



e-Tech: e-Waste Mismanagement at EcoPark

e-Tech: A Case of e-Waste Mismanagement at EcoPark



Research by Basel Action Network and HK01

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Introduction

This report highlights the special case of e-Tech Management which has been brought to our attention as one of the companies that was recently discovered sending electronic equipment from the US to Hong Kong. e-Tech had been well known to BAN for over a decade as a serial exporter of North American waste with facilities in Ohio and in British Columbia. And it was not surprising to see their export business model continued with our recent tracker placed with them in Texas (see Appendix 1). What was more surprising to us was the realization that e-Tech enjoyed the blessing of the EPD which had featured them at their EcoPark. We decided to do more research.

What we have learned is an important story revealing the larger context and longer history far beyond the simple export description. We believe this entire e-Tech picture is worth examining as it is sadly illustrative of the Hong Kong Environmental Protection Department's (EPD) lack of proper diligence when it comes to enforcing the environmental laws applicable to e-Waste importation and management. This story raises many questions -- all in need of answers.



A worker at e-Tech Management Junkyard in New Territories, Hong Kong smashing modems against a tabletop. This is the location where the printer dropped at e-Tech Management in Texas ended up. Copyright BAN, November 2017.

The Concern

Below, we highlight the special case of e-Tech Management which is discussed separately as export number 3 in this report. The e-Tech story, though, has a larger context and longer history far beyond the simple export description. We believe the bigger picture is worth examining as it is sadly illustrative of the Hong Kong Environmental Protection Department's (EPD) lack of proper diligence when it comes to enforcing the environmental laws applicable to e-Waste importation and management, and raises many questions in need of answers.

Herein we present information to show that, despite compelling evidence that e-Tech was a repeat violator of Hong Kong's waste importation laws (Waste Disposal Ordinance) for the years between 2009 and 2014, including at least three illegal shipments cited by EPD themselves, the company was not prosecuted.

Rather the illegal shipments were simply returned to North America and e-Tech was granted a highly coveted lease in the EcoPark, a Hong Kong-owned showcase for the city's most responsible recyclers. The e-Tech tracked printer from Houston described in tracker case number 3 ended up in the Tai Fat Tsuen neighborhood at a company which according to the enforcement records of EPD is operating under the name China Recycling Company LTD. When we visited the site, this company, presented itself as an e-Tech facility under another registered name. The yard was covered with boxes and bags labeled with e-Tech Management tags from their Columbus, Ohio facility. It was operating by about 8 employees all wearing green e-Tech knit shirts. The manager on the site told BAN that his boss was Mr. Benny Yeung. Mr. Yeung is considered to be the president and likely the owner of e-Tech Management. There was not a lot of dismantling or recycling taking place.

The Newspaper HK01's researchers have since learned that China Recycling Co. LTD shared an office with E-tech from 2013-2017. HK01 also found an online public record from 2012, that reported that in a town planning meeting the only director of China Recycling Co Ltd, a Mr. Lui Kin Wai, claimed that he was an employee of e-Tech Management and urged the Town Board to permit e-Tech to open an e-waste yard in Yuen Long. It was also discovered that the directors of China Recycling Co LTD and E-tech run a company together called "Evergreen Product Company Limited".

During our visit, an employee at the China Recycling Co. LTD site claimed that the circuit boards from the imported wastes from the Tai Fat Tsuen site would be transported to e-Tech in EcoPark for shredding. And yet, according to the EPD's lease clauses, EcoPark is not supposed to take in foreign waste but only waste from "local consumption". Was China Recycling Company LTD, set up by e-Tech to "launder" the imported waste into a "domestic" waste stream for e-Tech's EcoPark facility? If not, just what is the relationship between the two companies and why do they exist seemingly on top of each other?

After all, e-Tech only has 2 listed sites in Hong Kong -- an office in Kowloon and the EcoPark recycling facility. Why would e-Tech import 70 containers a month to Hong Kong if it were not going to recycle them? The China Recycling Co. LTD was not doing much recycling. Is it possible that this imported material, much of it likely illegal, has in large part been ending up in e-Tech's EcoPark shredder?

And why did the EPD even allow e-Tech, a known importer and violator of Hong Kong's laws to first lease and operate in the Hong Kong environmental showcase, EcoPark? They must clearly have been listed as a past violator

of the terms of the EcoPark contract, that stipulates all laws must be complied with. And, following the high-profile case of illegal shipments as reported in the Vancouver Sun in 2014, why was their tenancy retained?

e-Tech's Long History of e-Waste Exports from North America

E-Tech Management claims to be a recycling company with nine locations globally and have been in operation for at least 12 years. According to solicitations received by North American recyclers in the course of those 12 years, they "specialize in sourcing, processing and exporting of various productive metal and PC scraps to China and Hong Kong." They also claim that they "export more than 70 containers each month."

Between the years 2009 and 2015 BAN conducted research on the e-waste trade by tracking intermodal containers by their container numbers and online shipping company databases. Over this period BAN tracked 56 containers from e-Tech facilities in Columbus, Ohio, and Richmond (Vancouver area), British Columbia to Asia. Indeed, BAN has found e-Tech to be one of the most prolific exporters of e-waste they have known in the last two decades, with most shipments in likely violation of the Basel Convention or national laws (e.g. in Indonesia, Canada, or Hong Kong).

