



Certification Compliance Policy and Procedures

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Certification Compliance Policy and Procedures Revision Log

REVISION DATE	SECTION	TYPE OF CHANGE
January 2013	Initial Release	
August 2013	Non-controlled	Issued prior to implementation of document control system
February 2015	Non-controlled	Issued prior to implementation of document control system
February 2015	Non-controlled	Issued prior to implementation of document control system
January 21, 2016	Initial Controlled Release	
June 30, 2017	5.1	Role of investigation in changes to certification
June 30, 2017	6.2	Clarifies investigation within context of suspension
November 12, 2025	All	Updated to align with best practice and C2CPH systems.

1 General

1.1 Purpose

This policy delineates the requirements and procedures for maintaining the validity of a product certification within the Cradle to Cradle Certified® Certification Scheme.

1.2 Applicability

The policy and procedures in this document apply to any product certified within the Cradle to Cradle Certified Certification Scheme.

2 Normative references

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

ISO 14024, *Environmental labels and declarations — Type I environmental labelling — Principles and procedures*

Certification Scheme for the Cradle to Cradle Certified Products Program

Cradle to Cradle Certified® standards, requirements, and supporting assessment methodologies

3 Definitions and acronyms

Certification Body (CB): The Cradle to Cradle Products Innovation Institute (C2CPPI).

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

Certification Agreement: The legally binding and enforceable document that identifies each party's obligations and responsibilities, legal considerations such as length of term, indemnification and liability, and certification services and activities including the use of trademarks, logos, and intellectual property of C2CPPI.

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 (C2CPPI).

Certified Products Registry: The definitive registry of Cradle to Cradle Certified products, maintained by the C2CPPI.

Conformity Assessment Body (CAB): An entity authorized by the C2CPPI to conduct assessments sufficient in scope and rigor to support a certification decision based on the Cradle to Cradle Certified standards, in accordance with the requirements of ISO/IEC 17065.

Cradle to Cradle Certified® Product Standard (the 'standard'): The standard that serves as the basis for all Cradle to Cradle Certified® product certifications.

Reduction: The modification of a certification to reflect changes that require a product(s) be certified at a lower level or removed from the scope of a certificate.

Suspension: A temporary condition that exists when C2CPPI has reason to believe a product(s) is not in compliance with certification requirements yet may be reinstated following investigation and remediation. A product is not certified while it is suspended.

Termination: Action taken by a client to end certification, either during the term of certification or at the end of the term of certification.

Withdrawal: A permanent condition brought about when C2CPPI determines a product is not in compliance with certification requirements, and non-conformance is not remediated.

4 On-going surveillance

4.1 Surveillance of trademark use

4.1.1 C2CPH shall conduct surveillance of a certificate holder's use of C2CPH trademarks, logos, and intellectual property in accordance with the *Cradle to Cradle Certified Trademark Use and Surveillance Policy* to ensure continued compliance with the terms of the Certification Agreement and the *Cradle to Cradle Certified Products Program Trademark Use Requirements*.

4.1.2 C2CPH shall ensure all fees due to the C2CPH are paid and current in accordance with the *Cradle to Cradle Certified Program Fees Schedule*.

4.2 Client self-reporting of certification compliance

4.2.1 A certification holder is required to report to C2CPH any changes that may affect the accuracy of the product assessment or its certification status. These changes include:

- a) changes in material composition or processes believed to have an impact on the level or validity of certification
- b) any changes that may affect the accuracy of the product assessment, including conformance to a standard requirement and the assessment results
- c) any changes that may affect the accuracy of certification documentation and information on the Cradle to Cradle Certified Products Registry such as assessment results/outcomes, how the product met a requirement, product discontinuation, additions to a product line covered by a current certification, additional facilities producing the certified product, or changes in ownership

4.2.2 As a result of these changes and any actions that may affect the certification holder's ability to meet certification requirements, the certification holder is responsible for submitting updated assessment documentation to C2CPH and informing C2CPH of the updates prior to instituting the change. The updated assessment information shall be submitted to the certification holders' CAB, which then is required to submit an updated assessment report to C2CPH.

