

ANNUAL DATA - GOLD

ANNUAL | 2017

Staples

Please submit all numbers in tons or units, as indicated. Note that reporting in tons is required (*), while reporting in units is optional.

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

Total Collected for Reuse & Recycling from all Streams

Total Collected for Reuse & Recycling: 1 8,927.21 tons

Total Units Collected for Reuse and Recycling (optional):

Equipment: 2 (optional) * 6,663.86 tons

Units of Equipment Collected for Reuse and Recycling (optional):

Cell Phones and other Mobile Devices: 3 (optional) * 0.00 tons

Units of Cell Phones / Mobile Devices Collected for Reuse and Recycling (optional):

Accessories: 4 (optional) * 2,263.35 tons

Units of Accessories Collected for Reuse and Recycling (optional):

Total: 8,927.21 tons

Total Units:

Reuse and Recycling Data

Total sent to third-party certified recyclers from All Streams: 5 * 8,927.21 tons

Total Units sent to third-party certified recyclers (optional):

Percentage sent to third-party certified recyclers: 100.00 %

Has collection increased compared to the previous year? *

☒ Yes

☐ No

State Reporting Data

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

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

4,604.56 tons

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

1,580.07 tons

Total Units collected in states with take-back laws (optional):

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

2,742.58 tons

Total Units collected in states without take-back laws (optional):

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

0.00 tons

Total Units collected but not attributable to a specific state (optional):

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

The state data for the Staples Technology Recycling Program is captured based on recycling drop offs at the individual store level. The Call2Recycle data for each state is tracked by individual store. The Staples volume is supported nationwide by multiple OEM partners as arranged through (ERI) which is Staples' exclusive recycling partner. All Staples volume is supported through OEM partners. However, neither Staples nor ERI is privy to OEM recycling obligations and, as such, is not able to determine accurately the "weight of electronics that excess state take-back laws, collected in states with take-back laws". For purposes of this report, Staples is reporting all volume that would be eligible in states with take-back laws in the "weight of electronics collected in states with take-back laws explicitly to meet these laws". Please note reflected in the above data is "Weight of electronics in states with take-back laws that is not eligible under those laws or part of a program". As an example, this would include the Staples volume in Washington as Staples is not part of the State Standard Plan (operated by the WMMFA) or an approved Independent Plan.

Did your company increase collection, recycling and/or reuse in two states without take-back laws? *

☒ Yes

☐ No

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

State: *

Nevada

Previous Year's Data: *

27.60 *tons*

Previous Year Total Units collected (optional):

Current Year's Data: *

41.33 *tons*

Current Year Total Units collected (optional):

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

Staples has continued to promote its in-store Technology Recycling Program through a variety of manners including multiple different marketing initiatives and promotions, social media outreach, and digital search optimization efforts to drive consumers and small businesses to staples.com/recycle. The effort is nation-wide throughout the 2017 calendar year (with particular focus in the spring and fall).

State: *

Ohio

Previous Year's Data: *

167.98 *tons*

Previous Year Total Units collected (optional):

Current Year's Data: *

302.23 *tons*

Current Year Total Units collected (optional):

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

Staples has continued to promote its in-store Technology Recycling Program through a variety of manners including multiple different marketing initiatives and promotions, social media outreach, and digital search optimization efforts to drive consumers and small businesses to staples.com/recycle. The effort is nation-wide throughout the 2017 calendar year (with particular focus in the spring and fall) but the greatest

success in a non-regulated state (in terms of total tons recycled) was Ohio.

Reporting Requirements

Due Diligence

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

- are certified to an established third-party certification standard, or
- are examined by the company's auditors at least semi-annually to ensure safe management practices?

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

☒ Yes

☐ No

Provide the methodology used for verification: *

Recycling vendor ERI is both e-Stewards and R2 certified. Pursuant to those standards as well as ERI's internal downstream vendor management program, all of ERI's downstream vendors are audited. The audit includes a thorough and comprehensive multi-media audit that ensures each downstream vendor in the recycling chain continues to comply with all international, Federal, state and local environmental, safety and health laws, rules, regulations, permits, licenses and registrations for as long as it receives material directly or indirectly from ERI. ERI's U.S. vendors are audited at least biennially and international vendors are audited every 3-5 years. The type and frequency of audits is determined based on the material managed.

Certified Recyclers and Programs *

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

☒ Yes

☐ No

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

	CERTIFIED RECYCLER NAME *	CERTIFIED RECYCLER LOCATION - CITY, STATE, COUNTRY (IF APPLICABLE) *	CERTIFIED PROGRAM *
1	ERI	Multiple ERI locations in United States (Fresno, CA; Aurora, CO; Plainfield, IN; Holliston, MA; Badin, NC; Flower Mound, TX; Sumner, WA; Lincoln Park, NJ)	E-Stewards and R2 (also ISO 14001, ISO 9001, and OHSAS 18001)
2	Call 2 Recycle	Items sorted and sent to several different recyclers depending on item type: Inmetco (Ellwood City, PA, USA); Glencore Xstrata (Sudbury, ON, Canada); Gopher Resource (Eagan, MN, USA); Wireless Alliance (Boulder, CO, USA)	Call2Recycle, their sorters, and Wireless Alliance are all R2 certified. The metal smelter/processors are not R2 certified.

Education & Outreach

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

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

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

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

Company Policies Favoring Recycling and Reuse

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

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

Website

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

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

Upstream Communication & Innovation

Answer two of the three questions.

How do you influence supplier behavior (e.g. in the areas of materials selection, design for product longevity, reuse and recycling, energy conservation, end-of-life management and corporate performance)?

We have engaged suppliers to ensure they clearly identify products that they sell us that are Energy Star certified and/or EPEAT qualified so we can ensure these features are clearly communicated to our customers both on our web sites as well as in the reporting we provide to our larger customers. We've also worked closely with HP for many years to support recycling of ink and toner and electronics products. Finally, we carry an assortment of remanufactured electronics for customers, helping to enhance the life of existing products and supplies.

Website where company activities or programs are listed (optional):

Ensure website address begins with <http://> or <https://>

How have you helped customers reduce their electronics packaging waste (e.g., through creative packaging design, innovative material choices, and better logistics)?

Website where company activities or programs are listed (optional):

Ensure website address begins with <http://> or <https://>

How do you encourage customers (including large purchasers) to buy sustainable or "green" electronics products?

Our research indicates that customers will choose eco-preferable options if they understand the environmental feature and the product meets their requirements for features and pricing. We continue to work to improve green product identification on our web sites to easily and quickly direct customers to more eco-responsible products. We also offer filtering on our site that allows customers to narrow their results by items including environmental certifications and recycled content. Finally, for our Staples Advantage customers, we offer environmental reporting to show them what percentage of products they are buying from us meet specific environmental features. This includes overall and within specific product categories.

Website where company activities or programs are listed (optional):

Ensure website address begins with <http://> or <https://>

Notes:

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

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

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

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

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

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

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

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

Units: Individual items collected for reuse and recycling, including equipment (e.g., televisions, computers, printers), cell phones and mobile devices (e.g., smartphones, tablets, MP3players), and accessories (e.g., USB drives, headphones, keyboards).

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