See the table on the following page:

From: janice you [mailto:janice.etch@gmail.com]
Sent: Wed 11/14/2007 11:39 AM
To: [REDACTED]
Subject: Buying Your PC and Metal Scraps - E-Tech Management Ltd

Dear [REDACTED],

We are E-Tech Management Ltd. based in Vancouver, Canada. With own facilities, we specialize in sourcing, processing and exporting of various productive metal and PC scraps to China and Hong Kong. We export more than 70 containers each month. If you have large inventory of these materials, we are more than happy to offer you a best price.

We are now actively looking for new suppliers who can provide large volumes of quantity with more than 42,000 lbs per container of metal and PC scraps. I look forward to establishing a mutually beneficial and respectful partnership with you. Please e-mail or call me for a price list or any questions.

--
Best Regards,
Janice You

E-Tech Management Ltd.
153-5951 Minoru Blvd.
Richmond, BC V6X 4B1
Canada
Tel: (604) 630-7912
Fax: (604) 303-7979

Solicitation of e-Tech sent out in 2007 to US and Canadian recyclers.

Table of e-Tech Container Exports 2009-2015:

Shipping Line	Date Observed	Point of Departure	Port of Arrival	Arrival Date	Container #	Vessel
COSCO	10/18/09	Columbus	Hong Kong	11/20/09	CBHU8585423	OOCL VANCOUVER 041W
CMA CGM	10/18/09	Columbus	Hong Kong	12/3/09	TRLU7254750	CMA CGM VANCOUVER US078N
MSC	2/17/10	OH	Semarang	5/10/10	TRLU5631480	PACIFIC LINK R1012R
CMA CGM	2/24/10	Columbus	Hong Kong	4/27/10	CMAU4146235	?
MSC	3/10/10	OH	Semarang	5/24/10	MSCU7894700	MSC HOBART 21020A
HYUNDAI	3/10/10	OH	Hong Kong	4/17/10	HDMU6333628	APL HOLLAND/183W
MAERSK	3/21/10	Vancouver	Sanshan	4/22/10	GESU4896327	SL MICHIGAN 136W
ZIM	3/30/10	Vancouver	Hong Kong	4/28/10	UESU4652290	HAMBURG EXPRESS
MOL	5/14/10	Columbus	Semarang	7/8/10	TGHU7667878	SINAR BUTON 089
HYUNDAI	5/13/10	Columbus	Hong Kong	6/15/10	HDMU6411823	MOL PROMISE/ 055W
MOL	5/15/10	Columbus	Semarang	7/8/10	TGHU8264774	SINAR BUTON 089
MSC	5/14/10	Columbus	Semarang	8/1/10	MEDU8343837	MSC HOBART 21030A
HYUNDAI	5/17/10	Columbus	Hong Kong	6/22/10	HDMU6175311	MOL PROFICIENCY/ 027W
MSC	5/13/10	Columbus	Semarang	8/2/10	IRNU9812420	MSC KENYAH1028A
MSC	5/13/10	Columbus	Semarang	8/8/10	CAXU9229687	MSC KENYAH1028A
MSC	5/13/10	Columbus	Semarang	8/1/10	MEDU8527433	MSC HOBART 21030A
HYUNDAI	5/11/10	Columbus	Hong Kong	6/15/10	BMOU4130128	MOL PROMISE/ 055W
CMA CGM	5/13/10	Columbus	Hong Kong	6/24/10	ECMU4154531	MAERSK KAWASAKI US194N
HYUNDAI	5/7/10	Columbus	Hong Kong	6/15/10	HDMU6662789	MOL PROMISE/ 055W
MSC	5/6/10	Columbus	Semarang	7/7/10	MSCU7556430	MSC HOBART/ 21026A
CMA CGM	6/8/10	Vancouver	Hong Kong	7/4/10	CMAU5039951	MAERSK KOLKATA US180W
CMA CGM	6/18/10	Vancouver	Hong Kong	7/18/10	FSCU9746242	MAERSK KARLSKRONA US188W
K-LINE	7/10/10	Vancouver	Hong Kong	8/6/10	KKFU7109732	MOL SOLUTION 11W
K-LINE	6/1/11	Vancouver	Hong Kong	6/24/11	KKFU9104621	COSCO SHENZHEN 0063W
CMA CGM	6/9/11	Vancouver	Hong Kong	7/4/11	ECMU9778119	CMA CGM TOSCA US388W
CMA CGM	6/15/11	Vancouver	Hong Kong	7/18/11	FSCU6164459	CORNELIA MAERSK I4UV7R
CMA CGM	6/20/11	Vancouver	Hong Kong	7/19/11	ECMU8011837	ARTHUR MAERSK US396W
K-LINE	6/16/11	Vancouver	Hong Kong	7/7/11	KKFU9036830	COSCO PRINCE RUPERT 0004W
CMA CGM	8/1/11	Vancouver	Hong Kong	8/30/11	CAIU8065150	MAERSK KURE US420W
K-LINE	7/17/12	Vancouver	Hong Kong	8/11/12	KKFU7203184	BREMEN BRIDGE 073W

