

# WEEE and Environmental Compliance



## Global Overview

The enforcement of the EU WEEE Directive has accelerated the expansion of end-of-life product take back regulations throughout the world. As a result, Oracle has created an extensive product returns program to become compliant with regulations in the various geographies worldwide. In order to meet local compliance obligations associated with the placement of electronic products, batteries and packaging on given markets as it applies to Oracle Products, Oracle has joined compliance schemes and product stewardship programs in certain countries and jurisdictions.

Oracle considers and plans for every phase in our products' life cycle, from design and packaging to the end-of-life for electronic components and equipment. Despite the regional challenges and the differences between global take back regulations, when Oracle determines Oracle Products are in scope of the regulations, Oracle registers as a producer, pays required fees, provides put on the market declarations and collects and recycles branded product.

Oracle-branded products display the WEEE Symbol to alert our customers that products bearing this label should not be disposed in a landfill or with municipal or household waste. Instead, customers can take advantage of the return and collection system made available by Oracle to you for discarding these products. Our [Hardware Take Back and Recycling Program](#) website is referenced on Oracle shipping documents (commercial invoice and packing list) to allow for easy access to instructions on future product disposal.

### WEEE Symbol



In addition to offering our customers a Product Take Back and Recycling Program, Oracle also properly decommissions and recycles internal employee assets.

To learn more about Oracle's compliance initiatives globally, please click the various regions on the map above.

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## Canada

As the concern for the volume of electronic waste grows, a number of Provinces in Canada have passed regulations since 2006 to divert electronics waste and batteries from landfills as a means to protect the environment. These waste diversion regulations require manufacturers of covered electronic devices to participate in approved electronic product stewardship programs. The programs allow consumers and businesses to drop off eligible electronic devices for recycling, free of charge, at numerous depots throughout the Province. These programs are approved by the Provincial Minister of the Environment and will manage Oracle's "Brand Owner" obligations under the regulations.

Although Oracle is a member of these Product Stewardship organizations, these organizations do not currently manage all of our electronic product types within Canada. As such, Oracle also offers a take-back program for all product returns. For the individual products covered by the Provincial Stewardship programs, we calculate and remit the required environmental handling fees for the covered devices currently without reimbursement by our customers.

Click [here](#) for more information on the various Provincial programs.

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## United States

Typically the regulations enacted in the U.S. target the collection and recycling of residential electronic products. As Oracle's hardware business focuses on providing network computing products and services to the commercial market Most Oracle products are not in scope of the regulations.

Oracle strives to be a good steward of the environment by providing a product take back service for all of our customers and establishing solid environmental practices. Where required, Oracle registers with State take back programs when necessary and continues to take-back equipment, including third-party equipment that is part of an Oracle-branded e-waste de-installation.

Click [here](#) for a summary of the various state laws provided by Electronics Take-Back Coalition.

Certain States have additional information available for consumers to recycle computer monitors (this list is not all inclusive):

- California - [www.erecycle.org](http://www.erecycle.org).
- Maine - [Maine Department of Environmental Protection](#)

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## Latin America

Environmental regulations are emerging at a fast pace in Latin America. Regulations are being passed at the country, province and even municipal levels causing additional complexity in compliance. Most implementing regulations target specific electronic products and often require a threshold quantity to be reached before actions under the regulation become mandatory. The framework is very similar to the European Union, typically requiring the manufacturer to label the product as recyclable and to take back the product from the customer at end-of life. Some countries also require waste electronic equipment to be managed as a "special waste" and enforce collection targets that companies must attain.

Oracle has joined forces with compliance schemes in some countries like Colombia and Peru while also complying individually in others. In both circumstances, Oracle customer return requests are being managed via our Global Returns Program. Oracle has met its compliance obligations in several countries where Waste Management Plans have been submitted detailing our process around product collection and recycling at end of life.

