

THE "SCAM RECYCLING" CONTINUES

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

UPDATE #2

January 18, 2018



e-Trash Transparency Project
Basel Action Network
Seattle, WA, USA
www.ban.org

INTRODUCTION

The BAN e-Trash Transparency Project

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 norms (Basel Convention) and under 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 deemed as likely illegal.

The study as summarized in "Scam Recycling" witnessed 34% of the 205 deployments moving off-shore 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 is unfortunately 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 never would 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 Update #1

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. It is our intention to continue to report on these trackers.

The most recent deployment involved 60 trackers deployed in Texas, Georgia, and Florida in the US. 31 of these were R2 Certified (52%), 4 were both e-Stewards and R2 (6.66%), 1 was e-Stewards only (1.67 percent), and 24 were uncertified (40%).

On September 6 of 2017, the [first update](#) of new tracker findings since our September 15, 2016 report was published. In that report we revealed 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.

Overview Table of Update #1

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 BAN E-TRASH TRANSPARENCY PROJECT UPDATE #2

In this latest update report we have identified six new chains of export (involving four printers and two LCDs) involving six new US recycling companies. Three of these were in Texas, one in Georgia, and two in Florida. We have also included an update on a company -- CompuCycle that we reported in our first update. We have included it here as its tracked printer has since moved to a new country -- Pakistan. But we have not included it in the table below in order to keep our running tally of chains of export accurate.

This report also shows that the **City of Houston** was involved in export via their approved collection center.

A listing in this report of a company does not necessarily imply culpability. However, companies that are the “last” handlers prior to export are 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.”

Overview Table of Update #2

Final Destination	Uncertified	R2 Certified	e-Stewards Certified	Total
Hong Kong	2	2	0	4
Pakistan	0	1	0	1
Philippines	0	1	0	1
Total	2	4	0	6

The new companies involved in Export Chain:

e-Tech Management, RAKI Electronics Recycling, Advanced Technology Recycling, ARC Broward IT Asset Recovery, SEER, Allied Ecovery.

A company’s involvement in a “chain of export”, even though they may not be themselves the apparent exporter, is 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.

Note: Listings that include latitude and longitude are precise GPS readings. If a destination listing lacks these coordinates, then it means that the reading taken is from the nearest cell tower and is less accurate but still within a radius of 35 kilometers.

TEXAS

1. CompuCycle Inc

Certification: R2

Address: 7700 Kempwood Dr., Houston, TX 77055

Website: <http://www.compucycle.net/>

Note: CompuCycle was already reported in our last update report (Update #1) as an apparent exporter to Hong Kong. We have listed this again in this update as the device has, since then been exported to Pakistan and we were able to recently visit the site in Hong Kong that was the apparent exporter to Pakistan (see photo below). The proprietor in Hong Kong admitted his business is importing and exporting printers, from the US and many of his buyers were in Pakistan. The export of this printer from Hong Kong to Pakistan is likely to be illegal due to lack of proper notification to, and consent from Pakistan as required under the Basel Convention.

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	Position Chain of Export	Country Destination	Chain of Export Summary
TX141361	Printer	July 6, 2017		First and Last (in USA)	Hong Kong	CompuCycle Inc, Houston, Texas 7700 Kempwood Dr, Houston, TX 77055
			July 21, 2017			Carson, California
			Aug. 24, 2017			Port of Hong Kong
			Aug. 28 - Sept. 24, 2017			Hong Kong, New Territories, various locations
			Sept. 25, 2017- Oct. 26, 2017			Hong Kong, New Territories, 22.422347, 114.016634
			Nov. 13-15, 2017		Pakistan	Port of Karachi
			Nov. 22, 2017			Lahore, Pakistan

Photos from site visits:



Inside Hong Kong e-waste brokers storage unit where the CompuCycle printer arrived, before being further exported to Pakistan
Copyright BAN, November 2017.

