



HP Standard 007-2 Vendor Requirements for Hardware Recycling

Responsible Group	Global Social and Environmental Responsibility
Document Identifier	HX-00007-02
Revision and Date	D, 11-Jun-2014
Last Re-validation date	01-Aug-2015
Abstract	This standard defines the requirements for Vendors and Subvendors who recycle or dispose of electronic hardware products, parts, components or materials on behalf of HP.
Applicability	The requirements in this standard apply to all Vendors and all Sub vendors who provide recycling or disposal services for HP, including handling, storage, and transportation, with respect to HP brand and non-HP brand electronic hardware products, parts, component or materials.
Status	Approved

© Copyright 2015 HP Development Company, L.P.

This is an uncontrolled copy when in printed form.

Table of Contents

1	Introduction
2	General Compliance Requirements
3	Reuse, Resale, or Donation of Whole Units, Parts, or Components
4	Landfill Avoidance
5	Information Security
6	Site Security and Controls
7	Transboundary Shipment
8	Insurance
9	Subvendor Use and Audits
10	Audits of Vendors and Documentation
11	Approved Dispositions
12	Definitions
13	References
	Revision History

1 Introduction

The requirements in this standard apply to all Vendors and all Sub vendors who provide recycling or disposal services for HP, including handling, storage, and transportation, with respect to HP brand and non-HP brand electronic hardware products, parts, component or materials.

2 General Compliance Requirements



- 2.1 Vendors must comply with the HP Supplier Code of Conduct ([Electronic Industry Code of Conduct](#)) and sign and return to HP the [Supplier Social and Environmental Responsibility Agreement](#). These documents are available at: <http://www8.hp.com/us/en/hp-information/global-citizenship/society/supplier-ser-requirements.html>.
 - 2.2 Vendors must demonstrate a history of regulatory compliance. Government agency or independent input (such as environmental facility reports from Environmental Data Resources or Dun & Bradstreet) may be used to document history of compliance.
 - 2.3 Vendors must notify their designated HP Vendor Manager within 24 hours of any occurrence that could materially affect or interrupt the Vendor's ability to perform services for HP. In addition, any occurrences that involve security, health, safety, environmental, or labor issues that could negatively impact HP's interests must be reported to the HP Vendor Manager without delay.
 - 2.4 Vendors must comply with all laws, regulations and other government requirements that pertain to their business, including but not limited to environment, health and safety, and import and export laws. In addition, they must obtain and maintain all applicable permits, licenses, approvals, agreements, and other required government or regulatory documents.
 - 2.5 Vendors must implement and maintain an emergency response plan to prepare for and respond to emergency situations, including fires, medical emergencies, and uncontrolled releases of hazardous or harmful materials.
 - 2.6 Vendors must agree to implement and comply with the HP Hardware Recycling requirements set forth in this document and cascade these requirements to all Subvendors processing Covered Materials.
 - 2.7 In the event the HP Hardware Recycling requirements conflict with any laws, Vendors must adhere to the applicable legal requirements. To the extent local conditions require variations with the provisions from this Standard, Vendor must acquire HP approval in writing to the solution or disposition in advance.
 - 2.8 Vendors must comply with the HP Media Handling Standard for information security, document number HX-00019-00, on the [HP Supplier Portal](#); registration required. (Internal document [HP-00019-00](#)).
 - 2.9 Vendors must have an environmental management system with performance requirements, such as ISO-14001, as described in [The e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment](#) or [R2](#).
 - 2.10 Unless otherwise specified by HP, materials are to be reused or recycled to the extent technically and economically practical.
- 3 Reuse, Resale, or Donation of Whole Units, Parts, or Components**
- 3.1 Vendors engaged in any reuse, resale, or donation of hardware whole units, parts, or components must comply with [HP Standard 007-3 Vendor Requirements for Hardware Reuse](#) and use HP approved vendors and processes.



4 Landfill Avoidance

In addition to any restrictions imposed by law, Covered Materials that are or contain the following, whether broken (including shred) or intact, must not be landfilled:

- Cathode ray tubes (CRTs),
- Flat panel displays (e.g., liquid crystal displays (LCDs) and plasma screens)
- Circuit boards
- Mercury lamps or switches
- Batteries, all types
- Any other electronic components containing lead, mercury, cadmium, hexavalent chromium, beryllium, or polychlorinated biphenyls (PCBs).

