



The New Zealand Ecolabelling Trust

Licence Criteria for End-of-life Services for ITT Equipment

EC-56-22

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Specification change history

Minor clarifications, corrections or technical changes made since the specification was issued in July 2014.

Date	Version	Change
05/09/2022	EC-56-22 September 2022	Specification EC-56-14 rolled over effective September 2022.

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1 Introduction

Environmental Choice New Zealand (ECNZ) is an environmental labelling programme which has been created to help businesses and consumers find products and services that ease the burden on the environment. The programme results from a New Zealand Government initiative and has been established to improve the quality of the environment by minimising the adverse and maximising the beneficial environmental impacts generated by the production, distribution, use and disposal of products, and the delivery of services. The programme is managed by the New Zealand Ecolabelling Trust (The Trust).

ECNZ operates to the ISO 14024:1999 standard "Environmental labels and declarations – Type I environmental labelling – Principles and procedures" and the Trust is a member of the Global Ecolabelling Network (GEN) an international network of national programmes also operating to the ISO 14024 standard.

ISO 14024 requires environmental labelling specifications to include criteria that are objective, attainable and verifiable. It requires that interested parties have an opportunity to participate and have their comments considered. It also requires that environmental criteria be set, based on an evaluation of the environmental impacts during the actual product or service life cycle, to differentiate product and services on the basis of preferable environmental performance.

The life cycle approach is used to identify and understand environmental issues (adverse or beneficial impacts) across the whole life of a product or service (within a defined product or service category). This information is evaluated to identify the most significant issues and from those to identify the issues on which it is possible to differentiate environmentally preferable products or services from others available in the New Zealand market. Criteria are then set on these significant and differentiating issues. These must be set in a form and at a level that does differentiate environmentally preferable products or services, is attainable by potential ECNZ licence applicants and is able to be measured and verified. As a result of this approach, criteria may not be included in an ECNZ specification on all aspects of the life cycle of a product or service. If stages of a product or service life cycle are found not to differentiate environmentally preferable products or services, or to have insufficient data available to allow objective benchmarking in New Zealand, those stages will not generally be included in criteria in the specification. For some issues, however, (such as energy and waste) criteria may be set to require monitoring and reporting. These criteria are designed to generate information for future reviews of specifications.

The New Zealand Ecolabelling Trust Board is pleased to publish this proposed specification for End-of-life Services for ITT Equipment (information technology and telecommunications WEEE). The proposed specification has been published to maximise the environmental benefits of diverting this component of WEEE (waste electrical and electronic equipment) from waste streams, achieving reuse and material recycling and sound management of hazardous substances. The criteria in the specification take account of potential environmental impacts of processing activities and use of packaging in collection and distribution aspects of the services.

This specification sets out the requirements that End-of-life Services for ITT Equipment will be required to meet in order to be licensed to use the ECNZ Label. The requirements include environmental criteria and service characteristics. The specification also defines means to be used to demonstrate and verify conformance with the environmental criteria and service characteristics.

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This specification has been prepared based on an overview level life cycle assessment, information provided by the applicant company for an EC-34-08 licence and information from other independent sources identified by the ECNZ specification writers.

This specification will be valid for a period of five years. Twelve months before the expiry date (or at an earlier date if required), the Trust will initiate a further review process for the specification.

2 Background

A Ministry for the Environment (MfE) publication¹ has identified disposal of computer equipment as an important environmental issue. It notes the rapid growth of sales in New Zealand (612,160 desktop computers and notebooks sold in 2007 - 2.6 times higher than sales ten years earlier and more than five million sold between 1994 and 2007). It describes e-waste as the fastest growing type of municipal waste in the world. This is of concern because e-waste contains higher levels of heavy metals than other municipal waste. There is also an important opportunity to recover valuable resources for reuse.

