dys One

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The ITAD evidence checklist

29 checks that show whether your decommissioned hardware went where your rules said it would, from the rack to its final outcome.

For disposition, compliance, audit, security and sustainability teams at brands that retire hardware through IT asset disposition (ITAD) companies. Use it to review your terms, test your evidence or prepare for an audit.

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HOW TO USE IT

Certification checks the facility. This checks what happened to your units.

R2v3, e-Stewards and NAID AAA tell you an ITAD's facility meets an industry standard. They don't tell you whether your terms were met, on your hardware, this cycle. That needs evidence, unit by unit, checked by someone who didn't produce it.

Work through the sections in order. For each check, ask: **is the rule in our terms, do we receive the evidence, and has anyone checked it?** A check you can't tick is not a failure by anyone. It's a gap in what you can prove.

> Start with one closed cycle. On a finished cycle the evidence should already exist, so anything missing is a finding in its own right.

SECTION 1 · BEFORE ANYTHING IS COLLECTED

Your disposal terms

	CHECK	WHAT GOOD LOOKS LIKE	COMMON GAP
☐	**1.1 Every condition has a test**	Each rule says what must be true, in terms someone outside your company could check.	"Dispose of data securely" with no test behind it.
☐	**1.2 Every condition names its evidence**	Each rule says which document proves it: certificate, log, approval, screening record.	A rule with no evidence named, so any document will do.
☐	**1.3 Every condition has a deadline**	Evidence is due within a set number of days of collection.	No clock, so late evidence is never late.
☐	**1.4 Serials are required, not optional**	Certificates, sales records and reports must list serial numbers.	Reports by weight or batch only.
☐	**1.5 Restricted items are named**	GPUs, FPGAs and data-bearing devices are listed, with what may and may not happen to each.	A rule that names the wrong device, or none.
☐	**1.6 Buyer identity, not buyer type**	Records must name each buyer, not describe them as "reseller" or "broker".	A category can't be screened. A name can.

SECTION 2 · WHEN HARDWARE LEAVES YOUR SITE

Collection

	CHECK	WHAT GOOD LOOKS LIKE	COMMON GAP
☐	**2.1 Collection record by serial**	A signed record of every unit that left, by serial, with date and site.	A head count or weight with no serials.
☐	**2.2 Top-up collections recorded**	Extra units added on the day are recorded the same way as the main listing.	Units that move but never enter the record.
☐	**2.3 Listed vs collected reconciled**	Every listed unit is either collected or explained.	Uncollected units nobody asks about.

SECTION 3 · WHILE UNITS ARE HELD

At the ITAD

	CHECK	WHAT GOOD LOOKS LIKE	COMMON GAP
☐	**3.1 Certifications valid on the day**	R2v3, e-Stewards, NAID AAA or ISO certificates in date for the facility that received the units.	A certificate that expired before collection.
☐	**3.2 Stock on hand, signed**	A signed statement of what the ITAD still holds, with how long each item has been there.	GPUs sitting unaccounted for past 90 days.
☐	**3.3 Downstream partners listed**	The ITAD's list of downstream processors and their certifications.	Units sent to a partner nobody approved.

SECTION 4 · FOR EVERY DATA-BEARING DEVICE

Data destruction

	CHECK	WHAT GOOD LOOKS LIKE	COMMON GAP
☐	**4.1 Certificate per serial**	Each destroyed or erased drive appears by serial on a certificate.	Certificates covering a batch or weight.
☐	**4.2 Method, date and place**	Each certificate states the method, the date and the country and facility.	Destruction outside the country your terms require.
☐	**4.3 Certificate after collection**	The certificate date falls after the collection date.	Certificates issued before the units arrived.
☐	**4.4 Erasure logs for resale**	Drives resold after erasure have a machine log matched by serial, to NIST SP 800-88 Rev. 2 where your terms require it.	A statement that erasure happened, with no log.

SECTION 5 · BEFORE ANYTHING IS SOLD ON

Resale and restricted items

	CHECK	WHAT GOOD LOOKS LIKE	COMMON GAP
☐	**5.1 Approval before resale**	A written approval for each restricted item, dated before the sale.	Approval asked for after the sale, or not at all.
☐	**5.2 Every buyer named and screened**	A screening record for each buyer against sanctions and denied-party lists, dated before the sale.	"Screening done" in a monthly report, with no record.
☐	**5.3 Buyer is a real company**	Each buyer found on a company register, with ship-to checked separately.	A buyer incorporated last month, or not found anywhere.
☐	**5.4 Destination allowed**	Each sale goes to a country your terms allow.	A destination nobody checked.
☐	**5.5 End-user certificate where required**	Signed by someone with authority, matching the units and the destination.	A certificate signed by the wrong person, or covering different units.
☐	**5.6 Export controls considered**	Advanced AI chips and the servers that contain them can remain subject to export controls after first use. The ITAD can show how it decided whether a licence was needed.	An assumption that used hardware is never controlled.

SECTION 6 · AT THE END OF THE JOURNEY

Recycling and final outcome

	CHECK	WHAT GOOD LOOKS LIKE	COMMON GAP
☐	**6.1 Every unit has a final outcome**	Destroyed, resold or recycled, with the document behind it.	Units with no outcome, months after collection.
☐	**6.2 Recycling by stream**	What was recycled, by material stream, with the recycler named.	Weight with no recycler and no stream.
☐	**6.3 Silence is a finding**	Missing evidence is reported as a gap, never treated as a pass.	"No news" read as "all fine".

SECTION 7 · WHAT YOU TELL YOUR AUDITOR, BOARD AND REGULATOR

Reporting

	CHECK	WHAT GOOD LOOKS LIKE	COMMON GAP
☐	**7.1 Units, not weight**	Headline figures count units evidenced to a final outcome.	A circularity percentage nobody can trace.
☐	**7.2 Every figure traceable**	Each number links to the documents behind it.	Figures copied from ITAD summaries.
☐	**7.3 Estimates marked**	Anything estimated, such as avoided emissions, is labelled as an estimate.	Estimates presented as measured.
☐	**7.4 Someone independent checked**	The evidence was checked by someone who doesn't produce it and doesn't profit from the sale.	The party being measured marking its own work.

ABOUT THIS CHECKLIST

Written by people who've seen the whole journey.

Odys One is an independent compliance firm based in Ireland. It checks the evidence that IT asset disposition (ITAD) companies provide against a brand's own disposal rules, unit by unit, and issues a report of findings. Odys One does not buy, sell or handle hardware, and takes no share of what the hardware sells for.

Certifications check the facility. Nobody was checking what happened to each unit against the brand's own terms. We wrote this checklist so any team can start, with or without us.

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Always the latest version

We review the checklist every quarter. Check odysone.com/checklist for the latest version. Suggestions for the next one are welcome at hello@odysone.com.

This checklist is general guidance, not legal advice. Export controls, data protection and waste rules vary by country and change often; take advice on your own position.

> **Want this run on your last closed cycle?** Odys One checks every unit against your own terms and returns a report of findings in about four weeks, from files you already hold.
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> Talk to us: odysone.com/contact · hello@odysone.com