5 Information Security

5.1 All data-containing devices such as hard drives, and recording media such as CDs, DVDs, tapes, or other similar items must either be fully erased or destroyed by shredding, crushing, shearing, melting, incinerating, or perforating the memory resident material. Additional security requirements are described in the *HP Media Handling Standard*, document number HX-00019-00, on the [HP Supplier Portal](#); registration required. (Internal document HP-00019-00).

5.2 When requested by the HP Vendor manager, Vendors must maintain documents verifying destruction of data devices, including device serial numbers and date of destruction.

6 Site Security and Controls

6.1 Physical Security

Business processes and physical locations must be designed and maintained in a manner to ensure the protection of Covered Materials from the time of receipt, including any transit or third-party transfer, - until final disposition. Protection systems must be based on the degree of risk and may include facility security protections (such as access control, alarm system, closed-circuit television (CCTV), building construction, fencing and gates, lighting), security process controls (such as badging and identification, HR processes, concealed theft prevention, incident reporting and escalation, training, yard controls), business process controls (such as disposition, inventory control, loading and unloading), and in-transit controls (such as driver requirements, security seals, and truck security).

6.2 Workforce

Vendors must perform adequate pre-employment screening (unless prohibited by law) before assigning any employee or contractor work or access to Covered Materials. Work rules must be documented and enforced to facilitate the security of Covered Materials and to prevent unauthorized use or resale of Covered Materials. Employees must be trained on the requirements for all transactions completed on behalf of HP and the training must be documented.

6.3 Processing

Vendors providing recycling services for Covered Materials must ensure that those operations occur in a timely fashion and under appropriate security conditions to prevent unnecessary stockpiling, and



that Covered Materials are recycled or disposed as specified and are not diverted. HP reserves the right to audit or witness Vendor operations at any time.

6.4 Storage

Vendor storage and processing areas must be secured to prevent theft or unauthorized access or removal or value degradation. All Covered Materials must be stored and processed in covered or contained areas to prevent releases of hazardous substances to the environment. Specifically, Covered Materials must be protected from weather (such as wind, rain, or snow) during storage, and must not be stored (as a method to hold items for potential future processing) for more than 90 days unless a longer period of time is authorized under applicable law and approved by the HP Vendor manager.

6.5 Accounting

Vendors must provide an accounting to HP of all Covered Materials they have processed. Accountings may include, but are not limited to, material balance reports on materials received and material processed or disposed; outlines of the downstream flow of materials through the point of final processing and disposition; and information on the amount of materials received, processing methods, commodity generated, where sent, and transaction receipts.

6.6 Infrastructure and Business Interruption

Vendors' operations must be scalable and able to support large volume accounts without delays or adverse impacts to compliance with these standards. Vendors must have adequate equipment and support infrastructure (such as staff, storage space, equipment, process capabilities) to meet current volume requirements and have the ability to scale up operations when necessary.

6.7 Financial Stability

Vendors must be in conformance with HP regional and country requirements for financial solvency and must not be undergoing bankruptcy proceedings. Requirements for financial stability are provided by the HP Vendor manager.

7 Transboundary Shipment

- 7.1** Covered Materials exported across interstate and country borders must have prior approval from the HP Vendor manager.
- 7.2** Vendors must be able to report all export information in detail including but not limited to: quantities, make, model, serial number, type of product, destination, and importer of record.
- 7.3** Any required permits or government consents for transboundary shipments must be secured before shipment.
- 7.4** Vendors must maintain a documented Restricted Party List (RPL) process and demonstrate that a RPL check was performed for each transaction.
- 7.5** Supplier must not export, ship or otherwise transport any Covered Materials from developed countries (defined to include any country that is a Member of the Organization for Economic Co-Operation and Development (OECD) or the European Union (EU)) to developing countries



(defined as any country that is not a Member of the OECD or EU) except insofar as such exports are in compliance with applicable laws, the Basel Convention, and HP's Policy on Export of Electronic Waste to Developing Countries, which may be found at:

<http://www8.hp.com/us/en/hp-information/global-citizenship/environment/ewaste-export-policy.html>.