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## EMEA (Europe, Middle East & Africa) Region

### EU Waste Electrical and Electronic Equipment (WEEE) Directive

In August of 2005, the European Union (EU) implemented the [EU WEEE Directive 2002/96/EC](#) and later the [WEEE Recast Directive 2012/19/EU](#) requiring producers of electronic equipment to manage and finance the collection, reuse, recycling and appropriately treat WEEE that the producer places on the EU market after August 13, 2005. The goal of this directive aims at minimizing the volume of electrical and electronic waste disposal and encourages re-use and recycling at end of life.

As a hardware manufacturer, Oracle has met its national obligations to the EU WEEE Directive by registering in those countries to which Oracle is an importer. Oracle has also elected to join WEEE Compliance Schemes in some countries to help manage customer returns at end of life.

Customers who have purchased Oracle-branded electrical or electronic products in the EU and are intending to discard these products at the end of their useful life should not dispose of them with household or municipal waste. Oracle has labeled its branded electronic products with the WEEE Symbol to alert our customers that products bearing this label should not be disposed in a landfill or with municipal or household waste in the EU. Instead, please be aware that Oracle has a [return and collection system](#) available to customers, free of transportation and recycling costs, for discarding these products.

For a copy of Oracle's Selective Treatment of Waste Electrical and Electronic Equipment outlined under Article 8(2) and Annex VII of the EU WEEE Recast Directive, please click here [WEEE Selective Treatment List](#).

### EU Battery Directive

In September of 2008, the EU also implemented the EU Battery Directive (2006/66/EC) which was later amended (2013/56/EU) requiring producers of all battery types to properly manage and recycle their batteries at end of life. As a producer of Portable Batteries on the EU Market, Oracle has met its obligations by registering and joining Compliance Schemes in those countries it places batteries on the market and where threshold levels are met. Most batteries sold by Oracle are embedded within its hardware products and are not intended to be removed by the customer. When required, batteries and/or packaging are appropriately marked with the crossed-out wheelee bin symbol and are labeled with the chemical composition and/or capacity marking.

#### Example Crossed-out Wheelie Bin



### EU Packaging Directive

In December of 1994, the EU implemented the Packaging and Packaging Waste Directive aimed at reducing the production of packaging waste and promoting recycling and re-use. To meet its obligations as a packaging producer, Oracle has joined forces with numerous Packaging Schemes throughout Europe that customers can leverage for packaging recycling at end of life. Customers should contact their account managers for compliance scheme details. In addition, Oracle adheres to the essential requirements including supplying packaging that is easily recycled and not using materials that contain lead, mercury, cadmium, chromium, or chlorofluorocarbons.

Oracle is also tracking and complying to take back legislation in other countries in the Middle East. A trend is developing where many nearby countries including Israel and Serbia have enacted take back laws similar to the EU Directives.

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## APAC (Asia Pacific)

Like most other jurisdictions, APAC has enacted various WEEE take back, battery, and packaging laws that vary from country to country, however their intent remains the same: to maximize the proper disposal and recycling of electronic waste and to minimize the impact to the environment. Similar to the Latin America region, many of the regulations in APAC are triggered by threshold volumes and product classification through custom codes. Oracle continues to monitor the emerging regulations and impact to Oracle and is currently equipped to take back and recycle all branded equipment in the APAC Region through our [Hardware Take Back and Recycling Program](#).

## India

### E-Waste Rules

The Ministry of Environment and Forests (MOEF) originally published the India E-Waste (Management) Rules, 2011 which went into effect on May 1, 2012 for WEEE requirements and May 1, 2014 for RoHS requirements. Most recently, The E-waste (Management) Amendment Rules, 2018 was published on March 22, 2018, which further amended the current E-waste (Management) Rules, 2016. The E-waste Rules specify requirements around the take back, collection and recycling aspects of E-waste found in Schedule I in addition to the reduction in the use of certain hazardous substances in electrical and electronic equipment.

