



SAEWA Member: Code of Conduct

Version: 16/11/17

The following set of minimum legal, technical and operational requirements and practices are MANDATORY to fulfill by any existing Southern African e-Waste Alliance (SAEWA) MEMBER and provide the eligibility criteria for new “applicants” of SAEWA MEMBERSHIP.

As such they have to be readily in place for any SAEWA MEMBER practitioners providing professional services for any aspect of e-waste (and other secondary metals waste)management including :

- Collection
- Transportation & Trading
- Dismantling
- Processing (Mechanical and Metallurgical)
- Disposal

By harmonising the SAEWA Code of Conduct with key strategic elements from the “*ISO Guidance Principles for the Sustainable Management of Secondary Metals*” document, a roadmap has been designed for SAEWA AFFILIATES on how to reach full operational compliance and required SAEWA MEMBER working standards in a structured and systematic manner according to the specified milestones and suggested timelines.

Note: Non-SA based SAEWA Members and applicants for MEMBERSHIP can only be “guided” by the SAEWA Code of Conduct provisions as some of them are directly based on South African legislation. However Members located outside South Africa HAVE TO be compliant with all aspects of their own country-specific national, provincial and municipal legislative requirements and provide proof of “best practice” if and where otherwise required. Compliance assurance has to be provided by an existing SAEWA Member and/or third party Auditor.

1. GENERAL (APPLICABLE TO ANY TYPE OF E-WASTE PRACTITIONER) :

Legal Compliance, Fair Labour Conditions and General Safe Housekeeping

1.1 No SAEWA MEMBER is allowed to take in and/or handle radioactive, bio-hazardous or any other known toxic waste components in any aspect of operating with e-waste except they can proof that they can handle such waste in an environmentally responsible and legally fully compliant manner.

1.2 All SAEWA MEMBERS have to submit for each new Financial Year a LEGAL REGISTER to the SAEWA Chair to show proven compliance with all relevant National, Provincial and Local Legal Requirements applicable to the type of operations conducted AND at all physical sites the operator runs. All licences presented must be CURRENT and valid.

- (i) All SAEWA MEMBERS must hold and maintain a valid “Second Hand Goods” licence and provide a temporary retrieval storage area where goods are safe- kept for at least 7 days, as per the Second Hand Goods Act; (Act 6 of 2009). Anyone receiving any goods that appear suspicious or that have any knowledge or suspicion that the goods may have been stolen and or used in the commission of a crime, will need to report the matter to the local SAPS, and to the SAEWA with immediate effect, and take the necessary responsible actions to help in the combatting of crime and fraud related to e-Waste, in order to uphold the integrity of our industry.
 - (ii) No current or future MEMBER shall purchase from anyone any copper cabling that has been burnt under any circumstances as this is strictly illegal and therefore severely punishable (see also Second Hand Goods Act; (Act 6 of 2009) for more information).
- 1.3 MEMBERS need to comply with legally regulated minimum “Basic Conditions of Employment” for their type of business, i.e.: COID registrations, hours of work, minimum wage, minimum leave, code of conduct etc. for staff and they need to be able to supply to SAEWA (on request) with key documents including but not limited to: proof of CIPC registration, a Tax Clearance Certificate and BBBEE certificate.**
- 1.4 MEMBERS need to comply with minimum Environmental Health and Safety (EHS) requirements needed for a safe business operation for themselves and all staff (including the provision and systematic application of any required personal protection equipment (PPE) such as):**
- a) Eye protection
 - b) Suitable gloves
 - c) Overalls
 - d) Ear protection
 - e) Safety Shoes
 - f) Dust masks where required
 - g) Any other relevant requirements that are site or activity specific
- 1.5 MEMBERS need to be committed to follow an integrated waste management hierarchy based on the prevention and reduction of all (e-)waste from the outset and by pursuing a “ZERO waste to landfill” strategy (as and where possible).**
- 1.6 All SAEWA MEMBERS and applicants for MEMBERSHIP need to be committed to improve their operative and managerial status quo constantly and in accordance to the sustainability requirements (including suggested milestones and timelines) as set out in the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” document .**

1.7 All SAEWA MEMBERS and applicants for MEMBERSHIP need be in agreement to align and grow their respective businesses into a South African based, third party-auditable; traceable *value-chain* of collaborating *Chain of Custody* related service providers as envisaged and described in the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” document.

