



PERRY JOHNSON REGISTRARS, INC.



R2v3: Lessons Learned in Early Stages of Transition





R2v3: Lessons Learned Thus Far

The move to R2v3 is one of the biggest shifts in the electronics recycling certification industry to date. With months of experience interpreting and auditing to the new standard, what has Perry Johnson Registrars, Inc. gleaned from the newest edition of R2?

One aspect of the new version that has been particularly notable is the updated Data Sanitization requirements. This requirement, as of R2v3, now applies across the board by default to all media that contains data. From iPhones to disc drives and everything in-between, there is no “opting out” of this expectation; it is explicitly demanded by the standard. However, the singular instance where auditors may see and accept a lack of Data Sanitization implementation would be specific repair scenarios. For instance, a client organization fixing a computer for a customer and returning it, data intact.

According to Core Requirement 9 of the R2v3 standard, companies are required to carry insurance and/or hold reserves to cover any liabilities. While a risk assessment may be used to determine or establish how much coverage is appropriate, auditors may not accept the risk assessment in lieu of insurance or appropriate reserves. Additionally, it is worth noting that Appendix A requires pollution liability coverage for all R2 Facilities that manage negative value streams to their DSVs, and Appendix E mandates pollution insurance *or* guaranteed reserves.

The revised timeline and requirements for addressing and closing R2v3 NCRs (major and minor) to be verified through revisit (with the exception of Stage 1 NCRs) can be found below (as introduced in sections 8.9.5 through 8.9.13 of the Code of Practices and/or as required by PJR):

- All R2v3 Stage 1 NCRs require evidence of correction prior to the Stage 2 audit. The Stage 1 package cannot be closed without this evidence. Auditors are expected to revise the report accordingly, and submit evidence as relevant to the audit package.

Note: While a revisit is not required for identified R2v3 concerns by the Code of Practices, an auditor can request additional time or a revisit if there are a substantial number of concerns to be reviewed.

- All R2v3 NCRs (both minor and major) require evidence of correction within 60 days.
- All R2v3 NCRs (both minor and major) require verification of corrective action within 60 days. This constitutes documented evidence of investigation (root cause and corrective action), verified by the auditor through a desktop review. In other words, confirmation that the root cause and corrective action(s) identified by the client appear appropriate.
- For Surveillance audits, all R2v3 NCRs (both minor and major) require a revisit within 6 months to verify CA implementation/effectiveness. Per our normal process, this should be conducted within 90 days.

Note: If the above deadlines are not adhered to, the Code of Practices requires PJR suspend the certificate.

- For Recertification audits, all R2v3 NCRs (both minor and major) require a revisit within 3 months (90 days), or sooner based on the certificate expiry date, to verify CA implementation/effectiveness.

Note: If the above deadlines are not adhered to and the certificate expires, the client would need to start over with Stage 1 and 2 audits to pursue certification.

- For Stage 2 audits: all R2v3 NCRs (both minor and major) require a revisit within 3 months (90 days) to verify CA implementation/effectiveness. The revisit is required to verify implementation and effectiveness of corrective actions.

Note: If the above deadline is not adhered to, the client must repeat the Stage 2 audit (within 6 months of the Stage 1) to pursue certification.



Timeline for Stage I/II, Surveillance, and Recertification Audits (R2v3)

Audit type	Deadline	Required by deadline	Consequence for deviation
Stage 1	Prior to the Stage 2	Evidence of correction of NCR(s)	Stage 2 cannot proceed; repeat Stage 1
Stage 2	60 days	Evidence of correction for all minors and majors accepted by auditor	Repeat the Stage 2 (within 6 months of the Stage 1)
	60 days	Documented root cause and plan for corrective action for all minors and majors accepted by the auditor	
	90 days	Revisit to verify implementation and effectiveness of the corrective action(s)	
Surveillance	60 days	Evidence of correction for all minors and majors accepted by auditor	Suspension
	60 days	Documented root cause and plan for corrective action for all minors and majors accepted by the auditor	
	90 days, or up to 6 months* *for annual audits; for semi-annual audits, this can be addressed at the next (SA) audit	Revisit to verify implementation and effectiveness of the corrective action(s)	
Recertification	60 days	Evidence of correction for all minors and majors accepted by auditor	If the certificate expires, the client will need to start over with a new registration (Stage 1 and Stage 2 audits)
	60 days	Documented root cause and plan for corrective action for all minors and majors accepted by the auditor	
	90 days (or sooner based on certificate expiry)	Revisit to verify implementation and effectiveness of the corrective action(s)	



What's Next? A Timeline of Upcoming R2v3 Deadlines & PJR's Recommendations

- Facilities with existing R2:2013 certificates that expire on or before December 31, 2021 may be recertified to R2:2013 (if they so desire) *if*:
 - Their R2:2013 recertification audit is complete prior to January 1, 2022,
 - All NCRs (minor and major) from the recertification are closed/verified prior to certificate issuance, ***and***
 - The new R2:2013 certificate must expire by no later than June 30, 2023
- Facilities with existing R2:2013 certificates that expire on or after January 1, 2022 must transition during Recertification, or sooner based on the transition deadline of June 30, 2023
 - Recertification to R2:2013 will not be permitted
 - PJR recommends transition audits occur by 3/30/2023
- The final deadline for any and all transitioning certificates is June 30, 2023
- All remaining, non-transitioned R2:2013 certificates will expire June 30, 2023 and be withdrawn on July 1, 2023

While clients are able to transition to R2v3 during any audit in their cycle, PJR recommends clients strive to transition in 2022, although this is not required. PJR strongly suggests an internal deadline for transition audits to occur by March 30, 2023, otherwise a lapse in certification is likely to occur. Transition Audit time is equivalent to Stage I/II time, and can be conducted up to 50% virtually if the client is a good candidate for remote auditing techniques.

For more information on the R2V3 transition (and R2 certification in general), reach out to PJR today – visit www.pjr.com or call (248) 358-3388.