K-LINE	7/22/12	Vancouver	Hong Kong	8/23/12	KKFU9052467	COSCO LONG BEACH 0078W
K-LINE	7/25/12	Vancouver	Hong Kong	8/23/12	KKFU9088979	COSCO LONG BEACH 0078W
K-LINE	8/3/12	Vancouver	Hong Kong	8/30/12	INKU6172626	COSCO SHENZHEN 0074W
CMA CGM	8/13/12	Vancouver	Hong Kong	9/10/12	TGHU7894716	CMA CGM TOSCA US632W
K-LINE	8/21/12	Vancouver	Hong Kong	9/14/12	KKFU7663153	COSCO YOKOHAMA 0077W
MAERSK	2/7/13	Vancouver	Hong Kong	3/4/13	MSKU4611106	CMA CGM ATTILA 728W
MAERSK	2/20/13	Vancouver	Hong Kong	3/18/13	PONU3034838	CMA CGM LA SCALA 736W
MAERSK	4/19/13	Vancouver	Hong Kong	5/20/13	MSKU4737774	COLUMBINE MAERSK 776W
K-LINE	4/25/13	Vancouver	Hong Kong	5/24/13	KKFU9059332	CHICAGO BRIDGE 090W
K-LINE	5/3/13	Vancouver	Hong Kong	6/7/13	KKFU9096022	GRANVILLE BRIDGE 043W
MAERSK	5/12/13	Vancouver	Hong Kong	6/10/13	MSKU4611472	CMA CGM MELISANDE 788W
MAERSK	5/22/13	Vancouver	Hong Kong	6/17/13	MSKU0111611	AXEL MAERSK 792W
MAERSK	8/8/13	Vancouver	Hong Kong	9/2/13	MRKU3606546	CMA CGM DALILA 836W
MAERSK	8/13/13	Vancouver	Hong Kong	9/9/13	MSKU0599173	COLUMBINE MAERSK 840W
K-LINE	9/9/13	Vancouver	Hong Kong	10/4/13	KKFU9021980	CHISWICK BRIDGE 075W
MAERSK	9/13/13	Vancouver	Hong Kong	10/14/13	MSKU8111829	CMA CGM ATTILA 860W
K-LINE	9/25/13	Vancouver	Hong Kong	10/25/13	KKFU9071106	GLEN CANYON BRIDGE 048W
HANJIN	10/3/13	Vancouver	Hong Kong	10/29/13	HJCU1714556	COSCO FELIXSTOWE 0100 W
CMA CGM	7/3/14	Columbus	Hong Kong	8/25/14	TTNU9115729	CORNELIA MAERSK USA62N
CMA CGM	7/8/14	Columbus	Hong Kong	8/25/14	MAXU6244754	CORNELIA MAERSK USA62N
CMA CGM	7/17/14	Columbus	Hong Kong	9/1/14	CMAU5128473	CMA CGM SAMSON USA66N
CMA-CGM	12/9/14	Columbus	Hong Kong	2/5/15	TRLU7310495	CMA CGM DALILA USB54NANL
CMA CGM	5/18/15	Newark	Hong Kong	7/12/15	CMAU4750163	UASC UMM QASR USC66NANL
CMA CGM	6/4/15	Vancouver	Hong Kong	7/4/15	TGHU6310839	CMA CGM VIVALDI USC36W



Regarding the shipments, BAN alerted the Canadian government and the Hong Kong EPD about these exports over the years. In the case of the EPD, BAN would provide advance notice of them so that the containers could be seized and examined at the port. As the exports from the US were not violations of US law, due to the US is not a party to the Basel Convention, US authorities were not able to prosecute.

On at least three occasions indicated by the yellow highlighted container numbers above, the EPD reported back to us that the imports from e-Tech contained "chemical waste" and were therefore illegal. Please see examples of the correspondence below:

DATE: Sat Jul 10 19:58:24 2010

SUBJECT: 2 new containers arriving in HK soon

MESSAGE:
"Yuka Takamiya" <yuka@ban.org>garytam@epd.gov.hk2 new containers arriving in HK soon Dear Gary,

We have 2 new containers to notify you:

TRLU8122677
Port of Discharge: Hong Kong
Current ETA: November 14th, 2009
Vessel/Voyage: VENICE BRIDGE 0032W
Shipping Line: Hanjin Shipping

CBHU8585423
Port of Discharge: Hong Kong
Current ETA: Nov 20, 2009 22:00
Vessel/Voyage: OOCL VANCOUVER 041W
Shipping Line: Cosco Container Lines

Regarding your questions you sent to me on October 26th, I am sorry for not responding to you sooner. I was not able to find the information that could certainly tell you that the containers had CRTs or batteries.

Thank you very much,

Yuka

Notification 1

Response 1



Gary CW TAM/EPD/HKSARG
E[TC]42

11/12/2009 16:28

To Jim Puckett <apex@seanet.com>
cc "Yuka Takamiya" <yuka@ban.org>, Keith KO
YEUNG/EPD/HKSARG@EPD
bcc William CY LO/EPD/HKSARG@EPD

Subject Results of container examination

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

For Follow Up:  Normal Priority

Dear Jim,

Please find below the container examination results related to another11 containers.

Container No.	Hazardous Waste Found
CMAU5164104 DVRU0624226 MSKU9658045 CBHU8585423	Yes [CRT]
ECMU9179492	Yes [Battery]
TRLU7471041	Yes [CRT + Battery]
TGHU8889442 TRLU7649030 UXXU4805399 TRLU8122677 GSTU8714550	No

The above 6 containers with hazardous waste are now on the way back to the USA We have already informed the US EPA in this regard.