In New Zealand, some components of e-waste and materials in e-waste are recovered and reused/recycled; some are exported or are being stockpiled. A large amount of e-waste, however, ends up in landfill. Internationally, export of e-waste to developing nations which lack effective environmental regulations and controls has resulted in significant adverse effects on people and the environment. The United Nations Basel Convention² is an agreement addressing issues associated with export of hazardous wastes. Almost twenty five years on, environmental and other groups are still raising significant concerns about export of hazardous wastes, for example the Basel Action Network. The Basel Action Network³ is a United States-based charitable organisation that focuses on issues associated with the trade in toxic waste and products.

A wide range of hazardous substances is potentially and commonly found in waste electrical and electronic equipment (WEEE) and ITT in particular. MfE Guidance on WEEE⁴ includes a table listing the following twenty substances; antimony, arsenic, asbestos, barium oxide, beryllium, cadmium, chlorofluorocarbons and hydro-chlorofluorocarbons, chlorine or brominated flame retardants, cobalt, copper, lead, lithium, mercury, nickel, poly-chlorinated biphenyls, selenium, silver, tin and zinc.

These hazardous substances have a range of effects on human health and the environment. For example, lead causes damage to the nervous system and blood, it is bio-accumulative and highly ecotoxic. Barium can damage organs such as the heart, liver and spleen. Beryllium and arsenic are carcinogens. Mercury also bio-accumulates and is highly toxic⁵. A

¹ The Safe use and disposal of computer equipment. New Zealand Ministry for the Environment, February 2009. Accessed from Ministry for the Environment website on 2 August 2013.

² The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal was adopted on 22 March 1989 in response to a public outcry following the discovery, in the 1980s, in Africa and other parts of the developing world of deposits of toxic wastes imported from abroad.

³ www.ban.org

⁴ Waste electrical and electronic equipment: guidance for collection, reuse and recycling. MfE website <http://www.mfe.govt.nz/issues/waste/weee-guidelines/> accessed August 2013.

⁵ E-Waste in New Zealand: Taking responsibility for end-of-life computers and TVs. Computer Access NZ Trust report prepared for Ministry of the Environment, July 2006.

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literature review completed in 2006⁶ sets out even more detail on the toxicity effects of ten of the most common hazardous substances found in WEEE. It also outlines wider environmental issues identified in literature, including noting that impacts from hazardous substances are associated with all stages in the product life cycle.

The MfE Guidance is under-pinned by four principles, as follows:

- all parties in the disposal chain have “disposal chain” responsibilities;
- prioritise reuse;
- if you can’t measure it, you can’t manage it; and
- good practice companies have procedures to manage their risks.

The MfE Guidance goes on to identify what organisations need to do to demonstrate good practice standards of care, including:

- identify their role in the disposal chain (they may have more than one role);
- ensure they have management procedures in place to manage their role effectively (in particular to manage health, safety and environmental risks);
- look up and down the disposal chain to make sure others in the chain are managing their impacts too (recommending that good practice extends to the next operator in the disposal chain as an absolute minimum); and
- keep data on WEEE entering and leaving their operations.

The MfE Guidance draws on an extensive body of published information, standards and programmes associated with hazardous wastes and WEEE.

Based on a review of currently available information, the following product category requirements will produce environmental benefits by diverting waste from landfill, reducing demand for virgin resources, and ensuring safe handling hazardous substances in end-of-life ITT equipment. As information and technology change, product category requirements will be reviewed, updated and possibly amended.

3 Interpretation

Downstream processor means an entity that receives material from the Licence applicant/holder or other downstream processor for the purposes of additional processing and refining for maximum resource recovery or safe disposal.

End-of-Life means the life cycle stage of a product starting when it is removed from its intended use-stage.

