SUSTAINABLE RECYCLING INDUSTRIES

Assessing the Practical Implementation of ISO 59014 for Secondary Materials Recovery

PILOT TESTING AT E[CO]WORK IN INDIA

JUNE 2025

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Acronyms

CPCB	Central Pollution Control Board
EEE	Electrical and Electronic Equipment
Empa	Swiss Institute for Materials Science & Technology
EPR	Extended Producer Responsibility
GRN	Goods Received Note
GST	Goods and Services Tax
HS-Code	Harmonized System Code
IRF	Inclusive Recycling Foundation
ISO	International Organization for Standardization
IWA	International Workshop Agreement
JWG	Joint Working Group
KPI	Key Performance Indicator
LCA	Life-Cycle-Analysis
ME	Micro-Entrepreneur
PCR	Post-Consumer Recycling
PPE	Personal Protection Equipment
PRO	Producer Responsible Organization
SECO	Swiss State Secretariat of Economic Affairs
SoD	Score of Deviation
SOP	Standard Operating Procedures
SRI	Sustainable Recycling Industries
TC	Technical Committee
TSDF	Treatment, Storage, and Disposal Facility
WEEE	Waste Electrical and Electronic Equipment
WRF	World Resources Forum

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Executive summary

The ISO Standard 59014 (henceforth ISO 59014) provides requirements to ensure sustainability and traceability in the recovery of secondary materials. The Waste Electrical and Electronic Equipment (WEEE) handling organization E[co]work has been selected for piloting the ISO 59014 due to its small size and its engagement with subsistence work.

E[co]work is a social enterprise based in India that is a registered WEEE recycler. The company conducts dismantling activities, offers technical training on sustainable practices and business support to micro-entrepreneurs, and collaborates with organizations on data collection and pilot studies. Launched in 2023, its licensed recycling facility aims to bridge the gap between the informal WEEE sector, regulators and formal producers. To address challenges in WEEE dismantling, E[co]work focuses on safe processes and practices, reducing health risks and environmental pollution while promoting efficient material recovery. It also aims to support proper tracking of materials and promotes a safe, just and sustainable circular economy.

The study revealed the following level of compliance of E[co]work with the requirements of the standard:

» **Operational requirements**

In compliance with the standard, E[co]work has identified criteria for the materials to be recovered but could improve by consolidating and documenting them more clearly, highlighting also how quality and function with the best environmental and social outcome are considered in the criteria. Materials are sorted using the HS-Code and EEE-Code and are documented, but records on decision-making about sorting practices are lacking. Limited resources and market competition make it difficult to prioritize environmental concerns.

While E[co]work has little influence on the collection system design, it promotes separate collection where possible. Sorting practices could be better aligned with the criteria defined for material recovery and highlighting more clearly the considerations regarding best environmental and social outcomes. The implementation of a traceability system could enhance future operations. The facility has a proper and safe storage space, but improvements of better storage organization and optimization of depollution process are needed to reduce environmental risks. E[co]work has a dedicated storage area and adequate equipment for hazardous waste. For increasing operational efficiency and safety concerning hazardous waste management further improvements in dismantling practices and in handling, storage, labelling, and transport of hazardous waste are needed.

Overall, the company complies with 79% of the operational requirements of ISO 59014.

» **Organizational requirements**

E[co]work has established monitoring mechanisms but aims to improve its approach, especially in risk management and capacity building. The organization collaborates with stakeholders across both the informal and formal recycling sectors and is proactive in promoting social engagement, worker safety, and research. E[co]work does not yet have a value chain code of conduct and recognizes this as an area for future development. The organization

is committed to continuously improve working conditions, offer training, and strengthen communication regarding work Standard Operating Procedures and policies. E[co]work's facility is well-equipped, and while safety measures could be enhanced, it is dedicated to continuous improvements of its social and environmental performance. It faces challenges in recruiting skilled candidates but supports ongoing learning and development for its employees.

Overall, the company complies with 78% of the organizational requirements of ISO 59014.

» **Traceability requirements**

E[co]work has established a traceability system that collects data to monitor material flows. This data includes detailed upstream information such as supplier details, material descriptions, and costs. During the processing activities, E[co]work tracks data such as dismantling rounds, reference numbers, total weight, and material breakdowns. For downstream activities, E[co]work records invoices, buyer details, material descriptions, and HS-Codes among other data. There is room for improvement in collecting missing data or document, whenever needed, why data is not available, and in adding information about depollution processes. E[co]work is committed to improving its traceability practices, sharing knowledge, and collaborating with others to enhance material flow tracking and explore new traceability models.

Overall, the company complies with 64% of the traceability requirements of ISO 59014.

The overall compliance with the standard is 76%.

Generally, achieving full compliance with ISO 59014 is considered challenging, particularly for E[co]work due to limited human and financial resources. The high investment costs of obtaining an ISO certification which is assumed to range between USD 5'000 and USD 10'000, the weak regulatory enforcement and intense competition in the sector represents constraints for small and medium-sized enterprises seeking certification in India.

The standards' requirements are mostly applicable and feasible and relevant data for assessing compliance is available. E[co]work contributes to the sustainable recovery of secondary materials through dismantling activities and sales to formal, registered companies, supporting circular economy practices. The organization also identifies opportunities to reduce environmental and social risks and remains committed to continuous improvement as its processes mature.

Given E[co]work's integrated approach to bridging the formal and informal sectors, the principles of ISO 59014, especially regarding responsibility towards interested parties engaged in subsistence activities, are well aligned and present a unique opportunity to highlight and demonstrate efforts toward inclusivity and circularity. However, compliance with the requirements remains challenging. For example, direct engagement with subsistence workers is often limited by their dependence on better-off informal intermediaries. This dynamic necessitates a holistic approach that includes these stakeholders, which may not align fully with the standard's requirements.

Nevertheless, since the piloting of the Standard, significant improvements have already been made, including enhanced hazardous waste labelling, optimized storage organization, the introduction of new business monitoring indicators,

and the development of new Standard Operating Procedures and facility policies.

To conclude, E[co]work's vision of safe and sound WEEE management aligns closely with the principles of ISO 59014. Piloting the standard allowed E[co]work to systematically assess improvement areas, particularly in data and documentation. Adoption of ISO 59014 is expected to enhance operational efficiency, transparency, and regulatory compliance, while mitigating environmental risks and strengthening credibility in the global market. When combined with well-designed data management software – such as that offered by Minimise[1] – compliance with traceability requirements becomes easier. This also enables the verification of impact claims, which can improve access to recoverable resources and attract financial support for safe recycling efforts.

Keywords:
[ISO 59014, E[co]work, certification, requirements, compliance, traceability, secondary materials recovery, WEEE dismantling]

1) https://www.minimise.today/

1 Introduction

The shift towards a circular economy is crucial to address resource scarcity, environmental degradation, and economic sustainability. To ensure the sustainability and traceability of secondary material recovery, the International Organization for Standardization (ISO) developed ISO 59014, establishing principles, requirements, and guidance for responsible recovery practices.

ISO 59014 is part of ISO's broader circular economy standards and builds upon the ISO International Workshop Agreement (IWA) No. 19, Guidance Principles for the Sustainable Management of Secondary Metals (April 2017). This earlier document introduced subsistence activities into sustainability considerations, a milestone in standards development and further expanded in ISO 59014.

In May 2021, the Swiss-funded Sustainable Recycling Industries (SRI) program initiated ISO 59014's development. The Joint Working Group 14 (JWG 14) was formed under the ISO Technical Committee (TC) 323 on Circular Economy and subcommittee 5 of TC207 on Environmental Management / Life Cycle. Led by co-convenors Dr. Sonia Valdivia (World Resources Forum Association, Switzerland) and Berty Malabar (B.E.M. Recycling, Mauritius), the process spanned three years and four months, involving diverse stakeholders and experts. ISO 59014 was officially published on October 1, 2024, marking a significant step in sustainable resource management.

ISO 59014 provides guidance for organizations to enhance sustainability and traceability in secondary material recovery. It promotes transparency, environmental and social responsibility, and is applicable across all sectors, regardless of size, type, or location. On the other hand, the standard does not define quality criteria for secondary materials, nor does it cover energy recovery or final disposal. Reprocessing pathways such as remanufacturing, refurbishment, and repair also fall outside its scope.

ISO 59014 advances global sustainability by formalizing responsible secondary material recovery. It facilitates:

- **Reduced environmental impacts from processes for recovering secondary materials.**
- **Improved accountability and traceability in reverse supply chains.**
- **Greater support for individuals engaged in subsistence activities.**

The publication of ISO 59014 underscores ISO's commitment to circular economy models that prioritize resource efficiency, ethical labor practices, and long-term sustainability, fostering a more resilient and responsible global economy. In line with its vision and commitment of supporting the deployment of sustainable and responsible practices when recovering resources, the Sustainable Recycling Industries (SRI) program conducted pilots of the application of the ISO 59014 standard. The aim of this report is to present the results of piloting the ISO 59014 conducted at the Waste Electrical and Electronic Equipment (WEEE) recycling organization E[co]work, India.

2 Methodology

2.1 Purpose and key questions

To assess the feasibility of implementing ISO 59014 in organizations, a pilot was conducted. The primary objective was to test the level of compliance with the ISO 59014 standard, as well as its feasibility and auditability, potential benefits, and challenges.

Key guiding questions which were addressed in the pilot, included:

- **Compliance:** What level of compliance with ISO 59014 is reached at present stage?
- **Auditability:** Are the requirements auditable?
- **Data availability:** Is the data required for checking compliance with sustainability and traceability requirements available?
- **Subsistence activities:** Does the application of the standard foster engagement with individuals engaged in subsistence activities and contribute to the improvement of their living conditions?
- **Impact:** What benefits and opportunities arise from implementing the ISO 59014 standard?

2.2 Existing PRO projects

The process for assessing compliance at E[co]work included several webinars for gathering information and insights in the questionnaire along its 155 questions, an in-person visit to verify the execution of the activities concerned, and a review of relevant documents. For detailed information on the assessment methodology applied, see Annex 8.1 or refer to the integrated report Assessing the Practical Implementation of ISO 59014 for Secondary Materials Recovery by Valdivia et al. (2025). Recommendations for improvements were provided in situ and subsequently followed up to evaluate the measures implemented.

A questionnaire, consisting of 155 questions, was developed to generate feedback on the level of compliance with the 75 requirements of the ISO 59014 standard (in clauses 6, 7 and 8). The questionnaire follows the structure presented in Table 1, with an explanatory legend for guidance. For each requirement, the assessment of compliance was broken down into one or more questions. The questionnaire, answers and compliance details for E[co]work are available in the Annex 8.2.

Table 1: Structure of the questionnaire to assess compliance with ISO 59014 Standard.

# of requirement (1-75)	Rating of requirement (0,1 or 2)	Code of question	Question for auditing	Non applicability*	No**	Yes***

** Answers are indicated with one (1) if 'not applicable'*
*** Answers are indicated with one (1) if 'not fulfilled', 0.5 for 'partially not-fulfilled'*
**** Answers are indicated with one (1) for 'fulfilled', 0.5 for 'partially fulfilled'*

Rating of requirement equals score of deviation in case of non-compliance.
The requirements were categorized based on the level of severity of the impacts if they weren't fulfilled. These so-called deviations could be of a major type (M, ranked 2) or minor type (m, ranked 1) and are defined in Table 2.

Table 2: Rating of requirements, type of deviation and description

Rating of requirement (=Score of deviation in case of non-compliacen)	Type of deviation	Description
2	Major	If the non-compliance has very high negative effects
1	Minor	If non-compliance has low to medium negative impacts
0	Non-mandatory requirements	If it is a non-mandatory requirement (expressed as recommendation by using 'should' in the text)

This scoring system was developed to assess the level of compliance of the pilots with ISO 59014. It is not part of the official ISO guidance.

Difference between 'applicable' and 'feasible':

- **Applicable:** Refers to whether a requirement is **relevant or appropriate** to a particular situation, context, or system, e.g. if only collection is conducted, then the questions on recycling processes do not apply. If a requirement is applicable, it means it has to be assessed when checking organization's compliance.
- **Feasible:** Refers to whether the standard is **practically achievable** or **realistically implementable** given the available resources, technology, or constraints. A requirement might be applicable but not **feasible** in its implementation.

3 E[co]work

3.1 Indian context

WEEE has become a growing environmental and public health concern globally, with over 62 billion kilograms generated in 2022 [1]. India, one of the largest producers of WEEE, generates more than 4 billion kilograms annually [1]. The country's rapid technological advancement and increasing consumption of electronic devices contribute to this escalating problem. WEEE is often recycled through both formal and informal sectors, with more than 90% of WEEE processed in the informal sector [2].

In India, electronic waste has become a significant source of economic activity, particularly for the poor, with informal workers—such as scrap traders and waste pickers—engaged in crude recycling methods to extract valuable raw materials like gold, copper, and aluminium. WEEE dismantling presents significant challenges due to its complex material composition. The lack of knowledge and proper training further contributes to unsafe practices, including the use of toxic chemicals, which severely impact the environment and public health. Certain informal business owners generate considerable profits and employ workers on a daily basis. These workers have limited ability to influence management or improve working conditions, as they are reliant on daily wages from their employers to meet basic survival needs. Furthermore, micro-entrepreneurs (MEs) in the sector often depend on well-established and larger influential informal business owners to access essential resources, given their own lack of networks and investment capital. The intense competition within this market results in very low profit margins, leaving little opportunity or incentive to invest in safer, more sustainable recycling methods.

The regulation of WEEE in India began with the WEEE (Management and Handling) Rules, 2011[2], that have since evolved through significant updates. The E-Waste (Management) Rules, 2022[3] expanded to cover over 130 product categories. Central to these regulations is the concept of Extended Producer Responsibility (EPR), which holds producers responsible for the management of their products once they reach the end of life. On March 8, 2024, the Ministry of Environment, Forest and Climate Change introduced the WEEE (Management) Amendment Rules, 2024[4], effective immediately. Among the changes, the redefinition of "dismantler" now includes any entity or individual engaged in the dismantling of WEEE, even without formal authorization. The amendment also allows the central government to extend filing deadlines for producers and recyclers, providing flexibility in meeting regulatory obligations. Furthermore, a new provision allows the establishment of multiple trading portals for EPR certificates, expanding opportunities for certificate trading beyond government-run platforms and setting price ranges for transactions to ensure transparency.

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1) Source: Implementation of E-Waste Rules 2011, Guidelines. CPCB.
2) Source: https://cpcb.nic.in/uploads/Projects/E-Waste/e-waste_rules_2022.pdf
3) Source: https://cpcb.nic.in/uploads/Projects/E-Waste/E-waste-Third-Amendment-Rules-2024.pdf

3.2 Indian context

E[co]work is a licensed Indian WEEE recycling company that:

1. Conducts its own dismantling activities of WEEE sourced directly from retailers, households or procured from formal and informal aggregators and waste pickers. Throughout the organization's activities the material is consistently tracked.
2. Provides space, tools, training, networks, and business support to MEs engaged in WEEE dismantling. Training includes proper sorting, responsible material recovery, adherence to health and safety protocols as well as business related topics such as entrepreneurships and data reporting.
3. Offers technical training and awareness programs to stakeholders such as civil society representatives and educational institutes.
4. Collaborates with NGOs, businesses, PROs and other organizations on data collection, pilot studies, and project work.

3.3 Activities and processes

E[co]work engages in the collection, classification, sorting, and dismantling of WEEE, followed by classification and sorting of dismantled materials (see Figure 1). Table 3 provides more details on the specific processes. While destructive processes are not yet conducted, activities such as plastic shredding and pelletizing may become part of the organization's operations in the future.

