

## Motorola Mobility Electronics Recycling Plan for Covered Electronics Devices

### Motorola Mobility Overview

Motorola Mobility, Inc. is comprised of two business segments that produce a variety of products.

**Mobile Devices:** The Mobile Devices business designs, manufactures sells and services mobile devices with integrated software and accessory products, and licenses intellectual property.

**Home:** The business designs, manufactures, sells, installs, and services digital and Internet Protocol (IP) video and broadcast network interactive set-tops, end-to-end video/audio delivery systems, broadband access infrastructure platforms, and associated data and voice customer premise equipment to cable television and telecom service providers, and wireless access systems, including cellular infrastructure and wireless broadband systems, to wireless service providers.

### Products covered

In 2011, Motorola has started to manufacture and will sell tablet computers and a mobile phone accessory called a lapdock, which works like a computer monitor for a mobile phone.

### Process for the Recycling of Motorola Mobility Covered Electronics Device

Motorola Mobility offers take back and recycling for mobile devices. Our take-back programs accept any mobile device or accessory (not only Motorola products). Here is an outline of how the recycling program works in the U.S.:

1. Consumers may download a postage-paid label from our website:  
<http://responsibility.motorola.com/images/uploads/environment-recycling-mobile-phone-postage.pdf>
2. Consumers may also call a dedicated toll free number (800-264-5130) and request that a pre-paid mailing label be emailed or shipped to them.
3. This label can be affixed to any package/envelope containing the equipment and the consumer can drop it in the mail at no charge.
4. The package will be received by Recellular, Inc., who manages the recycling of all shipped mobile devices on behalf of Motorola. All phones are either refurbished for resale or recycled and Recellular reports the volume of phones collected to Motorola.
5. Further information about Recellular's process can be found in Appendix A.

### Contact Information

Motorola Recycling Webpages:

Global - <http://responsibility.motorola.com/index.php/environment/products/recycling/htrmp/>

U.S. -

<http://responsibility.motorola.com/index.php/environment/products/recycling/htrmp/USrecycling/>

Recellular Website - <http://www.recellular.com>

## Appendix A Recellular's Process Description

Motorola Mobility's consumer take back program is managed with support from ReCellular, Inc. The following describes Recellular's activities and compliance programs in relation to mobile devices collected, transported and recycled on behalf of Motorola Mobility Inc.

1. A detailed description of how the activities performed under the program are in compliance with the requirements of the Connecticut General Statutes ("CGS") Chapter 446n and the Regulations of Connecticut State Agencies ("RCSA") Section 22a-638-1(b)(3):
  - a. As an ISO 14001:2004 registered company, ReCellular is required to review all applicable environmental laws, regulations, and other requirements to which we subscribe on an annual basis. Once per year, a formal review of local, state, and federal laws is conducted. Documented evidence of that review and the results are maintained by the Environmental Manager Representative (EMR). If during the year, additional requirements become evident via new laws or regulations, a review will be conducted at that time to determine if it is applicable to ReCellular's operations.
  - b. Mobile devices are diligently tracked throughout entire disposition. Devices received are tracked by electronic serial number (ESN). This tracking system allows us to identify the source of each mobile device, its specific location within our facility, and the ultimate disposition event, be it resale or recycling. Additionally, ReCellular maintains a monthly environmental report that documents the following information for all end-of-life material streams: shipment date, invoice reference number, weight (in pounds), freight fees, and date certificate of destruction is received. A copy of this report can be provided upon request. Monthly Environmental Reports are kept for a period of five years.
  - c. LiION batteries have been classified as hazardous waste by the United States Department of Transportation (USDOT). The DOT's Hazardous Material Regulations govern the transportation of lithium ion batteries, which are regulated, for transportation purposes, as a Class 9 hazardous material. ReCellular's packaging and shipping of used lithium ion batteries for recycling constitutes activities that fall under the Hazardous Materials Regulations. Therefore, all LiION batteries that are sent for downstream recycling must be separated to prevent short circuits. To comply with this regulation, ReCellular individually packages batteries in plastic bags. Batteries are shipped downstream in a fire resistant 55 gallon drum, properly labeled.
2. A detailed description of the process flow regarding the recycling of covered devices:
  - a. It is ReCellular policy that devices received through recycling collection programs that do not pass the functionality criteria have three possible destinations.
    - i. Devices will only be sold to customers located in developed OECD countries.