8 Insurance

- 8.1** Vendors must maintain general liability, comprehensive liability, and pollution liability insurance that is sufficient to comply with applicable regulatory requirements or a minimum of \$1,000,000 (U.S.) per occurrence/ \$2,000,000 (U.S.) in aggregate. Exceptions may be granted by HP where coverage is not available in a particular country or where processes and volumes do not justify the levels of coverage specified above. And Vendors must comply with HP's risk management requirements unless a documented exemption is provided by HP.
- 8.2** Vendors must maintain financial insurance, or bonding instruments through an independent party or corporate parent to cover the maximum facility closure costs, where disposal costs may exceed \$10,000 U.S.;
- Closure cost estimates must be reassessed and documented at least once every two years.
 - Closure plans documenting how materials will be managed and how the facility will be properly decommissioned at the time of closure must be maintained and updated at least every two years.



- 8.3** Vendors must maintain Single Limit Public Liability and Property Damage Insurance, Statutory Worker's Compensation Insurance, and Employers Liability insurance, Automobile Liability, Technology Errors and Omissions insurance, Employee Dishonesty or crime coverage insurance, and excess liability insurance, in conformance with HP's risk management requirements. Insurance certificates providing proof of HP thresholds must be checked and recorded annually.

HP Requirements	
Workers Compensation	As Required by Law
Employers Liability Insurance	\$1,000,000 per accident
	\$1,000,000 per employee
General Liability	\$1,000,000 Per Occurrence
	\$2,000,000 General Aggregate
Automobile Liability	\$1,000,000 minimum
Professional Liability Insurance (TE&O)	\$1,000,000 minimum
Fidelity Bond/Crime Insurance	\$1,000,000 minimum
Property/Warehouse Liability	\$1,000,000 minimum

9 Subvendor Use and Audits

- 9.1** Vendor must disclose the identity of all Subvendors used to perform recycling services for Covered Materials, throughout their entire downstream supply chain through Final Disposition.
- 9.2** Vendors must verify and maintain documentation that any Subvendors they employ to provide recycling or disposal services for Covered Materials will and do comply with this Standard, including the HP Supplier Code of Conduct. Vendors must agree that any such subcontract will impose on the Subvendor all requirements to which the Vendor is subject in its contract with HP. Vendors will ensure that Subvendors comply with these requirements.
- 9.3** Except for those Subvendors that HP advises Vendor in writing do not require audits, Vendor must conduct annual audits of each of its Tier One Subvendors to document conformance with this Standard at all sites and operations, regardless of their location, that are used to provide services with respect to "Designated Materials". Vendor's audits of its Tier One Subvendors may be conducted by Vendor or third party auditors selected by Vendor.
- 9.4** Vendor must ensure that annual audits are performed on each Subvendor that is not its Tier One Subvendor that is providing services with respect to Designated Materials. The audits must document conformance with this Standard at all sites and operations, regardless of their location, that are used to provide such services and may be conducted by Vendor, by Subvendors with respect to their own downstream Subvendors, or by third party auditors. Some portion of the audits must be conducted on-site.
- 9.5** In all agreements with Subvendors, Vendor must reserve the right but not the obligation for HP or HP's designated third party to conduct annual on-site audits of Subvendors; and require its



own Subvendors to ensure by contract that all Subvendors providing services with respect to Designated Materials that are subject to the requirements in this section.

- 9.6** The on-site audit must assess all elements set out in the [U.S. EPA's Plug-In to eCycling Guidelines for Materials Management Sample Audit Checklist](#), including but not limited to, inspection of the Subvendor's facilities, review of the Subvendor's EHS management systems, materials tracking, export compliance and tracking, emergency management plan, closure plan, insurance documents, relevant permits, licenses, approvals, agreements and other required government or regulatory documents, and interviews with Subvendor employees. The Vendor shall make available to HP, upon request, documentation and results of all on-site audits of Subvendors.