Many thanks.

Gary Tam
EPD - 11.12.09
=====

DATE: Sun Jul 11 15:35:35 2010

SUBJECT: Containers of e-waste arriving in Hong Kong in June

MESSAGE:

"Yuka Takamiya" <yuka@ban.org> garytam@epd.gov.hk Containers of e-waste arriving in Hong Kong in June Dear Gary,

We have 5 containers to notify you as we believe they contain e-waste.

- 1) HDMU6411823
- 2) BMOU4130128
- 3) HDMU6662789

All these three containers -->

Port of Discharge: Hong Kong

ETA: June 15, 2010 7:00PM

Vessel/Voyage: MOL PROMISE/055W

Shipping Line: Hyundai Merchant Marine

- 4) HDMU6175311

Port of Discharge: Hong Kong

ETA: June 22, 2010 10:30AM

Vessel/Voyage: MOL PROFICIENCY/027W

Shipping Line: Hyundai Merchant Marine

- 5) ECMU4154531

Port of Discharge: Hong Kong

ETA: June 24, 2010

Vessel/Voyage: MAERSK KAWASAKI US194N

Shipping Line: CMA CGM

Thank you in advance for your attention and action,

Yuka Takamiya

Basel Action Network

Notification 2

-----Original Message-----

From: garytam@epd.gov.hk [mailto:garytam@epd.gov.hk]

Sent: Friday, July 02, 2010 12:20 AM

To: Yuka Takamiya

Cc: kyeung@epd.gov.hk; williamlo@epd.gov.hk; 'Jim Puckett'

Subject: Fw: Containers of e-waste arriving in Hong Kong in June

Dear Yuka,

Please find below the relevant container examination results for your reference:

- 1) HDMU6411823 (inspected & no control waste found)
- 2) BMOU4130128 (inspected & no control waste found)
- 3) HDMU6662789 (inspected & no control waste found)
- 4) HDMU6175311 (inspected & no control waste found)
- 5) ECMU4154531 (inspected & hazardous waste (battery) found)

Gary

Response 2

With respect to the three shipments which were seized and examined by the EPD and Hong Kong customs in the port of Hong Kong, the bills of lading would have been examined. The EPD would have seen that the shipments were from e-Tech Management and very possibly were sent to e-Tech Management as Hong Kong consignee. Thus, the EPD would be well aware that e-Tech was operating in its territory as an illegal importer. It is not easy to understand then, why the company was not prosecuted, and instead was granted the coveted showcase for Hong Kong's most responsible companies -- the EcoPark.

e-Tech Management only lists 2 locations in Hong Kong -- one of these is an office and not a

recycling facility. The only recycling facility in Hong Kong they own is at the EcoPark. Yet EcoPark does not allow the processing of imported waste. So the question is begged, why would e-Tech ship material to Hong Kong if it were not to find a pathway to recycle them at EcoPark?

Vancouver Sun Exposé

One of the principals of e-Tech is Mr. Benny Yeung. It is unclear precisely what his title is but he is said to be the owner. Following a Canadian Broadcasting Company (CBC) expose in 2008, which featured illegal exports from a company called Techno-Trash (owned by the same Mr. Benny Yeung), Mr. Yeung was forced by the Canadian government to shut down his Techno-Trash operations. However, he had another company known as e-Tech Management which proceeded to grow and expand across North America.

In 2014, BAN assisted the Vancouver Sun in looking into the exporters in the Vancouver region. The Vancouver Sun published a series of articles on the illegal export of e-Waste from the Vancouver area. The Sun highlighted e-Tech Management and Benny Yeung and containers BAN tracked from their Richmond, British Columbia facility to Hong Kong. The company told the Vancouver Sun that it gets its electronics for export from at least 50 recyclers in the Lower Mainland, of British Columbia.

Vancouver Sun Story:

<http://www.vancouversun.com/technology/Metro+Vancouver+companies+investigated+unlawful+export+waste+Asia+with+video/8458219/story.html>

One container (MSKU4611106 (see table)) sent from e-Tech to Hong Kong was reported to the Hong Kong Environmental Protection Department (EPD) and it was pulled off of the ship and inspected. Found inside were batteries and LCD flat screen monitors -- both of which are considered "chemical waste" whose importation into Hong Kong from Canada is banned. This shipment sent back to the port of Vancouver. Reporter Larry Pynn interviewed Benny Yeung on hidden camera about this shipment as reported in the Vancouver Sun. Larry also talked to the EPD. It was not conceivable that the EPD was not aware of the Vancouver Sun scandal.

Transcript of the video follows:



(from <https://www.youtube.com/watch?v=CyaSPhlOG1Y>)

Benny: \$1,000 dollars

Larry: One container, That's the value?

Benny: No, no, no cost new money.

Benny: You need to send it back, Pay the shipping cost, in order to (unintelligible) allow the procedure you need to go until customs releases your container, make sure there's no CRT's

Larry: So what does it cost to get 1 container to get shipped back again

Benny: I told you at least \$100,000

Larry: \$100,000?

Benny: \$10,000, \$10,000, \$100,000 in a Hong Kong dollar

Larry: \$10,000, Then what are you going to do with it?

