

Policy for Certification Extension

**Within the Certification Scheme for Material Health
Certificate Program**

Version 1.4

January 2019

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THE MATERIAL HEALTH CERTIFICATE PROGRAM POLICY FOR CERTIFICATION EXTENSION REVISION HISTORY

REVISION	SECTION	TYPE OF CHANGE	DATE	AUTHORIZED BY
1.0	Initial Release		January 2015	S. Klosterhaus
1.1	5.1.2.1	Allow for extension requests within two weeks after a certificate has expired if notification prior to the expiration date is provided.	April 2015	S. Klosterhaus
1.1	5.1.4	Allow for exceptions due to extenuating circumstances regarding engagement in the certification process at least two months prior to the certification expiration date.	April 2015	S. Klosterhaus
1.1	5.2	Provide examples of sufficient cause for granting an extension.	April 2015	S. Klosterhaus
1.1	5.2.2	Allow for actions by an Assessment Body to serve as grounds for granting an extension	April 2015	S. Klosterhaus
1.1	6.6	Allow for extensions longer than six months at the sole discretion of the Institute.	April 2015	S. Klosterhaus
1.1	6.17	Introducing the 'pending recertification' status.	April 2015	S. Klosterhaus
1.2	2.6	An additional extension period beyond the initial six months may be granted, based on documented justification and at the sole discretion of C2CPII.	April 2015	S. Klosterhaus
1.3	4.1.2	Removed provision allowing an additional 2 weeks after the expiration date to file an extension request	February 2016	S. Klosterhaus

1.3		Added provision requiring an automatic 60 day extension in cases where an Assessment Summary arrives at the CB within a timeframe insufficient to render a certification decision prior to the certification expiration date or a certification decision depends on additional information that cannot be provided prior to the expiration date	February 2016	S. Klosterhaus
1.3	6.1.7	Removed 'Pending recertification' status	February 2016	S. Klosterhaus
1.4	4.1.2	Simplified condition under which an automatic extension may be granted and extended the automatic extension period to 90 days	January 2019	S. Klosterhaus
1.4	4.2.2	Clarified that a change in the category achievement level may be a cause for extension	January 2019	S. Klosterhaus
1.4	5.3.3	Revised extension length and invoice and fee information related to the extension	January 2019	S. Klosterhaus
1.4	5.3.4	Revised maximum extension length and more accurately stated CB discretion in extending certifications. Moved AB obligations to section 5.6	January 2019	S. Klosterhaus
1.4	5.3.5	Added specific reference to disclaimers in Certified Products Registry as a contingency to extension	January 2019	S. Klosterhaus
1.4	5.3.7	Revised policy to state that extensions do not prolong the period of the subsequent certification	January 2019	S. Klosterhaus
1.4	5.4	Revised the fees associated with extensions	January 2019	S. Klosterhaus

1 General

1.1 Purpose

This policy addresses the requirements and procedures for extending an existing Material Health Certificate past its expiration date.

1.2 Applicability

This policy applies to Assessment Bodies (AB), Certification Bodies (CB), and the scheme owner (Cradle to Cradle Products Innovation Institute) making decisions regarding the extension of a Material Health Certificate beyond its expiration date.

2 Normative references

Material Health Certificate Standard

Material Health Certificate Program Fees Schedule

3 Definitions and acronyms

Assessment Body (AB): An entity accredited by the C2CPPI to conduct assessments sufficient in scope and rigor to support a certification 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.

Assessment Summary: The document prepared by an AB that demonstrates conformance with the standard and serves as the basis of a CB’s evaluation leading to a certification decision.

Certification Body (CB): An entity accredited by the C2CPPI 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 Material Health Certificate Program (Certification Scheme): The document which delineates the functions, responsibilities, relationships, and processes for entities engaged in the Material Health Certificate Program.

Certification Scheme Owner (Scheme Owner): The Cradle to Cradle Products Innovation Institute (C2CPPI).

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

Material Health Certificate Program: The program operating within the C2CPH that oversees and conducts certification activities in accordance with ISO 17065.

Material Health Certificate Registry: The definitive registry of Material Health Certificates, maintained by the C2CPH.