ITT Equipment means Information Technology and Telecommunications Equipment. This includes:

- (a) Server computers, including midrange and mainframe servers
- (b) Personal computers, including desktop and all mobile computing devices

⁶ See pages 23-32 in *A Literature Review on the Environmental and Health Impacts of Waste Electric and Electronic Equipment*, Dr R E Horne and J Gertsakis, June 2006. Accessed on 25 July 2014 at:<http://www.mfe.govt.nz/publications/waste/weee-literature-review-jun06/weee-literature-review-jun06.pdf>

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- (c) Computer displays, including cathode ray tubes (CRTs) monitors, and flat panel screens
- (d) Imaging equipment for printing, copying, mailing, faxing and scanning
- (e) Computer peripherals including keyboards, mice, portable speakers, modems and routers, web cameras, portable play and storage devices, external power suppliers and computer parts
- (f) Automatic data processing machines
- (g) Networking equipment (wired and wireless)
- (h) Power supply accessories
- (i) Test equipment
- (j) Electrical and electronic typewriters
- (k) Devices for collecting, storing, processing, presenting and communicating information by electronic means
- (l) User terminals and systems, including retail store and point of sale machine, calculators and self-service kiosks
- (m) Phones and related accessories
- (n) Answering systems
- (o) Other products or equipment for transmitting sound, images or other information by telecommunications.

ISO means International Organisation for Standardisation.

Label means the ECNZ Label.

Point of final disposal means a point in the downstream flow of material where the separated materials generated from the processing of end-of-life ITT equipment are physically altered from their original state and become commodities used to produce new products or become by-product waste for disposal.

4 Category definition

This category includes services that:

- collect and sort end-of-life ITT equipment; and
- process, dismantle and/or dispatch this equipment for reuse or recycling; and
- provide safe disposal of residual materials that cannot be reused or recycled.

To be licensed to use the Label, end-of-life services for ITT equipment must meet all of the environmental criteria set out in clause 5 and service characteristics set out in clause 6.

5 Environmental criteria

5.1 Legal requirements

Criteria

- a. The collection and recycling services provided by the Licence applicant/holder must comply with the provisions of all relevant environmental laws and regulations that are applicable to all aspects of the service.

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- b. The Licence applicant/holder must have and implement an effective environmental regulatory compliance assurance programme covering:
 - (i) aspects of its services that are carried out by contractors; and
 - (ii) downstream processing of ITT equipment, components or materials through to point of final disposal;
- c. The assurance programme must generate evidence that is sufficient to provide the Licence applicant/holder with a reasonable level of assurance that all contracted and downstream transfers and processing is occurring in compliance with the applicable environmental regulatory requirements.

Verification Required

Conformance with this requirement shall be demonstrated by providing a written statement on regulatory compliance, signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company.

The statement shall be supported by documentation that is kept up to date that:

- identifies the applicable regulatory requirements - including specific obligations for permits and obligations arising from permits, regulations. or in regional or district plan rules (i.e. plans prepared under the Resource Management Act in New Zealand);
- demonstrates how compliance is monitored and maintained;
- describes the environmental regulatory compliance assurance programme.

The statement shall also be supported by records that demonstrate that compliance is being achieved (for example, copies of compliance monitoring results/reports; regulatory compliance audits, copies or evidence of current permits and regulator inspection reports).

Evidence of a current (and relevant) certified ISO 14001 environmental management system being in place, where the certificate is issued by an accredited certification body will provide limited assurance. The documentation and records described above are required to provide the higher **reasonable** level of assurance.

Explanatory Notes

1. Relevant laws and regulations could, for example, include those that relate to:
 - collecting and transporting used ITT equipment;
 - sites and operations used to sort and/or process collected used ITT equipment;
 - producing, sourcing, transporting, handling and storing any raw materials and components required for sorting and/or processing used ITT equipment;
 - handling, transporting and disposing of waste products arising from collection, transport, sorting or processing used ITT equipment; and
 - transporting materials or waste within and between countries.
2. E-waste leaving New Zealand may need a permit under the Imports and Exports (Restrictions) Prohibition Order (No.2). This is the Order that implements New Zealand's obligations under the Basel Convention⁷ and so these permits are often referred to as Basel permits. The need for a permit will depend on what the product is, the intended

