

# ANNUAL DATA - GOLD

Member: Staples | Year: 2015 | Cycle: Annual

Please submit all numbers in tons.

An asterisk (\*) denotes a required field. Participants cannot submit the data form until all fields marked with an asterisk are complete.

## Total Collected for Reuse & Recycling from all Streams

Total Collected for Reuse & Recycling: <sup>1</sup> 8,467.01 tons

Equipment: <sup>2</sup> \* 6,147.22 tons

Cell Phones and other Mobile Devices: <sup>3</sup> \* 0.75 tons

Accessories: <sup>4</sup> \* 2,319.04 tons

Total: 8,467.01 tons

## Recycling Data

Total sent to third-party certified recyclers from All Streams: <sup>5</sup> \* 8,466.88 tons

Percentage sent to third-party certified recyclers: 100.00 %

Has collection increased compared to the previous year? \*

Yes

No

Please explain company-specific contributing factors (e.g. decrease weight in electronic devices). \*

The contributing factor in the decreased weight of electronic devices in 2015 was the closing of 62 Staples retail locations across the U.S. between 2014 and 2015. Since fewer stores were operational in 2015 to provide electronics recycling opportunities, the overall volume collected and recycled through the Staples in-store Technology Recycling Program was lower. However, it should be noted that tons collected per store was higher in 2015 (6.50 tons/store) versus 2014 (6.43 tons/store) which indicates the continuation of a strong collection infrastructure operated by Staples.

Will you include this explanation in the final publicly-posted report? (Note: You WILL NOT be penalized for not achieving an increase in collection if the rationale is publicly posted). \*

Yes

No

## State Reporting Data

Total Collected for reuse and recycling from all streams (Note: The total from the below categories should equal the total recycled)

### Weight of electronics collected in states with take-back laws explicitly to meet these laws. \*

3,681.86 *tons*

### Weight of electronics that exceeds state take-back laws, collected in states with take-back laws. \*

0.00 *tons*

### Weight of electronics collected in states without take-back laws. \*

2,999.86 *tons*

### Weight of electronics collected but not attributable to a specific state (e.g., collected by mail-back program, regional agreement, or other method that does not allow a company to track). \*

0.00 *tons*

### Please use this space to convey any details to EPA about your approach for arriving at your state data (i.e., with and without take-back laws) and any company-specific contributing factors and other useful information (e.g., did your company sell pounds to other OEMs? if so, how many?) \*

The state data for the Staples Technology Recycling Program is captured based on recycling drop offs at the individual store level. The Call2Recycle data for each state is tracked by individual store. The Staples volume is supported nationwide by multiple OEM partners as arranged through Electronic Recyclers International, Inc. (ERI) which is Staples' exclusive recycling partner. All Staples volume is supported through OEM partners. However, neither Staples nor ERI is privy to OEM recycling obligations and, as such, is not able to determine accurately the "weight of electronics that excess state take-back laws, collected in states with take-back laws". For purposes of this report, Staples is reporting all volume that would be eligible in states with take-back laws in the "weight of electronics collected in states with take-back laws explicitly to meet these laws". Please note that not reflected in the above data is "Weight of electronics in states with take-back laws that is not eligible under those laws or part of a program". As an example, this would include items like printers and other e-waste in New Jersey which do not count toward a manufacturer's obligation. It would also include the Staples volume in Washington as Staples is not part of the State Standard Plan (operated by the WMMFA) or an approved Independent Plan (there were no approved Independent Plans in WA in 2015). This volume accounts for 1,785.29 tons in 2015.

### Did your company increase collection, recycling and/or reuse in at least one state without a take-back law? \*

Yes

No

### Provide a specific state without a take-back law and actual data (i.e., not derived from an estimate) in which you achieved a total increase in recycling. \*

Alabama

### Previous Year's Data: \*

43.19 *tons*

### Current Year's Data: \*

122.85 *tons*

### Please explain how you achieved this increase in the text box below. \*

Staples has continued to promote its in-store Technology Recycling Program through a variety of manners including multiple different marketing initiatives and promotions, social media outreach, and digital search optimization efforts to drive consumers and small businesses to staples.com/recycle. The effort is nation-wide throughout the 2015 calendar year (with particular focus in the spring and fall) but the greatest success in a non-

regulated state (in terms of total tons recycled) was in Alabama.