From the company website: *"For the past 18 years CompuCycle has successfully upheld our promise of eco-friendly and secure electronic recycling practices. In January of 2011, CompuCycle was proud to become Houston's first Responsible Recycling (R2) Certified company. In February of 2012, CompuCycle earned yet another certification to ensure our environmental compliance; ISO 14001:2004. In November 2014, CompuCycle earned another certification for occupational health and safety management; OHSAS 18001:2007. We offer our customers products and services focused on refurbishing equipment for resale, reuse of components and base materials, as well as eco-friendly disposal. Our end-of-life technology solutions are ethical, ecologically sustainable, and comply with the highest regulatory standards."*

R2, ISO 14001, and OHSAS 18001 Certifications Ensuring Safe, Responsible, and Secure Recycling

[Read More](#)

SAFE, SECURE, AND CERTIFIED RECYCLING

[Upcoming Recycling Events](#)

[View Full Calendar](#)



2. E-TECH MANAGEMENT

Certification: Uncertified (Claims to have R2 certification)

Address: 6446 Long Point St, Houston, TX 77055

Website: <http://www.e-techmanagement.com/>

Note: Despite the claims on the website to the contrary, e-Tech is the "apparent exporter." This printer was delivered to an e-Tech Management collection location in Houston and ended up in what appears to be an e-Tech management electronics junkyard in New Territories. BAN was able to visit this site in New Territories in November of 2017 and found many boxes of imported e-waste from e-Tech Management's Columbus, Ohio location and other US locations.

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
TX136049	Printer	July 6, 2017	Sept. 29, 2017	First and Last	Hong Kong	E-Tech Management 6446 Long Point St, Houston, TX, USA New Territories, Hong Kong 22.431310, 114.020918

Photos from site visits:



A scene from the e-Tech Management junkyard in Hong Kong where the tracker-enabled printer deployed at e-Tech Management in Texas ended up. Copyright BAN, November 2017.



A worker at e-Tech Management Junkyard in New Territories, Hong Kong smashing modems against tabletop. This is the location where the printer dropped at e-Tech Management in Texas ended up. Copyright BAN, November 2017.

From the company website: "E-Tech Management has a strict zero landfill that ensure no electronic waste will be added to the global waste loop by exporting to third world countries."

Learn about our awards and certifications

E-Tech Management has been awarded with numerous certifications and recognition, including the industry standard R2:2013 /ISO 9001/ ISO14001/OHSAS. The certification programs for electronics recycling and asset disposition are based upon strong environmental standards which maximize the principle of the 3R (Reduce, Reuse, and Recycle). Our certification indicates ETM's capability of meeting all the necessary requirements to meet any local, municipal, and federal laws and regulations.



3. R.A.K.I. ELECTRONICS RECYCLING (From City of Houston Collection Center)

Certification: R2

Address: 6305 Skyline Dr, Houston, TX 77057

Website: <https://www.rakicomp.com/>

Note: R.A.K.I. is the apparent exporter in this case. Tracker TX137104 was dropped at the City of Houston Westpark Drive Transfer Station on July 6th and moved from there to R.A.K.I. Electronics Recycling on July 26th, 2017. The device was then exported to a large New Territories junkyard. Thus, it appears that the City of Houston has a contract with a company that exports its waste to developing countries. BAN was able to visit the Hong Kong destination site in March of 2016 and again in November of 2017.

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
TX137104	Printer	July 6, 2017	July 26, 2017	First and Last		Westpark Recycling Center 5900 Westpark Dr, Houston, TX 77057
			Oct. 3, 2017		Hong Kong	R.A.K.I. Electronics Recycling 6305 Skyline Dr, Houston, TX 77057 29.727613, -95.492771
			Oct. 4, 2017			New Territories, HK San Sik Road, New Territories, Hong Kong 22.453035, 113.987578

Photos from site visits:



Printer junkyard in Hong Kong New Territories where the printer deployed at the City of Houston's Westpark Drive collection site ended up. It first went to an e-waste recycler known as R.A.K.I. and then was exported to this location. Workers here at this site, smash printers down to recover plastic, steel and circuit boards for onward shipping to China. Heavy exposure to toner powders is experienced by the workers. Copyright BAN, March 2016.



Another view of printer junkyard in Hong Kong New Territories where the printer deployed at the City of Houston's Westpark Drive collection site and managed by R.A.K.I. ended up. Copyright BAN, November 2017.