1.8 All SAEWA MEMBERS and applicants for MEMBERSHIP have to refrain entirely from applying ANY of the “Worst Practices” (or aspects thereof) as described in Annexure A of the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” document (see also attached) and as referred to in the applicable SAEWA MEMBER“ Technical and Operational MINIMUM Standards” for defined activities.

Collaborative Agreements/Protection of Competition

1.9 Competition Law: SAEWAMEMBERS agree to fully comply with all local applicable competition and antitrust laws and regulations. Note: Competition Act 89 of 1989 and common law applies.

1.10 Anti-bribery Laws: All SAEWA MEMBERS acknowledge that they are familiar with any country-specific anti-bribery or anti-corruption laws ("Anti-bribery Laws") and that they will not offer any payment or other gift or promise, or authorize the giving of anything of value, for the purpose of influencing an act or decision of an Official of any Government or of an employee of any company in order to assist either Party in obtaining, retaining or directing any business, decision or understanding.

1.11 Confidentiality and publicity: All discussions between the SAEWA Members are confidential and the participants shall undertake all necessary measures to safeguard confidential processing of the information and discussions in the scope of the Alliance. No participant shall issue any press release or make any public announcement relating to the subject matter of this Alliance or any other participant without the prior (written) consent of the Alliance or the relevant other participants.

1.12 Member Collaboration and Member to Member Ethics: Should any Member of the SAEWA receive an enquiry regarding collection, refurbishment, recycling and or disposal of e-Waste related to SAEWA activities, they should give preference to pass the enquiry on to another Member of the SAEWA, should they not be able to execute the enquiry for whatever reason. In this way the client can be assured of a service that is controlled by the SAEWA minimum code of conduct.

1.13 “Anti-Poaching” Clause: Different future (and existing) SAEWA Members are by default sometimes in direct competition with each other but fair-play to create a fair and level competitive environment needs to be adhered to at all times. If there is a suspected deliberate and malicious breach of clause 1.13 the SAEWA reserves the right to seek legal advice and/or consult the SAEWA Steerco for possible resolution on a case by case basis.

1.13.1 SAEWA hence restricts Members from “poaching” or deliberately recruiting or soliciting KEY STAFF from other Members during their entire period of employment or within a period of 6 months after the staff member leaving (unless both parties have a mutual understanding and agreement to do so).

1.13.2 SAEWA hence restricts Members from “poaching” or deliberately soliciting CLIENTS from other Members within a period of 3 months (unless the client approaches the other Member him/herself). No Member shall review the work of another Member for the same client, except with the knowledge of the latter, unless such Member’s engagement of the work which is subject to review has been terminated.

1.14 Personal Responsibility: Anyone not complying to the SAEWA Code of Conduct will be held RESPONSIBLE AND ACCOUNTABLE in their personal or company capacity and all other Members of the Alliance will be absolved of any responsibility based on the conduct of the party concerned, and will if necessary be blacklisted dependent on the outcome and severity of the problem.

1.14 Ethics and Good Governance: Uphold all ethics related to the industry that we are in and also to good corporate governance including regards to the interests of the public, serving the community and the environment by using and applying a best practice approach where available and possible.

1.16 Auditing: Members might be subject to an audit to confirm any statements made and agree that the SAEWA chairperson or another elected SAEWA representative/Third Party Auditor can visit at any time for a visual inspection of the premises and the operations.

