

DETAILED OVERVIEW OF R2 PRACTICES REQUIREMENTS WITH IMPLIED EQUIVALENT ISO 14001 AND SHAS 18001

NOTE: any 18001 specifics are bolded

R2 PRACTICES	14001 / 18001
1 DEVELOP EHSMS	
a: review annually/update	4.1:establish/maintain/improve
a1: written goals	4.3.3: objectives/targets
a2: follow PDCA	4.1/4.2
a3A: hierarchy for end-of-life electronics	4.2: policy, 4.4.6: operational control
a3B: compliance with environmental, health and safety reqs., focus materials, and export regulations.	4.3.2, 4.4.6, 4.5.2
a3C: FM management plan	4.4.6a-c, 4.4.6 a-e
a3D: EHS hazards identification	4.3.1 a-b, 4.3.1 a-j
a3E: response/reporting plan for accidents/release and communication with local authorities	4.4.3b, 4.4.7, 4.4.3.1c
a3F: list of activities/documents that support R2 practices	4.4.4c-e
b: certified by accredited CB; EHSMS conforms to requirements and R2	--- 4.1
2 REUSE, RECOVER HIERARCHY	
a/b: written policy managing EOL electronics, onsite activity, management of downstream vendors	4.2, 4.4.6, 4.4.6c, 4.4.3.2b, 4.3.1a-e
3 LEGAL REQUIREMENTS	
a1: plan for compliance with environment, health and safety and export requirements	4.3.1, 4.3.2, 4.5.1, 4.5.2, 4.5.3
a2: documentation of legality of export	4.4.3b, 4.4.6c, 4.4.3.1c

4 ON-SITE ENVIRONMENTAL HEALTH AND SAFETY = possess expertise	4.4.1, 4.4.2
b: good housekeeping	4.4.6, 4.5.1
c: hazard identification of occupational and environmental risk	4.3.1
d: strategies for control of hazards and environmental release	4.4.7, 4.4.6
d1: engineering controls	4.4.7, 4.4.6
d2 A-E: health and safety training	4.4.2, 4.4.3, 4.4.3.2
d3: PPE	4.4.7, 4.4.2
e: monitoring/sampling protocols	4.4.6, 4.5.1, 4.5.5
f: entire workforce knowledgeable	4.4.2, 4.4.6c
g: coordinate/promote health and safety	4.4.1, 4.4.3.2
h: exceptional releases to environment	4.4.7, 4.4.3a-b, 4.4.3 b-c
5 R2 FOCUS MATERIALS	
a: FM plan	4.4.6, 4.5.1
b1-2: removal of FM's	4.4.6, 4.5.2
c1-4: treatment of FM's	4.4.6c, 4.5.1
d: energy recovery, incineration and land disposal of FM's	4.4.5, 4.4.7
e, f: downstream vendor compliance	4.4.6c, 4.5.1, 4.5.5

6 REUSABLE EQUIPMENT AND COMPONENTS

a: equipment not sold contrary to agreement 4.4.6c, 4.5.4

b1-2: downstream labeling/packaging 4.4.6, 4.4.3a

c1-3 reused, repaired refurbished equipment 4.4.6, 4.5.4

7 TRACKING THROUGHPUTS

a: records of material transfer 4.5.4

8 DATA DESTRUCTION

a: sanitize data 4.3.2, 4.4.6, 4.4.5f

b: documented destruction procedure 4.4.4, 4.4.5

c: data destruction training 4.4.1, 4.4.2

d: 3rd party destruction validation 4.3.2, 4.4.6c

9 STORAGE

a 1-3: store to avoid risk 4.4.3, 4.4.6, 4.4.7

10 FACILITY SECURITY

a: maintain security program 4.4.7

11 INSURANCE, CLOSURE PLAN AND FINANCIAL RESPONSIBILITY

a, b: possess insurance/closure plan 4.4.6, 4.4.7, 4.3.2, 4.5.1, 4.3.1

12 TRANSPORT

a: material packaged appropriately 4.4.6

b: transporter authorization/evaluation 4.4.6c, 4.3.2, 4.5.1

13 RECORDKEEPING

a: single location 4.4.1, 4.4.4, 4.4.5

OVERVIEW CORRELATION OF R2 PRACTICES WITH ISO 14001 AND OSHAS 18001

R2 PRACTICES	14001	18001
1 ESTABLISH EHSMS	4.1, 4.2, 4.3.3 4.4.4, 4.6	4.1, 4.2, 4.3.3 4.4.4, 4.6
2 REUSE, RECOVER HIERARCHY	4.2	4.2
3 LEGAL REQUIREMENTS	4.3.2, 4.5.2	4.3.2, 4.5.2
4 ON-SITE ENVIRONMENT, HEALTH AND SAFETY	4.3.1, 4.4.1, 4.4.7	4.3.1, 4.4.1 4.4.7
5 R2 FOCUS MATERIALS	4.3.1, 4.4.6c, 4.5.1	4.3.1, 4.4.6c 4.5.1
6 REUSABLE EQUIPMENT AND COMPONENTS	4.4.6c, 4.5.1	4.4.6c, 4.5.1
7 TRACKING/THROUGHPUT	4.5.4	4.5.4
8 DATA DESTRUCTION	4.4.5f,g	4.4.5f,g
9 STORAGE	4.4.6, 4.4.3a	4.4.6, 4.4.3a
10 FACILITY SECURITY	4.4.7	4.4.7
11 INSURANCE, CLOSURE PLAN, AND FINANCIAL RESPONSIBILITY	4.4.7, 4.3.2, 4.5.2	4.4.7, 4.3.2 4.5.2
12 TRANSPORT	4.4.6c, 4.3.2	4.4.6c, 4.3.2
13 RECORDKEEPING	4.4.4, 4.4.5	4.4.4, 4.4.5

NOTE: There is no R2 stand-alone specific requirement for Objectives and Targets, Document Control, Competence, Communication, Nonconformance and Corrective Action, Internal Audit, or Management Review. However, these activities are identified in several of the R2 Practices (1-13), and would be consistent with the expectations of PDCA as identified in Practice R1.