⁷ Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

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processing of the product (reuse/refurbishment, recovery or disposal) and the country to which it is proposed to export it. Permits are obtained from the New Zealand Environmental Protection Authority www.epa.govt.nz. Applications for permits need to include information about the facility waste is being exported to so there are some related requirements in clause 5.6 Downstream processing. There are also requirements under the Stockholm Convention that specifically concern brominated flame retardants (that may be present in plastics). Information about these is included in an MfE guide “Managing waste that may contain brominated flame retardants”, October 2013; available at: <http://www.mfe.govt.nz/publications/waste/bromide-flame-retardant-waste/managing-bromide-flame-retardants-waste.pdf>.

3. It is not intended to require licence holders to accept increased legal responsibility or liability for actions that are outside their control.

5.2 Policy commitments

Criteria

The Licence applicant/ holder must have a documented policy that includes commitments on the following matters:

- a. maximising the diversion of end-of-life ITT equipment from landfill;
- b. prioritising reuse;
- c. minimising the release of hazardous substances to the environment by adopting good practice;
- d. recording data so that end-of-life ITT equipment can be monitored through the reuse and recycling chain;
- e. providing a quality –assured serviced that meeting customer’s needs;
- f. having the financial, managerial and technical ability to perform their operations to good practice standards;
- g. only working with competent companies operating downstream in the reuse and recycling chain; and
- h. having systems to check that downstream recyclers also meet good practice standards.

Verification Required

Conformance with these requirements shall be stated in writing in a statement on compliance, signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. The statement shall be supported by a copy of a current policy statement.

5.3 Risk assessments

Criteria

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The Licence applicant/holder shall complete and periodically review risk assessments to identify potential risks to the environment posed by the ITT equipment its collects and processes. The risk assessments shall at a minimum consider:

- a. the hazardous substances that may be contained in the ITT equipment;
- b. any hazardous substances used in processing the ITT equipment (e.g. solvents or cleansers);
- c. the controls and processes in place to minimise and manage risks to the environment;
- d. potential emergency situations (fires, spills, natural hazards such as storms, earthquakes etc.); and
- e. the environmental context of sites and locations where collection and processing activities occur.

The Licence applicant/holder shall ensure the results of the risk assessment and reviews are used to review and improve, where appropriate, its procedures and services.

Verification Required

Conformance with this requirement shall be stated in writing in a statement on compliance, signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. The statement shall be supported by documentation describing the risk assessment process and records to demonstrate assessments have been completed and reviewed.

5.4 Collection of end-of-life ITT equipment

Criteria

5.4.1 General

Procedures for collection must ensure the ITT equipment is collected in a manner that maximises its reuse and/or recycling potential.

5.4.2 Segregation

Procedures must be in place and effectively implemented to ensure that:

- a. collected equipment is segregated by product type;
- b. contaminants amongst ITT equipment being collected are identified and removed, if possible at source; and
- c. organisations or personnel involved in collection are competent to identify potential contaminants in ITT equipment and implement measures to remove this from the ITT equipment.

5.4.3 Containers and containment

Procedures must be in place and effectively implemented to ensure that:

- a. collection containers and arrangements that protect the equipment from damage, deterioration, vandalism or theft;

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- b. collection containers that are appropriate to prevent any release of hazardous substances to the environment during collection, and delivery/deposit at the processing location/facility; and
- c. provision is made for appropriate equipment for spillage control and clean up.

5.4.4 Drop-off or collection sites

- a Sites used for storage and processing of end-of-life ITT equipment should be planned and established to ensure:
 - (i) there is sufficient room and facilities for safe storage of ITT equipment and components at all stages of the processing activities; and
 - (ii) there is sufficient area for safe vehicle access for unloading and collection.
- b Procedures must be in place and effectively implemented to ensure that there is clear labelling at collection locations/facilities so those depositing equipment can identify if the collection is for reuse, recycling or both.