10 Audits of Vendors and Documentation

- 10.1** HP reserves the right to conduct annual audits and assessments of all Vendor sites and operations, regardless of their location, that are used for handling, storage, or processing of Covered Materials to document conformance to HP standards. Such audits may be conducted by HP or an auditor selected by HP. HP reserves the right to conduct these annual audits on-site.
- 10.2** Corrective actions must be managed by the Vendor in close cooperation with the HP Vendor Manager to ensure the implementation of expedient remedial corrective action per audit program specifications. Records related to actions to correct deficiencies and documented management activities must be retained.
- 10.3** Upon request, Vendors must make available to HP, records and information related to their internal self-assessment process and supply copies of records and relevant information to HP. Records and information include, but are not limited to, material tracking documents, material balances, unit counts, materials analysis, shipping records, disposal records, emissions monitoring, employee medical testing, inspection reports, regulatory notices, training records, spill or release reports. Results from audits and assessments will measure conformance to this Standard and the terms of the contract. Vendors are required to show documentation on an ongoing basis and will be audited in areas including all elements set out in the [U.S. EPA's Plug-In to eCycling Guidelines for Materials Management Sample Audit Checklist](#), including but not limited to:
- Financial stability
 - Insurance Coverage
 - Business Continuity
 - Physical and building Security Protections
 - Permits, Licenses, etc.
 - Asset Mgmt. tracking mechanisms
 - Data Destruction practices, software utilized, and tracking
 - Environmental Health and Safety Mgmt. system
 - Document Control practices
 - Training Records
 - Waste Generation
 - Facility Operations
 - Ethics and Business practices
 - Management and account structure



11 Approved Dispositions

- 11.1 Mercury:** Lamps, LCDs (liquid crystal displays), batteries, switches and components containing mercury must be processed by HP approved Vendor and process that utilize technology designed to safely and effectively manage such mercury-containing items.
- 11.2 Batteries:** Batteries must be processed by HP approved Vendors that utilize technology designed to safely and effectively manage the recycling and recovery of the metals present in batteries.
- 11.3 CRTs (cathode ray tubes):** CRTs must be processed by an HP approved Vendor and process that utilizes technology designed to safely and effectively manage the recycled material, such as a leaded-glass recycler or a lead smelter.
- 11.4 Printed circuit boards (PC boards):** Batteries and mercury must be removed prior to PC board recycling. PC boards must be processed by a smelter utilizing effective and safe technology to recover precious metals (such as gold) and heavy metals (lead and other metals) for reuse and that controls emissions and disposition of lead, tin, mercury, cadmium, arsenic, chromium, beryllium and halogenated materials. With HP approval, circuit components may be extracted for reuse prior to recycling.
- 11.5 Plastics:** (Listed in order of priority) Plastics must be recycled for reuse in products, parts, components, or materials; processed for energy recovery; or disposed of by incineration. In all cases, the facility must monitor and control emissions and residues. See section 11.8 on incineration for related information.
- 11.6 Printing Supplies:** Printing supplies collected as part of hardware recycling (for example, a print cartridge present in a printer at the time of its collection): HP provides no-cost return and recycling for all HP brand printing supplies through the HP Planet Partners program. Vendors must use all commercially-reasonable efforts, exercised in good faith, to separate and return HP brand printer cartridges to HP for recycling via HP Planet Partners services if available in the operating country. All other non-HP brand print supplies must be recycled or disposed of in an environmentally responsible manner compliant with applicable laws and regulations.
- 11.7 Metals (other than in items above):** To the extent practical, metal items which will not be recovered in the smelting process must be separated from the product prior to smelting in order to recover the copper, precious metals (such as gold and silver), steel, aluminum and lead.
- 11.8 Incineration:** Incineration of Designated Materials or any material classified as hazardous waste must meet destruction and removal efficiency (DRE) regulations. The incinerator must meet 99.99% destruction removal efficiency (DRE) for all regulated hazardous contaminants and 99.9999% DRE for dioxins.
- 11.9 Other Dispositions:** Any other disposition is not authorized unless approved in advance by HP.