Figure 1: *Activities and processes in the scope of E[co]work. Adapted graphic from the ISO 59014 Standard.*

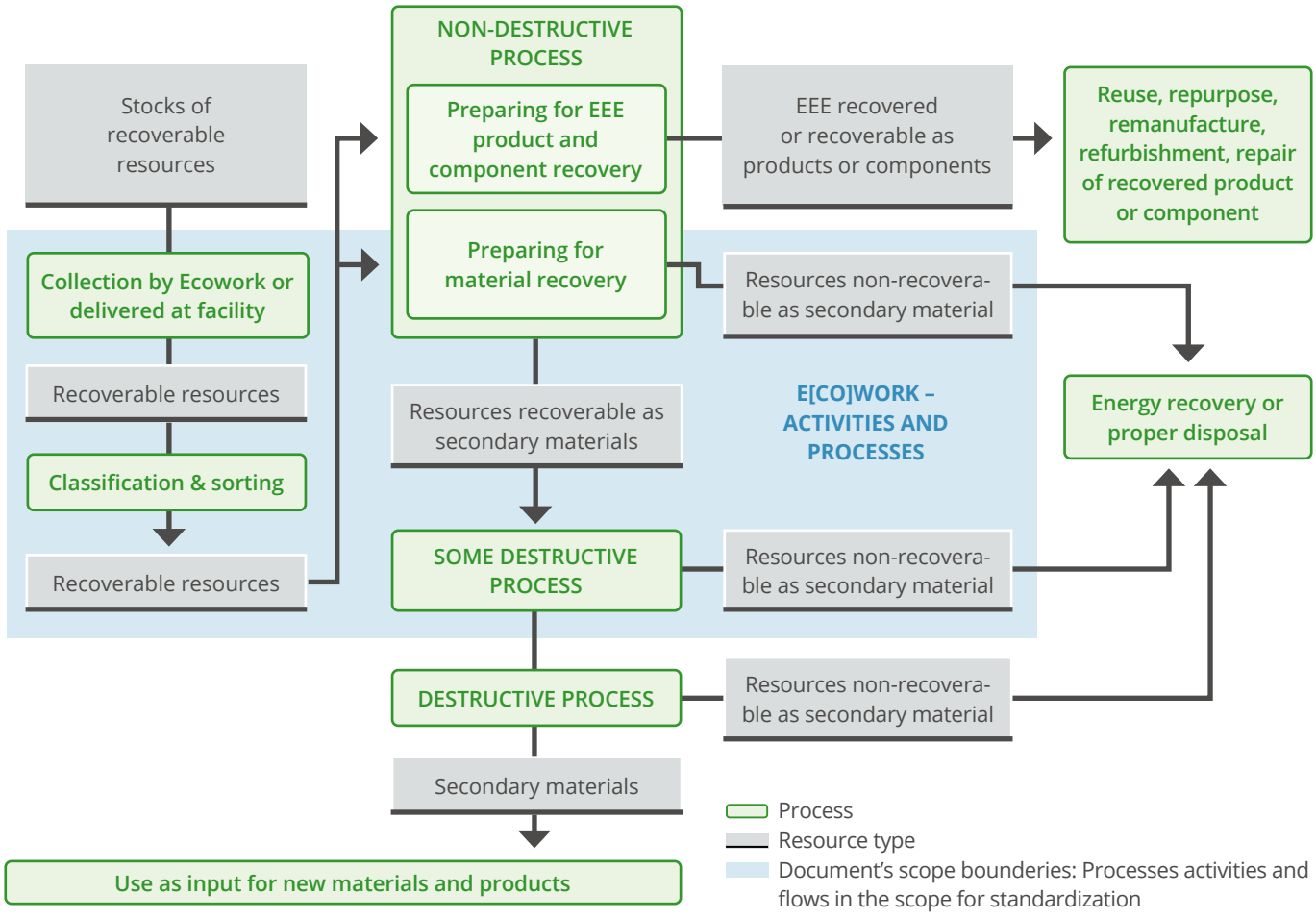


Table 3: Activities and processes conducted by E[co]work.

Activities and processes	Information
Collection of WEEE	WEEE for E[co]work's own dismantling activities is obtained either through organized transport or direct delivery by clients. Sourcing methods include: • Auctions and bidding processes • B2B procurement • Informal aggregators • Milk-route collection[5]
Classification and sorting	Upon arrival at the facility, weight, material type, and client data are recorded, along with other relevant information. Materials are then classified and sorted based on attributes such as: • Material type • Potential for reuse • Required dismantling efforts
Dismantling and further treatment	Materials with high reuse potential may be directly resold or passed on to organi-zations specializing in direct reuse or preparation for reuse. Materials not suitable for reuse are dismantled and further sorted into material or component fractions. Some fractions, such as plastics are further treated by shredding them into small pieces. Where necessary, multiple dismantling steps are carried out to achieve the level of granularity required by market demand and economic feasibility. Classification and sorting are based on factors such as: • Material type and grade • Purity levels • Presence of hazardous substances The resulting fractions are then sold for material recovery, hazardous waste treatment, or preparation for reuse.

3.4 Value chain

E[co]work operates at the intersection of multiple stakeholders in the WEEE ecosystem, bridging the gap between upstream players that generate or aggregate WEEE and downstream players involved in reuse, recycling, and hazardous waste treatment.

On the upstream side, E[co]work engages with bulk consumers, MEs, and organizations that generate, aggregate, and channel WEEE, providing them with access (by renting spaces) to formal dismantling practices and compliance support. It also ensures that WEEE is diverted from unsafe, informal processing to formal treatment.

On the downstream side, E[co]work connects with formal micro-enterprises specializing in direct reuse or preparation for reuse, as well as larger industrial players responsible for hazardous waste treatment and material recovery. This includes operators managing hazardous waste fractions and aggregators and recyclers engaged in the mechanical or chemical processing and recovery of valuable materials.

5) A system in which WEEE is systematically gathered from informal dismantlers, businesses, and collection points, then transported to a central recycling facility.

4 Compliance with ISO 59014

This chapter outlines the compliance of E[co]work with ISO 59014. The requirements are grouped into subclauses along the three main categories of requirements, namely the operational, organizational and traceability requirements. The compliance of E[co]work with the ISO59014 standard is assessed and summarized on the basis of these subclauses.

A consolidated and detailed table listing the scores and percentage of compliance is attached in the annex.

Summary of the requirements of the subclause.

The structure of the evaluation per subclause is as follows:

- **Findings:** Includes the current status (or state-of-the-art) and eventually positive developments
- **Deviations:** List of deviations (major or minor if non-compliance is >50%, remark if non-compliance is ≤ 50%)
- **Level of compliance:** The resulting percentage of compliance
- **Recommendations:** List of recommendations in corresponding to the identified deviations
- **Feasibility:** The feasibility of the proposed recommendations

4.1 Operational requirements

4.1.1 General (6.1)

Subclause 6.1 sets out the operational general requirement that organizations shall identify criteria for secondary materials to be recovered following aspects of quality and function with the best environmental and social outcome. This shall be identified from documented studies which follow a life cycle perspective which at least include energy consumption and resource scarcity aspects. If such studies do not provide the desired information, Life Cycle Assessment (LCA) studies based on ISO standards shall be considered. Considering continual improvement, quantitative and qualitative targets for secondary materials to be recovered shall be identified.

Findings

E[co]work considers environmental outcomes and social outcomes in its core vision. The company aims to create environmental benefits through the enhanced recovery of materials and avoidance of emissions through unsound and informal recovery practices. Social activities target the inclusion of the informal sector, the provision of a safer work environment, skill building, and awareness raising. Criteria for the recovery of materials are applied (see box).

Criteria applied for secondary materials to be recovered at E[co]work:

- Positive economic return possible
- Formal downstream buyers available
- Safe treatment at facility possible
- Legally compliant procurement possible
- No child labour involved (challenging to verify)
- Material specific, e.g. copper, iron, motherboards
- No contamination or unwanted materials/high purity (example in Fig. 2)

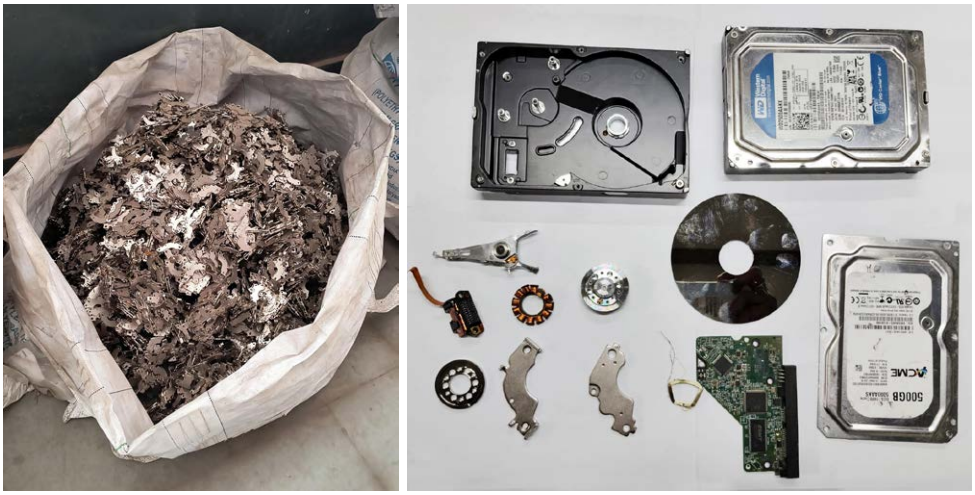


Figure 2: Left: Neodymium magnets from dismantled hard disks. Right: Components from a dismantled hard disk.

Deviations

The following non-compliances with the requirements in this sub-clause have been identified:

Minor non-compliance:

a) No formal studies have been conducted nor referred to identify the best environmental and social outcomes of the materials to be recovered. Hence, environmental outcomes and social outcomes do not form part of the primary criteria for the recovery of materials. They are not yet consistently implemented nor documented.

b) The rational for the choice when identifying or defining criteria for the recovery of materials has not been documented.

Remark:

c) There are no quantitative targets for recovering secondary materials.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
2.67	2.33	0	2	5	**53%**	**47%**

Recommendations

a) Identify life-cycle based studies that can serve as reference and sustain the identification of the best environmental and social outcomes and criteria for secondary materials to be recovered.

b) Document the rational for the choice when identifying or defining criteria for secondary materials to be recovered.

c) Define yearly quantitative targets, for example, the increase of materials recovered with respect to the previous year.

Feasibility

Due to the limited economic resources at E[co]work the implementation of the recommendations raised are not feasible in the short term but in the mid-term.

4.1.2 Classification and determination of recovery pathways (6.2)

Based on an established, documented and maintained list of attributes relevant to recoverable resources, organizations shall determine recovery pathways and processes based on methodology provided in the standard (Annex B) or alternatively using one based on a life cycle perspective or LCA studies in accordance with the ISO standards. Decisions on the selected recovery pathway need to be documented as well as a list of any relevant changes to the

recoverable resources handled and the activities and processes applied.

Findings

Classification

E[co]work classifies incoming material according to the Harmonized System of Nomenclature Code (HSN-Code or HS-Code) as required for Goods and Services Tax (GST) purposes. All incoming material fall under few HS-Codes, mostly under 8549 "electrical and electronic waste and scrap". After classifying the incoming materials according to the HS-Code, the organization proceeds to sort them into recoverable resources with potential for reuse and those for material recovery. The ones sorted for material recovery are further classified according to the electrical and electronic equipment (EEE) Code[6] with 112 EEE categories provided by the Central Pollution Control Board (CPCB) of India (see Figure 3).

Figure 3: A section of theclassification system used and corresponding attributes. Source: CPCB

The **classification system** used for classifying products, components or materials: Electrical and electronic equipment code according to the Indian E-Waste

Assigned **attributes**

Item-wise average percentage composition in terms of weight of Key Metals for generation of EPR Certificate

Sl. No.	Categories of electrical and electronic equipment	Electrical and electronic equipment code	Key metals for EPR certificate generation	Percentage of recoverable Key Metals			
				Au	Cu	Fe	Al
1	Centralized data processing: Mainframes, Minicomputers	ITEW1	Au, Cu, Al & Fe	0.0008	4.5	30	3
2	Personal Computing: Personal Computers (Central Processing unit with input and output devices)	ITEW2	Au, Cu, Al & Fe	0.0004	1.2	35	3

Determination of recovery pathways

A methodology for determining the recovery pathway is applied, but no documented approach exists. Generally, reusable items go into reuse first, followed by recycling, while non-recyclable materials are incinerated or sent to landfill. Items that the organization lacks the infrastructure to process, such as fridges, are in general not accepted and if they do happen to arrive at the facility are sold further either for reuse purposes or formal recycling. The choice of recovery pathway is primarily based on economic returns, and no systematic life cycle assessment has been conducted.

Deviations

Minor non-compliance:

a) The rationale for the choice of the alternative methodology to determine the recovery pathway has not been documented and no studies have been used nor a life cycle assessment conducted.

b) There is no documentation on how decisions are made regarding the recovery pathway.

6) *https://eprewastecpcb.in/assets/PDF/Framework.pdf*

Remarks:

c) The organization does not apply a methodology to determine the recovery pathway.

d) No reference is made to life-cycle based studies that support the decision-making process in regard to best environmental outcome.

Level of compliance:

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
3	6	0	2	9	**33%**	**67%**

Recommendations

a) Develop a methodology outlining the decision-making process for recovery pathways.

b) Make reference to published life-cycle based studies that support the applied methodology regarding best environmental outcome.

c) Apply a methodology to determine the recovery pathway.

d) Ensure that all decisions made are systematically documented.

Feasibility

Economic and environmental outcomes are largely aligned when deciding whether a product should be directed toward functional recovery or material recovery. However, in cases where these priorities conflict, the organization, as a startup, lacks the financial resources to prioritize environmental considerations over economic viability. Furthermore, fierce competition and distorted market conditions offering lowest prices based on unsound practices make it extremely challenging to achieve economic viability in the first place. Additionally, although the existing data would allow for referencing to existing life cycle analyses and related studies, this is not considered feasible due to the limited time resources within the organization.

4.1.3 Collection (6.3)

Organizations shall support the separate collection of recoverable resources and support measures to facilitate the return or collection of recoverable resources.

According to the standard this requirement only applies if the organization operates a collection system or is part of such a system[7].

Findings

The organization has limited influence on the collection system design. However, the organization promotes and facilitates the separate collection of recoverable resources through awareness sessions with educational and community centres, and by providing lists of materials that are acceptable by E[co]work.

Deviations

There are no deviations from the compliance requirements.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0	3	0	0	3	**0%**	**100%**

Feasibility

Fulfilment of these requirements are considered feasible.

7) This might include pick-up of materials.

4.1.4 Sorting (6.4)

The standard distinguishes between recoverable resources and resources non-recoverable as secondary materials. Organizations shall recover resources based on identified attributes and available traceability data. The subclause also outlines aspects regarding sorting technologies and practices, along with the subsequent treatment steps.

Recoverable resources as products, components or materials should be directed to non-destructive processing or to organizations which handle these resources for reuse, repairing, refurbishing or remanufacturing.

Resources non-recoverable as secondary materials shall be sent to energy recovery or proper disposal at authorized organizations.

Findings

E[co]work applies the official HSN-Code for the incoming material and the EEE-Code (see chapter 4.1.2) and identifies the material according to the assigned attributes.

After dismantling, materials are sorted into different fractions of recoverable resources according to a set of attributes, such as type of material, reusability, value, etc. (see Figure 4). Resources non recoverable as secondary materials are sent to energy recovery or authorized landfills. Recoverable resources with potential for reuse are forwarded to organizations for preparation for reuse, with their formal status checked against the available GST number.

Classification and sorting on arrival at the facility according to attributes such as:

- Reusability
- Going for material recovery > sorting according to HS-Code and EEE-Code

Classification and sorting after dismantling according to attributes such as:

- Type of material and color
- Grade and value
- Purity grade (contamination / presence of other materials)
- Hazardous components and substances

Figure 4: *Left: Dismantling process at E[co]work. Right: Separated recoverable resources before and after dismantling.*

Deviations There are no deviations from the compliance requirements.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0	6	0	0	6	**0%**	**100%**

Feasibility Fulfilment of these requirements are considered feasible.

