



## PART 2

# STEPS TO CORRELATING QMS/EHSMS CERTIFICATES TO R2 CERTIFICATES

PURPOSE: Maintain rigor in meeting the requirements of the R2 Standard as related to the QMS/EHSMS Certificates.

USAGE: This guidance is intended to provide a tool to audit the scope statements of QMS/EHSMS Certificates compared to R2 requirements and the R2 Standard. This guidance should be used in combination with the "Steps to Validating QMS/EHSMS Certificates" guidance document.

PROCESS:

### VALIDATION OF THE QMS/EMS/SMS CERTIFICATES

The R2 Code of Practices (COP) requires that a QMS certificate (as applicable) and EMS/SMS certificates (as applicable) be issued by an IAF Member Body. Ensuring the validity of a QMS/EMS/SMS certificate is the first step in this process.

- Follow "*Steps to Validating QMS/EHSMS Certificates*" guidance document.
- Once the certificate is known to be valid, continue.

### IDENTIFICATION AND CLARITY OF THE R2 CERTIFICATE SCOPE

After determining that the QMS/EHSMS certificate is valid, now it is time to determine whether the information on the certificate matches the R2 scope of certification.

- Compare the names
- Compare the address
  - Street
  - Suites
  - Zip codes
  - City
  - State
  - Country
- The presence of additional addresses and names will require auditing to determine whether they should be part of the scope of certification. Contact the CB to determine inclusion or exclusion in the scope of the audit. Record details in the audit report.

To calibrate QMS/EHSMS certificate with the R2 Standard requirements, follow the next step.

### CALIBRATE WITH THE R2 STANDARD IN THREE AREAS

The R2 Standard requires the QMS/EHSMS certificates as applicable to an R2 Facility's scope of operations.

- Core 3(a) states as follows: "An R2 Facility shall be certified by an accredited Certification Body, to one or more of the approved EHSMS standards, **to plan and manage the environmental, health, and safety aspects of its operations.**"

*Note: Does the EHSMS scope cover the operations/activities? The EHSMS certifications are to be appropriate to manage the environmental, health, and safety aspects of its operations.*

- Appendix C(1) states as follows: "An R2 Facility certifying to Appendix C – Test and Repair shall also be certified, by an accredited Certification Body, throughout the duration of its R2 certification, to an approved quality management system (QMS) standard **with a scope that includes all the equipment, components and processes to which this Appendix C applies.**"

*Note: Does the QMS certification include the equipment, components, and processes (testing, repairing, refurbishing) as applicable to the R2 scope of certification?*

- Appendix F(1)(c) states as follows: "Maintain certification, by an accredited Certification Body, throughout the duration of its R2 certification, to an approved quality management system (QMS) standard **with a scope that includes the brokering activities to which this Appendix F applies.**"

*Note: Does the QMS certification include brokering activities (aka trading)?*

- To compare the R2 scope with the QMS/EHSMS scopes, follow the next step.

## **R2 SCOPE VS QMS/EMS/SMS SCOPE**

A QMS/EHSMS scope may be different from an R2 certificate scope; however, the scope must be compatible and NOT contradictory.

- Identify the R2 Appendices on the R2 Certificate and align these with the scope of the QMS/EHSMS certificate scope.
- Identify the R2 applicable equipment from the R2 Certificate and align these with the scope of the QMS/EHSMS certificates.

## **GENERAL EQUIPMENT, COMPONENTS, AND MATERIALS TRAILS**

- Scope – Understand the types of electronic equipment, components, and materials to correlate to the R2 Scope. "Electronic equipment" in a QMS/EHSMS may include unrestricted streams, but it may be a trail to know that a variety of devices are processed by the R2 Facility. It is important to understand and be able to determine whether "electronic equipment" also applies to the R2 Scope, and what specifically is included in the processing of electronics towards understanding the necessary R2 Scope.
- Legal compliance plan - Understand the legal requirements for the ***types of equipment, components, and materials*** within the scope of certification. What is the R2 Facility authorized to do? Do these permissions/permits match the scopes of certification?
- Focus Materials Management Plan - Understand ***types of equipment, components, and materials*** within the scope of certification. Are these types of equipment, components, and materials compatible with the FM Management Plan?
- Downstream Vendor Flow – Do the DSVs have scopes on their QMS/EHSMS certificates, as applicable, that reflect the expertise, capabilities, and methods of processing the types of equipment, components, and materials as needed per the FM Management Plan?
- Tracking throughput – Do the BOLs/invoices/packing lists of the incoming and outgoing shipments corroborate the scope of certification activities?