1.17 Minimum Member participation in SAEWA meetings: At least 50% of all meetings need to be attended by a company member representative (either the owner, CEO or a designated appointed “Proxy” which is fully briefed and authorised and empowered to vote and make decisions on behalf of this MEMBER company)

2. ACTIVITY SPECIFIC MINIMUM REQUIREMENTS

Please refer to the attached “Technical and Operational MINIMUM Standards” for SAEWA MEMBERS

Code of Conduct
Technical and Operational
MINIMUM Standards
For SAEWA MEMBERS

***Collection, Transportation, Dismantling,
Processing, and Disposal of e-WASTE***



November 2017

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Terms and Definitions

collection

gathering of waste, including the preliminary sorting and preliminary storage of waste, for the purposes of transport to storage, manual or mechanical processing, metallurgical processing or the next *economic operator*. Collection can be done through waste collectors involved in *subsistence activities*, curbside collection services and recycling centres. (Definition Source: *ISO Guidance Principles for the Sustainable Management of Secondary Metals*).

component

element of an appliance with a distinct proper function as part of a device as a larger unit. Typical components of e-Waste are batteries, capacitors, printed circuit boards, CRT, hard disks.

CRT (Cathode Ray Tube)

vacuum tube containing an electron gun and a fluorescent screen used to create images in the form of light emitted from the fluorescent screen. The CRT vacuum tube consists of a screen, cone, frit glass, shadow mask (only for colour CRTs), anti-implosive metal frame, and an electron gun.

disposal

final or temporary placement of waste that is not salvaged for further metal reuse or recovery purposes (Definition Source: *ISO Guidance Principles for the Sustainable Management of Secondary Metals*).

downstream: any other facility from the current location is considered “downstream”.

drop off point

location designated for the gathering of waste from any source to facilitate separate collection.

economic operator

individual, enterprise, association, cooperative or organization involved in the collection, manual or mechanical processing, metallurgical processing, transportation, trading, storage, consumption/manufacturing and/or disposal of waste that contains metals and/or of materials produced as part of *subsistence activities, unofficial business activities or official business activities*. (Definition Source: *ISO Guidance Principles for the Sustainable Management of Secondary Metals*)

fraction

separate material stream generated through any *processing of e-waste/secondary metals containing materials*, including de-pollution, dismantling, or any other type of processing.

hazardous waste

waste which displays one or more properties that are hazardous to the environment or health and as defined in the NEM:WA (Act 59 of 2008).

official business activities (OBA)¹

economic activities that are conducted by economic operators constituted as legal entities and are therefore subject to government regulation, taxation and observation (Definition Source: *ISO Guidance Principles for the Sustainable Management of Secondary Metals*).

¹SAEWA MEMBERS have to be OBA type economic operators as being fully legally compliant.

preparing for re-use through refurbishment

checking, cleaning or repairing operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing. Preparing for re-use includes, but is not limited to, the selection, visual inspection, safety and functionality testing, documentation, records and labelling with the result that the electrical and electronic equipment is fit for use.

processing

recovery for either repair, reuse, refurbishment or dismantling including any preparation prior to disposal.

processing facility

location where waste undergoes processing.

recycling

process by which *secondary metals* are extracted from waste and *end-of-waste* fractions or materials that contains metals and used in products, materials or fractions, whether for the original or other purposes.(Definition Source: ISO Guidance Principles for the Sustainable Management of Secondary Metals).

re-use

any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.

subsistence activities

activities that can be found in both the formal and the informal sectors and are conducted by economic operators (mostly individuals and families) who earn a wage that is barely sufficient to support or maintain themselves and is below the minimum tax threshold required per national laws and regulations to pay taxes.(Definition Source: ISO Guidance Principles for the Sustainable Management of Secondary Metals).

unofficial business activities (UBA)²

activities that are conducted by economic operators not constituted as legal entities, with income above the living wage as well as the minimum tax threshold and that (purposely desire to) bypass national and/or local laws and regulations.(Definition Source: ISO Guidance Principles for the Sustainable Management of Secondary Metals).

