

THE "SCAM RECYCLING" CONTINUES

**E-WASTE EXPORTATION FROM THE U.S. TO
DEVELOPING COUNTRIES**

UPDATE #1

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e-Trash Transparency Project
Basel Action Network
Seattle, WA, USA
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INTRODUCTION

The BAN e-Trash Transparency Project / Phase 1

In 2016, BAN published its groundbreaking reports entitled "[Disconnect: Goodwill and Dell, Exporting the Public's E-Waste to Developing Countries](#)," (May) and "[Scam Recycling: e-Dumping on Asia by US Recyclers](#)," (September). These reports followed several years of research, development and implementation of GPS/cell phone-based tracking technology. They involved placing 205 different GPS tracking devices inside of old printers, LCD, and CRT monitors, delivering them to US charities, retailers and recyclers and following them to their endpoints across the globe.

Such research activities and subsequent publication of the results can be said to be a form of citizen enforcement because the trade of hazardous wastes, including most electronic waste to developing countries from developed countries, is illegal under international decisions (Basel Convention) and under the laws of most developed countries. Certainly, under the rules of the Basel Convention, it is illegal for developing countries to import hazardous e-wastes from the United States. 96% of the exports revealed by BAN 's 2016 study were most likely illegal.

The study as summarized in "Scam Recycling" witnessed 34% of the 205 deployments moving offshore with 31% of the total going to developing countries. Looking at those that were exported only 93% of the exports went to developing countries. 87% to Asia, 3% to Africa and 1% to the Middle East, and 1% to the Latin America/Caribbean region. 7% moved to the developed countries of Mexico and Canada.

Most of the exports ended up in Hong Kong's rural northern area called New Territories. BAN's investigators visited GPS locations where the trackers ended up and found hundreds of e-waste junkyards in New Territories where the hazardous equipment was smashed by hand, exposing workers to dangerous mercury laden dust, vapors and hazardous toners. Much of the e-waste was simply dumped in fields and wastelands.

Of the 152 trackers delivered directly to recyclers and not to charities, 40% were exported -- significantly higher than the 15% rate for the 53 trackers delivered to charities or retailers.

In the course of the entire pathways (chains) of the 205 tracker movements, the trackers passed through the hands of 168 different identifiable US recyclers. Of these companies, over 45% were part of a movement that went offshore (export chain).

That study revealed also that R2 certified recyclers had a higher-than-average export rate. Uncertified recyclers had a lower-than-average export rate, and e-Stewards Certified Recyclers had the lowest average export rate of all three categories. With respect to the Certifications held by the "last holder" (apparent exporter), R2 exceeded e-Stewards 9-1. Finally, the report reveals the false claims and "green washing" of many of the companies that claim that they would never allow the public's waste electronics to be exported.

The complete reports and media generated from them, including the PBS Newshour video segment that followed BAN to Hong Kong, can be found on our website's [Trash Transparency Project pages](#). These reports include in detail, a full disclosure of the study findings including lists of all companies involved, the environmental harm caused, methodology, conclusions, and recommendations.

The BAN e-Trash Transparency Project / Phase 2

BAN's work tracking e-waste in the United States and around the world with GPS trackers continues. BAN's ethical recycling certification program known as e-Stewards now uses trackers routinely to verify performance of the trade requirements in the standard (e.g. no export of hazardous e-waste to developing countries). At the same time, BAN continues to deploy trackers across North America to reveal for consumers and lawmakers alike, the illegal and/or unethical trade practices of some recyclers.

This report is the first update of tracker findings since our September 15, 2016. We call this second phase of deployment Phase 2. We expect more phases to follow.

Herein, we reveal 16 more chains of export (15 LCD monitors and one printer) involving 7 target recycling companies. 5 of these were in California, one in Ohio and one in Texas. An additional two companies (Skill Office Machines and VKL Exports) were also identified. Due to the fact that most of the Phase 2 tracker-enabled devices are still active, we are not ready to report on locations for which no export results have been indicated. We hope to publicise this at a later date.

Overview Table

Final Destination	Uncertified	R2 Certified	e-Stewards Certified	Total
Hong Kong	9	3	0	12
China	3	0	0	3
Philippines	1	0	0	1
Total	13	3	0	16

The listing in this report of a company does not necessarily imply culpability. However, companies that are the “last” handlers prior to export are most likely willfully involved in exporting, as they most likely had direct control over the decision to export or not. For this reason, we call these actors “apparent exporters.”