12 Definitions



- 12.1 Covered Materials:** Electronic hardware products, parts, components or materials, whether HP brand or non-HP brand, that are handled, stored, transported or processed by a Vendor or Subvendor pursuant to a recycling services contract or other arrangement with HP.
- 12.2 Designated Materials:** are a subset of Covered Materials that, because of their properties, require special care. They are: (i) printed circuit boards, plastics, cathode ray tubes (CRTs) and CRT glass, batteries, mercury- and polychlorinated biphenyls (PCB)-containing lamps and switches, whether broken (included shredded) or intact, and any other items containing lead, mercury, cadmium, hexavalent chromium, beryllium, or PCBs; and (ii) products that include such materials. “Designated materials” do not include material following the point of Final Disposition.
- 12.3 Disposal:** Landfill, incineration without energy recovery, and any other disposition of electronics hardware products, parts, components or materials that is not for resale, reuse, recycling, or energy recovery.
- 12.4 Disposition:** Management of unwanted electronic hardware products, parts, components, or materials for resale, reuse, recycling, or disposal.
- 12.5 EHS:** Environmental, Health and Safety.
- 12.6 Electronic hardware:** All electrically powered computing, printing, video display, audio, peripheral input/output (e.g., keyboard, mouse, remote control) or other equipment operated by electrical current (e.g., batteries, power supply, power cord, etc.), whether HP or other brand. This includes, but is not limited to, products for sale or lease, sample and prototype products, factory scrap managed by HP, obsolete inventory, customer or reseller returns, trade-in, components, subassemblies, and whole units.
- 12.7 Energy Recovery:** Processing of materials to generate and collect energy, such as through incineration of material to create steam and drive electrical turbines.
- 12.8 Final Disposition:** The point at which the output fractions from recycling or residuals (a) have been subjected to final disposal (including through land disposal) or energy recovery; or (b) are converted into a material that needs no further processing in order to be directly used in other manufacturing processes.
- 12.9 Recycling:** Recycling means processing of electronic hardware products to recover usable or marketable raw materials (ingredients in manufacturing) or other products such that the original products lose their identity. Recycling does not include processing to return products to use in their original form (for example, repair, remanufacturing or refurbishment for the purpose of reusing computers).
- 12.10 Resale:** Sale of a used electronic hardware product for its original intended purpose with or without prior repair or refurbishment.
- 12.11 Reuse:** Use of an electronic hardware product, part, or component for its original intended purpose with or without prior repair or refurbishment.



12.12 Subvendor: Any third party who provides services to or on behalf of HP's Vendors with respect to recycling, reuse, or disposal of electronic hardware products, parts, components or materials.

12.13 Vendor: Any third party who either manages first tier Vendors (sometimes known as "Tier 0" Vendors) or provides first tier services to or on behalf of HP with respect to recycling, reuse, or disposal of electronic hardware products, parts, components, or materials.

12.14 Vendor Manager: The designated HP employee or representative responsible for managing HP's relationship with a Vendor, Vendor's understanding and compliance to HP standards and policies, and Vendor responsiveness to corrective action.

13 References

HP Media Handling Standard, document number HP-00019-00 (External version HX-00019-00, is on the [HP Supplier Portal](#); registration required)

[HP Standards of Business Conduct](#)

[HP Supplier Code of Conduct](#) (pdf file)

[Supplier Social and Environmental Responsibility Agreement](#) (pdf file)

[HP Standard 007-2 Vendor Requirements for Hardware Recycling](#)

[HP Standard 007-3 Vendor Requirements for Hardware Reuse](#)

[HP Standard 007-4 Vendor Requirements for Printing Supplies Recycling](#)

[Export of Electronic Waste to Developing Countries Policy](#)

[The e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment](#)

[Responsible Recycling \("R2"\) Practices for Use in Accredited Certification Programs for Electronic Recyclers](#)

[U.S. EPA's Plug-In to eCycling Guidelines for Materials Management Sample Audit Checklist](#)

Revision History

Revision, Date, Change Number	Brief Description of change
A, 28-May-2004	Initial document.
B, 13-Apr-2007, DCN 02827	Added new requirements in each existing section and new sections regarding reuse, landfill, insurance, and security. Added new definitions as needed.
C, 13-Oct-2008, DCN 02919	New standard owner identified. Added new requirements in use of Subvendors (section 7) and information security (section 12), and new definitions (section 15).
D, 10-Jun-2014	Major revision of the entire document.
01-Aug-2015	Cloned the standards for HPI