4 Conditions

4.1 Good standing

The client seeking an extension must be in good standing with the scheme owner, AB, and CB.

4.1.1 All financial obligations relating to the product certification must be current. The re-certification fee must be paid prior to the issuance of an extension.

4.1.2 The certificate has not expired, or the following condition applies.

a) In the event the CB is unable to render a certification decision prior to the certification expiration date and the re-certification fee has been paid, the CB shall automatically grant a no-cost, 90-day extension of the certification.

4.1.3 The Client shall be engaged in the re-certification process, by having signed a legally binding agreement with an AB to conduct an assessment, where that assessment is currently underway. Conditions covered in this policy can only be determined within the course of an assessment; hence this policy applies only in cases of active assessment.

4.1.4 The Client shall be engaged in the re-certification process on a date at least two months prior to expiration that would allow sufficient time to attain re-certification. Certain exceptions due to extenuating circumstances, such as those in 4.2.1, may apply in order to allow for the assessment and certification process to be completed beyond the expiration date, regardless of the date the process was initiated.

4.2 Cause for extension

Other than when the conditions in 4.1.2 apply, the Client or AB shall demonstrate in writing sufficient cause for granting an extension. Examples of sufficient cause are listed below. Other causes, either within or beyond an applicant's control, may be deemed legitimate by C2CPH.

4.2.1 Conditions resulting from actions by the client, including the following:

- a) Discontinuation or replacement of a certified product is planned within a short time period following the expiration date.
- b) Reasonable short-term administrative or financial impediments to timely completion of the assessment and certification processes (e.g. change of ownership, management, budget, operational infrastructure, etc.).
- c) New forms of technical optimization are to be realized within a short period of time following the expiration date.

4.2.2 Conditions resulting from actions by an AB, including the following:

- a) An AB presents its Assessment Summary on a date that does not allow a CB sufficient time to review and render a certification decision prior to expiration of the certification, or a certification decision depends on additional information that cannot be provided prior to the expiration date.
- b) An assessment does not contain sufficient information to support a certification decision.
- c) A change to the product or product group being assessed or a change in certification or category achievement level is indicated, requiring a period of time longer than normally anticipated to complete an assessment.
- d) An AB fails to engage with the client in a timely manner that would allow for completion of an assessment prior to expiration. Examples of such failures to engage may include lack of communication, insufficient data and information collection, or personnel changes affecting an assessment.

4.2.3 An extension shall be granted in cases where the assessment process may be enhanced by creating an opportunity to gather more accurate and/or current data and information that would have an effect on the assessment outcome.

4.3 Decision

4.3.1 The decision to grant an extension rests solely with the CB, using information supplied by the AB and client.

4.3.2 The decision to grant an extension is subject to the complaints and appeals processes of the CB and scheme owner.

5 Process

5.1 Initiation

5.1.1 The AB transmits an extension request to the CB with supporting justification based on conditions defined in 4.2, OR

5.1.2 The client transmits an extension request directly to the CB with supporting justification based on conditions defined in 4.2, OR

5.1.3 The CB determines an extension shall be necessary in order to achieve a certification decision and proceeds with granting an extension without a formal request from AB or client.

5.2 Review

The CB reviews the extension request.

5.3 Decision and Extension Issuance

5.3.1 The CB renders a decision on the request.

5.3.2 If the decision is not to grant an extension, the certification shall be suspended following expiration, and the product shall be de-listed from the Material Health Certificate Registry. The product shall be reinstated to the Registry only when a CB determines the re-certification process is complete and a positive certification decision is warranted. In such cases a suspension shall not exceed six months before the certification shall be withdrawn.

5.3.3 If the decision is to grant an extension after the initial automatic 90-day extension described in 4.1.2, the CB shall send an invoice for the certification extension fee to the client.

5.3.4. The total time of extensions issued shall be no longer than six months (one automatic 90 day extension and one additional 90 day extension). Extensions beyond six months may be considered at the discretion of the CB with supporting evidence and documentation to justify the extension.

