. For other items which UNCTAD, OECD and Basel may not yet agree on (plastic recycling, casings on wire, or solder on some copper and gold bearing scrap), industry should discuss a timetable for periodic review of export restrictions. The goal of these standards should be to allow importers with legitimate ESM practices to continue in the legal business of reducing mining while "raising the bar" on poor recycling practices. Trade organizations and foreign trade offices should be involved in these discussions.