4.1.5 Material recovery processes (6.5)

The processes applied for the recovery of secondary materials shall be done by operating an adequate infrastructure, technology and processes. The selection between non-destructive and destructive processes shall focus on maximizing the quantity and fulfilling the defined quality criteria of the material recovered with the best environmental and social outcome. The latter should be based upon publicly available studies applying a life cycle perspective or on an LCA done by the organization.

Depollution processes shall be done in a way that the release of substances or mixtures to the environment are prevented without applying the concept of dilution.

Findings The facility is equipped with adequate infrastructure to ensure the safe storage of materials, including features such as sealed flooring, dry conditions, fire safety installations (see Figure 5), worktables, proper lighting, and ventilation. The selection of non-destructive and destructive processes aims to maximize quantity and on fulfilling the quality criteria. The quality criteria is not driven based on environmental and social outcome but on market demand (see chapter 4.1.1).

Figure 5: Left: Fire safety installation at the facility. Right: Dismantling workplace at the facility.

Hazardous substances – such as batteries and mercury-containing backlights – are removed and stored in dedicated containers. Some depollution processes are not carefully executed, risking environmental release. No intentional dilution occurs at any stage. Hazardous substances are routed for proper treatment, or safe disposal. The organization is authorized by the CPCB to generate hazardous waste which is then disposed of at the Treatment, Storage, and Disposal Facility (TSDF) site (on a paid basis).

Deviations Minor non-compliance:

a) Decisions regarding the choice of processes are not supported by publicly available studies based on life cycle thinking. Neither are the decisions supported by conducting a LCA in accordance with ISO 14040 and ISO 14044.

Remarks:

b) Depollution processes are not consistently carried out in a way that prevents the release of any substances or mixtures to the environment.

c) Not all dismantlers are fully competent and have the appropriate education, awareness and experience regarding depollution.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
2.5	10.5	0	1	13	**19%**	**81%**

Recommendations

a) Incorporate publicly available studies or simplified LCAs (ISO 14040/14044) to support process-related decisions with environmental considerations and life-cycle thinking.

b) Ensure and monitor safe execution of depollution processes to prevent any environmental release. This can be supported by implementing clear depollution procedures.

c) Strengthen the provision of targeted training and awareness sessions to ensure all dismantlers have the necessary knowledge and skills for safe and effective depollution.

Feasibility

At this point in time, integrating life cycle thinking or conducting studies such as LCAs in accordance with ISO 14040/14044 is not considered feasible due to the limited financial and time resources of the organization. However, opportunities to gradually incorporate simplified life cycle approaches may be explored in the future if resources allow for it.

4.1.6 Logistics (6.6)

Handling, transport and storage of recoverable resources shall be done in a way that facilitates the recovery as product, component or material ensuring a best environmental outcome using adequate transport, storage, packaging methods and packaging materials.

Findings

Some spill-overs and cross-contamination were seen in the facility due to the unproper handling, transport, and storage of materials. Recoverable resources are transported in box trucks (see Figure 6) including fragile items like screens with a high risk of breaking mercury-containing backlights. Resources non-recoverable as secondary materials and hazardous substances are stored separately for energy recovery or proper disposal. Some storage areas are not properly organized, labelled, and packaged.

Figure 6: *Left: Truck that is used to pick up materials. Right: Unloading material.*

Deviations

Remark:

a) Storing recoverable resources separately in heaps and piles can lead to spill-overs and limits the ability to maximize both quantity and quality, potentially impacting the overall environmental outcome.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
1	7	0	0	8	13%	88%

Recommendations

a) Improve material storage to prevent spilling between heaps, e.g. use boxes to store the materials which would also facilitate material handling. Alternatively, separating fences could be built along the wall to prevent material spill over and allow higher heaps of materials.

Feasibility

This recommendation and with this the fulfilment of the requirements are considered feasible.

4.2 Organizational requirements

4.2.1 Monitoring and Evaluation (7.1)

A monitoring and evaluation plan shall be established, maintained, and implemented, covering, among other aspects:

- Issues and risks relevant to the recovery of secondary materials based upon fulfilling the requirements of the standard,
- the application of the code of conduct agreed upon between the organization and its suppliers,
- information about interested parties and their relevant requirements,
- performance against targets, and traceability data.

Findings

The company has implemented a monitoring and evaluation plan at the organizational level, with key performance indicators (KPIs) aligned to company-wide targets (see Figure 7). While individual KPIs for team members are still in development, overall performance is reviewed monthly. Indicators relevant to the recovery of secondary materials – such as WEEE procured, dismantled, and sold – are tracked and reviewed monthly. Measures to achieve targets are also assessed on a monthly basis.

There is no formal code of conduct in place, hence the application of it cannot be monitored. While, customer insight studies have been conducted, and regulatory developments and stakeholder interests are monitored, it is not yet done systematically.

Competence monitoring is partially in place through the review of KPIs, and monthly team meetings are conducted to discuss them. However, these meetings are only being conducted with the office team and does not include the dismantlers. Data collected is documented and digitally stored, and performance trends are monitored consistently. Calculations such as percentage of secondary material recovery can be calculated with the available data.

Figure 7: Some key performance indicators that are regularly assessed and monitored by the organization.

CLOSURE OF MATERIAL CYCLES

- Number of auctions participated
- Number of auctions won
- Tons of WEEE procured
- Tons of WEEE dismantled
- Tons of WEEE sold

COMMUNITY

- Number of new ME's reached out
- Number of engagements with ME's
- Number of clients
- Number of trainings/awareness session
- Number of participants

Deviations

Remarks:

a) Competence of individuals is not yet directly monitored. Individual performance indicators are under development.

b) The monitoring results are shared during monthly team meetings within the "office team". Since the dismantlers do not form part of it, they are not informed about the monitoring results.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0.67	5.33	0	0	6	11%	89%

Recommendations

a) It is recommended to finalize and implement individual performance indicators to enable regular and direct monitoring of staff competence. This will support more targeted capacity-building and performance management.

b) To ensure all relevant personnel are informed, including dismantlers, it is advisable to expand the communication of monitoring results beyond the office team.

Feasibility

The implementation of individual performance indicators is considered feasible and is under development.

4.2.2 Interested Party Engagement (7.2)

Cooperation and communication with interested parties which are affected by or can potentially influence its operations are key requirements in the standard. A continuously monitored collaborative structure should facilitate the inclusion of supplier(s), customer(s) and other organizations involved in the collection, classification, sorting, processing, transport and logistics (including business-to-consumers, business-to-business and individuals in subsistence activities) and other interested parties.

Findings

The organization is based on a collaborative culture and actively engages with various stakeholders. It supports various value chain participants, especially the informal sector but also engages with formal recyclers, producer responsible organizations (PROs) and authorities among others. The organization monitors social engagement activities and has conducted several studies, and participatory workshops to identify and understand the interest of the informal sector. The organization creates awareness and holds trainings sessions to improve workers safety and promotes recycling of materials (see Figure 8). Furthermore, it conducts dismantling tests for understanding unit economics and material

recovery potential. Though the organisation provides clear channels for communication, it lacks grievance mechanisms.

Figure 8: A dismantling activity with external stakeholders.

Deviations

Remark:

a) A formal grievance mechanism has not yet been established, and structured measures to prevent or address potential conflicts with interested parties are currently lacking.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0.5	1.50	0	0	3	**17%**	**83%**

Recommendations

a) It is recommended to establish a formal grievance mechanism and define preventive measures to address potential conflicts with interested parties.

Feasibility

Establishing a formal grievance mechanism and defining preventive measures is considered feasible to some extent. However, some level of conflict potential is inherent to the nature of competitive business environment.

4.2.3 Responsibility towards the value chain (7.3)

Organizations "... shall develop or adhere to a value chain code of conduct ..." which includes ethical behavior, traceability aspects and responsible practices for achieving the quality and targets expected of the secondary material to be recovered. The considerations of the code of conduct (CoC) shall be incorporated in any type of agreement with value chain partners.

Findings

The organization does not have a value chain code of conduct. Consequently, any code of conduct requirements concerning their application in the value chain cannot be further assessed.

Deviation

Major non-compliance:

a) Because the organization does not have a value chain code of conduct, it is not compliant with the major requirement of this clause.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
2	0	1	0	2	100%	0%

Recommendations

a) Development and adherence to a value chain code of conduct, that considers the aspects mentioned in the standard and:

- Where possible and feasible communicate the code of conduct to external stakeholders
- Where it might be possible, consider integrating the value chain code of conduct into contractual agreements
- When there is a value chain code of conduct developed, it is recommended to conduct internal training regarding integral aspects of the value chain code of conduct

Feasibility

It is considered feasible to develop and incorporate a value chain code that considers some of the listed aspects into the organization own activities. However, including a value chain code of conduct into agreements is considered not feasible in most cases within the current framework conditions. Most formal and probably all informal ME's are likely to refuse signing such an agreement.

4.2.4 Responsibility towards individuals engaged in subsistence activities (7.4)

Organizations engaging or intending to engage with individuals working in subsistence activities (SA) shall create an enabling environment for collaborative work addressing their specific needs and interests regarding their well-being and livelihoods and their continuous improvement. **This requirement only applies if the organization is engaged or intends to engage with individuals working in subsistence activities.**

Findings

The organization is strongly committed to improving the livelihoods of workers engaged in subsistence activities. However, most of the individuals engaged in subsistence activities are hired on a daily basis by informal MEs with greater capital. Given this socio-economic structure, improving conditions for subsistence workers requires the organization to engage with various stakeholders, including informal MEs who – considering their economic situation – are not considered subsistence workers. Key engagement activities include:

- Providing access to safe rental workspaces, tools and equipment
- Support in administrative areas, such as taxation and legal compliance
- Directly employing individuals engaged in subsistence activities

Deviations

There are no deviations from the compliance requirements.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0	2	0	0	2	0%	100%

Feasibility

Fulfilment of these requirements are considered feasible.

4.2.5 Equitable working conditions (7.5)

Organizations shall establish decent working conditions, prevent child labour, forced labour harassment and any form of discrimination with a specific focus on vulnerable and disadvantaged workers, women and individuals involved in SA. Freedom of association and the right to collective bargaining shall be ensured in any case. Safety and occupational health aspects shall encompass free provision of personal protective equipment, toilets and sanitary facilities and specific safety and health measures and infrastructure for pregnant workers and workers who have recently given birth or are breastfeeding.

Findings

The facility is equipped with bathrooms, showers, a kitchen, and a recreational area. Staff offices have AC, and ventilation ensures a suitable temperature in the dismantling area. The organization has a Human Rights Policy covering points such as anti-discrimination, anti-harassment, equality, anti-discrimination, women's safety, fairness, no retaliation, prevention of involuntary labour etc.

The organization prohibits child and forced labour, as well as harassment and discrimination. Workers have the right of freedom of association and collective bargaining. Personal protection equipment (PPE) is provided, and sanitary facilities are accessible. While pregnant workers or babies are not recommended on-site, space and infrastructure could be arranged if necessary.

Deviations

Remark:

a) No specific safety and health measures and infrastructure for pregnant workers and workers who have recently given birth or are breastfeeding are in place.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0.20	2.80	0	0	3	**7%**	**93%**

Recommendation

a) It is recommended to develop a policy outlining the procedures and measures to be taken if a worker is pregnant or has recently given birth, including clear steps for identification, reassignment, or leave, in compliance with applicable laws and international standards.

Feasibility

Developing a health and safety policy for pregnant workers and workers who have recently given birth is considered feasible to be implemented.

4.2.6 Risks (7.6)

Organisations shall identify social and environmental risks and impacts and address them by developing protocols to prevent, reduce or control them. A communication plan addressing interests and concerns of interested parties shall be put in place Harmful substances or harmful practices are to be removed if these cannot be properly managed. Otherwise, practices shall be improved to make them safer. Activities and processes for recovering secondary materials should not increase risks of environmental harm arising from the release of hazardous substances. The organization shall consider and communicate health and safety risks, and develop protocols for their prevention, reduction and control. **This requirement applies for workers and if the organization is engaged or intends to engage with individuals working in subsistence activities.**

Findings

E[co]work has conducted external audits to address risks and provides training on environmental and social concerns, though it lacks a formal communication plan and proper documentation of risk assessments and measures taken. Safety

measures, including emergency plans and incident reporting, are in place. While dismantling activities pose a higher risk of hazardous exposure compared to keeping products intact, they are safer than uncontrolled disposal methods. The organization is working to improve health and safety awareness, however, PPE use and depollution processes are consistently followed. E[co]work is committed to continuous improvement.

Deviations

Minor non-compliance:

a) The organization does not have a communication plan to address the interests and concerns of interested parties.

Remark:

b) While the organization has improved workplace organization and established PPE policies to address safety risks, implementation by formerly informal workers remains inconsistent. Key procedures, such as depollution, are still in the process of being further improved.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
1.58	5.42	0	1	7	**23%**	**77%**

Recommendations

a) Develop and implement a communication plan to engage stakeholders and address their concerns.

b) Enforce PPE and depollution protocols to ensure consistent safety practice through regular monitoring, training, and accountability measures.

Feasibility

The recommendations and with this the fulfilment of the requirement are generally considered feasible to implement. However, the nature of dismantling involves increased risks of environmental harm due to the risks of release of hazardous substances. Therefore, the recommendation to avoid increasing these risks through activities and processes for recovering secondary materials is considered feasible only to the extent that measures are implemented to keep the risks as low as possible. Furthermore, implementing measures to aid and accelerate ecosystem recovery is not applicable, given the nature of the organization's activities.

4.2.7 Resource use (7.7)

The organisation shall identify opportunities to minimize resource use and implement corresponding measures, such as the replacement or substitution of scarce materials the use of renewable instead of non-renewable resources, and the reduction of energy and fuel consumption based on a life cycle prospective.

Findings

The organization does not systematically or regularly monitor its resource use. Apart from energy and general infrastructure, no significant quantities of additional resources – beyond tools and PPE – are required. Expenses for utilities and general equipment are partially tracked through the financial accounting. The installation of PV panels is currently not financially feasible due to too high upfront investment requirements.

Deviations

Remark:

a) The organization does not systematically identify opportunities to minimize resource use.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
2	1	0	0	2	50%	50%

Recommendations

a) Establish a systematic approach to identify and implement opportunities to minimize resource use across operations.

Feasibility

Feasibility is limited, since the company does not require large amount of resources for operations. While reducing resource use in transport and energy is theoretically feasible, it is cannot be implemented in the short term due to the significant investments required.

4.2.8 Competencies and training (7.8)

The organisation shall determine and assess the necessary managerial and operational competences of individuals for work under its control that affects the performance and effectiveness of its activities and processes. Training needs to be provided where needed. The organisation shall identify of training needs for anyone with whom it engages – including individuals engaged in SA – and plan and conduct training in the areas of need.

Findings

While competencies are assessed during interviews and through work performance evaluation, challenges remain in finding candidates with the required skills. Hence, not all employees might have all skills required for their tasks. The company supports continuous learning and skill development of their employees. Assigned roles lack clear specifications and descriptions (this is currently being developed). Trainings, such as fire safety trainings and hygiene at work, are being conducted for the team and for interested external stakeholders. Training for external stakeholders focuses on informal MEs, with tailored programs.

Deviations

Remark:

a) The effectiveness of the actions to ensure that individuals are competent are not evaluated.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0.40	8.60	0	0	9	4%	96%

Recommendations

a) Where applicable, evaluate the effectiveness of the actions to ensure individuals are competent.

Feasibility

This recommendation and with this the fulfilment of the requirement are considered feasible.

4.3 Traceability requirements

4.3.1 General (8.1)

The organization shall develop and implement a traceability system on products, components and materials handled and make a relevant policy publicly available.

Findings

E[co]work has a traceability system and collects various traceability data. While SOPs provide guidelines on data collection, a comprehensive traceability policy is lacking. There is no explanation in the data collection sheet for any missing information. See chapter 4.3 for further information about the data collected.