5.4.5 Contracted activities

Procedures must be in place and effectively implemented to ensure that formal service level agreements or contracts are in place with any contractors engaged to collect ITT equipment.

Verification Required

Conformance with these requirements shall be stated in writing in a statement on compliance, signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. The statement shall be supported by:

- copies or descriptions of procedures and processes;
- details and descriptions (including for example photographs) of facilities, vehicles, equipment and storage containers/areas; and
- information on contractors involved in collection activities and copies of (or extracts of) contracts or service agreements with them.

Explanatory Note

Contaminants in ITT equipment being collected include equipment or other materials that may damage or otherwise limit the ability of the ITT equipment being collected to be processes for reuse or refurbishment. Measures to manage contaminants should include segregation and could include rejection at the point of collection or safe storage. It may be appropriate to have a formal acceptance criteria document or process to ensure contaminants are removed as early as possible to protect the ITT equipment.

5.5 Processing of end-of-life ITT equipment

Criteria

5.5.1 5.5.1 General

Procedures for processing must ensure the ITT equipment and components are stored and handled in a manner that maximises their ability to be reused and/or recycled.

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5.5.2 Sorting

- a Procedures for sorting collected materials must ensure the maximum number of equipment items or components are separated for reuse or recycling, including:
 - (i) measures to protect equipment and components from damage that could make them unsuitable for reuse options; and
 - (ii) clear specifications on the quality and acceptability of collected equipment and components for reuse options.
- b Procedures and planning for processing (including downstream processing) should be planned and implemented to avoid stockpiling of equipment or components as far as possible.
- c During sorting, procedures must be implemented to ensure that any identifying or distinguishing marks on equipment are removed and any stored data is securely destroyed.

5.5.3 Disassembly

- a Procedures for dismantling end-of-life ITT equipment that is not able to be reused must ensure that the maximum recovery and separation of components and materials is achieved that are suitable for recycling/reprocessing for other beneficial purposes, including:
 - (i) mechanical or manual separation and sorting techniques as most appropriate to maximise recovery of usable components and materials;
 - (ii) sorting and storage facilities that provide for efficient and effective sorting and separate storage of components and materials; and
 - (iii) measures to prevent or minimise the potential for cross contamination of separated materials.
- b Dismantling processes must remove, separate and safely store the following potentially hazardous components, in line with known requirements for downstream processing:
 - (i) mercury containing components;
 - (ii) batteries;
 - (iii) cathode ray tubes;
 - (iv) toner cartridges;
 - (v) plastic containing (or potentially containing) brominated flame retardants;
 - (vi) printer and copier drums containing selenium or arsenic; and
 - (vii) liquid crystal displays.

5.5.4 Containers and containment

Procedures for all stages of processing must ensure components and materials (including waste materials) are contained, secure and managed so as to avoid or minimise the potential for discharge of contaminants to air, land or water, including:

- a appropriate containment of processing area and location/integrity of storage areas/containers (for example impermeable surfaces and weatherproof coverings); and
- b protection from vandalism and theft.

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5.5.5 Packaging

Procedures to manage, handle and store packaging used for collection and/or dispatch of ITT equipment, components or materials for further processing, must ensure that:

- a the maximum reuse of packaging is achieved; and
- b the maximum recycling of packaging that is not able to be reused is achieved.

5.5.6 Site design and layout

- a Sites used for processing of end-of-life ITT equipment should be planned and established to ensure:
 - (i) there is sufficient room and facilities for safe and secure storage of ITT equipment and components at all stages of the processing activities; and
 - (ii) there is sufficient area for safe vehicle access for unloading and collection.
- b A formal emergency response plan and procedures must be in place for the site to ensure:
 - (i) effective spill containment and clean up;
 - (ii) required equipment is available and maintained;
 - (iii) emergency preparedness is regularly tested; and
 - (iv) emergency plans and procedures are regularly reviewed.