- ii. Devices will be broken down into functional component parts (i.e. LCD, Keypad, etc.) for repair processes.
    - iii. Devices will be sent for downstream management to ReCellular's approved recycling partner.
  - b. Sims Recycling Solutions, located at 3700 N Runge Ave., Franklin Park, IL, is ReCellular's approved downstream recycling partner for all electronic end-of-life material streams. They manage the physical recycling of our mobile devices, circuit boards, chargers, and all chemistry batteries. Sims Recycling Solutions is ISO 14001:2004 and ISO 9001:2001 registered, and very active in the electronic recycling industry.
  - c. All generated electronic scrap material streams must be managed and sent to a qualified recycler located in an OECD country (<http://www.oecd.org>). Sims Recycling Solutions, has agreed to this stringent restriction. Additionally, Sims Recycling Solutions has provided a list of approved downstream refining partners that are utilized that complies with ReCellular's exporting policies.
  - d. ReCellular also has a zero landfill policy for all collected electronic material streams, therefore end-of-life electronic material cannot be sent to a landfill or incinerator at any point in the downstream disposition process. Sims has agreed to comply with this policy as well and provides a certificate of recycling for each lot of material sent to their facility.
  - e. The obsolete and non-functional mobile devices are shredded on-site at the Sims facility. Following the shredding process a portion of the lot is taken for precious metal assaying purposes. The shredded lot is then sent to a refinery for precious metal recovery. The circuit board of a mobile device contains material streams such as gold, silver, palladium, and copper, which after refining are reused for manufacturing purposes.
  - f. A detailed process flow has been attached for reference. As indicated above, all downstream processing throughout disposition must take place in OECD countries per ReCellular exporting policy.
  - g. Mobile Decices are recovered primarily via the service provider. Motorola provides information on "How to Recycle Motorola Products" at the following link:  
<http://responsibility.motorola.com/index.php/environment/products/recycling/htrmp/USrecycling/>
3. Information that the program is in compliance with environmental protection laws of Connecticut, all other states, the federal government and in addition, the environmental protection laws of any country.



- a. As an ISO 14001:2004 registered company, ReCellular is required to review all applicable environmental laws, regulations, and other requirements to which we subscribe on an annual basis. Once per year, a formal review of local, state, and federal laws is conducted. Documented evidence of that review and the results are maintained by the Environmental Manager Representative (EMR). If during the year, additional requirements become evident via new laws or regulations, a review will be conducted at that time to determine if it is applicable to ReCellular's operations.

In ReCellular's Environmental Policy, which is available online, we commit to meet or exceed the requirements of applicable environmental law and regulation and other requirements to which we subscribe. Additionally, we require adherence to environmental laws, regulations and our policies and procedures for all employees. Further it is required that ReCellular employee's received adequate and appropriate training for all applicable environmental regulations.

- 4. Mobile Devices are typically returned to the recycler via United States Postal Service to:  
ReCellular  
2555 Bishop Circle West  
Dexter, MI 48130

- a. See item 2 above
- b. No smelting, incineration, air or waste permits are needed for any of the processes held at ReCellular's facilities. The only law that ReCellular must be compliant with is Part 111, Hazardous Waste management, Michigan Compiled laws (MCL) 321.11101 et seq. or Part 121, Liquid Industrial Wastes, MCL 324.12101 et seq. of the Natural Resources and Environmental Protection Act, 1994 Pa 451, as amended (NREPA); Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA). The authority of Michigan Department of Environmental Quality issued ReCellular their Site Identification Verification **MIK884957481** for being compliant for the above-mentioned law as of May 2003. This law considers ReCellular a large quantity handler of universal waste (LQHUW) of universal waste. Documentation of ReCellular's Site Identification number has been attached.
- c. ReCellular's Environmental Management System manual has been attached as requested, which provides a description of the environmentally preferred practices.
- d. This requirement is not applicable as no smelting, incineration, air or waste permits are needed for any of the processes held at ReCellular's facilities,
  - i. NA
  - ii. NA
  - iii. NA
  - iv. NA
- e. Documentation of Audits. Not Applicable



- f. Motorola collected and sent 237,771 mobile devices to ReCellular, Inc. for processing in 2009. 108,851 units were sent downstream for precious metal recovery.
5. See Downstream Recycling Process flow charts below.
6. NO CED's are exported.
7. ReCellular Certifies that all CED's in the private program will be recycled or reused or refurbished in accordance with 446n of the Connecticut General Statutes and Section 22a-638-1 the Regulations of Connecticut State Agencies.

## ReCellular, Inc. Downstream Recycling Process