Deviations

Remarks:

a) There is no traceability policy in place.

b) There are some missing data for which a justification is not provided in the data sheet.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
1.50	3.50	0	0	5	**30%**	**70%**

Recommendations

a) Develop a traceability policy in place.

b) Provide a justification where traceability data cannot be accessed.

Feasibility

Recommendations drawn are considered feasible and with this, the fulfilment of these requirements.

4.3.2 Collection of upstream data (8.2)

Upstream data shall include among others confirmation of compliance with CoC from the organizations in its value chain, the sorting attributes and indication of recoverable resources that have completed the appropriate stage identified for non-destructive or destructive processes.

Findings

E[co]work consistently collects the following upstream information:

- Invoice Date and No.
- Vehicle No.
- Supplier/Organization name
- Mobile Number
- Address (company/individual)*
- Goods Received Note (GRN) No.
- GST Invoice Availability
- GST number
- HS-Code
- Name of Material
- Item Code (EEE-Code)
- Quantity (in kg)
- Unit Price
- Total Amount

**Sometimes only neighborhood or name of the city is collected*

Where relevant it also collects: Additional description of materials, such as number of pieces, transport costs, weighbridge costs, loading / unloading costs, other charges. Both the invoicing date and date of receiving the materials are collected, however not in the same document. The origin of the consignment is not recorded. The organization assigns a Goods Received Note Number (GRN number) that serves as unique reference number, and attributes based on the official EEE-code of the Indian WEEE Rules, 2022. Information regarding the stage of the

recoverable resources procured (e.g. used, brand-new, non-functional, washed, depolluted) is in general not available and therefore not applicable.

Deviations

Remark:

a) The origin of the consignment is not recorded.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0.14	0.86	0	0	1	14%	86%

Recommendation

a) Record the origin of the consignment (this might not be the same as the registered address of the supplier).

Feasibility

The recommendation is considered feasible to be implemented only to the extent that E[co]work performs the collection of the material. When the material is delivered by the supplier, information about the origin of the consignment may not always be disclosed.

4.3.3 Collection of processing data (8.3)

Processing data shall be preferably categorized by input and output data, and percentage of input routed towards different recovery pathways. It shall include information on activities and processes applied including depollution.

Findings

The organization collects detailed information about the processing activities, including data of processing, name of workers, hours spend on dismantling, number of rounds (level) of dismantling process, unique reference number (GRN number in the table called “Initial incoming batch number”) and total weight. The type and mass of the dismantled material is collected based on a more granular level than HS-Code, encompassing currently more than 100 different types of fractions. HS-Code is applied as well to the outgoing fractions. The organization doesn’t indicate the reason for missing data, nor calculates the percentage of dismantled materials routed towards different treatment pathways (see Figure 9).collected.

Figure 9: An extract of the dismantling data collection sheet used by E[co]work.

Date	Name of worker	No. of worker	Hours Spent (HRS)	Round of dismantling	Name of item for dismantling	Initial incoming batch number	Total Weight of item [kg]	Iron	Cast Iron (Daegchun)	Iron coil	Iron collar ring	Aluminium	Aluminium Cast (Purja)	Aluminium/ Steel
03.02.2025	Salman	5	7.0	1st Round	Music System	IN24-25_111	344.70	198.45					23.65	
	Md. Sameer		6.0											
	Sharik		4.0											
	Sagar		5.0											
03.02.2025	Shahrukh	3	6.0	1st Round	Power Window	IN24-25_111	124.50	72.05					2.85	
	Shahzad		6.0											
	Aarish		6.0											
03.02.2025	Salman	4	1.5	2nd Round	Music System	IN24-25_111	67.30	7.10				6.40	4.60	
	Sagar		1.5											
	Sharik		2.0											
	Md. Sameer		2.0											

Deviations

Remark:

a) No percentage of the total amount of inputs routed towards different recovery and final treatment pathways is calculated, however the data to do so is available.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0.17	0.83	0	0	1	17%	83%

Recommendation

a) Calculate the percentage of the total amount of inputs routed towards different recovery and final treatment pathways.

Feasibility

It is considered feasible to implement the recommendations and, in doing so, achieve full compliance with all requirements of this subclause.

4.3.4 Collection of downstream data (8.4)

The percentage of the total amount of outputs routed towards different clients, recovery pathways, energy recovery, or proper disposal shall be retrieved, classifying types of products, components or materials according to a classification system (e.g. United Nations University (UNU) key code for electronic waste).

Findings

E[co]work consistently collects the following upstream information:

- Invoice Date and No.
- Gate pass No.
- Vehicle No.
- Name of buyer
- Mobile No.
- Address (company/individual)*
- GST Number
- HS-Code
- Quantity (mass / pieces)
- Name & attributes of Material
- Unit Price
- Total Amount
- GST costs

**Sometimes only neighborhood or name of the city is collected*

Some data is collected consistently, while others lack data entries. A description with assigned attributes of downstream recoverable resources is in development, attributes from the applied code categorization are available. No specific information is provided regarding the completed processing stage.

Deviations

Remark:

a) No percentage of the total quantity of outputs routed towards different clients and final treatment pathways is calculated.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0.08	0.92	0.00	0.00	1	8%	92%

Recommendation

a) Calculate the percentage of the total quantity of outputs routed towards different clients and final treatment pathways.

Feasibility

While it is considered feasible to implement the recommendation and with this comply with the relevant requirements of this subclause.

4.3.5 Collection of depollution data (8.5)

Recoverable resources shall be accompanied by information on removed materials, substances or mixtures, presence of declared hazardous substances when receiving from upstream or delivering downstream. Related information forwarded with the recoverable resources downstream shall document the removed components, materials, substances and mixtures and the routing for proper treatment for recovery, energy recovery or disposal.

Findings

While the organization conducts depollution activities, the systematic approach and monitoring of adherence to standardized procedures is missing. Currently, there is no documented information accessible upstream nor provided by the organization downstream on the specific components, materials, substances, or mixtures that are removed during the depollution process. Additionally, there is an absence of data regarding declared hazardous substances and their concentrations in both input categories and output fractions. The organization maintains documentation for the hazardous fractions transferred to a Treatment, Storage, and Disposal Facility (TSDF), but doesn't record the specific type of hazardous substance and corresponding weight.

Deviations

Minor non-compliance:

a) No justification is available in written for missing documentation or data.

Remark:

b) Limited information about depollution is recorded to accompanied when receiving the material from upstream or delivering them downstream.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
2	1	0	1	3	67%	33%

Recommendations

a) Provide a justification where data cannot be collected.

b) Collect and share information about depollution when receiving from upstream or delivering them downstream. Label incoming materials that may contain hazardous substances and collect information about conducted depollution, where relevant. Document the type of hazardous substances and corresponding weight transferred to TSDF

Feasibility

It is considered only marginally feasible to comply with the requirements. Data from upstream suppliers regarding conducted depollution processes are not always accessible and hence difficult to apply. Furthermore, data regarding hazardous substances and their concentration is not accessible.

4.3.6 Communication (8.6)

Relevant requirements for implementation of the traceability system applied shall be made available effectively across all relevant interested parties, including workers and suppliers with whom the organization has contractual relationships. Traceability data shall be made available to the organization's immediate downstream and upstream partners upon request. This requires collaboration with all direct suppliers and other organizations involved in collection, processing and delivery of the materials, components or products..

Findings

The organization supports traceability and knowledge sharing and is open to collaboration, if it does not compromise critical business secrets or pose signifi-

cant risks. Traceability data can be made available upon request to downstream and upstream organizations. E[co]work is open to supporting partners in data collection upon request.

Deviations

Minor non-compliance:

a) Measures are taken to engage and collaborate with organizations involved in the collection, processing, and delivery of materials, components, or products. The engagement is yet missing data gathering aspects.

Remark:

b) The requirements for the implementation of the traceability system are not communicated across all relevant interested parties.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
1.50	1.50	0.00	1.00	3	**50%**	**50%**

Recommendations

a) Establish measures to actively engage and collaborate with all direct suppliers and involved organizations to support consistent and accurate data gathering across the supply chain.

b) Ensure that traceability system requirements are clearly communicated to all relevant interested parties.

Feasibility

E[co]work aims to support traceability and knowledge sharing and is open to collaboration on these aspects, provided it does not disclose critical business secrets or pose significant business risks.

4.3.7 Continual improvement (8.7)

Regular reviews of the effectiveness of the traceability system shall be conducted by the organizations, any aspect revised if found to be ineffective, and enhancements towards continual improvement implemented.

Findings

E[co]work is committed to enhancing its traceability system by improving procedures and optimizing processes and data collection. As a young organization, continual efforts, adaptation, and optimization are ongoing to improve the overall effectiveness of the traceability system.

Level of compliance

Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
0	1	0	0	1	**0%**	**100%**

Feasibility

Fulfilment of these requirements are considered feasible.

5 Data management

This chapter specifically highlights data management at E[co]work in relation to the requirements of ISO 59014. It further aims to discuss the opportunities and challenges of applying a digital solution for enhancing data management and traceability of the recoverable resources. The organization collaborated with Minimise[8] on a project to test their software platform designed to support data management, traceability, and documentation in material flows.

5.1 Current data management

Figure 10 highlights the material flow, based on the criteria, classification and attributes applied for deciding the recovery pathway. Refer to chapter 4.1 for further information.

Figure 10: *Materials flow at E[co]work, outlining the criteria, classification, and attributes used at each processing stage.*

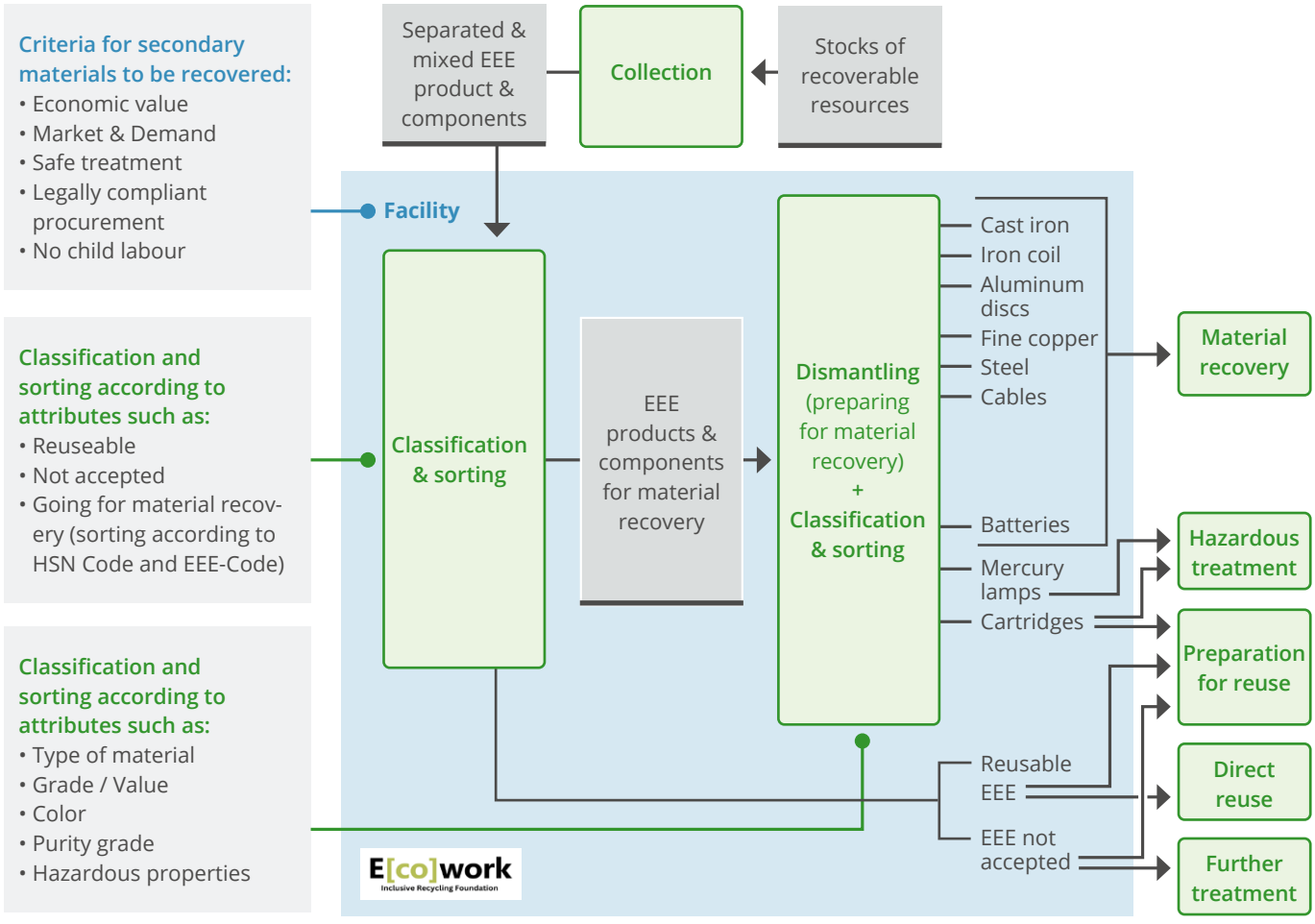


Figure 11 outlines the data management aspects of E[co]work. Data is collected at various steps of the material process flow. A wide range of data is collected upon the arrival of the material, or even beforehand, including invoice data, contact details, quantity, item codes, and unique reference number (in this case the GRN number). The sorted and registered material is then moved to an in-

8) *https://www.minimise.today/*

termediate storage before being dismantled and sorted into different fractions. Before and after the dismantling process, additional data is collected to ensure traceability and enable monitoring of business operations, such as GRN number to identify batch and type, corresponding weight, and the number and names of workers doing the dismantling. After dismantling, the resulting sorted or mixed fractions are weighed, and corresponding data is registered. Once the dismantling of the batch is completed, the dismantled fractions are added to the corresponding fractions in storage. Once they reach relevant volumes, the fractions are sold to downstream partners. For each outgoing fraction, another set of data is collected, including the date, contact details of the buyer, GST number, type of material, and quantity. The data is currently being collected on paper sheets and than added to an excel sheet or directly into an excel sheet, from which relevant numbers are calculated. The consolidated data is then further used for Government Portals, compliance requirements, accounting, internal calculations of indicators and unit economics, etc.

