

## CompuCycle's response to BAN Press Release

On September 6, 2017, BAN issued a press release stating BAN placed a scrap printer containing a tracking device at CompuCycle's premises and that it was tracked moving to Dallas, then Long Beach, CA and then Hong Kong. BAN stated the listing of CompuCycle "does not necessarily imply culpability" but that our "involvement in a chain of export" is of "serious concern." We consider this to be a misleading accusation and damaging to our reputation.

CompuCycle has taken the following response to the Ban press release:

- A. On September 7<sup>th</sup>, CompuCycle contacted the E-SCRAP News and issued the following statement in reaction to BANs press release:

*"CompuCycle had no prior knowledge of the BAN press release on September 6, 2017. We take issue with that release. We are horrified to be listed by BAN as a "Scam Recycler."*

*CompuCycle did not export a printer from our Houston facility to Hong Kong. What actually happened is as follows: CompuCycle delivered 15 skids of printers to our approved recycler in Fort Worth, Texas on July 13, 2017, and this is documented. CompuCycle had previously performed significant due diligence on this approved recycler, and we have documentary proof that they routinely dispose of their dismantled printer materials in conformance with R2 standards.*

*By virtue of this BAN press release, Jim Puckett and BAN have made an obvious attempt to improperly besmirch our business reputation and we intend to pursue this matter more fully.*

*We felt the need to issue this correction to set the record straight. Our reputation in the community is of course very important to us. CompuCycle has been in business for 21 years, and we will always strive to conduct our operations in an environmentally responsible manner."*

- B. E-SCRAP NEWS posted our response in their publication on September 8<sup>th</sup>, 2017.  
<https://resource-recycling.com/e-scrap/2017/09/08/tracking-project-accuses-companies-e-scrap-exports/>
- C. CompuCycle contacted SERI (Sustainable Electronics Recycling International) on September 6<sup>th</sup> to launch an investigation into this matter. SERI is the housing-body for R2 (Responsible Electronics Recycling) Standard and works with a coalition of partners to raise awareness of electronics repair and recycling issues around the world. CompuCycle is a R2 certified company.  
<https://sustainableelectronics.org/>
- D. CompuCycle immediately cancelled all shipments of printers to our approved recycler in Fort Worth, Texas and has stopped shipping printers to this recycler until a thorough investigation has been completed.
- E. John Lingelbach, the executive director of Sustainable Electronics Recycling International, submitted an article in the E-Scrap News publication regarding BAN's GPS tracking activities.  
<https://resource-recycling.com/e-scrap/2017/09/14/opinion-trackers-ban-ignores-advice/>

We summarize the article as follows:

GPS trackers can be an effective tool for identifying potential wrongdoing that warrants further investigation. However, GPS trackers alone do not provide sufficient information to indict a recycler in the court of public opinion for complicity in illegal exports.

BAN knows this. Yet it ignores its own advice. “The presence of any particular company being listed as part of an ‘export chain’ by itself is not an indicator of irresponsible behavior.”

Even the “apparent exporters” (BAN’s term for the last facility in the U.S. that a tracker passed through) may not be guilty. A few of the “apparent exporters” identified in the first report a year ago were not, in fact, the exporters. Instead, they sold to U.S.-based buyers and some may have believed – even after a good faith effort at due diligence – that their shipments would not be illegally exported.

BAN has a mission that includes stopping the export of hazardous electronic wastes from developed to developing countries. It is a good and important mission. With respect to its use of GPS trackers, however, BAN shows a willingness to throw the proverbial baby out with the bathwater.

The harm caused to many good recyclers in loss of business and reputation is substantial. And it could be avoided. What is needed in conjunction with GPS tracking is solid investigative work. It takes time and resources, but it would lead to better results that, possibly, the industry could get behind.

- F. On September 25<sup>th</sup> – 29<sup>th</sup>, CompuCycle was audited by Perry Johnson Registrars (3<sup>rd</sup> Party Company) for the recertification of ISO 14001:2004 and OHSAS 18001:2007, and annual surveillance of R2:2013. Perry Johnson were aware of the BAN Press Release and focused a considerable amount of time reviewing our downstream and substantiated we are in full compliance of R2:2013 standards. CompuCycle has been recommended for recertification for ISO 14001:2004 and OHSAS 18001:2007 and R2:2013.
- G. On October 6 2017, CompuCycle conducted a site audit of our downstream’s Fort Worth recycling facility. It should be noted CompuCycle had previously concluded a site visit of their St. Morris, IL processing facility.
- H. On October 27, 2017, CompuCycle was audited by SERI (Sustainable Electronics Recycling International). This was an unannounced audit due to the BAN Press Release and after concluding their site visit and reviewing all requested documentation concluded we are in full compliance.

In conclusion, CompuCycle rejects the BAN Press Release and has fully substantiated their position as a reputable company in compliance with all R2:2013 standards.