5.3.5 If the CB deems contingencies should be attached to the extension, these conditions shall be included in the extension documentation. Examples of such contingencies may be, but not limited to, benchmarks for data gathering, timelines for deliverables, and/or the addition of qualifying disclaimers to the product's listing in the Material Health Certificate Products Registry.

5.3.6 The extension is granted by the CB.

5.3.7 A new certificate reflecting the end date of the extension as the new expiration date shall be issued. Extensions do not prolong the period of the subsequent certification. Once issued, the next certification will expire two years after the previous certification's expiration date. For example, if a certification expires in June 2019, and two 90 day extensions were issued (until December 2019), the next certification would still expire in June 2021.

5.3.8 Payment of the extension fee and any other outstanding balances is required before the next re-certification is issued.

5.4 Fees

The client shall be subject to the certification extension fee as defined in the *Material Health Certificate Program Fees Schedule*. All associated fees for maintaining certification and certification documentation during the extension period shall be kept current by the client under the payment terms of the CB and scheme owner. Failure to do so shall result in suspension of the certificate and de-listing the product from the Material Health Certificate Registry.

5.5 Termination, reduction, suspension, and withdrawal

5.5.1 A client may terminate certification at any time during an extension. The product(s) shall be de-listed from the Material Health Certificate Registry and all certification documentation shall indicate the product(s) is no longer certified.

5.5.2 If during the course of the extension, conclusive information and/or data emerges that indicates the certified product can no longer be certified at the same or higher level than that of the current extended certificate, the extended certificate and listing in the Material Health Certificate Registry shall be modified to reflect this reduction to a lower level of certification.

- a) The AB shall be responsible for communicating any such need for change to the CB.
- b) The client shall be responsible for any associated fees resulting from such a change.

5.5.3 If discovery such as defined in 5.5.2 indicates the product(s) can no longer be certified, the AB shall inform the CB. The certification shall be suspended immediately, regardless of its extended expiration date; and the product(s) shall be de-listed from the Material Health Certificate Registry.

5.5.4 If during an assessment it is indicated a product may attain certification at a higher level than that of the current extended certificate, this situation shall be considered to be part of the assessment process and will have no effect on the extended certification. Provided the CB confirms the assessment recommendation for a higher level of certification, the new level will be reflected on the renewed certificate at the time it is issued.

5.5.5 If a client fails to meet deadline and benchmark contingencies of the extension, the CB may suspend the certification for a period not to exceed six months before the certification shall be withdrawn.

5.5.6 Certification shall be withdrawn upon any of the following circumstances:

- a) Six months after suspension
- b) If the assessment and/or certification decision process indicates a product no longer qualifies for certification.
- c) If conditions established for extension and/or suspension have not been met

5.6 Assessment Body obligations during extension

5.6.1 The AB is responsible for ensuring the information contained in an Assessment Summary and supporting documents is up to date throughout any extension periods granted during the assessment review process. At the discretion of the CB, this information may also need to be updated after the assessment review process is completed if certification issuance is significantly delayed for reasons not caused by the CB.

5.6.2 An AB shall inform the CB if conditions required to maintain an extension are not being met.

- a) Failure by an AB to inform the CB that conditions required to maintain the extension are not being met by a client shall result in a nonconformance report (NCR) for the AB.
- b) The CB shall inform the scheme owner of any such cause for issuance of a NCR. The scheme owner shall issue the NCR and act in accordance with its Policy for Accrediting ABs.

5.7 Timely reporting by Assessment Bodies

5.7.1 An AB shall complete and deliver Assessment Summaries to a CB on a date prior to certification expiration that allows sufficient time for evaluation and certification decision.

5.7.2 The CB shall solely determine insufficiency of time for evaluation and certification decision due to

- a) More time being needed to collect missing data
- b) More time being needed to clarify information provided in the Assessment Summary.
- c) The Assessment Summary arriving at the CB on a date that does not permit sufficient time prior to expiration for evaluation within its normal workflow.

5.7.3 Consistent failure by an AB to complete and present Assessment Summaries to a CB in time sufficient for evaluation shall be cause for the Scheme Owner to issue NCRs and act in accordance with its Policy for Accrediting ABs.