Explanatory Note

Knowledge about the downstream processing arrangements is needed to inform decisions on if, when and how to separate the components listed in clause 5.5.3b. For some shredding or processing operations there may not be a need to remove some components, where these can be safely contained and managed during the processing. For some downstream processing it may be safer to transport equipment or components with limited or no disassembly.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported with the following documentation and evidence:

- copies or descriptions of procedures and/or processes;
- information on requirements and procedures for removing potentially hazardous components;
- details and descriptions (including for example photographs) of facilities, equipment and storage containers/areas; and
- copies of site emergency plan and procedures and records of testing and review of preparedness.

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5.6 Downstream processors

5.6.1 General

The Licence applicant/holder must know and maintain current information about the downstream processes associated with all equipment, components and materials it dispatches, through to the final disposal point. This must include keeping records about how the destination facilities process the materials they receive.

5.6.2 Acceptable end-uses

- a The Licence applicant/holder must ensure that the downstream processes for end-of-life ITT equipment, components and materials achieve the following minimum acceptable end-uses:
 - (i) batteries (where these are separated) – metal, plastic and acid recovery;
 - (ii) CRT, LCD and LED – glass recycling and reuse and lead, metal and phosphorescent recovery;
 - (iii) printed circuit boards – metal recovery;
 - (iv) cable and wires – metal recovery;
 - (v) metals – metals recovery; and
 - (vi) plastics (except those containing brominated flame retardants) – plastics recycling.
- b The Licence applicant/holder must ensure that disposal of any residual waste is to appropriate and licensed facilities.

5.6.3 Downstream operators

- a The Licence applicant/holder must ensure the recycling and disposal companies it engages with downstream are reputable and have appropriate management, technical and operational systems to:
 - (i) minimise the release of hazardous material or contaminants from their operations; and
 - (ii) deliver safe re-use and/or disposal.
- b The Licence applicant/holder must establish and implement effective processes to provide assurance about operators downstream of its own operations, which include:
 - (i) contracts/agreements with the next operator in the downstream chain (the Licence applicant/holder's direct customer);
 - (ii) obtaining information about how downstream operators assess and manage their environmental, health and safety impacts that demonstrate their capabilities;
 - (iii) obtaining copies of procedures and records;
 - (iv) requesting copies of performance reports, certificates and other formal statements; and
 - (v) where appropriate, carrying out ongoing periodic checks/site visits or audits.

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Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported with the following documentation and evidence:

- descriptions, flow charts or maps showing the downstream processes through to final disposal for all equipment, components and materials;
- supporting information and records about each downstream processes and processors; and
- copies of specifications and contracts (which may include memoranda of understanding or other written agreements) with companies to whom equipment or components are being dispatched for reuse, or to whom components and materials are being dispatched for recycling, treatment and/or disposal.

Explanatory Notes

The compliance programme described in clause 5.6.3b is likely to be linked or combined with the requirements for assurance on regulatory compliance in clauses 5.1b and c.

If an ISO 14001 certificate is provided, it is important to confirm it is currently valid, that its scope includes the operations represented to be covered and that it has been issued by an appropriately accredited certification body. To provide a reasonable level assurance, an ISO 14001 certificate should be supported by other evidence and documents, as described in clause 5.6.

5.7 Packaging requirements

Criteria

- a The collection and recycling service provider must have and effectively implement a packaging procurement programme and use packaging for its services with the following objectives:
- (i) providing the necessary level of protection for collected ITT equipment and for components and materials being distributed for reuse or recycling to minimise damage that would prevent such reuse or recycling;
 - (ii) maximising the reuse of packaging material in the collection and distribution systems;
 - (iii) giving preference to ECNZ-licensed packaging products and materials, where these are available and fit for purpose;
 - (iv) giving preference to purchasing and using packaging materials that have recycled content and maximising the percentage of recycled content; and
 - (v) using packaging materials that are able, after re-use, to be recycled in New Zealand (or the market to which they will be exported).
- b Licence holders must report annually to The Trust on packaging procurement and use including:
- (i) data, descriptions and analysis demonstrating how the objectives have been achieved; and
 - (ii) targets and plans for ongoing delivery of the objectives.