Benny: Just a sorting, very small community, this one we're not going to import into law we're not going to export. Local (unintelligible) For example, We send it to local recyclers so they can handle this type of material locally. I don't know how they handle, but this one is like uh

Larry: Do you plan on sending computers in the future to Hong Kong now that these ones are turned back?

Benny: Because there's no (unintelligible) You can see the report, as if the whole container is dangerous, It's only 1 small part. We are not very clear and not very good, so they don't like it 99% is good for recycling. That's why I told you when we choose the material, by the material sometimes we're going to miss, so for us you have to, the recycler, you have to separate, clean it.

Larry: You're talking about just cleaning it

Benny: Ya clean it and make sure it's a test, sometimes you have to believe that one item is one item. It's more like 2 items then we

report 1 item. It's no difference, you know. So this was at your kind of like a local recycler. So once you received the material (unintelligible) transformer you have to separate

Larry: Is this because of the Basel Convention that this this uh?

Benny: I think uh, if it was the Basel Convention they wouldn't care at all. The whole container couldn't go right? but you take out some material, were still receiving that material

Larry: So part of that container stowed and part came back you're saying? Or the whole container?

Benny: The whole container came back, we can take out the part that that they don't like and we can resend again.

Larry: It was returned because of the Basel Convention do you think?

Benny: If Basel Convention is to go, nothing we can do about it. You know what I mean Basel convention is like China, BAM, people saying they're sending a computer to China, he's lying to you but Hong Kong is a part of China but with special laws.

Larry: Does anybody in Canada or the government care about this container or no?

Benny: Of course

Larry: Have they contacted you?

Benny: Yeah, I call him all the time because I'm the receiver of business, I'm not just like, we are long term, we recycle material, one container come in I say, fine, because we hire a lot of people. Healthy to run a business

Larry: Environment Canada have they contacted you about this container or no?

Benny: Yeah

Larry: What did they say?

Benny: Yeah, they said what happened, and then we, of course, we had to open all the containers, and then they say CBS yeah CBS [note: Canada Border Services Agency] is going to check the ticket. Environment enforces.

Larry: *Border securities*

Benny: *We know the procedure, we know this procedure when the container is arriving, we release the container to customs. Because we have to sign to customs and customs go to environment department to check. So everything, everything this is kind of a government procedure*

Larry: *Where's it now? Is it still on route?*

Benny: *Yeah it's in the boat*

Larry: *It's still in Hong Kong is it?*

Benny: *Yes, it will come back, we have to tell it yet tell it before coming, everything prepares better when you have an understanding (unintelligible) trying to do something it's stupid because were waiting a long time hiding a lot of people*

Larry: *So is this the first time this has happened?*

Benny: *Yes, for like this kind of situation.*

Environment Canada has launched investigations into e-Tech management linked to the export of electronic waste in possible violation of Canadian law. It is unknown at this time what the result of those investigations have been.

Misrepresentations

e-Tech implies on their current website that they do not send wastes to developing countries; yet it is our experience that this is precisely what they do. Indeed, their own solicitations boast of sending 70 containers per month overseas.

Further, on their website, e-Tech Management claims to be R2 Certified. SERI, Administrator of the R2 Certification, however, has e-Tech listed on their website in a special list of those companies that are *not* R2 certified. This list exists presumably to indicate those companies that falsely claim certification but refuse to stop doing so. It is not known whether the other certifications and memberships indicated on their site are also false.

ABOUT E-TECH MANAGEMENT

E-Tech Management is a company with global presence in the electronics processing and recycling industry. ETM has over 12 years of industry experience, active ownership and a corporate philosophy dedicated to the core value of integrity, quality, and customer satisfaction. We thrive to provide our clients with a sustainable electronic recycling solution for their used electronic devices. Our complete transparency gives our customers the peace of mind to know their materials have been processed and recycled exactly as promised. Every day we do our part to protect the earth and the liability of our clients through our ethical, safe and secure recycling processes. Thanks to our advance processing and recycling technologies, we can protect the environment through reducing air emission and pollution

Our goals:

- E-Tech Management is committed to the highest level of customer service and satisfaction.
- E-Tech Management utilized the latest in recycling and processing technologies to solve our client's electronic waste and disposal problem.
- E-Tech Management will provide our client with 100% assurance that every piece of their equipment and devices will be properly handled in accordance with local, state and federal regulations.
- E-Tech Management has a strict zero landfill that ensure no electronic waste will be added to the global waste loop by exporting to third world countries.

In last bullet, e-Tech states "no electronic waste will be added to the global waste loop by exporting to third world countries. (from their website).

CERTIFICATIONS

e-techmanagement.com

> Certifications

Learn about our awards and certifications

E-Tech Management has been awarded with numerous certifications and recognition, including the industry standard R2:2013 / ISO 9001/ ISO14001/OHSAS. The certification programs for electronics recycling and asset disposition are based upon strong environmental standards which maximize the principle of the 3R (Reduce, Reuse, and Recycle). Our certification indicates ETM's capability of meeting all the necessary requirements to meet any local, municipal, and federal laws and regulations.



Non-Certified Recyclers

Sometimes it is difficult for the public to determine if a facility is R2:2013 Certified or not. The facilities on this Clarification List **do not** have a valid R2:2013 certificate issued by a Certification Body that is accredited by an IAF multilateral recognition arrangement signatory Accreditation Body, as required by the R2 Code of Practices.