UEEE

used“ Electronic and Electrical Equipment”

WEEE

electrical or electronic equipment which is perceived to be waste including all fractions, components, subassemblies and consumables which are part of the product at the time of discarding. Another term for “e-waste”

²SAEWA AFFILIATES are typically UBA type economic operators. While listed and registered as a company and hence run as a formal business with tax liabilities etc , operational and management practice of UBAs tends to be poor and to some degree non-compliant to the prevailing laws (e.g. illegal activities and operations and compliance gaps linked to reporting of waste streams, activity and location based operational permits etc.)

1 COLLECTION

1.1 Administrative and organisational requirements

1.1.1. Legal Compliance

1.1.1.1. The Collection and all associated activities need comply with all basic local and national laws (including the Second Hands Goods Act) . SAEWA MEMBERS need to refrain from engaging in any “worst practice” as described for “Uncontrolled Collection Practices” in the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” and the “ Worst Practice Factsheet Collection” (Annexure A and B of the Code of Conduct).

1.1.2. Technical and infrastructural preconditions

1.1.2.1. Employees handling waste shall properly use required personal protective equipment.

1.1.2.2. Collection, including storage areas, shall be designed, organised, and maintained to provide safe access to and from the site and to avoid access by unauthorized persons e.g. in order to prevent theft.

1.2. Technical requirements

1.2.1. Handling

1.2.1.1. All collected waste shall be handled (including loading and unloading) and stored with due care in order to avoid any release of hazardous substances into air, water, or soil, as a result of damage and/or leakage.

1.2.1.2. All handling of waste including the loading, unloading and transport shall be carried out with appropriate tools and with all PPE worn to avoid damage and protect the operator.

1.2.1.3. Waste shall not be handled in such a way that subsequent preparation for re-use, or recovery for dismantling and recycling is adversely affected or even inhibited.

1.2.2. Storage

1.2.2.1. Storage areas for formal e-waste collection activities should be committed to introduce the following minimum requirements within reason:

- Impermeable surfaces for all waste storage areas,
- Spillage collection facilities for all uncovered storage areas,
- Weatherproof covering where cooling equipment, CRT display appliances, flat panel displays, batteries and lamps are stored. Weatherproof covering includes roof, closed or covered containers.

1.2.2.2. When storing CRT display appliances, flat panel displays, cooling equipment, and lamps they shall be placed in containers or stacked in a stable manner to prevent damage or breakage, lead acid batteries should be stored upright to prevent any acid leakage and care should be taken to ensure that the terminals do not come into contact with each other or metal / conductive materials.

1.2.3. Documentation

1.2.3.1. SAEWA MEMBERS shall record the quantity of waste collected and forwarded (to a licenced Processing facility) by means of weight, piece count or documentation of number, size, and/or filling level of receptacles.

2. TRANSPORTATION AND TRADING

2.1. Administrative and organisational requirements

2.1.1. Legal compliance

2.1.1.1. The Logistics operator will comply with all applicable local, national and international legislations and regulations. SAEWA MEMBERS need to refrain from engaging in any “worst practice” as described for “Uncontrolled Transportation and Trading” in the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” and the “Worst Practice Factsheet Collection” (Annexure A and B of the Code of Conduct).

2.1.1.2. The operator will maintain procedures i.e.–a regularly updated legal register- to identify all legal requirements that are applicable to the environment, health and safety aspects of activities undertaken in the transportation² of e- waste and other secondary metals containing wastes- such as a valid hazardous waste transportation licence.

2.1.2. Technical and infrastructural pre-conditions

2.1.2.1. The operator shall possess an appropriate (motorized or non-motorized) mode of transport in terms of size, safety and characteristics that are suitable for the activities performed.

2.1.2.2. Employees handling waste shall properly use required personal protective equipment

2.1.2.3. The logistics operator shall ensure that there is appropriate and relevant insurance coverage in case of an accident.

2.1.3. Training

2.1.3.1. All employees of the logistics operator shall be familiar with the environmental, health and safety aspects of e-waste. Training shall include as a minimum: emergency response planning; occupational health; workplace safety measures; environmental considerations; and training for the relevant operations performed and how to use PPE properly to protect themselves.