From the company website: "Our state of the art 20,000 square foot facility was built in compliance with environmental guidelines at the Federal, State, Local, and EPA level, and we hold top-level industry certifications. Our warehouse is set on an acre of land, helping ensure the security of your data and hardware. We also have a strict No Landfills policy, making sure that your disposed electronics are recycled rather than left to poison waterways and soil."



CERTIFICATIONS

RAKI Electronics Recycling operates in adherence with your industry's best practices and is committed to keeping sensitive data safe whether responsibly recycling your business equipment or securely disposing of your data.

LEARN MORE ABOUT THE **R A K I** ADVANTAGE
[VIEW OUR ENVIRONMENTAL POLICY](#)



Responsible[™] Recycling


R2 (Responsible Recycling)
Certified Electronic Recycler
[VIEW FULL CERTIFICATION](#)




ISO 14001
Certified Electronic Recycler
[VIEW FULL CERTIFICATION](#)



OSHAS 18001
Certified
[VIEW FULL CERTIFICATION](#)




Texas Solid Waste
Registration Number: 88847



EPA ID: TXR000079817

All of RAKI Electronics Recycling operations are conducted under E.P.A., Federal, State and Local guidelines.



Our facility is approved by the Texas Commission on Environmental Quality (TCEQ).
Site ID Number: RN105745905
Customer CN: CN603328360
[VIEW FULL CERTIFICATION](#)

4. ADVANCED TECHNOLOGY RECYCLING

Certification: R2

Address: 8559 Northeast Interstate 410 Loop B-144, San Antonio, TX 78219

Website: <https://www.atrecycle.com/>

Note: ATR is the apparent exporter.

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
TX136239	LCD	July 5 th , 2017	Nov. 2, 2017 Nov. 29, 2017	First and Last	Pakistan	Advanced Technology Recycling 8559 Northeast Interstate 410 Loop B-144, San Antonio, TX 29.437150, - 98.393570 Karachi, Pakistan Akbar Road, Karachi, Sindh, Pakistan 33.496671, - 97.163997

From the company website: *"ATR does not export E-Waste, recovered commodities or traditional recycling materials to developing countries or entities outside of the OECD sanctioned group."*

"Our commitment to our customers, partners and employees to protect our environment by offering the highest standards in ethics and safety and to focus on continual improvement in our reuse and recycling process establishes us as a pioneer in our industry."

ATR can provide various types of collection systems including Gaylords, Pallets, locking bins and we have a fleet of GPS enabled vehicles including 53' trailers that can be deployed at your facility and switched out as needed . ATR does not export E-waste, recovered commodities or traditional recycling materials to developing countries or entities outside the OECD sanctioned group.

World-Class E-Scrap Recycling Services

Advanced Technology Recycling (ATR) E-Scrap services help protect your corporate image and reputation by offering customized environmentally responsible recycling solutions to meet your electronic recycling needs and green initiatives.

ATR will manage your decommissioned assets responsibly, efficiently, securely and compliantly.



FLORIDA

5. ARC BROWARD IT ASSET RECOVERY

Certification: R2

Address: 3300 SW 13th Ave, Fort Lauderdale, FL 33315

Website: <http://www.arcbrowarditasset.com/>

Note: ARC Broward is a non-profit company whose mission purports to help people. The printer delivered to ARC Broward IT Asset Recovery first likely went to the rail head Florida East Coast Rail yard near Miami Springs, Florida, and then to Chino, CA where numerous exporters are located (see earlier reports) and then out of the Port of Long Beach to New Territories, Hong Kong. This device to date has never given a GPS signal but rather has indicated its location by cell tower locations only but it has clearly moved from Florida to Hong Kong via California.