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Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported with documentation and evidence that:

- describes the packaging used and the procurement programme; and
- includes annual reports on packaging use and procurement.

5.8 Staff and contractor training and competence

Criteria

- a The Licence applicant/holder must ensure training programmes for staff and contractors and evaluations of staff and contractor competence cover:
 - (i) material and equipment handling;
 - (ii) worker exposure;
 - (iii) controlling releases of hazardous substances; and
 - (iv) safety and emergency procedures.
- b Training plans and materials must:
 - (i) provide links to formal management systems and risk assessments; and
 - (ii) include Safety Data Sheet information for those involved in collecting, transporting or storing/depositing or handling equipment that contains hazardous substances.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported with documentation that:

- describes the training programmes and processes to assess staff and contractor competence;
- includes examples of training materials; and
- records of completed training and competence evaluations.

Explanatory Note

In New Zealand, an EXITO Unit Standard is available on resource recovery. This covers: resource recovery operations, resource recovery theory and zero waste. This may form part of the training programme for staff and contractors working in New Zealand.

5.9 Tracking, records and reporting

Criteria

- a The collection and recycling service provider must implement tracking, records and reporting systems that are sufficient to ensure that:

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- (i) equipment, components and materials are accounted for throughout the operation;
 - (ii) records are sufficient to complete mass balance of the operation to provide basic reuse, recovery and recycling statistics; and
 - (iii) there is a visible tracking system (such as a unique ID code for items or batches) to the point of final disposal.
- b Information on basic reuse, recovery and recycling statistics must be available to customers.
 - c Records must be kept for at least 4 years.
 - d The Licence holder must report annually to The Trust on basic materials balance statistics, including percentages of collected materials dispatched for reuse and/or for recycling, other beneficial use and disposal.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported with documentation and evidence that:

- describes tracking and records systems;
- includes examples of information provided to customers; and
- includes annual reports to The Trust on reuse and recovery/recycling statistics.

5.10 Energy management

Criteria

- a The Licence holder/applicant must have effective energy management policies and procedures and/or an energy management programme covering the service delivery operations.
- b The policies and procedures must include logistics planning for efficient collection and dispatch of equipment, components and materials.
- c Licence holders must report annually to The Trust on energy management, including:
 - (i) total energy use;
 - (ii) breakdown of total energy use to types of energy used;
 - (iii) energy use related to service delivery;
 - (iv) initiatives taken to reduce energy use and improve energy efficiency; and
 - (v) initiatives taken to calculate and reduce CO₂ emissions associated with energy use.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be accompanied by documentation that:

- describes the energy management policies, procedures and programmes; and

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- includes annual reports on energy use and management.

5.11 Waste management

Criteria

- a The Licence applicant/holder must have effective waste management policies and procedures and/or a waste management programme covering the service delivery operations.
- b Licence holders must report annually to The Trust on waste management, including:
 - (i) quantities and types of waste disposed of to landfill;
 - (ii) waste generation related to service delivery; and
 - (iii) initiatives taken to reduce waste generation.

Verification Required

Conformance with this requirement shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be accompanied by documentation that:

- describes the waste management policies, procedures and programmes; and
- includes annual reports to The Trust on waste generation, minimisation and management.

5.12 Management systems

Criteria

The Licence applicant/holder shall have and implement a formal environmental management system, based on ISO 14001⁸ that covers:

- a. all of the requirements in this specification; and
- b. all of its collection and recycling activities.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant company. This statement shall be supported with the following documentation and evidence:

- a certificate (if available) issued by an independent and competent agency confirming compliance with the requirements of ISO 14001 or an equivalent

⁸ ISO 14001:2004 *Environmental management systems – Requirements with guidance for use*

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management system certification (for example in New Zealand, Enviro-Mark diamond level); and

- copies of management system documentation and records that can be directly assessed by ECNZ assessors.