2.1.4. Movement monitoring

2.1.4.1. The logistics operator shall document the movement of e-waste between collection and delivery points to ensure auditable traceability of movement from and to registered/licensed premises only and adhere to any binding country trade agreements such as the Basel Convention which restricts the international movement of hazardous waste and or/ any other applicable Conventions

2.2. Technical requirements

2.2.1. Handling

2.2.1.1. e-Waste shall be transported with due care in order to avoid release of hazardous substances into air, water, or soil, as a result of damage and/or leakage and special care needs to be given to cooling equipment, heaters, transformers, CRT monitors and lamps. Only fully legally transportation services shall be utilised.

2.2.2. Documentation

2.2.2.1. SAEWA MEMBERS offering any transport or trading services shall record the quantity and origin of e-waste collected and forwarded by means of weight, piece count or documentation of number, size, and filling level of receptacles.

2.2.3. Shipments

2.2.3.1e-Waste and fractions thereof which are intended for cross-border shipments shall be subject to and legally compliant with all regulations and international Conventions on shipments of waste.

2.2.3.2. No operator shall initiate, contribute to, or otherwise allow shipments of e-waste or fractions containing secondary metals that would result in downstream processing that is not in compliance with the objectives of this document and might lead to any “worst practice”.

3. DISMANTLING

3.1 Administrative and organisational requirements

3.1.1. Legal Compliance

3.1.1.1. The SAEWA MEMBER shall comply with all relevant legislation. The operator shall maintain a record documenting compliance with legal and regulatory obligations applying to all activities undertaken on site.

3.1.1.2. The operator shall establish and maintain a procedure in order to identify legal requirements that are applicable to the environmental, health and safety aspects of all activities, services and processes undertaken at the facility. A register of the operator's activities and related legal provisions shall be maintained and valid permits required by all relevant authorities shall be available.

3.1.1.3 The operator needs to refrain from applying any “worst practice” as described for “Dangerous Manual Dismantling Practices” in the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” and the “Worst Practice Factsheet Collection” (Annexure A and B of the Code of Conduct).

3.1.2. Management principles

3.1.2.1. The operator shall ensure that a management system e.g. similar to the one described as “Sustainability Requirement 5” in the “Guidance Principles for the Sustainable Management of Secondary Metals” is in place for all activities related to dismantling and in the fields of health, safety, environment and quality.

3.1.2.2. The operator shall demonstrate continuous improvement of their activities by a review and management process. The policy shall also be updated or revised as changes occur to the activities of the operator and evaluated in order to monitor its effectiveness.

3.1.3. Technical and infrastructural preconditions

3.1.3.1. Employees shall properly use required personal protective equipment (PPE)

3.1.3.2. Dismantling facilities including storage areas shall be designed, organised, and maintained to provide safe access to and from the site and to avoid access by unauthorized persons and theft.

3.1.4. Training

3.1.4.1. All persons at the dismantling facility shall be familiar with the environmental, health and safety aspects of e-waste, especially when working with CRT display appliances, flat panel displays, cooling equipment, batteries, and lamps which are broken or damaged. Employees and contractors involved in operations shall be instructed and trained to perform the tasks assigned to them and how to use PPE properly to protect themselves.

3.1.4.2. Training shall be conducted in intervals according to legal requirements and include as a minimum: emergency response planning; occupational health; workplace safety measures; environmental considerations; and training for the relevant operations performed. Materials and information shall document specific risks inherent to personal health and the environment.

3.1.4.3. The effectiveness and suitability of training shall be checked regularly. Training programs shall be delivered at a level suitable to the trainee in form, manner and language.

3.1.4.4. Training materials and information including technical guidance documents, risk assessment, safety statements, information charts, information tables, photos or examples of components of e-waste, and safety data sheets for hazardous chemical components shall be available at the work place and be easily accessible to employees at all times.

3.2. Technical requirements

3.2.1. Handling

3.2.1.1.e-Waste and other secondary metals containing wastes shall be handled and stored with due care in order to avoid release of hazardous substances into air, water, or soil, as a result of damage and/or leakage.