A company's involvement in a “chain of export”, even though they may not be themselves the apparent exporter, is also of serious concern. Today, it is an established industry norm and practice that responsibility for waste management does not just extend to the edges of one's property boundaries or ownership, but includes the choices and additional steps a company takes to verify that their downstream vendors operate responsibly. This concept known as “due diligence” applies both to upstream supply chains as well as to downstream disposition chains. All recyclers have a responsibility to perform the necessary due diligence to know that their e-waste does not get harmfully or illegally exported after it leaves their hands.

CALIFORNIA

IQA Metals

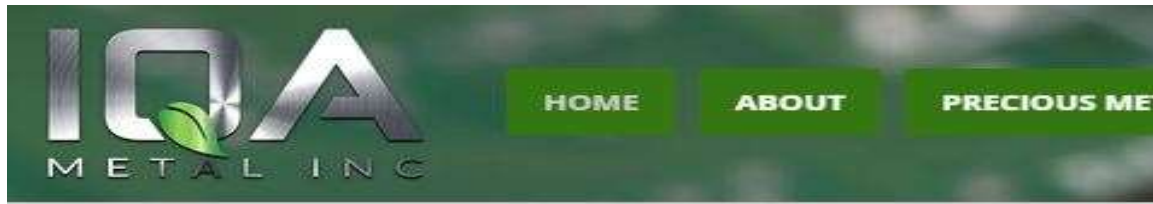
Certification: Uncertified

Address: 13825 Norton Ave, Chino, CA

Note: Apparent Exporter. This company was formerly known as e-World, also in Chino, CA. BAN has long had records of this company exporting via our container tracking work. This company was also found to be involved as a "last holder" (apparent exporter) in the chains of export previously published in the BAN report "Scam Recycling".

Tracker Number	Type	Date of Deploy	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
CA653523	LCD	October 12, 2016	January 13, 2017	First and Last	Hong Kong	1. IQA Metals 2. Hong Kong, Port of Hong Kong 3. Hong Kong New Territories 4. Hong Kong, New Territories, 22.40357 , 113.91632
CA653507	LCD	October 12, 2016	January 16, 2017	First and Last	Hong Kong	1. IQA Metals 2. Hong Kong, New Territories, 22.52717 , 114.13831 3. Hong Kong, New Territories, 22.44416 , 113.99727
CA654935	LCD	October 12, 2016	January 13, 2017	First and Last	Hong Kong	1. IQA Metals 2. Hong Kong, New Territories
CA653424	LCD	October 12, 2016	January 13, 2017	First and Last	Hong Kong	1. IQA Metals 2. Hong Kong, New Territories

From their website:



"IQAA Metal agrees not to allow the export of hazardous e-waste we handle or control to be exported to developing countries, either directly or through intermediaries, throughout final disposition."

-- <https://www.iqametal.com/services/environmental-services/>

Attan Recycling

Certification: Uncertified

Address: 13941 Norton Ave, Chino, CA

Note: Apparent Exporter. This company was also found to be involved in chains of export previously as a "last holder" (apparent exporter) published in the BAN report "Scam Recycling".

Tracker Number	Type	Date of Deploy	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
CA654109	LCD	October 12, 2016	January 2, 2017	First and Last	Hong Kong	1. Attan Recycling 2. Hong Kong, New Territories, 22.45351, 113.98352
CA653937	LCD	October 12, 2016	January 13, 2017	First and Last	Hong Kong	1. Attan Recycling 2. Hong Kong, New Territories

From their website:



"It is important for us all to do our part and instead of simply throwing away your old computer or electronics, they need to be properly disposed of."

-- <http://attanrecyclingcorp.com/>

All Green Recycling

Certification: Uncertified

Address: 15561 Del Amo Ave, Tustin, CA

Note: There is another All-Green recycling firm based in North Carolina and New Brunswick which should likely not be confused with this company based in Tustin, CA. The Tustin All Green

company falsely claims to be R2 and e-Stewards Certified. These exports noted below implicate two other companies -- a collection depot (Skill Office Machines), and a downstream company (VKL Exports), likely to be a broker. The tracker-enabled devices were deployed at Skill Office Machines (a certified All Green drop off location). All devices moved to the Los Alamitos, CA area on Nov 8, 2017. One of the devices was later exported by VKL Export of South El Monte, CA, arriving at Hong Kong Port January 3, 2017. Of the exported units, two units last communicated from Hong Kong, and one from Mainland China. All Green has repeatedly been warned not to imply certification to, or use the name of e-Stewards. However, they continue to do so even though they have not been e-Stewards Certified for several years.