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
FL141262	Printer	July 10, 2017	Aug. 14-15, 2017 Aug. 29-Sept. 3, 2017 Oct. 12, 2017	First (last could have been a company in China)	 Hong Kong	ARC Broward IT Asset Recovery 3300 SW 13th Ave, Fort Lauderdale, FL 33315 Miami Springs, FL Chino, CA Hong Kong, New Territories, various locations

From the company website: *"We are committed to the protection of the environment by providing solutions based on an end-of-life hierarchy of reuse, recovery, and disposal for responsible management strategies of electronic waste. We are committed to the secure processing of electronic waste throughout the recycling chain and conducting downstream due diligence for all materials of concern (focus materials). We diligently comply with all applicable compliance obligations to which we subscribe."*

The business was founded as a "mission-based enterprise" of Arc Broward, a nonprofit organization dedicated to providing services to more than 1,400 children and adults with disabilities. The mission-based enterprise concept embraces efforts that Arc Broward has made to operate a revenue-generating business that advances its social mission.

Arc Tech is currently South Florida's only R2-certified electronics recycler. Arc Tech maintains its Responsible Recycling ("R2") Practices, ISO 14001, and OHSAS 18001 certifications. These certifications represent a core set of standards for creating and implementing stringent and effective environmental, safety and quality management systems.

Responsible businesses and government agencies entrust their decommissioned IT assets and other electronics to certified asset recovery companies because they recognize the value of protecting their brand and bottom line from data breaches and environmental liabilities stemming from improper handling or disposal of their IT assets. Use of certified companies generally reduce exposure to liability and is legally, financially, and environmentally responsible.

[Click HERE to view our certifications.](#)



Responsible Recycling ("R2") Practice:2013

R2 standards set forth requirements relating to environmental and public health, worker health and safety, security and the entire chain of custody of toxic materials through final disposition. It prohibits e-recyclers and their downstream vendors from exporting these more toxic materials to countries that have enacted laws making their import illegal. [Click here for more info.](#)

6. SEER

Certification: Uncertified

Address: 6902 E 7th Ave, Tampa, FL 33619

Website: <http://www.seerrecycling.com/home2.html>

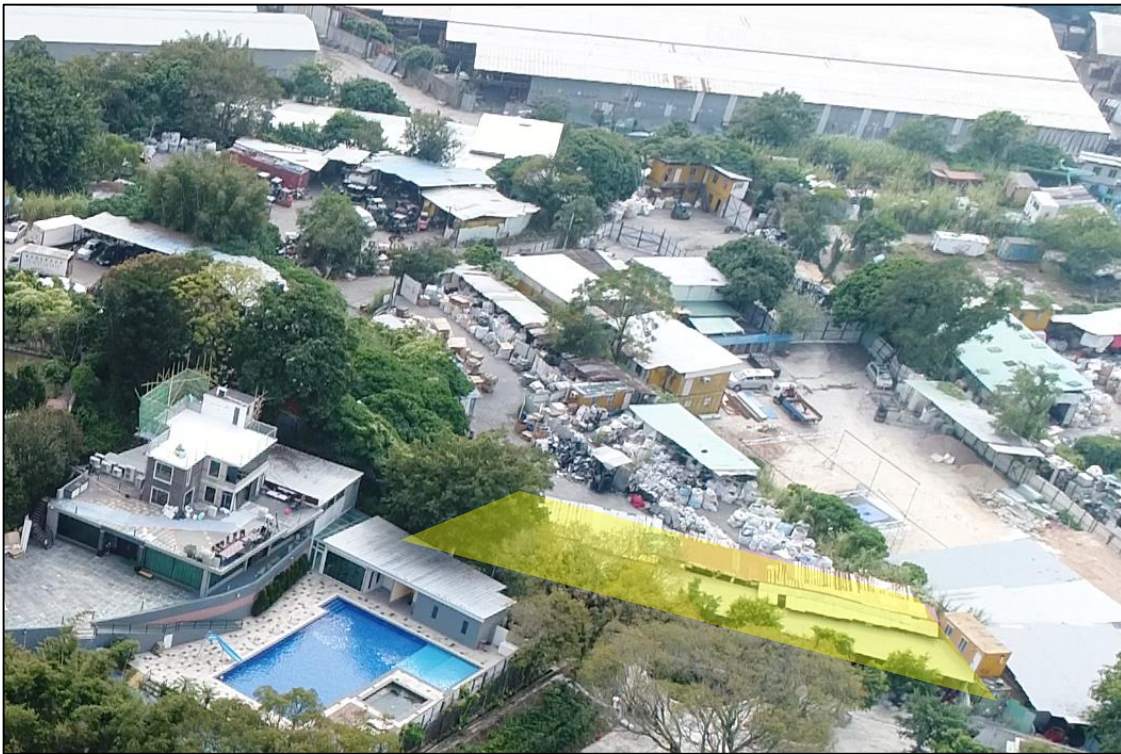
Note: SEER is the apparent exporter of this LCD. BAN was able to visit the site in Hong Kong's New Territories where this mercury laden device ended up. While we were unable to take photos inside the junkyard, BAN witnessed large quantities of broken CCFL lamps at the workstations where workers would clearly be exposed to harmful levels of mercury.