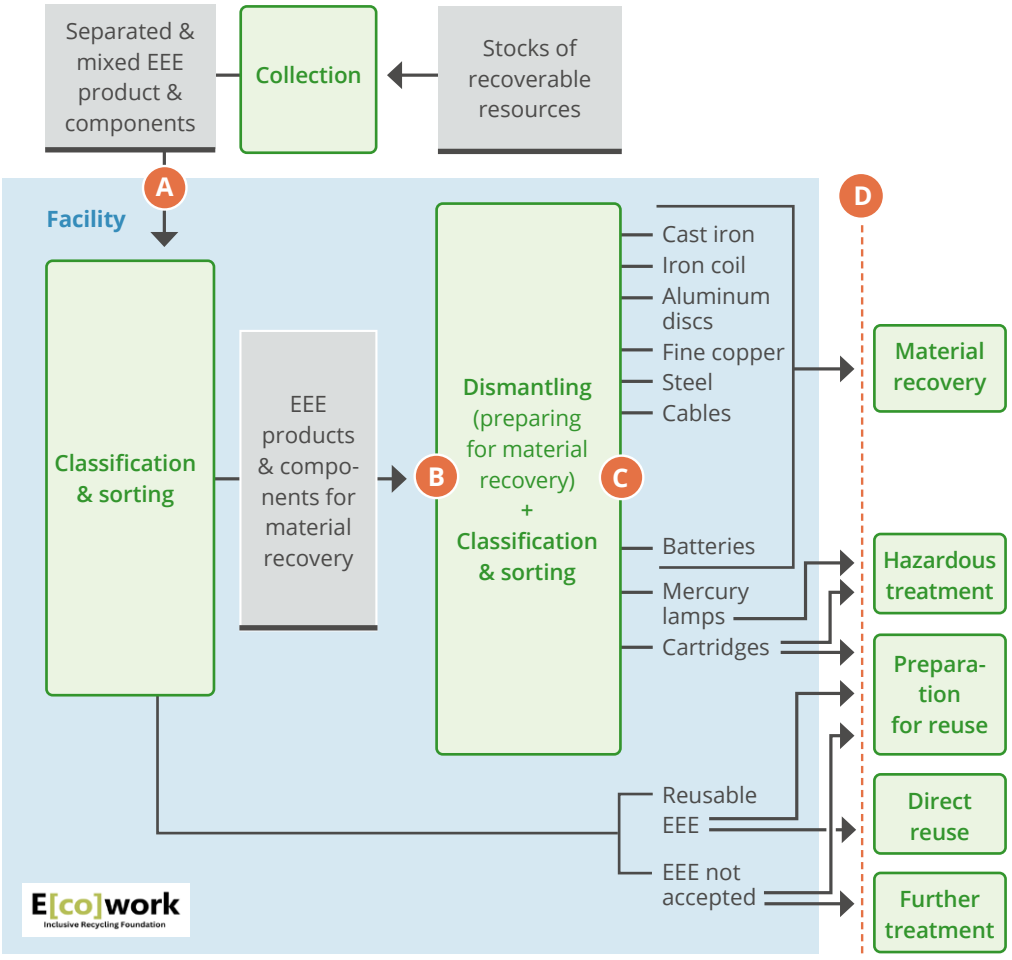
A) Data collected upstream:
- *Invoice Date and No.*
- *Vehicle No.*
- *Name, address, contact*
- *GRN No.*
- *GST number*
- *HS Code*
- *Item Code (EEE-Code)*
- *Name of material*
- *Quantity*
- *Unit price*
- *Various costs*

B) Data collected before dismantling:
- *GRN No. (=unique reference number)*
- *Name of items*
- *Weight*
- *Names of workers*
- *No. of workers*

C) Data collected after dismantling:
- *Material type & attributes*
- *Quantity*
- *Hours worked*

D) Data collected downstream:
- *Invoice Date & No.*
- *Gate pass No.*
- *Vehicle No.*
- *Name, address, contact*
- *GRN No.*
- *GST number*
- *HS Code*
- *Name & attributes of material*
- *Quantity*
- *Unit price*
- *Various costs*

Figure 11: *Material flow at E[co]work, outlining the data collected at each processing stage.*



5.2 Enhancing data management and traceability through a digital platform

A pilot project in collaboration with Minimise was conducted with two primary objectives:

1) to collect data on material composition;

2) second, to test whether the digital platform could meet the data management and traceability needs of the organization.

The broader motivation was to better understand data collection requirements while also exploring tools that allow for the engagement and integration of the informal sector and support the clear environmental, social, and governance (ESG) practices (see Figure 12). This conducted project reflects the for transparent and standardized information in the management of e-waste, particularly in systems involving a diverse range of stakeholders.

The digital platform developed by Minimise offers several features to support this goal. It enables mass-balance documentation and material flow analysis, allowing users to track materials from input to output. The platform facilitates the calculation of key performance indicators (KPIs), supports the linkage of incoming batches with outgoing fractions through mass flow tracking, and visualizes the recovery pathways of different materials (see Figure 13). These functions help create a more reliable and traceable record of resource recovery, which is essential for compliance with the requirements of ISO 59014.

Figure 12: Key aspects of the motivation for establishing optimal recycling infrastructure in emerging markets.

ENVIRONMENTAL
Extraction of tghe maximum amount of recyclates, with a minimum impact to soil, water, air and biodiversity.

SOCIAL
Safe, healthy and humane working conditions for all workers, while working towards a child labor free world.

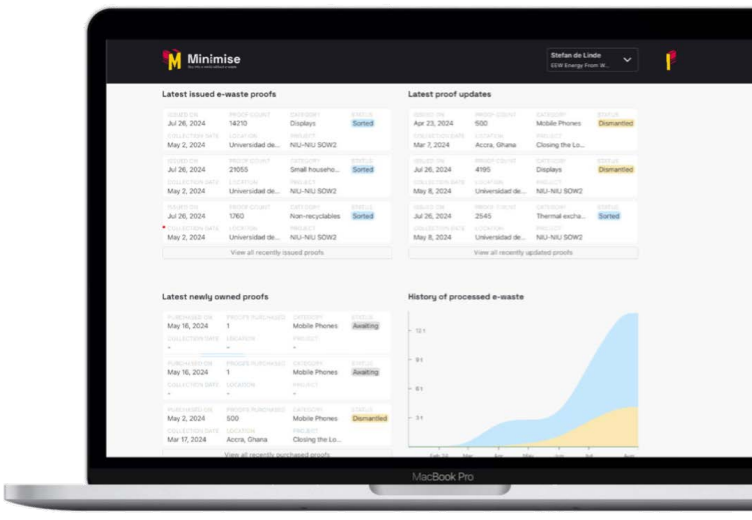
GOVERNANCE
Traceability and transparency of the flows of waste and output resources and their destinations in a circlar economy.

Advantages of using such a platform include increased transparency, improved data quality, and enhanced decision-making. It also helps to analyse and optimize performance in regard to recovery of secondary materials and financial returns and to linked with environmental benefits. Additionally, it facilitates reporting requirements and can help attract responsible investors or partners.

However, there are also **challenges**. The initial setup and training require time, financial investment, and a certain level of digital literacy, which may pose barriers. Data input still depends on user consistency and reliability, and in contexts with limited internet connectivity or infrastructure (not the case at E[co]work, but in other places), the platform's functionality may be constrained. Ensuring alignment with existing workflows, maintaining data security, and protecting sensitive information also remain important considerations.

Figure 13: Mockup and example of the software provided by Minimise.

Further trials of the software are currently being developed to assess its effectiveness in different operational environments and to refine its features in response to the organization's evolving needs. These trials are essential to determine the platform's long-term suitability and its potential to support efficient, inclusive, and traceable recovery of secondary materials.



6 Integrated Results and Discussion

6.1 Operational requirements

Table 4 provides the summarized results of the E[co]work's compliance with the operational requirements. Further details can be found in Annex 8.2.1. Overall, the company complies with 79% of the organizational requirements of ISO 59014.

Six minor non-conformities were observed, mainly relating to opportunities for strengthening documentation and formalizing decision-making processes in material recovery. While the organization already considers environmental and social outcomes in practice, there is currently no formal study or documented methodology guiding the prioritization of materials based on these outcomes. Enhancing this area would support a more structured and transparent decision-making process.

Table 4: Integrated results of E[co]work's compliance with operational requirements.

Operational requirements							
Subclause	Weighted scoring of non-compliance	Weighted scoring of compliance	Major NC (if SoD = 2 and NC > 50%)	Minor NC (if SoD = 1 NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
6.1 General	2.67	2.33	0	2	5	**53%**	**47%**
6.2 Classification and recovery pathway	3.00	6.00	0.00	2.00	9.00	**0.33**	**0.67**
6.3 Collection	0.00	3.00	0.00	0.00	3.00	**0.00**	**1.00**
6.4 Sorting	0.00	6.00	0.00	0.00	6.00	**0.00**	**1.00**
6.5 Material recovery processes	2.50	10.50	0.00	1.00	13.00	**0.19**	**0.81**
6.6 Logistics	1.00	7.00	0.00	0.00	8.00	**0.13**	**0.88**
Total	**9.17**	**34.83**	**0**	**5**	**44**	**21%**	**79%**

The definition and application of recovery criteria, as well as the selection of recovery pathways, would benefit from clearer documentation and alignment with established methodologies. Although internal knowledge and operational experience play a strong role in guiding these decisions, referencing scientific studies, life cycle thinking, or life cycle assessments (LCAs) could further enhance consistency and traceability. At this stage, formal LCAs in accordance with ISO 14040 and ISO 14044 have not yet been conducted.

Compliance is high in both the collection and sorting subclauses, primarily due to the organization's active role in promoting the separate collection of recoverable resources – despite limited influence over the broader collection system design – and its structured, attribute-based sorting process, which includes standardized coding, material classification, and responsible downstream handling of both recoverable and non-recoverable fractions.

6.2 Organizational requirements

Table 5 provides the summarized results of the E[co]work's compliance with the operational requirements. Further details can be found in Annex 8.2.2.

Overall, the company complies with 78% of the organizational requirements of ISO 59014.

Organizational requirements							
Subclause	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Major NC (if SoD = 2 and NC > 50%)**	**Minor NC (if SoD = 1 NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
7.1 Monitoring and Evaluation	0.67	5.33	0.00	0.00	6.00	**11%**	**89%**
7.2 Interested Party Engagement	0.50	1.50	0.00	0.00	3.00	**17%**	**83%**
7.3 Responsibility towards the value chain	2.00	0.00	1.00	0.00	2.00	**100%**	**0%**
7.4 Responsibility towards individuals engaged in subsistence activities	0.00	2.00	0.00	0.00	2.00	**0%**	**100%**
7.5 Equitable working conditions	0.20	2.80	0.00	0.00	3.00	**7%**	**93%**
7.6 Risks	1.58	5.42	0.00	1.00	7.00	**23%**	**77%**
7.7 Resource use	2.00	1.00	0.00	0.00	2.00	**50%**	**50%**
7.8 Competencies and training	0.40	8.60	0.00	0.00	9.00	**4%**	**96%**
Total	**7.35**	**26.65**	**1**	**1**	**34**	**22%**	**78%**

Table 5: *Integrated results of E[co]work's compliance with organizational requirements.*

One major non-compliance was identified regarding the absence of a value chain code of conduct, as required by the standard. While the organization demonstrates responsible practices, these are not yet formalized in a documented code covering ethical behavior, traceability, and quality expectations. Developing such a code for internal use is considered feasible and could enhance transparency and alignment with ISO 59014. In addition, the standard requires that the considerations outlined in the code of conduct (CoC) be incorporated into all types of agreements with value chain partners. However, this is considered not feasible under current framework conditions. Most formal, and likely all informal, micro-enterprises (MEs) involved would be reluctant to sign such agreements, limiting the practical applicability of this requirement at this stage.

One minor non-compliance was also noted, concerning stakeholder communication. Currently, the organization does not have a structured communication plan in place to address the interests and concerns of interested parties. Developing such a plan would strengthen alignment with the standard's emphasis on transparent communication.

Compliance is high in subclause 7.4, primarily due to the organization's initiatives such as providing access to safe rental workspaces, tools, and equipment; offering technical and health-related training; and supporting administrative areas such as taxation for MEs. These efforts demonstrate a comprehensive approach to supporting vulnerable workers within a complex socio-economic context.

6.3 Traceability requirements

Table 6 provides the summarized results of the E[co]work's compliance with the operational requirements. Further details can be found in Annex 8.2.3. Overall, the company complies with 64% of the traceability requirements of ISO 59014.

Traceability requirements							
Subclause	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Major NC (if SoD = 2 and NC > 50%)**	**Minor NC (if SoD = 1 NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
8.1 General	1.50	3.50	0.00	0.00	5.00	**30%**	**70%**
8.2 Collection of upstream data	0.14	0.86	0.00	0.00	1.00	**14%**	**86%**
8.3 Collection of processing data	0.17	0.83	0.00	0.00	1.00	**17%**	**83%**
8.4 Collection of downstream data	0.08	0.92	0.00	0.00	1.00	**8%**	**92%**
8.5 Collection of depollution data	2.00	1.00	0.00	1.00	3.00	**67%**	**33%**
8.6 Communication	1.50	1.50	0.00	1.00	3.00	**50%**	**50%**
8.7 Continual improvement	0.00	1.00	0.00	0.00	1.00	**0%**	**100%**
Total	**5.39**	**9.61**	**0.00**	**2.00**	**15.00**	**36%**	**64%**

Table 6: Integrated results of E[co]work's compliance with traceability requirements.

Two minor non-compliances were observed. First, there is no written justification available for missing documentation or data, which affects transparency and traceability. Second, although the organization takes measures to engage and collaborate with entities involved in the collection, processing, and delivery of materials, components, or products, this engagement currently lacks a formal data gathering component. Strengthening documentation practices and incorporating data collection into supplier collaboration would improve compliance and support more comprehensive data management.

Compliance is high in subclause 8.7, mainly because E[co]work demonstrates a strong commitment to enhancing its traceability system through ongoing procedural improvements and optimization of processes and data collection. As a young organization, these continual efforts reflect a proactive approach to strengthening the overall effectiveness of its traceability system.

6.4 Compliance with the standard

Considering the three parts of operational, organizational and traceability requirements the average compliance with the standard is 76% (rounded) (see Table 7).

It is worth noting that due to insufficient human and financial resources at E[co]work and given the challenging framework conditions in India, it would be challenging for the organization to implement all the needed measures to fully comply with the standard.

Those requiring less time and minimum resources were implemented during

Organizational requirements							
Subclause	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Major NC (if SoD = 2 and NC > 50%)**	**Minor NC (if SoD = 1 NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
Clause 6: Operational requirements	9.2	34.8	0	5	44	**21%**	**79%**
Clause 7: Organizational requirements	7.3	26.7	1	1	34	**22%**	**78%**
Clause 8: Traceability requirements	5.4	9.6	0	2	15	**36%**	**64%**
Total	**5.39**	**9.61**	**0.00**	**2.00**	**15.00**	**36%**	**64%**

Table 7: *Summary of compliance of E[co]work with ISO 59014.*

the weeks following the field visit conducted in January 2025, thus, improving the process and activities. Measures implanted include:

- Optimization of storage area to avoid spillover (however boxes or fencing is still missing)
- Advancement in the development of detailed SOPs for various processes, e.g. how to handle incoming material and accounting processes
- Identification and elaboration of additional business monitoring and performance indicators
- Calculation of percentage routed towards reuse and material recovery
- Elaboration of role description and reporting structure
- Detailed description of material categorization and attributes started

The level of compliance of 76% and discussed does not take into account these most recent improvement measures implemented after the field visits. It can be fairly assumed that because of that, the level of compliance also improved (now could be even higher than 80%).

At this point, it is worth recalling that the requirements in the ISO 59014 standard are not intended to cover legal aspects in laws and regulations which prevail when implementing this standard. Moreover, these requirements are ambitious and typically exceed the legal requirements in the countries. Therefore, the audit cannot be considered as a legal compliance assessment and the findings identified do not imply non-compliance with national legislation.

7 Conclusion and Outlook

7.1 Answering the key questions

This study primarily aimed to assess the feasibility of E[co]work's compliance with the sustainability and traceability requirements outlined in ISO 59014, while also evaluating the auditability of these aspects. In addition, the pilot sought to explore the potential benefits and challenges associated with implementing the standard. The responses to the key questions outlined in Chapter 2.1 are provided below, based on insights gained through the evaluation of E[co]work's alignment with ISO 59014.

To assess the feasibility of implementing ISO 59014 in organizations, a pilot was conducted. The primary objective was to test the level of compliance with the ISO 59014 standard, as well as its feasibility and auditability, potential benefits, and challenges.

Compliance

What level of compliance with ISO 59014 is reached at present stage?
Overall, full compliance with ISO 59014 is considered feasible in the long term, provided that framework conditions are taken into account – for example, the inclusion of a value chain code of conduct may not be feasible in all stakeholder engagements – and that adequate human and financial resources are available to implement the recommended measures. Intense market competition and weak regulatory enforcement in the sector may pose significant challenges for small and medium-sized enterprises seeking to comply with ISO 59014 and achieve certification, not only in India but also in other countries.

Auditability

Are the requirements auditable?
The auditability of ISO 59014 requirements was assessed as largely achievable throughout the pilot project. While most criteria can be verified through existing documentation and operational evidence, some requirements and associated audit questions lack precise definitions, leading to potential ambiguity in their interpretation. This occasionally challenges auditors in applying consistent and objective assessments. Incorporating detailed case studies and practical examples within the standard could provide clearer guidance, supporting uniform understanding and more reliable verification outcomes across different audit contexts.