Oracle doesn't offer to sell branded products directly in India. As such, Oracle is not currently obligated to register as an authorized producer nor obtain an Extended Producer Responsibility Authorization. However, Oracle is a Bulk Consumer in India utilizing its own take back and recycling process to properly dispose of internal assets and meeting the annual Form 2, 3 and 6 requirements. We encourage all local customers to take advantage and to utilize our [Hardware Take Back and Recycling Program](#), which is made available to them free of charge.

In addition, Oracle is currently meeting the various requirements stipulated by the Rules as described below:

- Oracle has labeled its branded electronic products with the crossed out wheelie bin symbol to alert our customers that products bearing this label should not be disposed in a landfill or with municipal or household waste in India. Instead, please be aware that Oracle is making a return and collection system available to customers, free of transportation and recycling costs, for discarding these products.
- For large equipment returns, Oracle has provided [De-install Returns Packaging Material and Packing Instructions](#) to ensure the safe handling of the equipment and to help prevent accidental damage or breakage during transport.
- Oracle products do not contain lead, mercury, hexavalent chromium, polybrominated biphenyls or polybrominated di-phenyl ethers above the maximum concentration value of 0.1% by weight in homogeneous material and do not contain cadmium above the maximum concentration value of 0.01% by weight in homogeneous material except for the exemptions set in Schedule 2 of the Rule.
- Oracle uses environmentally sound recycling methods. Once products are disassembled and useful components and materials are removed for reuse and/or resale, and hazardous materials are removed for special processing, remaining materials are processed through a "grind" process which segregates printed circuit boards and assemblies and different metals in separate bins. The bins are forwarded to smelters for further processing into raw metals for reuse. Typically less than 1 percent of any of the material ends up in landfill.
- Oracle's recyclers have obtained the appropriate permits to operate as a recycler in India, including submittal of the various annual forms due.

### Battery Rules

Under the Batteries (Management & Handling) Rules 2001, as amended in 2010, Oracle India qualifies as a bulk consumer of Lead Acid Batteries in India. As such, Oracle is fulfilling its various requirements under these Rules.

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## Packaging Waste Management Rules

The Ministry of Environment and Forests published the Packaging Waste Management Rules on March 18, 2016, which took effect immediately and later was amended to the Plastic Waste Management (Amendment) Rules, 2018 on March 27<sup>th</sup>, 2018. Oracle doesn't meet the definition of a producer recycler (i.e., those conducting recycling) and is not a manufacturer of carry bags, recycled plastic bags or multilayered packaging, and so is out of scope for the State Pollution Control Board registration process.

Oracle is, however, recognized as a Waste Generator and, as a responsible corporate entity, will meet all applicable requirements.

## Hong Kong

### Product Eco-Responsibility Regulated Electrical Equipment Regulation

On August 1, 2018, the Regulated Electrical Equipment (REE) Regulations went into effect obligating Oracle to be a registered seller and supplier. As a seller of REE in Hong Kong, Oracle has provided a removal service plan for all of its customers that purchase Oracle- branded (MICROS) tablets, workstations and monitors. Oracle will arrange the removal of the same type and quantity of old REE of all brands from our customers upon your new purchase. If you would like Oracle to arrange the collection and recycling of your old REE, please make a request to Oracle's [Hardware Take Back and Recycling](#) Program within three days after the purchase of your new product(s). Please review [Oracle's Removal Service Plan](#) for our collection terms and conditions (TREE9 Template).

In addition and as a supplier of REE in Hong Kong, Oracle will provide a recycling label to accompany each product upon delivery, reminding our customers of the paid take back program available to them.

In the last decade, we have seen an increase in the number of enacted product take back, battery and packaging regulations. Not all of Oracle products fall within the regulation scope. Where necessary, Oracle engages in good corporate citizenship practices by registering or paying fees and continues to monitor and track regulations that could impact Oracle.

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