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
FL175906	LCD	July 10, 2017	Sept. 26, 2017	First and Last	Hong Kong	SEER Recycling 6902 7th Ave East Tampa, FL 33619 New Territories, Hong Kong 22.469878, 113.989680

Photos from site visits:




Scene from Hong Kong, New Territories location where the LCD dropped at SEER in Tampa, Florida ended up. Computer mice dumped along the internal site roadway. Copyright BAN 2017



Drone shot of location in Hong Kong's new territories where the LCD deployed at SEER in Tampa, Florida ended up. BAN's visit occurred with workers absent. However, the work stations (under yellowed roof) were littered with broken CCFLs (mercury containing lamps). Copyright BAN, November 2017.

From the company website: "We work only with ethical, EPA-compliant recycling partners. We closely monitor their practices to ensure they meet all state and federal standards and adhere to our zero-landfill policy for eWaste. We focus exclusively on eliminating the risks surrounding data security, compliance, and environmental impact. Improperly disposed of PCs, monitors, and other hardware leach toxic metals into the soil, contaminate water supplies, and can wind up costing millions of dollars in fines, cleanup costs, and bad publicity. Storing equipment that will never be used again – often at great expense – is not a good option for any organization."

ENVIRONMENTAL RESPONSIBILITY



Electronic waste represents 2% of America's trash but more than 70% of its toxic waste.

Old computers and electronics that are not disposed of properly can contaminate the environment and lead to massive fines and bad publicity. With a zero-landfill policy, SEER eliminates these risks. By adhering to the strictest standards throughout its system of reuse, remanufacturing, redeployment and recycling, SEER navigates the myriad of environmental regulations so that you can focus on what you do best.

GEORGIA

7. ALLIED ECOVERY

Certification: R2


Address: 465 Clary Connector, Toccoa, GA 30577, USA

Website: <http://www.alliedecover.com/Home.html>

Note: Allied Ecovery is the apparent exporter in this case. This device has yet to send a GPS reading but is letting us know where the nearest cell tower is. This information indicates a clear export from Allied Ecovery to Luzon, Philippines.

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	Position, Chain of Export	Destination	Chain of Export Summary
GA139431	LCD	July 13, 2017	Sept 18, 2017	First and Last	Philippines	Allied Ecovery 465 Clary Connector, Toccoa, GA 30577 Central Luzon, Philippines


From their company website: *"Allied Ecovery has a zero tolerance landfill policy and will protect the environment by maintaining the highest possible standards of recycling and reuse excellence. Allied Ecovery is committed to the prevention of pollution and the prevention of injury and ill health. Allied Ecovery is committed to meeting customer requirements. Allied Ecovery is committed to managing used and end of life electronic equipment based on a reuse, refurbishment, recovery, disposal (RRD) hierarchy including onsite and downstream materials management throughout the recycling chain. Allied Ecovery is committed to managing Focus Materials throughout the recycling chain to final disposition with due diligence to protect our environment."*



ISO 14001

Allied Ecovery Inc. is certified to ISO14001 and R2, and is an eWaste recovering and recycling company based in Toccoa GA USA. AEI is dedicated to providing eWaste management solutions including asset management, disposal, remarketing, recycling and data security services. AEI accepts used computers, servers, cellular phones, network and telecommunication equipment, and cable equipment from several contracting OEMs, private corporations and various levels of government, then restores, reuses, dismantles and recycles every piece and component of these equipment in an environmental-friendly way, with zero landfill...

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Responsible™ Recycling