## General Process Trails

- Legal compliance plan – Understand the legal requirements for the *types of processes* within the scope of certification. What is the R2 Facility authorized to do? Do these permission(s) match the scopes of certification?
- Certificate versus actual – Remember that it is key to audit evidence of scope of operations. If an R2 Certificate has an Appendix, evidence is required to show continued implementation of the processes; however, if processes are identified in place but not on the certificate, then it is also important to ensure the CB is contacted to add these processes.

## APPENDIX-SPECIFIC PROCESS TRAILS

### *Appendix A Trails*

- Downstream Vendor Flow – Are the DSVs qualified for the scopes on their QMS/EHSMS certificates, as applicable, that reflect the expertise, capabilities, and methods of processing the types of equipment, components, and materials as needed per the FM Management Plan?

### *Appendix B Trails*

Note: Appendix B does not specifically require a certified QMS. Having specific words related to data sanitization is not required on the QMS certificate.

- Look for words that describe data sanitization process on the QMS/EHSMS Certificates. These are indicators of Appendix B for either logical or physical on the R2 Certificate.

### *Appendix C Trails*

- If a QMS certificate has wording like "repair," "testing," "parts harvesting," and "refurbishment activities," then it will be assumed that these are audited under R2 Appendix C scope of activities.
- If an R2 Certificate has testing and/or repairing, then these activities MUST be on the QMS certificate.
- If a QMS certificate uses the word refurbishment, this can be acceptable for inclusion of test and repair. Refer to the word Refurbishing in the R2 Standard.

### *Appendix D Trails*

- Does the QMS/EHSMS certificate call out specific specialty equipment or use words like "medical devices"? Use of these specific words could mean that Appendix D is required or at least that the 'less than 1% rule' should be audited. Or perhaps the QMS certificate would address testing, repairing or verification of specialty equipment.

### *Appendix E Trails*

- If an QMS/EHSMS certificate has “dismantling of e-waste,” check to ensure that the R2 Certificate has materials recovery.

### *Appendix F Trails*

- Does the QMS certificate have brokering or trading in the scope?

### *Appendix G Trails*

- Does the EHSMS certificate have PV modules or solar panels, as applicable to the scope of operations?
- Does the QMS certificate, as applicable, include the scope of operations related to testing and repairing PV modules or solar panels?

## IDENTIFICATION OF INCONISTENCIES

- Any inconsistencies or gaps identified when reviewing and comparing certificates should be communicated to the CB immediately.

## WRITING AN NC

- If a scope of an QMS/EHSMS certificate is found to be nonconforming. Record the necessary nonconformance under the following requirements:
  - Core 3(a)
  - Appendix C(1)
  - Appendix F(1)(c)

## OTHER TRAILS

- QMS certificates for non-R2 refurbishers and non-R2 brokers must also follow this guidance. Check QMS certificate validity for non-R2 DSVs.
- For a RIOS certificate, check the scope of equipment, components, and materials as you would an QMS/EMS/SMS Certificate.  
**Website** - [Find a RIOS™ Recycler | RIOS™ Certification \(rioscertification.org\)](https://rioscertification.org)

## RESOURCES AND TERMS

- **International Accreditation Forum (IAF)** – The International Accreditation Forum (IAF) is a worldwide association of accreditation bodies (ABs) and other bodies interested in conformity assessment in the fields of management systems, products, processes, services, personnel, validation and verification and other similar programs of conformity assessment. ABs have an approved scope issued by the IAF. Find the AB and verify its scope of accreditation for QMS/EHSMS Standards.  
**Website** - <https://iaf.nu/en/home/>
- **Accreditation Body (AB)** – Independent third-party entity that assesses and evaluates the competence of a Certification Body to conduct R2 audits and maintain an R2 Certification Program. Each AB has its own website that can be found at the

International Accreditation Forum's website. Go to the AB's website to verify the validity of the CB's scope of certification.

**Website** – <https://iaf.nu/en/accreditation-bodies/>

- **Certification Body (CB)** – Is an organization accredited in accordance with the requirements specified in the R2 Code of Practices to audit and certify facilities to the R2 Standard. CBs have their own websites; most websites can be found on the AB's website. Also use the IAF CertSearch website to find the CBs website information. Go to the CB's website or IAF CertSearch, to verify the validity of the R2 Facility's QMS/EHSMS certificate as applicable.

**Website** – <https://www.iafcertsearch.org/search/certification-bodies>

- **International Accreditation Forum (IAF) CertSearch** – IAF CertSearch is a global database where auditors can search and validate the status of accredited certification issued by a Certification Body that has been accredited by an IAF signatory member Accreditation Body under main scope ISO/IEC 17021-1. However, it is not used by all CBs. An auditor can use this database as a tool to validate the applicable QMS/EHSMS Certificates.

**Website** – <https://www.iafcertsearch.org/>