## Reporting Requirements

### Mass Balance/Tracking Throughput

**Have you verified that all recycling vendors used by your company are required to fully account for the organization's used electronics as they enter and leave each facility used? \***

Yes

No

**Provide the methodology used for verification: \***

Yes, the recycling vendor has an internal tracking system that allows for the tracking of incoming material from the point of receipt through the recycling process. The vendor conducts a mass balance account at the end of each month to ensure the volume of electronics coming into the facility is aligned with the outgoing commodities.

### Beyond 3rd Party Certification Standards

**List company policies or programs for vendors that go beyond third-party certification standards, and verify that the policies are followed by each recycler used. \***

Staples staff periodically visits certain ERI recycling facilities, typically these visits are arranged with several days of notice and they are not audits. Staples relies on the legally binding contractual agreements with ERI and Call2Recycle to outline our expectations for our vendors. We monitor compliance against these agreements through the reporting and manifests we ask our recycling partners to provide us, as well as the third party certification programs our recyclers are certified against (e-Stewards and R2). Staples may decide to invest in additional third party audits to validate and verify vendor compliance in the future, but has not dedicated resources to additional audit programs to date.

**Our company has verified that all of these policies and/or programs are being followed by each recycler used. \***

Yes

No

**Website where company policies or programs that go beyond third-party certification standards are listed (optional):**

*Ensure website address begins with http:// or https://*

### Due Diligence

**Have you verified that your company conducts due diligence to ensure that the recycler of first entry into the system, as well as any vendors receiving materials after the initial recycler (i.e., downstream vendors), either:**

- are certified to an established third-party certification standard, or

- are examined by the company's auditors at least semi-annually to ensure safe management practices?

**If a certifying body conducts an annual audit, only one additional in-person or paper audit is required per year. \***

Yes

No

**Provide the methodology used for verification: \***

Recycling vendor (Electronic Recyclers International, Inc. or ERI) is both e-Stewards and R2 certified. Pursuant to those standards as well as ERI's internal downstream vendor management program, all of ERI's downstream vendors are audited. The audit includes a thorough and comprehensive multi-media audit that ensures each downstream vendor in the recycling chain continues to comply with all international, Federal, state and local environmental, safety and health laws, rules, regulations, permits, licenses and registrations for as long as it receives material directly or indirectly from ERI. ERI's U.S. vendors are audited at least biennially and

international vendors are audited every 3-5 years. The type and frequency of audits is determined based on the material managed. Call2Recycle is R2 certified and works

## Certified Recyclers and Programs \*

**Is this information included in the final, publicly-posted report? \***

Yes

No

**List names of certified recycler(s) used and certification programs:**

	Certified Recycler Name *	Certified Recycler Location - City, State, Country (if applicable) *	Certified Program *
<b>1</b>	ERI	Multiple ERI locations in United States (Fresno, CA; Aurora, CO; Plainfield, IN; Holliston, MA; Badin, NC; Flower Mound, TX; Sumner, WA)	E-Stewards and R2 (also ISO 14001, ISO 9001, and OHSAS 18001)
<b>2</b>	Call 2 Recycle	Items sorted and sent to several different recyclers depending on item type: Inmetco (Ellwood City, PA, USA); Glencore Xstrata (Sudbury, ON, Canada); Gopher Resource (Eagan, MN, USA); Wireless Alliance (Boulder, CO, USA)	Call2Recycle, their sorters, and Wireless Alliance are all R2 certified. The metal smelter/processors are not R2 certified.

