



MOTOROLA MOBILITY

Division of
Solid and Hazardous Waste

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July 25, 2012

Scott T. Anderson, Director
Division of Solid and Hazardous Waste
Department of Environmental Quality
Po Box 144880
195 North 1950 West
Salt Lake City, Utah 84114-4880

Re: Motorola Mobility, Inc.
Annual Report on Eligible Electronics Recycling Programs

Dear Sir/Madam,

Attached you will find the annual report for Motorola Mobility, as required by the state of Utah under Senate Bill 184. Motorola Mobility manufactures tablet computers under the brand "Motorola" and our recycling program is outlined in the attached electronics recovery plan.

If you have any question please do not hesitate to contact me at 847.523.2848.

Kind Regards,

Emily Barton
Corporate Environmental Manager
emilybarton@motorola.com

Motorola Mobility, Inc
600 NORTH US HIGHWAY 45
Libertyville, IL 60048



Motorola Mobility Electronics Collection Plan for Covered Electronic Devices

a) A collection plan submitted in accordance with N.J.A.C. 7:26A-13.4 shall include the following:

1. The methods and services that will be used to collect used covered electronic devices, including, but not limited to:

- i. The locations, including street addresses, of the collection sites to be utilized. The collection plan must provide for at least one collection site in every county in the State, unless the plan provides documentation that the county for which the plan does not provide collection coverage is already adequately covered by the collection plan of another manufacturer, group of manufacturers or other entity;
- ii. Each collection site's hours of operation;
- iii. A description of how each collection site will be staffed and secured;
- iv. A listing of any limitations to be imposed on the quantity and type of material to be accepted, and whether any additional electronic equipment not required to be collected under the Electronic Waste Management Act will be accepted (for example, DVD players, VCRs, scanners, printers, or other computer and television peripherals and equipment);
- v. A description of the collection methods to be utilized for consumers who are not physically able to travel to a collection site without assistance;
- vi. A description of the collection methods to be employed for heavy (50 pounds in weight or heavier) or unwieldy covered electronic devices, including, but not limited to, flat screen televisions with screens greater than 40 inches measured diagonally and projection televisions;
- vii. A description of how the collected covered electronic devices will be stored prior to transport to an authorized recycler;
- viii. Certification that there will be no fee or cost charged a consumer for the collection, transportation or recycling of any covered electronic device other than a fee for a premium service provided for in an approved collection plan;



- ix. An explanation of the extent to which, if any, there is coordination with county and municipal government recycling programs;
 - x. A description of the methods to be used to ensure that personal information contained on hard drives or similar data storage devices is secured from access by the general public and any untrained persons or employees; and
 - xi. Certification that each collector, transporter, or authorized recycler of covered electronic devices who is participating in a manufacturer's or group of manufacturers' approved collection plan is compliant with all applicable requirements of N.J.A.C. 7:26A-13.11;
2. The processes and methods that will be used to recycle collected covered electronic devices, including, but not limited to:
- i. The name and location of each authorized recycler to which collected covered electronic devices will be transported. The collection plan must also include a copy of any permit issued by the state in which the recycler is located and a certification executed by the recycler stating that the recycler is aware of and has agreed to comply with the requirements of this subchapter. In addition, the collection plan must also include, for an authorized recycler located in a state other than New Jersey, a copy of the operating permit or approval issued by the state where the authorized recycler is located and documentation that the facility is operating in accordance with all applicable rules and regulations;
 - ii. A description of the recycling processes that will be used by each authorized recycler identified in 2.i, above;
 - iii. The processes and methods that will be used, if any, to recycle collected covered electronic devices, other than televisions, that are the subject of any vendor-to-business purchaser recycling arrangements into which the manufacturer has entered; and
 - iv. Certification that no collected covered electronic device has been handled in a manner that would violate N.J.A.C. 7:26A-13.7(f);
3. A description of the means that will be utilized to publicize the collection services, including a website or toll-free telephone number that provides information about the manufacturer's recycling program in sufficient detail to inform a consumer how to return covered electronic



devices for recycling, including any limitations placed by collectors on the number of covered electronic devices permitted for drop-off by consumers;

4. A detailed explanation of how the manufacturer intends to fulfill its obligation, through its own operations, either individually or with other registered covered electronic device manufacturers, or by contract with for-profit or not-for-profit corporations, or local government units, including a commitment to provide for the collection of all types and all brands of covered electronic devices, including orphan devices. This explanation shall include, at a minimum, the anticipated collection amounts for each collection site;

5. The following certification:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

The certification shall be signed as follows:

- i. For a corporation, by a principal executive officer of at least the level of vice president; or
- ii. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; and

6. Certification that each manufacturer that is party to the collection plan is in compliance with N.J.S.A. 13:1E-99.101, which prohibits the sale or offer for sale in New Jersey of a new covered electronic device that is prohibited from sale in the European Union based on the excessive presence of heavy metals in the product, unless the covered electronic device is exempted from this prohibition under N.J.S.A. 13:1E-99.111(2)(a). For any covered electronic device exempted under N.J.S.A. 13:1E-99.111(2)(a), the manufacturer will include certification that the covered electronic device would have been in compliance with European Union standards for heavy metals, but for the inclusion of a substance in order to comply with the consumer, health or safety requirements of the Underwriters Laboratories or Federal or State law.



(b) The Department will hold confidential any information obtained in connection with a collection plan submitted pursuant to (a) above, if the Department determines, based upon a showing by the manufacturer, that the information, if made public, would divulge competitive business information, methods or processes entitled to protection as trade secrets of the registered manufacturer. A manufacturer asserting confidentiality shall submit its claim by following the procedures at N.J.A.C. 7:26-17.3.

1. This provision is in addition to and shall not be deemed to limit any claims of confidentiality under the Open Public Records Act, N.J.S.A. 47:1A-1.1 et seq., or common law.

(c) If a manufacturer asserts a claim of confidentiality pursuant to N.J.A.C. 7:26-17.3 for any part of a collection plan, it must submit two copies of its collection plan – one that omits the confidential information, and includes only the information for which no claim of confidentiality is being made, and a second that includes all the required collection plan information, including the information for which a claim of confidentiality is being made. The manufacturer shall certify both of these submittals.

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 (e.g. mobile phones, tablets) 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 addition to mobile phones, Motorola has started to manufacture and sell tablet computers and a mobile phone accessory called a lapdock, which works like a computer monitor for a mobile phone. Our Home products are not currently covered under any state recycling laws, although we do offer a separate recycling program for those products (not covered in this plan).



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/Websites

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 a hazardous material 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 Devices 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 CEDs are exported.
7. ReCellular Certifies that all CEDs 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