Data availability

Is the data required for checking compliance with sustainability and traceability requirements available?
Relevant data necessary to assess compliance with sustainability and traceability requirements is largely available through existing documentation and operational records. However, obtaining comprehensive data throughout the entire value chain – particularly from upstream and down-stream players – can be challenging due to factors such as mistrust, business confidentiality, and unavailability. Additionally, misunderstandings, human errors in data collection, and inconsistent documentation further influence the availability of complete and reliable data. These limitations affect data completeness and consistency.

Subsistence activities

Does the application of the standard foster engagement with individuals engaged in subsistence activities and contribute to the improvement of their living conditions?
The application of ISO 59014 is considered feasible and relevant, particularly for organizations like E[co]work, whose vision also emphasizes bridging the formal and informal sectors—a distinctive and valuable dimension of the standard. The standard encourages engagement with individuals involved in subsistence activ-

ities. However, it is important to acknowledge that these workers often rely on better-off informal stakeholders (who are not subsistence workers) that engage them daily or provide access to materials. Bridging the gap between responsible environmental and social management practices and the realities of subsistence activities therefore requires a holistic approach. Improving the livelihoods of subsistence workers may, depending on local conditions, require engagement with intermediaries and support for the gradual formalization of the sector. By allowing for such comprehensive engagement, while setting conditions for continuous improvement toward safer and healthier working conditions, ISO 59014 has the potential to contribute significantly to enhancing the livelihoods and working conditions of individuals engaged in subsistence activities.

Impact

What benefits and opportunities arise from implementing the ISO 59014 standard?

It enhances and harmonizes data collection and management practices across operations, thereby enabling the development of reliable and transparent traceability systems. This improved traceability supports the monitoring of material flows and losses, facilitating more efficient resource recovery and circular economy strategies. Additionally, the standard promotes inclusive and responsible management of recoverable resources, creating a framework that can contribute to improved environmental outcomes and social equity. By formalizing practices and encouraging stakeholder engagement, ISO 59014 also opens up opportunities for livelihood improvement, particularly for workers and communities engaged in the collection and management of recoverable resources. This establishes a framework to guide the gradual integration into a formal system.

7.2 Benefits for the organization

Figure 14: Benefits of using the software offered by Minimise correspond directly by the benefits of implementing ISO 59014 (PCR = post-consumer recycling).

1. Unlock verifiable and traceable impact claims.
Our proofs represent physical waste collected, documented and recycled.

2. Gain access to additional quantities of e-waste to recycle.
Our proofs are generated in countries without a formal recycling infrastructure, guaranteeing additionality.

3. Open the doors to PCR resources.
Our proofs are the basis for a marketplace of traceable circular materials from e-waste.

Minimise

The vision of E[co]work, of safe and sound WEEE management is in line with the ambition of ISO 59014 in particular with its operational and organizational requirements, so their implementation is a direct benefit. Implementing the traceability part further supports collaboration and information sharing to achieve closed, efficient, and sustainable material cycles. Hence, by applying the ISO standard 59014 and testing the compliance of E[co]work, it helped the organization systematically analyse and assess areas with potential for improvement, such as gaps in data collection and documentation. The benefits of complying with the traceability requirements closely align with those identified by Minimise through the application of their data management too (see Figure 14). Enhanced traceability enables the verification of impact claims, strengthens credibility – potentially improving access to additional materials – and eventually supports greater access to financial resources for safely recycled materials.

In particular, the unique feature of ISO 59014 which is its emphasis on responsibility towards individuals engaged in subsistence activities, supports the formal recognition of the organization's efforts to bridge the gap with the informal sector. Furthermore, the adoption of ISO 59014 provides several other benefits, including enhancing operational efficiency by standardizing processes and ensuring greater transparency in material flows. It also supports the facility in mitigating environmental risks, particularly in managing hazardous substances.

This structured approach facilitated through the implementation of ISO 59014 enables better decision-making, drives continuous improvement, and highlights E[co]work's commitment to sustainability, which could result in enhanced trust among stakeholders, including clients, regulatory bodies, and the broader community.

8 Annex

8.1 Detailed assessment methodology

Table 8: Overview of the number of requirements whose deviation are considered Mayor (M) or minor (m)

Table 8 provides an overview of the number of requirements whose deviations are considered major (M) and minor (m). The Annex 8.2 lists all the questions used, along with the score as-signed to each one in case of non-compliance. Due to copyright restrictions, the actual text of ISO 59014 cannot be included in this document.

Sub-clauses per clause	# of requirements whose deviation are considered major (M)	# of requirements whose deviation are considered minor (m)	Total maximum point
Clause 6. Operational requirements (total: 35) (maximum points: 48)			
6.1 General	0	6	**6**
6.2 Classification and recovery pathway	1	8	**10**
6.3 Collection	1	1	**3**
6.4 Sorting	2	4	**8**
6.5 Material recovery processes	5	3	**13**
6.6 Logistics	4	0	**8**
Clause 7. Organizational requirements (total: 26) (maximum points: 38)			
7.1 Monitoring and Evaluation	2	2	**6**
7.2 Interested Party Engagement	1	1	**3**
7.3 Responsibility towards the value chain	1	3	**5**
7.4 Responsibility towards individual engaged in subsistence activities	1	0	**2**
7.5 Equitable working conditions	1	1	**3**
7.6 Risks	2	3	**7**
7.7 Resource use	1	0	**2**
7.8 Competencies and training	3	4	**10**
Clause 8. Traceability requirements (total: 14) (maximum points: 17)			
8.1 General	2	2	**6**
8.2 Collection of upstream data	0	1	**1**
8.3 Collection of processing data	0	1	**1**
8.4 Collection of downstream data	0	1	**1**
8.5 Collection of depollution data	1	1	**3**
8.6 Communication	0	4	**4**
8.7 Continual improvement	0	1	**1**
Total of requirements	**75**		

Level of compliance

Per requirement. The percentage of compliance per requirement is calculated through the following formula:

$$\%\ of\ compliance\ per\ requirement = \frac{\sum(\text{Yes}^{***})}{\sum(\text{Yes}^{***}) + \sum(\text{No}^{**})}$$

If non-compliance is higher than 50%, it is considered a minor or major non-compliance depending on the rating of this requirement (2 for major and 1 for minor).

Per sub-clause. The level of compliance per sub-clause is than calculated by the following formula:

$$\%\ of\ compliance\ per\ subclause = \frac{\sum_i^n(\%\ of\ compliance\ per\ requirement_i * rating\ of\ requirement_i)}{Maximum\ score\ possible}$$

Whereas

$i = 1, 2, \dots n$

$n = total\ number\ of\ requirements\ per\ subclause$

and

$$Maximum\ score\ possible = \sum_i^n rating\ of\ requirements_i - \sum_i^n (non\ applicability_i * rating\ of\ requirements_i)$$

Per clause. The same calculations are applied at the clause level and for overall compliance (see chapter 6) with n referring to the total number of requirements per clause, or to all requirements across the three clauses, respectively.

** Answers are indicated with one (1) if 'not applicable'*
*** Answers are indicated with one (1) if 'not fulfilled', 0.5 for 'partially not fulfilled'*
****Answers are indicated with one (1) for 'fulfilled', 0.5 for 'partially fulfilled'*

8.2 Questionnaire responses and compliance assessment for E[co]work

8.2.1 Operational requirements

Requirement #	Rating of requirement (0,1 or 2)	6.1 General (if your organization is only concerned with collection by collecting or influencing the collection systems design, it can still identify or define criteria for secondary materials to be recovered, for example, "it has to be valuable, otherwise we do not collect it", "no child labour should be involved, otherwise we do not collect it / do not transfer it forwards nor sell it")		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
1	1	1.1	Have the requirements in clause 6 been applied in accordance with the relevant activities and processes undertaken by the organization?	0	0	1	0%	100%	0	1	0	0	Yes
2	1	2.1	Has the organization identified or defined criteria for secondary materials to be recovered?	0	0	1	17%	83%	0.16666667	0.83333333	0	0	Yes, E[co]work defines criteria for the recovery of materials. These include: - Grade / Economic value (target: profitable) - Market and demand available (target: available safe downstream buyers) - Possibility to treat safely (target: materials are possible to be treated at the facility without harming people's health or the environment) - Not possible to be sold for reuse (target: whatever can be reused and where a buyer can be found, functions should be recovered) - Legally compliant procurement is possible (target: sourcing and sell materials only within legally compliant boundaries)
		2.2	If yes to 2.1., do the criteria take into consideration the quality and function of the secondary materials TB recovered?	0	0	1							To some extent. The criteria develop do not directly consider the quality and function of the secondary materials to be recoverd. They only take into consideration that it should be of a minimum quality that potentially will fetch a good price when sending downstream.Economic criterias based on unit economics are in development -> has to fall into specific price range (or other deals can be made)
		2.3	If yes to 2.1., do the criteria take into consideration the best environmental and social outcome of the secondary materials TB recovered?	0	0.5	0.5							No/yes. The organization takes into account environmental outcomes, such as material recovery, as well as social outcomes, like the inclusion of the informal sector. However, these environmental and social outcomes are not directly linked to the criteria or the quality or function of the product.
3	1	3.1	If yes to 2.1., are there documented studies that infer the best environmental and social outcomes for secondary material recovery?	0	1	0	100%	0%	1	0	0	1	No, no there are no documented studies used.
		3.2	If yes to 3.1., do these studies apply a life cycle perspective?	1	0	0							Not applicable
		3.3	If yes to 3.1., do the studies consider energy consumption and resource scarcity?	1	0	0							Not applicable
4	1	4.1	If the studies did not provide sufficient information to define the best environmental outcome when identifying or defining the criteria, has the organization considered conducting studies in accordance with ISO 14040, ISO 14044, and ISO 14075?	1	0	0	0%	0%	0	0	0	0	Not applicable
5	1	5.1	If ISO 14040, ISO 14044, and ISO 14075 were not applied, has the organization documented a rationale for the choice?	0	1	0	100%	0%	1	0	0	1	Not applicable
6	1	6.1	Based on the properties of the incoming recoverable resources, has the organization identified quantitative and qualitative targets for the recovery of secondary materials?	0	0.5	0.5	50%	50%	0.5	0.5	0	0	Yes/No. There are no quantitative targets for the recovery of secondary materials in relation to the incoming material. There is a quantitative target as
		6.2	If yes to 6.1, does the organization consider continual improvement when setting targets for the recovery of secondary materials?	1	0	0							Not applicable

Score of 6.1	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC >	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	2.67	2.33	0.0	2	5	53%	47%

Requirement #	Rating of requirement (0,1 or 2)	6.2 Classification and determination of recovery pathways (acc. to a list of attributes of recoverable resources received such as product, component and material type and characteristics, hazard potential, process requirements, repairability) and determination of recovery pathways. Answer these questions if your organization is concerned with collection by collecting or influencing the collection systems design.		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
7	**2**	**7.1**	**Has the organization established, documented, and maintained a list of attributes (e.g. component and material (3.122) type and characteristics, hazard (3.8) potential, process requirements, repairability.) relevant to the recoverable resources it handles?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, officially HSN Code 8549 is applied (but this is just one category). E[co]work applies additionally the official EEE-code (https://eprewastecpcb.in/assets/PDF/Framework.pdf) according to which incoming material is sorted.
		7.2	**If yes to 5.1, which is the list of attributes and how did you come up with this list?**	**0**	**0**	**1**							See above
8	1	8.1	Does the organization apply a methodology, such as the one described in informative Annex B, to determine the recovery pathway?	0	0.5	0.5	50%	50%	0.5	0.5	0	0	Yes/No, but the methodology is not documented. Generally what can be reused is going into reuse. Only after into recycling. What cannot be recycled goes into incineration / landfill disposal. Items for which the organization does not have appropriate treatment infrastructure, are not accepted or not processed and sold further (e.g. fridges).
9	1	9.1	If an alternative methodology to Annex B has been chosen, does it aim for the best environmental outcome based on life cycle thinking?	0	0.5	0.5	50%	50%	0.5	0.5	0	0	No, not specifically - The choice for the rational is not based on environmental best outcome but on economic returns.
10	1	10.1	If an alternative methodology was used, has the rationale for its choice been documented?	0	1	0	100%	0%	1	0	0	1	No, the rational for the choice (methodology) has not been documented
		10.2	Has your organization used publicly available studies based on life cycle thinking to supplement Annex B?	0	1	0							No --> NOTE: here is "can" in the clause, so it's a guidance but not required
		10.3	Has your organization conducted a life cycle assessment (LCA) in accordance with ISO 14040 and ISO 14044 to compare the environmental outcomes of different recovery pathways?	0	1	0							No --> NOTE: here is "can" in the clause, so it's a guidance but not required
11	1	11.1	Has the organization identified each delivery of recoverable resources received in accordance with the list of established attributes?	0	0	1	0%	100%	0	1	0	0	Yes, all incoming delivery is sorted and separated according to the attributes established. Documented information is available.
12	1	12.1	Has the documented information about the identification process for each delivery been maintained as part of your traceability system?	0	0	1	0%	100%	0	1	0	0	Yes, documented information is available about incoming delivery.
13	1	13.1	If data about attributes was not available, has your organization applied measures such as testing the received batch of recoverable resources?	1	0	0	0%	0%	0	0	0	0	Not applicable - so far the incoming deliverable were possible to be identified according to the list of attributes (but there is for example also a attribute called mixed materials)
14	1	14.1	Has the organization documented how decisions regarding the recovery pathway for each delivery were made?	0	1	0	100%	0%	1	0	0	1	No, there is no documentation how decisions are made.
15	1	15.1	Has the organization ensured that the list of attributes is kept up to date with any relevant changes to the recoverable resources or the processes applied?	0	0	1	0%	100%	0	1	0	0	Yes, the list of attributes is continously adapted as per needs and changes

Score of 6.2	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Total MAJOR NC (if score of deviation = 2 and NC > 50%)**	**Total MINOR NC (if score of deviation = 1 and NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
	3.0	**6.0**	**0**	**2**	**9**	**33%**	**67%**

Requirement #	Rating of requirement (0,1 or 2)	6.3 Collection Answer these questions if your organization is concerned with collection by collecting or influencing the collection systems design.		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
16	**2**	**16.1**	**Where there is influence on collection systems design, does the organization support the separate collection of recoverable resources (e.g., through the provision of separate containers or separate collection points)?**	0	0	1	0%	100%	0	2	0	0	Yes, E[co]work request suppliers to provide the accepted types of materials only and that they do not mix it with other wastes.
17	1	17.1	Where there is influence on collection or return, does the organization support the development and implementation of mesures to facilitate the return or collection of recoverable resources returned or collected (e.g., by supporting collectors with materials lists, communication campaigns, and take-back scheme in place)?	0	0	1	0%	100%	0	1	0	0	Yes, the organization conducts awareness sessions and provide lists of the materials accepted.