Tracker Number	Type	Date of Deploy	Date of Arrival	Position on Chain of Export	Destination	Chain of Export Summary
WA653135	LCD	November 7, 2016	January 3, 2017	First	Hong Kong	1. Skill Office Machines at 10919 Downey Ave, Downey, CA 2. Los Alamitos, CA area 3. Unidentified Business, El Monte CA, 34.04720, -118.04014 4. Chino, CA area 5. Hong Kong, New Territories 6. Hong Kong, New Territories, 22.52874, 114.16518
WA652962	LCD	November 7, 2016	January 3, 2017	First	Hong Kong	1. Skill Office Machines 2. Los Alamitos, CA area 3. El Monte, CA area 4. Chino, CA area 5. Hong Kong, New Territories 6. Hong Kong, New Territories, 22.52874, 114.16518

WA655585	LCD	November 7, 2016	January 3, 2017	First	Mainland China	<ol style="list-style-type: none"> 1. Skill Office Machines 2. Los Alamitos, CA area 3. Unidentified Business, El Monte CA, 34.04720, -118.04014 4. VKL Export, South El Monte, CA, 34.04822, -118.03545 5. Hong Kong, New Territories 6. Hong Kong, New Territories, 22.43884, 114.01635 7. Nanhai Qu, Foshan Shi, Guangdong Sheng area, China 8. Mashitang area, China
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From their website:

ALL GREEN
ELECTRONICS RECYCLING
DATA DESTRUCTION
IT ASSET DISPOSITION

The Evolving Need For Certified Electronics Recycling

Certified electronics recycling is a solution that has evolved in response to an unexpected problem, as consumers and companies alike wonder what to do with e waste. Unprecedented demand for electronic equipment, coupled with the progressively shortened useful life of electronics and the speed at which technology evolves, has caused an ever-increasing problem with e waste.

“If you are trying to determine how to recycle your electronics, a good first step is to find a responsible recycler. Many recyclers will only export your old gadgets and dump them in developing nations. That isn’t a solution to the problem of electronic waste in landfills. The toxics will hurt the people in these nearby nations and compound our world’s environmental problems. You can look into the “e-steward network,” to find out how to recycle your electronic devices responsibly. These companies don’t export waste to countries in development and follow other high standards.”

-- <https://www.allgreenrecycling.com/how-to-recycle-electronics-a-beginners-guide/>

Tri Valley Recycling

Certification: Uncertified

Address: 1988 E Alpine Ave, Stockton, CA

Note: This company was involved previously as reported in the BAN report "Scam Recycling". At that time they were the first holder in a device that later ended up in Kenya. This time, one LCD was deployed December 22, 2016. The unit was exported by an unknown business, arriving at Xiamen, China, March 14, 2017, then appearing in Hong Kong New Territories on March 20, 2017.

Tracker Number	Type	Date of Deploy	Date of Arrival	Position on Chain of Export	Destination	Chain of Export Summary
WA653580	LCD	December 22, 2016	March 14, 2017	First	Hong Kong	1. Tri-Valley Recycling 2. City of Industry, Nelson Ave E/ N Unruh Ave area, CA 3. Xiamen Port, China 4. Hong Kong Port, Hong Kong 5. Hong Kong, New Territories, 22.52689 , 114.14671

From their website:

“Unfortunately, E-Waste that does avoid our landfills is often exported to developing countries, where the devices are picked apart by low wage laborers who are not protected from the toxic releases.”



-- <http://www.trivalleyrecycling.com/e-waste-law.php>

MICHIGAN

Great Lakes Recycling

Certification: R2

Address: 26500 Harding St, Oak Park, MI

Note: This company was involved as an intermediate holder in the chain of export in our previously published report "Scam Recycling". This time LCD monitors were deployed at the company directly on October 14, 2016. The units moved November 3, 2016, to Dallas TX, then the units moved to Norcross, GA on December 30, 2016. The units were then exported arriving at the port of Hong Kong on March 23, 2017.