3.2.1.2.During handling and storage special attention shall be given to:

- Cooling equipment to avoid release of gases and transformers/heaters to avoid oil release
- CRT display appliances to avoid implosion and/or emissions of fluorescent coatings,
- lamps and appliances containing lamps to prevent breakage resulting in the release of mercury
- appliances/devices that may contain personal or business data/information to ensure the integrity and security of all data/information contained within the appliance/device.

3.2.1.3.All handling of e-Waste shall be carried out with appropriate tools and all required PPE .

3.2.1.4.e-Waste shall not be handled in a way that further preparation for re-use, de-pollution or recovery of components is adversely affected or inhibited.

3.2.2. Preparing for re-use

3.2.1If the operator is involved in preparation for re-use of ICT equipment, personal data stored on the memory of the ICT equipment shall be destroyed and evidence kept on record for a period of at least 3 years.

3.2.2. Electrical and electronic equipment prepared for re-use shall conform to safety, environmental, and legislative requirements.

3.2.3The documentation of e-Waste prepared for re-use shall encompass a documentation of all tests performed on the equipment, all destinations and recipients as well as a summary of amounts and types of e-Waste prepared for re-use.

3.2.3. Storage

3.2.3.1.Maximum storage amounts of e-waste shall respect legal and regulatory requirements

3.2.3.2.Sites for storage (including temporary storage) of e-waste prior to their processing should provide impermeable surfaces for storage areas and the provision of spillage collection facilities. Weatherproof covering is required for appropriate areas, which includes roofing and closed or covered containers.

3.2.3.3.For CRT display appliances, flat panel displays, batteries, printing supplies and lamps only storage areas with weatherproof covering are appropriate and such items shall be placed in containers or stacked in a stable manner to prevent damage or breakage.

4. PROCESSING (Mechanical and Metallurgical)

4.1 Administrative and organisational requirements

4.1.1. Legal Compliance

4.1.1.1. The operator shall comply with all relevant waste processing legislation. The operator shall maintain a record documenting compliance with legal and regulatory obligations applying to all activities undertaken on site.

4.1.1.2. The operator shall establish and maintain a procedure in order to identify legal requirements that are applicable to the environmental, health and safety aspects of all activities, services and processes undertaken at the facility. A register of the operator's activities and related legal provisions shall be maintained and valid permits required by all relevant authorities shall be available.

4.1.1.3 The operator needs to refrain from applying any “worst practice” as described for “Inefficient Mechanical and Inefficient and dangerous metallurgical processing” in the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” and the “ Worst Practice Factsheet Collection” (Annexure A and B of the Code of Conduct).

4.1.2. Management principles

4.1.2.1. The operator shall ensure that a management system e.g. similar to the one described as “Sustainability Requirement 5” in the “Guidance Principles for the Sustainable Management of Secondary Metals” is in place for all activities in the fields of health, safety, environment and quality.

4.1.2.2. The operator shall demonstrate continuous improvement of their activities by a review and management process. The policy shall also be updated or revised as changes occur to the activities of the operator and evaluated in order to monitor its effectiveness.

3.1.3. Technical and infrastructural preconditions

3.1.3.1. The operator shall possess infrastructure in terms of size, technologies installed, and characteristics of the operations that are suitable and safe for the activities performed on site. If trigger volumes are exceeded (and in the absence of any Norms and Standards regulating these activities) the suitability of site shall be assessed by an operational risk management process such as a legally required Environmental Impact Assessment (EIA) for all tasks performed on site and include the identification of hazards, the assessment of risk and, where appropriate, the elimination or reduction of the risk, and documentation of the process.

3.1.3.2. Employees shall properly use required personal protective equipment (PPE)

3.1.3.3. Processing facilities including storage areas shall be designed, organised, and maintained to provide safe access to and from the site and to avoid access by unauthorized persons and theft.