Score of 6.3	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0	**3**	**0**	**0**	**3**	**0%**	**100%**

Requirement #	Rating of requirement (0,1 or 2)	6.4 Sorting Answer these questions if your organization is sorts or has an influence on sorting practices.		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
18	**2**	**18.1**	**Does the organization consistently sort recoverable resources in accordance with the identified attributes?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, E[co]work applies the official HSN-Code for the incoming material and the EEE-Code. After dismantling material is categorized into different fractions.
19	1	19.1	When sorting recoverable resources, does the organization employ appropriate sorting technologies and practices to facilitate the achievement of the defined criteria?	0	0	1	0%	100%	0	1	0	0	Yes, E[co]work applies manual sorting technoligies. These allow for flexible and effective sorting for identifying complex and high-valuable components (pcb, reusable objects). Sorting is done on visual basis.
20	1	20.1	After sorting, have non-recoverable secondary materials been sent to energy recovery or proper disposal at authorized organizations, where available?	0	0	1	0%	100%	0	1	0	0	Yes, E[co]work sends non-recoverable resources to energy recovery or engineered landfill. (there are authorized hazardous treatment plant and landfills available)
		20.2	If authorized organizations were not available, have these materials been sent to organizations that handle them properly?	1	0	0							
21	**2**	**21.1**	**After sorting, have resources that are recoverable as products, components, or materials been sent for proper non-destructive processing or to authorized organizations for reuse, repairing, or refurbishing?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, the potentially reusable products are sent to organization conducting preparation for reuse. Their formal status is checked by ensuring that they have an official GST number.
22	1	22.1	Does the organization maintain separation between recoverable resources for which it has traceability data and those for which it does not?	1	0	0	0%	0%	0	0	0	0	So far, we have traceability data for all incoming material.
23	1	23.1	If maintaining this separation is not feasible, has the entire consignment been considered not traceable in accordance with the requirements of this document?	1	0	0	0%	0%	0	0	0	0	Not applicable

Score of 6.4	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.0	**6.00**	**0**	**0**	**6**	**0%**	**100%**

Requirement #	Rating of requirement (0,1 or 2)	6.5 Material Recovery Processe Answer these questions if your organization is conducting material processing or has an influence on material recovery processes.		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
24	**2**	**24.1**	**Does the organization keep recoverable resources that have been sorted into material types separate to facilitate further processing?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes
25	1	25.1	When preparing for material recovery, does the organization operate and maintain an adequate infrastructure, technologies, and practices that facilitate achieving the criteria defined for secondary materials to be recovered?	0	0	1	0%	100%	0	1	0	0	Yes, the facility has adequate infrastructure for safe material storage, including a fire NOC, a sealed floor, and dry conditions. Hazardous substances and valuable materials like copper are stored in a fenced area. Manual dismantling is used effectively to separate materials and meet defined criteria.
26	**2**	**26.1**	**Does the selection of non-destructive and destructive processes, or any combination thereof, focus on maximizing the quantity and on fulfilling the defined quality criteria of the material recovered, with the best environmental and social outcome?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, the selection of non-destructive and destructive processes, focuses on maximizing the quantity and on fulfilling the quality criteria.
27	1	27.1	Are decisions regarding the choice of processes supported by using publicly available studies based on life cycle thinking to compare the environmental outcomes of the different processing options?	0	1	0	100%	0%	1	0	0	1	The decisions regarding the choise of processes are primarily driven by market demand and monetary returns and not based on environmental and social outcome. No life cycle assessment is conducted.
		27.2	If no to 20.1, are decisions regarding the choice of processes supported by conducting a life cycle assessment (LCA in accordance with ISO 14040 and ISO 14044) to compare the environmental outcomes of the different processing options?	0	1	0							
28	**2**	**28.1**	**Are depollution processes undertaken in such a way that prevents the release of any substances or mixtures to the environment?**	**0**	**0.5**	**0.5**	**50%**	**50%**	**1**	**1**	**0**	**0**	Yes/No. There is a dedicated hazardous storage with containers, however some depollution processes are not undertaken carefully and not in a way that prevents the release of substances or mixtures to the environemnt. (e.g. mercury containing backlights, way of stpring, etc.) Hazardous substances that are removed include: batteries, mercury backlights, glas, general waste,
29	**2**	**29.1**	**Is dilution of the concentration of substances or mixtures to be removed avoided as part of the depollution process?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	There is no dilution that is done on purpose.
30	1	30.1	Is depollution carried out by personnel who are competent based on appropriate education, training, or experience regarding depollution?	0	0.5	0.5	50%	50%	0.5	0.5	0	0	Yes/No, not all dismantlers are competent and have received proper education and training yet.
31	**2**	**31.1**	**Does the organization route any resulting hazardous substances and components to proper further treatment?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, hazardous substances are routed towards proper further treatment, e.g. incineration plant, landfill

Score of 6.5	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Total MAJOR NC (if score of deviation = 2 and NC > 50%)**	**Total MINOR NC (if score of deviation = 1 and NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
	2.5	**10.50**	**0**	**1**	**13**	**19%**	**81%**

Requirement #	Rating of requirement (0,1 or 2)	6.6 Logistics		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
32	2	32.1	Does the organization handle, transport, and store recoverable resources in a manner that facilitates their subsequent recovery as whole products, components, or materials?	0	0	1	25%	75%	0.5	1.5	0	0	Yes, the organization transports the material in an appropriate way.
		32.2	Is the way that the handling, transporation and storing of these recoverable resources done ensure the best environmental outcome?	0	0.5	0.5							Yes/No. The material is handled appropriately depending on the category. Material storage could be improved to avoid spilling between heaps of materials.
33	2	33.1	Are resources that are not recovered as materials, components, or products handled, transported, and stored in a way that facilitates their energy recovery or proper disposal?	0	0	1	0%	100%	0	2	0	0	Yes, the resources not recoverable are stored separately.
34	2	34.1	Are adequate transport, storage, packaging methods, and packaging materials used to prevent environmental and human health risks?	0	0	1	25%	75%	0.5	1.5	0	0	Yes, recoverable resources are transported in a way, that prevent that it is falling from trucks.
		34.2	Are adequate transport, storage, packaging methods, and packaging materials used to minimize damage to recoverable resources?	0	0.5	0.5							Yes/No. Material storage could be improved by using containers instead of creating heaps of materials.
35	2	35.1	Are adequate transport, storage, packaging methods, and packaging materials used to reduce resource use?	0	0	1	0%	100%	0	2	0	0	Yes. Storage and handling is conducted with metal grids, pallets or bags, or just piled in heaps. It is to a large extent reusable packaging.

Score of 6.6	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	1.0	7.0	0.0	0.0	8	13%	88%

8.2.2 Organizational requirements

Requirement #	Rating of requirement (0,1 or 2)	7.1 Monitoring and Evaluation		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
36	**2**	**36.1**	**Has the organization established, implemented, and maintained a monitoring and evaluation plan?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes. The company has implemented a monitoring and evaluation plan that encompasses key performance indicators against performance target on a company level. Key performance indicators on a individual team member level are in developmemnt.
37	2	37.1	Does the organization regularly monitor and review issues that are relevant to the recovery of secondary materials and that affect its ability to fulfill the requirements in this document?	0	0	1	8%	92%	0.166667	1.833333	0	0	Yes, the company reviews the indicators on a monthly bases. The indicators reviewed and relevant to the recovery of secondary materials are •Tons of WEEE procured •Tons of WEEE dismantled •Tons of WEEE sold
		37.2	Does the organization regularly monitor and review the measures and means required?	0	0	1							Yes, measures and means to achieve the target are reviewed on a monthly basis.
		37.3	Does the organization regularly monitor and review the application of the code of conduct where it has been agreed to between the organization and the suppliers?	1	0	0							Not applicable. The organization does not has a code of conduct.
		37.4	Does the organization regularly monitor and review information about interested parties and their relevant requirements?	0	0	1							Yes, customer insights studies were conducted. Regulations and information about interested parties are monitored, though not a systematic way.
		37.5	Does the organization regularly monitor and review evidence of competence of individuals doing work under its control that affects the performance and effectiveness of its activities and processes?	0	0.5	0.5							Yes/No. Through the review of the KPIs, the competences of the individuals responsible for reaching the target is indirectly monitored. KPIs are being currently being develop for each team member.
		37.6	Does the organization regularly monitor and review performance against targets, such as the percentage of secondary material recovered?	0	0	1							Yes, this is done on a monthly basis (not the percentage, but this can be easily calculated).
		37.7	Does the organization regularly monitor and review traceability data in accordance with clause 8?	0	0	1							Yes, those data points that are being collected, are regularly monitored reviewed.
38	1	38.1	Are workers informed of the monitoring results?	0	0.5	0.5	50%	50%	0.5	0.5	0	0	Yes/No. Monthly meeting with the team are being conducted. However not with
39	1	39.1	Does the organization retain appropriate documented information?	0	0	1	0%	100%	0	1	0	0	Yes, the information is documented and digitally stored.

Score of 7.1	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.67	**5.33**	**0.00**	**0.00**	**6**	**11%**	**89%**

Requirement #	Rating of requirement (0,1 or 2)	7.2 Interested Party Engagement		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
40	**2**	**40.1**	**Does the organization take into account the interests and concerns of interested parties that are affected by or can potentially have an effect on its operations?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, the organization takes into account the different interests and concerns of interested parties.
41	1	41.1	Has the organization established clear and accessible channels for two-way communication with the interested parties identified?	0	0	1	50%	50%	0.5	0.5	0	0	Yes, we share contact information and address.
		41.2	Has the organization established measures to prevent conflicts with the interested parties identified and grievance mechanisms to resolve active ones?	0	1	0			0	0			No, there are no specific measures implemented, and no grievance mechanisms
commendati	0		Has the organization designed and implemented a collaborative structure or joined an existing one with defined aims, roles, responsibilities, procedures, and appropriate means?	0	0	1							Yes, the organization has established a collaborative structure. An interested party can rent workshop, offices. The organization is set up to collaboratie and integrate various interested parties, including the informal sector.
			Does the collaborative structure facilitate the generation and sharing of ideas, information, data, and knowledge to achieve the defined quality of secondary materials and targets?	1	0	0							Not applicable, as there are no defined criteria for the quality of the materials and targets
			Does the collaborative structure ensure inclusive participation of all suppliers, customers, and other organizations involved in collection, classification, sorting, processing, transport, and logistics, including both business-to-consumer and business-to-business interactions, and other	0	0	1							Yes, as inclusive recycling foundation it is a core principal of the organiuzation to include all types of suppliers (formal and informal) and is open to collaborate with various players.
			Does the collaborative structure include mechanisms for monitoring the effectiveness of engagement and collaboration with suppliers, customers, and other organizations involved in collection, classification, sorting, processing, and logistics of the consignment?	0	0	1							Yes, there are Indicators in place to monitor engagement and outreach activities. The effectiveness for inclusion of informal microentrepreneurs is monitored.

Score of 7.2	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Total MAJOR NC (if score of deviation = 2 and NC > 50%)**	**Total MINOR NC (if score of deviation = 1 and NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
	0.50	**2.50**	**0**	**0**	**3**	**17%**	**83%**

Requirement #	Rating of requirement (0,1 or 2)	7.3 Responsibility towards the value chain		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
42	**2**	**42.1**	**Has the organization developed or adhered to a value chain code of conduct?**	**0**	**1**	**0**	**100%**	**0%**	**2**	**0**	**1**	**-**	No, there is no value chain of conduct developed.
		42.2	**If yes to 8.1, has the organization communicated the value chain code of conduct as an expectation of the organization?**	**1**	**0**	**0**							
43	1	43.1	If yes to 8.1, does the value chain code of conduct refer to ethical behavior, traceability aspects, and responsible practices for achieving the quality and targets expected of the secondary material to be recovered?	1	0	0	-	-	-	-	-	-	
44	1	44.1	Does the organization incorporate the value chain code of conduct aspects into any type of agreement with the organizations concerned along the value chain?	1	0	0	-	-	-	-	-	-	
commendati	0		Does the code of conduct prioritize reuse before processes and activities for secondary material recovery?	-	0	0							
			Does the code of conduct include labour practice and standards such as child labour laws, anti-discrimination practices, health and safety standards, working conditions, working hours, compensation, right to association, and freely chosen employment?	-	0	0							
			Does the code of conduct include climate change mitigation measures and pollution prevention during product and material use, extraction, production, recovery, disposal, and transportation?	-	0	0							
			Does the code of conduct include anti-corruption measures such as those addressed in ISO 37001?	-	0	0							
			Does the code of conduct include fair business practices (e.g., upstream in the supply chain)?	-	0	0							
			Does the code of conduct include a review and documentation policy?	-	0	0							
commendati	0		Has the organization established procurement criteria in accordance with the value chain code of conduct developed?	-	0	0							
45	1	45.1	Has the organization identified capacity development needs in the value chain and provided corresponding training options for properly applying the code of conduct, based on the properties of the incoming recoverable resources and considering continual improvement?	1	0	0	-	-	-	-	-	-	

Score of 7.3	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Total MAJOR NC (if score of deviation = 2 and NC > 50%)**	**Total MINOR NC (if score of deviation = 1 and NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
	2.00	**0.00**	**1.00**	**0.00**	**2**	**100%**	**0%**

Requirement #	Rating of requirement (0,1 or 2)	7.4 Responsibiliy towards individuals engaged in subsistence activities (SA)		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
46	2	46.1	**Does the organization create an enabling environment to work collaboratively with organizations or individuals involved in SAs?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, this is one of the primary goals of the organisation.
		46.2	**Does the environment address the organizations or individuals involved in SAs needs and interests with regards to their well-being and livelihoods?**	**0**	**0**	**1**							The needs and interest of an Micor-entrepreneur is mainly making more profit. The goal of the organization is to prove a safe and sound work environment. To achieve this financial incentives for following and implementing better practices
commendat	0		Where applicable, has the organization developed mechanisms for supporting any individuals involved in subsistence activities (SAs), who are part of its value chain, in the continual improvement of their well-being, livelihoods and professional practices?	-	0	1	0%	100%	0	0	0	0	Yes, we support them, mechanism are through their bosses to rent space and conduct dismantling at our facility, where the laborers get trained and work in a safe and sound environment.

Score of 7.4	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.00	**2.00**	**0.00**	**0.00**	**2**	**0%**	**100%**

Requirement #	Rating of requirement (0,1 or 2)	7.5 Equitable working conditions (During activities and processes to recover secondary materials)		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
47	2	**47.1**	**Has the organization established decent work conditions in their own operations?**	**0**	**0**	**1**	**10%**	**90%**	**0.2**	**1.8**	**0**	**0**	Yes, the facility is renovated, bathrooms and showers are available. Staff has AC in office to heat or cool. Ventilation should ensure decent temperature in the dismantling area. Kitchen and recreatioal area are provided.
		47.2	**Does the organization take measures to prevent child labor, forced labor, harassment, and any form of discrimination, with a specific focus on vulnerable and disadvantaged workers, women, and individuals involved in subsistence activities with whom the organization engages with?**	**0**	**0**	**1**							Yes, the organization does not allow child labour or forced labour. Harassment and any form of discrimination is not in line with the organizations principles
		47.3	**Does the organization provide personal protective equipment (PPE) to workers?**	**0**	**0**	**1**							Yes
		47.4	**Are toilet and sanitary facilities regularly accessible to workers?**	**0**	**0**	**1**							Yes
		47.5	**Has the organization put in place safety and health measures and infrastructure for pregnant workers and workers who have recently given birth or are breastfeeding?**	**0**	**0.5**	**0.5**							Yes/No, it would not be recommended in the first place to have pregnant workers, or babies in the facility. There would be sufficient space to accomodate this aspects if there is need.
48	1	48.1	Does the organization ensure freedom of association and the right to collective bargaining?	0	0	1	0%	100%	0	100%	0	0%	Yes, they have freedom of association and the right to collective bargaining.
		48.2	Does the organization inform workers of any existing collective bargaining agreement at workplace sites?	1	0	0							Not applicable
		48.3	If the formation of workers' associations or unions is prohibited in the country of operations, does the organization provide other mechanisms to engage in a dialogue with workers (such as a health and safety committee with representatives from workers and management)?	1	0	0							Not applicable

Score of 7.5	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.20	**2.80**	**0.00**	**0.00**	**3**	**7%**	**93%**