Non-Certified List

To report companies that claim R2:2013 certification but are not, please contact info@SustainableElectronics.org

COMPANY	LOCATION
All Green Electronics Recycling	15561 Del Amo Ave. Tustin, CA, 92780, United States
All Star Tech	Sterling, VA
American Ecycling division of Planet USA	21854 76th Avenue, South Kent, WA 98302 United States
American Recycling	5001 South 16th Street, Lincoln, NE, 68512, United States
Bee Green	309 Westbury Ave #181, Carle Place, NY 11514, United States
eLot Recycling	8000 Main St., Troy, NY, 12180, United States
e-Tech Management	3910 Groves Road ,Unit E, Columbus, OH 43232 USA

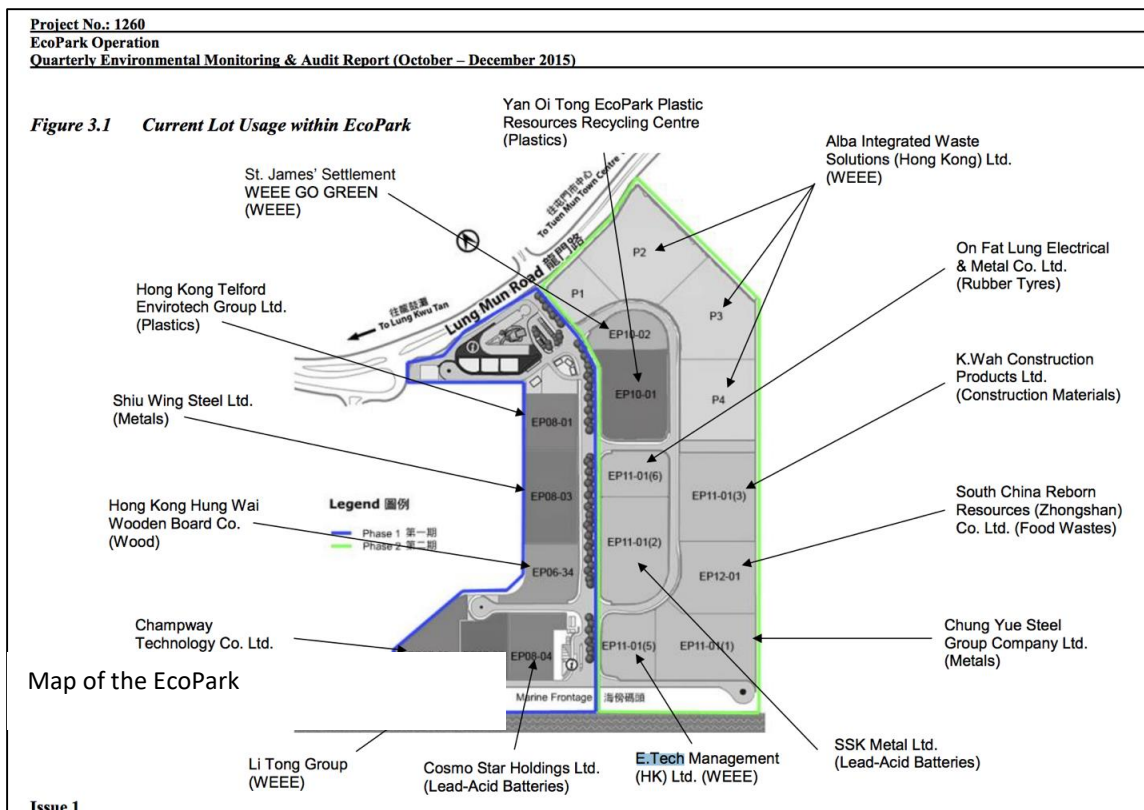
From the SERI website: <https://sustainableelectronics.org/recyclers>

e-Tech Rewarded with Facility at EcoPark

Despite the company being involved in repeated illegal import, and some of it proven to be illegal by the EPD's own inspections, in 2011, the EPD granted e-Tech Management a coveted lease agreement at their EcoPark. The EcoPark is owned and operated by the EPD to showcase model recycling companies. By December 2015, e-Tech had finally finished construction and

equipment trials there. It is believed that today at their EcoPark facility e-Tech has a shredder and a sorter. The lease for the facility paid to the EPD from January 2012 to January 2017 was 80,000 HKD/month. From Jan 2017, the rent rose to 91,799 HKD/month. The area of the

facility is 5,000 square meters. This lease price was, and is, far below market rates. So, in effect not only has e-Tech gained considerable prestige, but have enriched themselves from the EPD's blind generosity.



Below is a screenshot of a portion of their tenancy agreement for occupying a space at the EcoPark:

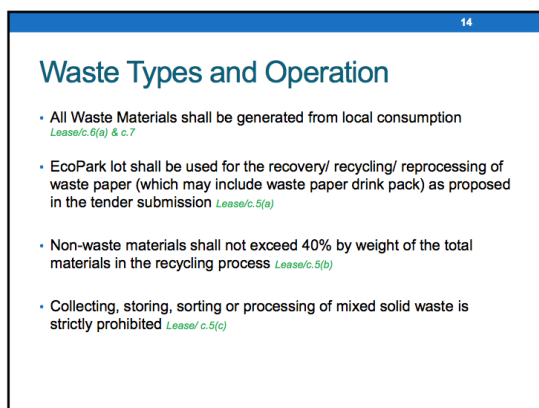
ENVIRONMENTAL RESPONSIBILITIES

- 14.(a) The Tenant shall at its own cost(s) apply for, obtain, renew, maintain and comply with all the relevant licences related to compliance with all relevant Ordinances, by-laws, regulations, statutory technical memorandums, codes of practice, rules, non-statutory guidance notes, schemes, abatement notices and the environmental permits for the time being in force in Hong Kong (including those relating to the environment and governing the control of any form of pollution including air, noise, water and waste pollution, and for the protection of the environment). The Tenant shall comply with all abatement notices, orders, directions and requests of the relevant authorities and public officers and shall be responsible for paying all relevant fees, costs, fines and penalties.