3.1.3.4. Reflecting the waste volumes, type and risks related to the processing the processing operator shall ensure that there is insurance coverage or other financial resources in place adequate to the nature and size of the operations and related to the inherent operational risk. The insurances or financial resources shall accommodate legal and regulatory requirements, but as a minimum cover risks and liabilities of:

- bodily injury of employees, contractors, visitors or neighbours of the plant,
- damages to neighbouring facilities,
- damages due to accidental pollutant release to the environment where the owner of the property is liable.

4.1.4. Training

4.1.4.1. All persons at the Processing facility shall be trained according to legal requirements and shall be familiar with the environmental, health and safety aspects and impacts of all types of e-waste and other secondary metals containing materials.

4.1.4.2. Training shall include as a minimum: emergency response planning; occupational health; workplace safety measures; environmental considerations; and training for the relevant operations performed and how to use PPE properly to protect themselves. Materials and information shall document specific risks inherent to personal health and the environment.

4.1.4.3. The effectiveness and suitability of training shall be checked regularly. Training programs shall be delivered at a level suitable to the trainee in form, manner and language.

4.1.4.4. Training materials and information including technical guidance documents, risk assessments, safety statements, information charts, information tables, photos or examples of components of e-waste, and safety data sheets for hazardous chemical components shall be available at the work place and be easily accessible to employees at all times.

4.1.5. Downstream monitoring

4.1.5.1. The operator shall document the origin of the e-Waste treated and the downstream processing value chain of e-Waste and fractions thereof as long as they have not reached the end-of-waste status.

4.1.5.2. Responsibility of downstream monitoring remains in cases where handing over of e-waste and other secondary metals containing wastes takes place to dealers or brokers, or when shipped across borders.

4.2. Technical requirements

4.2.1. Handling

As described for DISMANTLING

4.2.2. Storage

As described for DISMANTLING

5. Disposal

5.1. Administrative and organisational requirements

5.1.1. Legal Compliance

5.1.1.1. Within disposal options priority shall be set to avoid long-term emissions from landfills. Waste destined for landfills shall be treated to fulfil the requirements for the disposal and ONLY at authorised, legally fully compliant and controlled landfill sites.

5.1.1.2. SAEWA MEMBERS needs to refrain from applying any “worst practice” as described for “Uncontrolled Disposal” in the “ISO Guidance Principles for the Sustainable Management of Secondary Metals” and the “Worst Practice Factsheet Collection” (Annexure A and B of the Code of Conduct).

5.1.2. Documentation

3.2.5.1. The operator shall be in a position to make available simple and understandable documents including:

- records demonstrating compliance with legal and regulatory obligations applying to all activities undertaken on site,
- internal administrative procedures and management review and improvement process
- results and documents of downstream monitoring,
- first aid measures and emergency plans including records of insurance or financial resources
- risk assessments documents and emergency records addressing incidents, accidents, illness, leakages, fires, and damages,



- training, health, safety, and environmental monitoring records,
- instructions, hints, advices for processing steps and manual dismantling,
- process diagrams with single steps and related fractions,
- records of maintenance of site and servicing of machinery,
- results of internal controls and de-pollution monitoring

3.2.5.2.The Processing operator shall keep a mass balance, which consists of the documentation of all material flows (summaries of incoming and outgoing deliveries of e-Waste or e-Waste fractions) in an annual overview under consideration of stored amounts.

3.2.5.3.All documents shall be stored securely and maintained to demonstrate compliance. All documents shall be stored for five years unless legislation or authorities stipulate a longer period.



Appendix A: Guidance Principles for the Sustainable Management of Secondary Metals

INTERNATIONAL
WORKSHOP
AGREEMENT

IWA
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First edition
2017-04

Guidance principles for the sustainable management of secondary metals

Principes directeurs pour la gestion durable des métaux de seconde fusion



Appendix B: Worst Practices Factsheets Collection



DESCRIPTION OF WORST PRACTICES FACTSHEETS

Developed to support the implementation of
The Guidance Principles for
Sustainable Management of Secondary Metals

Version: 16.05.2017



Sustainable Recycling Industries (SRI)