Requirement #	Rating of requirement (0,1 or 2)	7.6 Risks		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
		7.6.1 Environmental and social risks											
49	**2**	**49.1**	**Does the organization undertake actions to address identified environmental and social risks arising from its activities for the recovery of secondary materials?**	**0**	**0**	**1**	**0%**	**100%**	**0**	**2**	**0**	**0**	Yes, external audits are conducted, Health and Safety policy is in place, this could be strengthened (e.g. hazardous storage area missing labels)
		49.2	**Has the organization developed protocols to prevent, reduce, or control social or environmental risks and adverse social or environmental impacts from releases?**	**0**	**0**	**1**							Yes, policies and rules in the faciliy are established to prevent, reduce and control env. & social risks. However, implementation is challenging
		49.3	**Has the organization developed protocols, activities, processes, and mechanisms to aid and accelerate the recovery of ecosystems that have been degraded or destroyed by its activities? Does the organization ensure financing for preventive and restorative measures?**	**1**	**0**	**0**							Not applicable
50	1	50.1	Has the organization implemented a communication plan to address the interests and concerns of interested parties?	0	1	0	100%	0%	1	0	0	1	No, examples of a communication plan? Would trainings be considered?
		50.2	If yes to 23.1, does the communication plan consider any risks to the environment or the community related to its processes and activities?	1	0	0							Not applicable
		50.3	If yes to 23.1, does the communication plan include protocols for preserving healthy and safe living conditions?	1	0	0							Not applicable
		50.4	If yes to 23.1, does the communication plan include emergency protocols (e.g., explosion, fire, contamination, or accident)?	1	0	0							Not applicable
51	1	51.1	Does the organization seek to identify information that helps it prevent or mitigate risks when the risks of current practices are not well understood?	0	0	1	0%	100%	0	1	0	0	Yes, if new e-waste products reach eol, the organization aims to identify any risks associated with the processing of these. This is however not done in a systematic nor documented way.
52	1	52.1	Has the organization removed harmful substances from the activities and processes where it has identified that it is not properly managing them?	0	0	1	25%	75%	0.25	0.75	0	0	Yes, we either remove hazardous substances and forward it to appropriate treatment technologies, or do not process the eol products at all, but sell it furhter as such.
		52.2	Has the organization improved practices to make them safer in situations where it has identified that it is not properly managing harmful substances or is engaging in harmful practices?	0	0.5	0.5							Certain measurements were taken, such as better work place organization. However, there are drawbacks and continous efforts are needed to keep it in place.
commendat	0		Do the activities and processes for recovering secondary materials not increase the risks of environmental harm from releases of hazardous substances?	-	0	1	0%	100%	0	0	0	0	Yes, there is no specific increase of environemtnal harm - except by nature of the recovery practices risks are generally higher due to the dismantling of a product. Depollution could be carried out in a safer manner.
		7.6.2 Health and safety risks of workers and individuals involves in SAs											
53	**2**	**53.1**	**Does the organization consider health and safety risks for secondary material recovery at the workplace of their workers and individuals involved in SAs with whom the organization is engaging?**	**0**	**0**	**1**	17%	83%	0.333333	1.666667	0	0	Yes, E[co]work is considering the health and safety risks, and is actively seeking to create awareness.
		53.2	**Has the organization developed protocols to prevent, reduce, or control health and safety risks for secondary material recovery?**	**0**	**0.5**	**0.5**							Yes, there are policies about PPE, however they are not strictly implemented. Depollution is further not carried out in a safe way (e.g. mercury, workplace organization, etc.)
		53.3	**Does the organization communicate these risks to those concerned?**	**0**	**0**	**1**							Yes, the organization communicates it, however implementation is challenging.

Score of 7.6	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Total MAJOR NC (if score of deviation = 2 and NC > 50%)**	**Total MINOR NC (if score of deviation = 1 and NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
	1.58	**5.42**	**0.00**	**1.00**	**7**	**23%**	**77%**

Requirement #	Rating of requirement (0,1 or 2)	7.7 Resource use		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
54	2	54.1	**Does the organization identify opportunities to minimize resource use?**	**0**	**0.5**	**0.5**	50%	50%	1	1	0	0	No, the organization does not regularly monitor our resources use, however it is moniotred through bills and bookkeeping.
		54.2	**Does the organization implement corresponding measures to minimize resource use?**	**0**	**0.5**	**0.5**							Yes, when there is extensive energy use for example, the organization aims to find out the reason for it and implement corresponding measures.
commendati	0		Does the organization consider replacing materials made from primary resources with secondary materials when it represents the best environmental outcome based on life cycle thinking?	1	-	-							Not applicable
			Does the organization reduce or subsitute the use of materials, particularly those that are likely to be scarce for current and future generations?	1	-	-							Not applicable
			Does the organization prioritize replacing non-renewable resources with renewable resources when it represents the best environmental outcome based on life cycle thinking?	0	1	0							No, as the organization is renting the facility, this is currently not considered feasible.
			Does the organization avoid, reduce, or substitute the use of resources that pose a risk to the environment and human health, such as very persistent, very bioaccumulative (VPVB) substances?	1	-	-							Not applicable
			Does the organization minimize energy or fuel use when transporting, sorting and processing recoverable resources or secondary materials?	0	1	0							Not, this is currently not feasible given the options and resources available.

Score of 7.7	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	1.00	1.00	0.00	0.00	2	50%	50%

Requirement #	Rating of requirement (0,1 or 2)	7.8 Competencies and training		Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
		7.8.1 Operation and managerial competencies											
55	**2**	**55.1**	**Has the organization determined the necessary operational competencies of individuals doing work under its control that affects the performance and effectiveness of its activities and processes?**	**0**	**0**	**1**	20%	80%	0.4	1.6	0	0	Yes / no. This has been done to some extent.
		55.2	**Has the organization appointed individuals with the required competencies responsible for the operational activities and processes, and activities or management processes, with a description of the roles of this position?**	**0**	**0**	**1**							Yes, this is currently being developed
		55.3	**Does the organization assess whether individuals concerned possess the identified competencies?**	**0**	**0**	**1**							Yes, we assess it during the interview process and after through work performance
		55.4	**Where applicable, has the organization taken actions to ensure that individuals are competent based on appropriate education, training, mentoring, or experience?**	**0**	**0**	**1**							Yes, however, recruitment is being done with the intetntion to find the most suitable person for the position, however it is very challenging finding a person that has the required competencies. Also, it is our believe that a person should
		55.5	**Does the organization evaluate the effectiveness of these actions?**	**0**	**1**	**0**							The effectiveness of these actions are not evaluated.
		7.8.2 Training needs											
56	**2**	**56.1**	**Has the organization identifed training needs for any organization with whom it engages, such as suppliers, subcontractors, and individuals engaged in SAs?**	**0**	**0**	**1**	0%	100%	0	2	0	0	Yes, trainings needs of individuals engaged in SA are being identified.
57	1	57.1	Does the organization plan and conduct training activities in the areas of need?	0	0	1	0%	100%	0	1	0	0	Yes, trainings and workshops are being conducted
58	1	58.1	If yes to 35.1, do the training activities include training on the organization's value chain code of conduct?	1	0	0	-	-	-	-	-	-	Not applicable
59	1	59.1	Does the organization provide guidance, training, and awareness-raising to workers in appropriate forms, manners, and languages?	0	0	1	0%	100%	0	1	0	0	Yes
60	1	60.1	Does the guidance cover topics such as occupational health and safety, emergency response, first aid, safe handling, collection, classification, sorting, logistics, and in-depth training in treatment processes?	0	0	1	0%	100%	0	1	0	0	Yes, not all of it is covered but some.
61	**2**	**61.1**	**When the organization engages with individuals involved in SAs, are they provided with guidance, training, and awareness-raising in appropriate forms, manners, and language(s), at least on operating safely, emergency response topics, and standard operating procedures (SOPs)?**	**0**	**0**	**1**	0%	100%	0	2	0	0	Yes, they receive trainngs

Score of 7.8	**Weighted scoring of non-compliance**	**Weighted scoring of compliance**	**Total MAJOR NC (if score of deviation = 2 and NC > 50%)**	**Total MINOR NC (if score of deviation = 1 and NC > 50%)**	**Max. score**	**% of non-compliance per sub-clause**	**% of compliance per sub-clause**
	0.40	**8.60**	**0.00**	**0.00**	**9**	**4%**	**96%**

8.2.3 Traceability requirements

Requirement #	Rating of requirement (0,1 or 2)	Question #	Score of deviation	8.1 General			Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
62	2	1	2	1	62	Has the organization developed and implemented a traceability system that includes procedures?	0	0	1	50%	50%	1	1	0	0	Yes, the traceability system includes: - identification, labeling, data recording,
		2			62	Has the organization developed and implemented a relevant policy for the traceability system?	0	1	0							No, E[co]work does not have a traceability policy
63	1	3			63	Is the policy publicly available?	1	-	-	-	-	-	-	-	-	not applicable
64	2	4	2	2	64	Does the organization collect data about the products, components, or materials handled?	0	0	1	0%	100%	0	2	0	0	Yes, we do collect data about that
65	1	5	1	3	65	Is a justification provided if traceability data cannot be accessed?	0	0	1	50%	50%	0.5	0.5	0	0	There are some missing data for which it is not

Score of 8.1	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	1.50	3.50	0.00	0.00	5	30%	70%

Requirement #	Rating of requirement (0,1 or 2)	Question #	Score of deviation	8.2 UPSTREAM: Does the collected data cover the following minimum requirements			Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
66	1	6	1	4	66	Name and address of the organizations in its value chain with which it has contractual relationships. Organizations in the value chain can include those doing collection, processing, and delivery of the consignment of products, components, or materials, including the names of the responsible staff.	0	0	1	14%	86%	0.14	0.86	0	0	Yes, E[co]work collects name, address, contact information, products, components or material received, GST number,… with which it has contractual relationsships. These include not only organization but also Micro-entrepreneurs.
		7	1	5	66	Confirmation of compliance with the code of conduct from the organizations in its value chain with which it has contractual relationships.	1	-	-							No, E[co]work does not has a code of conduct
		8	1	6	66	Date of receipt of the recoverable resource and their date of release or shipment.	0	0	1							Invoicing date is registered and data of receiving material is registered. Release of shipment by
		9	1	7	66	Origin (address) of the consignment.	0	1	0							The origin of the consignment is not recorded
		10	1	8	67	Unique reference number of the recoverable resource	0	0	1							the organization asigns a GRN number (goods
		11			67	If no to 66.5, has the organization assigned one?	0	0	1							
		12	1	9	67	Classification system used for classifying products, components, or materials (e.g., UNU Key-code for electronic waste).	0	0	1							Yes, officially HSN Code is applied (but there are just few relevant categories, mostly 8549) and the
		13	1	10	67	Assigned attributes for sorting.	0	0	1							Attributes are according to the discription of the
		14	1	11	67	Indication of recoverable resources that have completed the appropriate stage identified for nondestructive or destructive processes	1	-	-							Information such as "has been washed already" or "has been depolluted"?

Score of 8.2	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.14	0.86	0.00	0.00	1	14%	86%

Requirement #	Rating of requirement (0,1 or 2)	Question #	Score of deviation	8.3 DURING PROCESSING: Does the collected data cover the following minimum requirements			Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
67	1	15	1	12	67	Inputs by mass or volume (in SI units) or number of units, preferably categorized by product, component or material types, according to the Harmonized System (HS code);	0	0	1	17%	83%	0.17	0.83	0	0	Yes, Product inputs: type and weight, level of dismantling, GRN no. (= uniqe batch referene number) - but some data missing
		16	1	13	67	Percentage of the total amount of inputs routed towards different recovery and final treatment pathways, identifying main activities and processes applied including depollution;	0	1	0.5							Yes/No, no percentage is calculated per se but can be done e.g. on a yearly basis for example
		17	1	14	67	Outputs by mass or volume (in SI units) or number of units, preferably categorized by product, component or material types, according to the Harmonized System Codes (HS Codes);	0	0	1							Yes, output type and mass is dumented, HS-Code is applied, some missing data.

Score of 8.3	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.17	0.83	0.00	0.00	1	17%	83%

Requirement #	Rating of requirement (0,1 or 2)	Question #	Score of deviation	8.4 DOWNSTREAM: Does the collected data cover the following minimum requirements			Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
68	1	18	1	15	68	Name and address of the receiving organizations;	0	0	1	8%	92%	0.08	0.92	0	0	Yes
		19	1	16	68	Shipment address;	0	0	1							Yes
		20	1	17	68	Percentage of the total amount of outputs routed towards different clients and final treatment pathways, identifying types of products, components or materials;	0	1	0.5							Yes / No. We don't calculated the percentage. But we have the weight
		21	1	18	68	Unique reference number (e.g. products or components identification or batch number) generated with commonly accepted code systems; if not available, the organization should assign one;	0	0	1							HS Code
		22	1	19	69	Classification system used for classifying products, components or materials;	0	0	1							HS Code yes, but the internal one no
		23	1	20	69	Assigned attributes for sorting;	0	0	1							Yes, in development
		24	1	21	69	Indication of recoverable resources that have completed the appropriate stage identified for nondestructive or destructive processes	1	0	0							Information that could be recorded here include: - dismantled materials from e-waste - not tested / tested

Score of 8.4	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.08	0.92	0.00	0.00	1	8%	92%

Requirement #	Rating of requirement (0,1 or 2)	Question #	Score of deviation	8.5 Depollution			Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
69	2	25	2	22	69	If depollution is carried out, are the recoverable resources accompanied by the related information when receiving them from upstream or delivering them downstream?	0	1	0.5	50%	50%	1	1	0	0	Yes/No. Upstream there is no data available. Downstream the substances are labeled.
		26	1		69	If yes to 69.1, does the information include the component, materials, substances, or mixtures fully or partially removed?	1	-	-							Not applicable
		27	1		69	If yes to 69.1, does the information include the presence of declared hazardous substances and their concentration?	1	-	-							Not applicable
		28	1		69	If yes to 69.1,does the information include documentation demonstrating proper treatment for recovery or final treatment?	1	-	-							Yes, there is documentation about hazardous waste brought to TSDF (Treatment, storage
70	1	29	1	23	70	If data upstream or data downstream cannot be collected, is a justification provided?	0	1	0	100%	0%	1	0	0	1	No

Score of 8.5	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	2.00	1.00	0.00	1.00	3	67%	33%

Requirement #	Rating of requirement (0,1 or 2)	Question #	Score of deviation	8.6 Communication			Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
71	1	30	1	24	71	Does the organization adhere to a recognized model, such as ISO 22095, or equivalent when communicating about the traceability of materials?	1	0	0	0%	0%	0	0	0	0	No the organization does not adhere to a recognized model, such as ISO 22095, when communicating about the traceability of materials.
72	1	31	1	25	72	Are the relevant requirements for the implementation of the traceability system effectively communicated across all relevant interested parties, including workers and suppliers with whom the organization has contractual relationships?	0	1	0.5	50%	50%	0.5	0.5	0	0	The requirements for the implementation of the traceability system are not communicated across all relevant interestd parties.
73	1	32	1	26	73	Is traceability data made available to the organization's immediate downstream and upstream organizations who can require it?	0	0	1	0%	100%	0	1	0	0	Traceability data can be made available on request by the downstream and upstream
74	1	33	1	27	74	Does the organization take measures to engage and collaborate with all direct suppliers and other organizations involved in the collection, processing, and delivery of materials, components, or products, and support them with their data gathering?	0	1	0	100%	0%	1	0	0	1	No, at the point it is not possible to take measures to engage and collaborate with all direct supplier(s) and other organizations involved in the collection, processing and delivery of the

Score of 8.6	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	1.50	1.50	0.00	1.00	3	50%	50%

Requirement #	Rating of requirement (0,1 or 2)	Question #	Score of deviation	8.7 Continual Improvement			Applicability of question [0 = does apply; 1 = does not apply]	No	Yes	% of non-compliance	% of compliance	Weighted scoring of non-compliance	Weighted scoring of compliance	MAJOR NC (if score of deviation = 2 and NC > 50%)	MINOR NC (if score of deviation = 1 and NC > 50%)	Description
75	1	34	1	28	75	Does the organization undertake regular reviews of the effectiveness of the traceability system and revise any aspect found to be ineffective?	0	1	0.5	50%	50%	0.5	0.5	50%	50%	Yes, E[co]work is reviewing and is eager to continously improving the data management and

Score of 8.7	Weighted scoring of non-compliance	Weighted scoring of compliance	Total MAJOR NC (if score of deviation = 2 and NC > 50%)	Total MINOR NC (if score of deviation = 1 and NC > 50%)	Max. score	% of non-compliance per sub-clause	% of compliance per sub-clause
	0.50	0.50	0.50	0.50	1	50%	50%

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