## Education & Outreach

**List and describe public education and outreach activities on safe management of used electronics and available collection opportunities. \***

Staples was the first national retailer to offer everyday recycling services for our customers in 2007 and the program has been free since 2012. We have continued to encourage the responsible recycling of e waste through customer facing marketing materials and blogs, social media, and by driving browser search results to our recycling page. Staples would welcome public education support from government agencies like US EPA and other state governments since raising awareness of the importance of recycling electronics (and any other issue) takes significant and sustained effort and since these agencies have unparalleled access to citizens. Thus far national and state government efforts to educate consumers have been inadequate. Staples would also welcome improved EPA enforcement against bad actors in the recycling industry. Better EPA enforcement would ensure that responsible recyclers are not competing against illegal actors who are not bearing the full cost of recycling legally and responsibly. Finally, Staples would support national electronics producer responsibility legislation that is broad in scope to drive more manufacturers to take accountability for their products and their end of life impacts, which should help divert significantly more electronic material to recycling than today.

**Website where public education and outreach activities are listed (optional):**

<http://www.staples.com/recycle> *Ensure website address begins with http:// or https://*

## Company Policies Favoring Recycling and Reuse

**List and describe company policies that favor recycling and reuse of electronics equipment and/or components, as opposed to energy recovery, incineration, or land disposal. \***

Our store policy related to electronics specifically states that all material collected must be back-hauled for recycling by our vendors. We have contractual agreements with our vendors that support the conversion of as close to 100% of materials for reuse or recycling as possible, unless the material must be disposed of as waste due to legal requirements or lack of any feasible end market solutions for recycling. Our vendors also have an inherent financial incentive to avoid generating waste since it is a cost and not a source of revenue like recyclable materials.

Website

**List website where EPA provided baseline/annual tier data is publicly posted: \***

<http://www.staples.com/responsibility> *Ensure website address begins with http:// or https://*

**Notes:**

**1. Total Collected for Reuse and Recycling:** This is the total amount of used electronics collected for reuse and recycling, including the amount sent to certified and non-certified recyclers. It can include company assets, business to business, warranty returns, and electronics collected and/or purchased to meet state take-back laws. See below for definitions of "reuse" and "all streams".

**2. Equipment:** Defined as electronics equipment such as central processing units (CPUs), desktops, laptops, televisions, printers, monitors, copiers, fax machines, scanners, imaging equipment, radios, tablets, e-readers, slates, netbooks, and heavy equipment such as servers. It further includes any other or new (future) types of equipment that are designed primarily to store or convey information electronically and have a 4-inch screen or larger measured diagonally.

**3. Cell Phones & Other Mobile Devices:** Defined as electronic equipment such as cell phones, personal digital assistants (PDAs), organizers, tablets, e-readers, slates, smart phones, compact disc players, gaming systems, calculators, and MP3 devices. It also includes any other or new (future) types of equipment that are designed primarily to store or convey information electronically and that are lightweight, mobile in design, and have a 4-inch screen or less measured diagonally.

**4. Accessories:** Defined as headphones, speakers, CDs, printers, toner cartridges, USB sticks, keyboards, game system accessories, cables, chargers, and other small, miscellaneous items as defined by the Participant. It further includes any other or new (future) types of accessories to either the equipment or cell phone and other mobile devices equipment. The participant is welcome to provide a separate breakout of any of the items listed as accessories.

**5. Total sent to third-party certified recyclers:** For the purposes of the SMM Electronics Challenge, the term "recycler" denotes refurbisher or recycler certified to a recognized third-party certified recycling program. Similarly, the term "recycling" denotes recycling, refurbishment and reuse. Currently, Responsible Recycling Practices (R2) and e-Stewards are the only recognized certification standards for recyclers. However, EPA may recognize additional standards at a later date. Also see definition of 'all streams' below.

**Reuse:** Denotes an electronics object, or component of an electronics object that is used again by a different owner either for its original purpose or for a similar purpose, without significantly altering the physical form of the object or material. The electronics object may be cleaned, repaired, or refurbished between uses.

**All Streams:** Denotes used electronics collected for recycling or reuse from the various return streams used by the participant. Streams could include consumer take-back programs, asset recovery programs, retired lease returns, collection events, or trade-in programs.

**Baseline:** The year a participant joins the challenge. Annual results are compared to the baseline as well as preceding years' results.

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