

**Policy for Manufacturers to Maintain Compliance
Within the Material Health Certificate Scheme**

Version 1.1

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1 Purpose

This policy is intended to delineate the requirements for maintaining the validity of a product certificate within the Material Health Certificate Scheme.

2 Normative References

Cradle to Cradle Certified Product Standard, V3.1
Cradle to Cradle Certified Material Assessment Methodology
Cradle to Cradle Certified Banned Lists of Chemicals
Material Health Certificate Standard
Supplemental Guidance for the Cradle to Cradle Certified Material Health Assessment Methodology
Supplemental Guidance for the Cradle to Cradle Certified Product Standard, V3.1

3 Definitions

3.1 Assessment Body (AB): An entity accredited by the C2CPPII to conduct assessments sufficient in scope and rigor to support a certificate issuance decision based on the Material Health Certificate Standard (the ‘standard’). ABs may be accredited to conduct full assessments or assessments limited to specific categories of the standard.

3.2 Certification Body (CB): An entity accredited by the C2CPPII to perform conformity audits, render certificate issuance decisions, and issue certificates based on the standard in accordance with the principles of ISO 17065.

3.3 Certificate Scheme for the Material Health Certificate Program (Certificate Scheme): The document that delineates the functions, responsibilities, relationships, and processes for entities engaged in Material Health Certificate Program.

3.4 Certificate Scheme Owner (scheme owner): The Cradle to Cradle Products Innovation Institute (C2CPPII).

3.5 Material Health Certificate Standard (the ‘standard’): The governing standard that serves as the basis for issuing all Material Health Certificates.

3.6 Maintenance: The process by which a certificate is continually maintained in accordance with the standard and Program Scheme. Any lapse in continual certificate maintenance due to certificate expiration is not covered by this policy. Renewal after the original or extended certificate expiration date is considered a new certificate, to be attained in accordance with the Certificate Scheme, which requires adherence to the most current version of the standard. Lapse of certificate maintenance for any reason shall result in withdrawal of a certificate and de-listing from the Material Health Certificate Registry.

4 Applicability

This policy applies to any product covered by a certificate within the Material Health Certificate Program Scheme during the time a certificate is in effect, including extensions. This policy is continuously in effect, including during the renewal process.

5 ANNUAL SURVEILLANCE

- 5.1 The Program Scheme, Section 5.2.9, requires annual surveillance of all certificates by a CB to confirm products continue to meet the requirements set forth in the standard. Section 5.2.9 (b) of the Program Scheme defines the basis and scope of the annual surveillance:

Surveillance is based on the original certificate. It does not require updated adherence to new versions of the standard or subsequent refinements of interpretation and guidance related to the version of the standard applied during the initial certificate issuance. However, it does cover addressing certificate requirements for continual improvement during the certificate's validity period and the monitoring of resolutions of Non-Conformance Reports (NCR) and Opportunities for Improvement (OFI) contained in the certificate issuance report.

- 5.2 The annual surveillance may reveal issues that would impact a certificate's validity.
- 5.2.1 Non-conformance Reports (NCR) have not been closed in accordance with conditions for certificate maintenance.
 - 5.2.2 Continuous improvement benchmarks established as conditions for certificate issuance have not been met.
 - 5.2.3 New materials or process changes are discovered that have an impact on certificate level or validity.
 - 5.2.4 Improper use of Cradle to Cradle Certified intellectual property or marks.
 - 5.2.5 Failure to meet financial obligations to the scheme owner, CB, or AB.
- 5.3 If warranted by discovery, the CB shall take appropriate action in accordance with the requirements of the standard.
- 5.3.1 Issue a NCR.
 - 5.3.2 Change certificate level.
 - 5.3.3 Withdraw certificate and de-list product.
- 5.4 Associated Fees: The agreement between the CB and client shall have clear provisions for the fees associated with annual surveillance.

6 SELF-REPORTING CLIENT SURVEILLANCE

- 6.1 The Program Scheme, Section 5.2.9 (c), requires manufacturers of products holding certificates or their AB to report to its CB all product changes.

The client is required to inform the CB of all such changes in material composition or processes believed to have an impact on a certificate's level or validity.

- 6.2 The CB shall evaluate the information reported by the client or AB and take appropriate action in accordance with the requirements of the standard, its supplements and interpretive documentation.
 - 6.2.1 Issue a NCR.
 - 6.2.2 Change certificate level.
 - 6.2.3 Withdraw certificate and de-list product.
- 6.3 Associated fees: The CB may charge reasonable fees for conducting an evaluation of a reported product change. If the CB deems an assessor's services are required to ensure accuracy of such an evaluation, appropriate assessor fees may also apply.

7 ONGOING OVERSIGHT

- 7.1 If a CB, AB, or the Scheme Owner become aware through any means that there may be reason for altering the certificate status of a product, the CB shall undertake a sufficient course of action to determine the correct certificate level.
- 7.2 Associated fees: The CB may charge reasonable fees for conducting an evaluation of a product change discovered outside the annual surveillance audit or client self-reporting.

8 ADDITIONAL CAUSES FOR WITHDRAWAL OF A CERTIFICATE

- 8.1 Other causes for withdrawal of a certificate and de-listing products from the registry not covered by surveillance or oversight are found in Section 5.2.13 of the Certificate Scheme. Additional details relating to renewal may be found in the Policy for Certificate Extension.
 - 8.1.1 Client fails to sufficiently engage in the process to maintain, extend, or renew a certificate. Engagement is defined as having signed an agreement with an AB or CB to conduct an assessment or certificate issuance audit, where that assessment or audit is currently underway.
 - 8.1.2 Client has been found to be engaged in illegal activity, practices antithetical to the underlying principles of the C2CPII, or any activity that negatively impacts the integrity or public image of the C2CPII or the standard.
 - 8.1.3 Client delays or disengages from the process for a duration that makes it impossible to issue a certificate under the terms of the

original assessment. Examples of problems arising from excessive delay or disengagement would be data are no longer current, process changes have occurred during the interim, or a new latest version of the standard has gone into effect to govern current assessment processes. Delays of greater than 60 days caused by the client may be deemed by the AB, CB or Scheme Owner sufficient cause to withdraw a certificate.

- 8.1.4 Client fails to communicate with an AB or CB for more than 30 days during the course of an active assessment or certificate issuance audit.

9 SCIENTIFIC ADVANCEMENT OR DISCOVERY

- 9.1 While a certificate remains valid under the terms current at the time of its issuance, there are continual scientific advancements and discoveries that may have an effect on its validity. 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.
- 9.2 As part of the certificate maintenance process, the C2CPHII may disseminate technical guidance, updates, interpretations, or other forms of information based on latest research that may impact certificate 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 certificates under a new version of the standard or a current version with interpretations and guidance not in place at the time a current certificate was issued.
- 9.3 Though unlikely, it is possible a discovery may lead to the conclusion that a material or process shall be regarded as harmful to a degree that a Material Health Certificate for a product cannot be credibly maintained. If such a discovery was determined by the C2CPHII Certification Standards Board to be so clear in the danger it presents to human health or the environment, the C2CPHII would be required to withdraw the certificate 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 certificate withdrawal and product de-listing, is the appropriate course of action for maintaining the integrity of the C2CPHII and the standard.