



Policy for Manufacturers to Maintain Product Certification Compliance

Within the Cradle to Cradle Certified™ Certification Scheme

Version 1.5

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TABLE OF CONTENTS

The Cradle to Cradle Certified Products Program Policy for Manufacturers to Maintain Product Certification Compliance Revision History 4

1 General..... 5

 1.1 Purpose..... 5

 1.2 Applicability 5

2 Normative references 5

3 Definitions and acronyms..... 5

4 Compliance maintenance..... 6

 4.1 Surveillance..... 6

 4.2 Self-reporting Client Surveillance..... 7

 4.3 Associated fees 7

5 Ongoing oversight..... 7

 5.1 Determining the correct level of certification 7

6 Termination, suspension, reduction, or withdrawal of certification 8

 6.1 Certification termination..... 8

 6.2 Certification suspension..... 8

 6.3 Certification reduction in level or scope 9

 6.4 Certification withdrawal..... 9

7 Scientific advancement or discovery 9

The Cradle to Cradle Certified Products Program Policy for Manufacturers to Maintain Product Certification Compliance Revision History

REVISION	SECTION	TYPE OF CHANGE	DATE	AUTHORIZED BY
1.0	Initial Release			Susan Klosterhaus
1.1	Non-controlled	Issued prior to implementation of document control system	August 2013	Susan Klosterhaus
1.2	Non-controlled	Issued prior to implementation of document control system	February 2015	Susan Klosterhaus
1.3	Non-controlled	Issued prior to implementation of document control system	February 2015	Susan Klosterhaus
1.4	Initial Controlled Release		January 21, 2016	Susan Klosterhaus
1.5	5.1	Role of investigation in changes to certification	June 30, 2017	Susan Klosterhaus
1.5	6.2	Clarifies investigation within context of suspension	June 30, 2017	Susan Klosterhaus

1 General

1.1 Purpose

This policy is intended to delineate the requirements for maintaining the validity of a product certification within the Cradle to Cradle Certified™ Certification Scheme.

1.2 Applicability

This policy applies to any product certified within the Cradle to Cradle Certified Certification Scheme throughout the term of certification. This policy is continuously in effect, including during extensions and the re-certification process.

2 Normative references

ISO 17065:2012, *Conformity Assessment – Requirements for bodies certifying products, processes, and services.*

ISO 14025, *Environmental labels and declarations -- Type III environmental declarations -- Principles and procedures*

Cradle to Cradle Certified™ Product Standard

Cradle to Cradle Certified™ Material Health Assessment Methodology

Certification Scheme for the Cradle to Cradle Certified Products Program

3 Definitions and acronyms

Assessment Body (AB): An entity accredited by the C2CPH to conduct assessments sufficient in scope and rigor to support a certification decision based on the Cradle to Cradle Certified Product Standard (the ‘standard’). ABs may be accredited to conduct full assessments or assessments limited to specific categories of the standard.

Certificate Holder: The entity granted a currently valid Cradle to Cradle product certification. Also referred to as client.

Certification Body (CB): An entity accredited by the C2CPII to perform conformity audits, render certification decisions, and issue certificates based on the standard in accordance with the principles of ISO 17065.

Certification Scheme for the Cradle to Cradle Certified Products Program (Certification Scheme): The document which delineates the functions, responsibilities, relationships, and processes for entities engaged in Cradle to Cradle Certified product certification.

Certification Scheme Owner (Scheme Owner): The Cradle to Cradle Products Innovation Institute (C2CPII).

Certified Products Registry: The definitive registry of Cradle to Cradle Certified products, maintained by the C2CPII.

Cradle to Cradle Certified™ Product Standard (the ‘standard’): The governing standard that serves as the basis for all Cradle to Cradle product certifications.

Maintenance: The process by which continual certification is maintained in accordance with the standard and Certification Scheme. Any lapse in certification due to certificate expiration is not covered by this policy. Re-certification after the original or extended certificate expiration date is considered a new certification, to be attained in accordance with the Certification Scheme, which requires adherence to the most current version of the standard.

Trademark License Agreement (TLA): The legally binding document that governs the use of trademarks, logos, and intellectual property of the C2CPII.

4 Compliance maintenance

4.1 Surveillance

4.1.1 Throughout the term of certification the CB shall conduct surveillance of a certificate holder’s use of C2CPII trademarks, logos, and intellectual property to ensure compliance with the terms of the Trademark License Agreement and the Cradle to Cradle Certified™ Products Program Trademark Use Guidelines.

4.1.2 The CB shall ensure all fees due to the C2CPII during the term of certification are paid and current.

4.2 Self-reporting Client Surveillance

4.2.1 A certificate holder shall be required to report to its CB any changes that may affect its certification status. The certificate holder shall inform its CB of all such changes in material composition or processes believed to have an impact on the level or validity of certification. The CB is required to communicate to the C2CPII such changes in order to ensure the accuracy of certificates and the Certified Products Registry.