Tracker Number	Type	Date of Deploy	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
MI614673	LCD	October 14, 2016	March 23, 2017	First	Hong Kong	1. Great Lakes Recycling 2. Dallas, TX 3. Norcross, GA 4. Hong Kong Port, Hong

						Kong 5. Hong Kong, New Territories
MI654216	LCD	October 14, 2016	March 23, 2017	First	Hong Kong	1. Great Lakes Recycling 2. Dallas, TX 3. Norcross, GA 4. Hong Kong Port, Hong Kong

From their website:



"E-waste is the fastest growing waste stream primarily due to the rapid technology change and this is causing a problem. In 2012, the EPA estimated only 27% of 4.4 million TONS of e-waste in the U.S. was recycled. The remaining 73% was either landfilled, processed in an incinerator, or exported to Asia..."

...GLR is a licensed and certified recycler that processes e-waste responsibly to EPA, ISO 9001, and ISO 14001 standards. The material is processed to the commodity level and then returned to the marketplace for reuse to conserve our natural resources."

-- <http://www.glradvanced.com/about-us/earth-day/>

Goodwill Oxford, Michigan

Certification: Uncertified

Address: 203 S Locust St, Oxford, Michigan 45056

Note: This Goodwill was implicated as being first in the chain of export in our report entitled "Disconnect" published in 2016. This time three LCD monitors were deployed there on October 15, 2016. These units moved as before to the Groveport, OH area November 8, 2016, then to Morristown, TN on November 25, 2016, then to Toccoa, GA on December 5, 2016. All three units were then exported from Eastern seaboard ports. Two units arrived at Bantagas Port, Philippines March 25, 2017, and one unit transmitting data from Hong Kong February 13, 2017. In June, one of the Philippine trackers signaled from a rural area west of Nanjing, China.

Currently, the Goodwill website provides a link to their "environmental partner" Padnos, an R2 Certified recycling company in Michigan. Padnos was implicated in the chain of export in our 2016 report "Disconnect".

Tracker Number	Type	Date of Deploy	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
MI613998	LCD	October 15, 2016	February 13, 2017	First	Hong Kong	<ol style="list-style-type: none"> 1. Goodwill Oxford 2. Groveport Ohio area, 3. Morristown, TN 4. Toccoa, GA 5. Hong Kong Port, Hong Kong 6. Hong Kong, New Territories, 22.52974 , 114.14547 7. Hong Kong, New Territories, 22.52876 , 114.16640 8. Qingcheng Qu, Qingyuan Shi, Guangdong Sheng, China
MI615936	LCD	October 15, 2016	June 17, 2017	First	Philippines	<ol style="list-style-type: none"> 1. Goodwill Oxford 2. Groveport Ohio Area 3. Morristown, TN 4. Toccoa, GA 5. Batangas Port, Phillipines 6. Olongapo, Philippines, 14.83565, 120.29231

						7. West of Nanjing, China, 32.21203, 117.75315
MI616322	LCD	October 15, 2016	March 25, 2017	First	Philippines	<ol style="list-style-type: none"> 1. Goodwill Oxford, Ohio 2. Groveport, Ohio area 3. Morristown, TN 4. Toccoa, GA 5. Batangas Port, Philippines 6. Olongapo, Philippines, 14.83565, 120.29231 7. Olongapo, Philippines, 14.85743, 120.30464

From their website:



Padnos is declared as the "environmental partner" of this Goodwill store.

"Your electronics are not dumped -- Recycling your old electronics at a Certified e-scraper like PADNOS ensures that your old computer will not be disposed of at a landfill and cause damage to our environment or our communities."

-- <https://www.padnos.com/electronics-recycling>

TEXAS

CompuCycle

Certification: R2

Address: 7700 Kempwood Dr., Houston, TX

Note: One printer was deployed July 6, 2017. The unit moved to Dallas, TX on July 13, 2017 and then arrived at the port of Long Beach, CA on July 21, 2017 where it was placed on a ship and exported, arriving in Hong Kong on August 28, 2017.

Tracker Number	Type	Date of Deploy	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
TX141361	Printer	July 6 2017	July 21, 2017 Aug. 24, 2017 Aug. 28 – Sept. 6, 2017	First	Hong Kong	1. Compucycle Inc., Houston, Texas, 7700 Kempwood Dr. Houston, TX 77055 2. Carson, California 3. Hong Kong Port, Hong Kong 4. Hong Kong, New Territories, various locations

From their website:



Know Where Your Recycled Electronics Are Going

 No Landfills  No Prison Labor  No Exports of E-Waste  No Child Labor  No Incinerators

CERTIFIED and GUARANTEED!

-- <http://www.compucycle.net/faq-questions/residential-recycling-faq/98-how-where-do-i-drop-off-equipment-for-recycling>