6 Service characteristics

6.1 Scope of service

The collection service must:

- a accept all brands of end-of-life ITT equipment, regardless of age or value;
- b provide for collection from commercial client premises;
- c provide either for collection direct from private residential premises or from collection points well distributed and accessible to potential residential service users; and
- d be provided free or for minimal charge.

Note: In order to meet all of these requirements, a service provider may limit its service to a specific geographical area. If this is the case, any ECNZ licence granted by The Trust will identify the service's geographical limitations.

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported with the following documentation and evidence:

- a description of the collection systems, including any geographical limitations; and
- records to demonstrate that all of the requirements of a-d are being met.

6.2 Fitness for purpose

Criteria

The collection and recycling service for end-of-life ITT equipment shall be fit for its intended and advertised purpose and conform, as appropriate, to relevant service performance standards.

Verification Required

Conformance with this requirement shall be demonstrated by providing a written statement of compliance, signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported by documentation:

- identifying the applicable standards and or consumer/customer requirements;
- demonstrating how compliance is monitored and maintained; and
- records of customer feedback or complaints.

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6.3 Customer information

Criteria

- a The Licence applicant/holder must ensure information about the collection service is readily available for potential customers on the company's website and via customer contact, information services.
- b Information about the collection service must include:
 - (i) confirming that all brands and outlining what types of end-of-life ITT equipment are accepted;
 - (ii) how the collection service can be accessed, including details of how to obtain collection boxes and/or the location of collection points;
 - (iii) the cost of any collection service and how payment can be made;
 - (iv) details about whether and how collected end-of-life ITT equipment is reused or recycled, and any residual materials are disposed;
 - (v) advice on how unwanted ITT equipment should be stored and handled prior to collection to protect it from damage;
 - (vi) evidence of secure destruction of data (where appropriate); and
 - (vii) certificates of recycling for all recycled equipment (on request).

Verification Required

Conformance with these requirements shall be stated in writing and signed by the Chief Executive Officer or other authorised representative of the applicant/licensed company. This statement shall be supported with the following documentation and evidence:

- copies of and/or links to information that is available on company websites; and
- copies of information that is available and provided through customer contact/service numbers or at point of sale/collection.

7 Requirements and notes for Licence holders

Monitoring Compliance

Prior to granting a Licence, The Trust will prepare a plan for monitoring ongoing compliance with these requirements. This plan will reflect the nature of the services covered by the Licence and the level of sampling appropriate to provide confidence in ongoing compliance with criteria. This plan will be discussed with the Licence applicant and when agreed will be a condition of the Licence.

As part of the plan, The Trust will require access to relevant quality control and service delivery records and the right of access to service facilities. Relevant records may include formal quality management or environmental management system documentation (for example, ISO 9001 or ISO 14001 or similar).

The monitoring plan will require the Licence holder to advise The Trust immediately of any noncompliance with any requirements of this specification which may occur during the

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term of the Licence. If a non-compliance occurs, the Licence may be suspended or terminated as stipulated in the Licence Conditions. The licensee may appeal any such suspension.

The Trust will maintain the confidentiality of identified confidential information provided and accessed during verification and monitoring of Licences.

Using the ECNZ Label

Wherever it appears, the Label must be accompanied by the words “End-of-life Services for ITT Equipment” and by the Licence Number e.g. “licence No. 1234”.

The Label must be reproduced in accordance with the ECNZ programme’s keyline art for reproduction of the Label and the Licence Conditions.

Any advertising must conform to the relevant requirements in this specification, in the Licence Conditions and in the keyline art.

Failure to meet these requirements for using the ECNZ Label and advertising could result in the Licence being withdrawn.

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