4.2.2 A certificate holder shall be required to report to its CB any changes that may affect the accuracy of certification documentation and the Cradle to Cradle Certified Products Registry. Examples of such changes would be product discontinuation, additions to a product line covered by a current certification, or additional facilities producing the certified product.

4.2.3 The CB shall evaluate the information reported by the certificate holder and take appropriate action in accordance with the certification scheme, requirements of the standard, its supplements and interpretive documentation.

4.3 Associated fees

In addition to documentation change fees, a CB may charge reasonable fees for conducting an evaluation of a reported product change. If the CB deems an AB's services are required for the evaluation, appropriate AB fees may also apply.

5 Ongoing oversight

5.1 Determining the correct level of certification

5.1.1 Should a CB, AB, or the Scheme Owner become aware of a condition that may call for altering the certification status or scope of a product through any means other than client self-reporting, a CB shall undertake an investigation to determine the correct level or status of certification in a procedure defined in Section 6 of this document.

5.1.2 Any further action required as a result of the findings will follow the same course as delineated in Section 6 of this document.

5.1.3 Associated fees: The CB may charge reasonable fees for conducting an evaluation of a product change discovered outside certificate holder self-reporting.

6 Termination, suspension, reduction, or withdrawal of certification

6.1 Certification termination

A certificate shall be terminated upon receipt of a written request to a CB indicating a client no longer wants a product(s) certified.

6.2 Certification suspension

Suspension of certification shall occur when an investigation into the validity of a certification concludes a product no longer meets the requirements for certification. Investigations shall be conducted in accordance with the procedures required by the *Certification Manual for Certification Bodies for the Cradle to Cradle Certified Products Program* to reach a certification decision regarding a product. A client may initiate a request for suspension in the event it opts not to accept a level of certification it perceives may be detrimental to its business interests. Suspension shall be automatic if a client

- a) fails to engage sufficiently in the process to maintain, renew, or extend its certification.
- b) fails to adhere to the terms of the Trademark License Agreement
- c) fails to pay C2CPII certification fees as set forth in the C2CPII Certification Fee Schedule.

Any product(s) covered within the scope of a suspended certification shall be deemed not certified until the terms of remediation established by the CB are met. These product(s) shall be de-listed from the CB's database and the Cradle to Cradle Certified Products Registry until certification is reinstated. Since these product(s) are deemed not certified, the CB shall charge no certification fees if the period of suspension extends beyond the certification expiration date. If suspension occurs during the course of certification renewal, the term of certification shall begin on the date certification is reinstated. If the time frame specified in the terms of remediation is not met, suspension shall lead to withdrawal of certification.

Suspension may be concluded with

- a) Reinstatement of certification

- b) Reinstatement of certification at a reduced level or scope
- c) Withdrawal of certification

6.3 Certification reduction in level or scope

Certification level or scope shall be reduced when an investigation and re-evaluation indicate a product cannot be certified at its current level.

Reduction in level or scope shall incur fees associated with certification administration and any assessment and evaluation activities needed to determine the appropriate level or scope of certification.

6.4 Certification withdrawal

A CB shall withdraw certification

- a) When a product no longer meets the requirements for any level of certification and fails to qualify for suspension.
- b) If a client fails to meet the terms of remediation set forth to restore a suspended certification.
- c) Upon expiration of a certificate in cases where a client does not terminate, request an extension, or engage in the recertification process.
- d) Automatically, if a client is found to be engaged in illegal activities, practices antithetical to the principles of the C2CPPII, or any activity that negatively impacts the integrity or public image of the C2CPPII, the Cradle to Cradle Certified Product Standard, or the Cradle to Cradle Certified Products Program.

7 Scientific advancement or discovery

While a product remains certified under the terms current at the time of certification, there are continual scientific advancements and discoveries that may have an effect on the validity of certifications. Ongoing activities are creating new chemicals, as well as new ways of understanding and evaluating the human and environmental health impact of those chemicals. These impacts are being continually researched and re-evaluated.

As part of the certification maintenance process, the C2CPPII may disseminate technical guidance, updates, interpretations, or other forms of information based on latest research

that may impact certification renewal. The intent of conveying such information is to provide clients with tools for determining a course of action to make it possible to renew certification under a new version of the standard, or a current version with interpretations and guidance not in place at the time of a product's current certification.

Though unlikely, it is possible a discovery may lead to the conclusion that a material or process should be regarded as harmful to a degree that Cradle to Cradle product certification cannot be credibly maintained. If such a discovery was determined by the C2CPH Certification Standards Board to be so clear in the danger it presents to human health or the environment, the C2CPH would be required to withdraw the certification of any product containing that material or using that process in a manner consistent with the conditions under which the discovery was made. An outright immediate ban of a material or process must be based on evidence that such a ban, with resulting certification withdrawal and product de-listing, is the appropriate course of action for maintaining the integrity of the C2CPH and the standard.