Compliance of Environmental Legislation

5. The Tenant shall comply with and observe all Ordinances, by-laws, regulations and rules for the time being in force in Hong Kong governing the control of any form of pollution, including air, noise, water and waste pollution, and for the protection of the environment.

Further, the lease also requires that the wastes are "generated from local consumption". This is indicated as follows in the PowerPoint pdf document "EP18-01_Tender-Briefing-eng.pdf" that cites the lease clauses as c.6(a) and c.7.



or Canada into Hong Kong. This definition includes: batteries, LCD or CRT monitors, and loose circuit boards.

And, according to the lease agreement that must be signed by all tenants, "all Waste Materials shall be generated from local consumption." Is the EPD quite sure that the employee we interviewed at the China Recycling Company LTD site is not right when he said the imported waste goes onwards to EcoPark in violation of their lease? We would ask the EPD to make that determination as a matter of some urgency.

Clearly, following the Waste Disposal ordinance of Hong Kong wherein the Basel Convention's rules on waste trade import and export are enshrined, would be something that the e-Tech company must follow. The rules are clear.

No company is allowed to import anything considered "chemical waste" from the US

Conclusion

The following are the important questions to be asked of the government of Hong Kong as a matter of some urgency:

1. What is the relationship between e-Tech and China Recycling Company Ltd? Who is really the boss there?
2. Is the China Recycling Company Ltd. site a conduit for imported e-waste to EcoPark?
3. Is all of the imported material at this site non-chemical waste?
4. Where does all of the material at e-Tech EcoPark come from?
5. Where does the material generated at e-Tech EcoPark go? Is it considered to be chemical waste?

6. And finally, is it right for a company that has been involved in multiple instances of illegal waste trade, presents fraudulent information on its website to be retained as a tenant at EcoPark?

While we will await the answers to the first five questions above, we are certain of the answer to the final question. It is clear retaining a company with a track record of illegal trafficking in waste and fraud at the EcoPark is in itself a fraud and cannot stand. We hope the EPD does the right thing with respect to e-Tech, and moreover examines all of the tenants of EcoPark, the sourcing of their waste as well as their outputs. Its time EPD showed a seriousness with respect to diligent waste management and international law.

Appendix I

Below is BAN's standard Tracker report description for the tracker enabled printer deployed at e-Tech's Texas delivery location. This is the tracker that allowed BAN to find the hidden site that serves as a staging area for e-Tech waste from the US.

E-Tech Management

Certification: Uncertified (however claims on its website to have R2 certification at its high-rise office building in Kowloon, Hong Kong)

Address of Deployment: 6446 Long Point St, Houston, TX 77055, USA

Website: <http://www.e-techmanagement.com/>

Notes: BAN first reported this export from Texas in "*Scam Recycling Continues Update #2*". This printer was delivered to an e-Tech Management collection location in Houston and ended up in what appeared to be an e-Tech management electronics junkyard in the Tai Fat Tsuen neighborhood of New Territories.

BAN was able to visit this site with HK01 journalists in November 2017 and found many gaylord boxes of imported e-waste from e-Tech Management's Columbus, Ohio location. This site was quite large and seemed to be a facility owned and operated by e-Tech Management. The manager and all of the employees there were wearing bright green e-Tech Management knit shirts. When he was asked if this was an e-Tech site he quickly claimed that no, in fact, they are not owned by e-Tech but then he said, "Benny is my boss". Benny is the well-known nickname for the President of e-Tech Management -- Mr. Benny Yeung -- an operator in both US and Canada that has a long history of e-waste exports (see e-Tech Feature).

At the site, there was a mixture of all kinds of material but very little recycling activity

-- about 8 employees. There were a few flat screen TVs/monitors and a few CRTs under a tarp. Many gaylord boxes were labeled with e-Tech labels from Columbus, Ohio. The operator said they used to get 100 containers in a month and now they were getting less than 10. One box which we could not open indicated "circuit boards" were inside. If any of the CRTs, LCDs or loose circuit boards were imported as it appeared everything was, this would indicate an import violation in Hong Kong.

The assertion by the manager of Benny being the boss, and the fact that all of the employees were wearing e-Tech Management T-shirts, as well as the observation that the site seemed to only have labels from e-Tech Management facilities in the US and no other exporter labels, would lead one to the conclusion that this facility was an unreported e-Tech Management receiving station, even though it is not listed as an e-Tech facility on their website. However, according to the enforcement records of the Environmental Protection Department (EPD) of Hong Kong the site is in fact registered to China Recycling Co Limited. The relationship between China Recycling Co Ltd. and e-Tech appears to be a very close one (see Feature).

