

ISRI Position on the Export of Used Electronics¹

Overview

The Institute of Scrap Recycling Industries, Inc. (ISRI) supports increasing the sustainable benefits of responsibly recycling electronics in compliance with domestic and international legal requirements. A vital component of sustainable recycling is ensuring the free and fair trade of specification grade commodities into the global marketplace. These commodities provide raw material substitutes that are needed to develop economies around the world. ISRI also recognizes the inherent risks of exporting electronic equipment and components to countries and facilities that lack the expertise and technical capacity to process such shipments in a manner that is protective of worker safety, public health, and the environment. As such, ISRI strongly condemns “sham” recycling and illegal exports to countries and facilities that lack such expertise.

It is the position of the Institute of Scrap Recycling Industries, Inc. (ISRI) that:

- Recognizes the sustainable benefits of and supports necessary financial incentives to responsibly recycle electronic equipment and components in the United States.
- Promotes the free and fair trade of specification grade commodities derived from electronic equipment and components, including commodities with de minimis amounts of hazardous substances.
- Bans the export of electronic equipment and components for landfilling, or incineration for disposal.
- Requires that all shipments of used electronic equipment and components exported for direct reuse are effectively tested to confirm that key functions are working and that such equipment and components are not obsolete.
- Requires that all pre-existing data and data storage devices are sanitized, purged or destroyed prior to export, unless otherwise agreed to by a valid commercial agreement between the domestic buyer and seller.
- Requires that all exports of electronic equipment, components and specification grade commodities are packaged and transported in a manner that is protective of human health and the environment and when appropriate prevents damage during transport.
- Requires that facilities engaged in electronics repair, refurbishment, or processing located outside of the United States that import electronic equipment and components have in place:
 - A documented, verifiable environmental, health and safety management system;
 - The necessary capability to reuse, refurbish or recycle electronic equipment and components in a manner protective of worker safety, public health and the environment;
 - Adequate business records to document compliance with environmental, health and safety legal requirements including the legality of shipments in importing countries;

¹ As adopted by the ISRI Board of Directors on November 5, 2016.

- Necessary measures in place to manage hazardous wastes in a safe and environmentally sustainable manner through final disposition; and
- A transparent process for each facility to demonstrate conformity to these requirements to the U.S. exporter.