While visiting the location an employee stated in Cantonese that they dismantle things there and send the circuit boards onward to the e-Tech EcoPark site for shredding and further separation. However, the EcoPark is obliged to only process domestically sourced electronics according to its lease agreement. As can be seen by the screenshot below, the company only lists two sites in Hong Kong on its website -- an office in a large high-rise office building in upper Kowloon and the showplace facility at the Hong Kong government's EcoPark.

Legality: *Likely legal.* This particular dysfunctional printer shipment, unlike the shipments described in e-Tech's past discovered from container tracking (see e-Tech feature section), is likely to be legal. Due to the presence of a lead-containing circuit board, the printer would apparently fall under the hazardous waste definitions of the Basel Convention unless it is tested and proven to be fully functional. The device was rendered non-functional and economically unrepairable by BAN prior to deployment. Hong Kong, however, claims an exemption from the definitions of controlled

waste for circuit boards in equipment unless the equipment otherwise contains another hazardous waste. Such a claimed exemption is of dubious legality. Nevertheless, as Hong Kong is claiming this exemption, and it has not been legally challenged by the Basel Convention Parties nor by the mainland Chinese government, and due to the fact that the US is not a Basel Convention Party, there is no jurisdiction claiming this printer as a hazardous waste under the Basel Convention.

Tracking Record:

Tracker Number	Type of E-Waste	Date of Deployment	Date of Arrival	State/Province of Export	Destination	Chain of Export Summary
TX136049	Printer	July 6, 2017	Sept. 29, 2017	Texas	Hong Kong	E-Tech Management 6446 Long Point St, Houston, TX, USA, 29.803335, -95.463390 New Territories, Hong Kong 22.431310, 114.020918

Photos:

Contact Us

contact@e-techmanagement.com

E-Tech Management is a company with global sourcing in the electronics recycling industry.

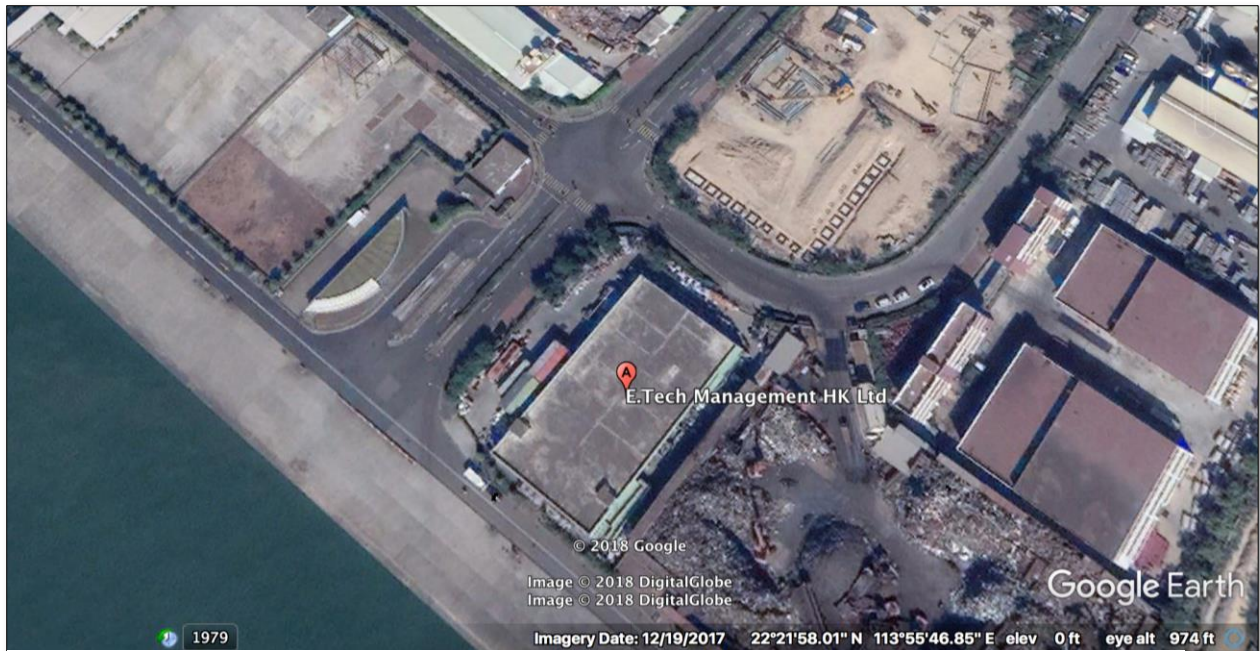


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Screenshot of e-Tech website showing e-Tech facilities. Note only EcoPark and Office building are listed and only the office is R2 certified. May 11, 2018.



A scene from the e-Tech Management junkyard in Hong Kong where the tracker-enabled printer deployed at e-Tech Management in Texas ended up. Copyright BAN, November 2017.



Satellite shot of e-Tech site at EcoPark. Google Earth



Photo showing a label in English on the side of a gaylord indicating that loose circuit boards may be inside. Such boards are now considered as "chemical waste" by EPD and illegal to import into Hong Kong. Copyright BAN, November 2017.



LCD screens at e-Tech site. These are also considered "Chemical waste" in Hong Kong. Were these imported? Copyright BAN, November 2017.



Picture showing imported computers from e-Tech. Copyright BAN, November 2017.