4.2.3 C2CPH shall evaluate the updated assessment report and take appropriate action in accordance with the policies and procedures in this document, the certification scheme, requirements of the standard, its supplements and interpretive documentation.

4.2.4 Associated fees: In addition to documentation change fees, C2CPH may charge reasonable fees for conducting an evaluation and review of a reported product change. If

C2CPH deems a CAB's services are required for the evaluation, appropriate CAB fees may also apply.

5 Compliance investigation and changes to certification status

5.1 Determining the correct certification level or status

5.1.1 Should C2CPH or a CAB become aware of a condition that may call for altering the status or scope of a product certification or correcting a product assessment through any means other than client self-reporting, C2CPH shall undertake an investigation to determine if a change in certification or the assessment results is required.

5.1.2 If the investigation indicates a change in certification status or the assessment is required, C2CPH shall issue a nonconformance report (NCR) to the client. The client may be granted up to 60 days to close the NCR unless the change is considered to be a critical non-conformance where a shorter time frame will be specified. At the sole discretion of C2CPH, the closure date of the NCR may extend beyond 60 days with supporting documented justification.

5.1.3 During an investigation of changes and while an NCR is open, the certificate shall not be renewed. However, it may be extended at the discretion of C2CPH for a specified timeframe that is demonstrated and documented to be necessary in order to yield definitive results that indicate whether a change in certification shall be made.

5.1.4 If a certification or assessment change indicated is the result of a CAB or C2CPH action, the certificate shall remain active at its current level, pending investigation. Examples of such actions may be, but are not limited to, incomplete or incorrect assessments. If the investigation period extends beyond the certificate's expiration date, C2CPH may grant a certification extension for a specified timeframe at the discretion of C2CPH with documented justification for doing so. If the investigation indicates a change in certification status may be or is required, C2CPH shall issue a nonconformance report (NCR) to the CAB (and to the client, if applicable). The CAB and client may be granted up to 60 days to close the NCR. At the sole discretion of C2CPH, the closure date of the NCR may extend beyond 60 days with supporting documented justification.

5.1.5 At the discretion of C2CPH, a disclaimer qualifying the certification may be appended to the certificate and/or Certified Product Registry during an investigation.

5.1.6 Following the closure of an NCR, any further action required as a result of the findings will follow the procedures defined in Section 5.2.

5.1.7 Associated fees: C2CPH may charge reasonable fees for conducting an evaluation of a product change discovered outside certificate holder self-reporting.

5.2 Changes to certification status – Termination, suspension, reduction, or withdrawal of certification

5.2.1 Certification termination

- a) Termination of a certification shall occur when a client or their CAB notifies C2CPH in writing that it no longer wishes to have its product(s) certified.
- b) When a certification is terminated, C2CPH shall make all necessary modifications to formal certification documents, the Cradle to Cradle Certified Products Registry, public information, authorizations for use of marks, and any other instruments to ensure it provides no indication the product continues to be certified.

5.2.2 Certification suspension

- a) 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 by C2CPH to reach a certification decision regarding a product.
- b) Suspension shall be automatic
 - i. Upon expiration of a certificate in cases where a client does not terminate, request an extension, or engage in the recertification process.
 - ii. If a client fails to engage sufficiently in the process to maintain, renew, or extend its certification.
 - iii. If a client fails to adhere to the terms of the Certification Agreement

- iv. If a client fails to pay C2CPH program fees as set forth in the C2CPH Program Fee Schedule.
- c) Any product(s) covered within the scope of a suspended certification shall be deemed not certified until the terms of remediation established by C2CPH are met. These product(s) shall be de-listed from the Cradle to Cradle Certified Products Registry until certification is reinstated. Since these product(s) are deemed not certified, C2CPH shall charge no certification fees if the period of suspension extends beyond the certification expiration date.
- d) 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.
- e) Suspension may be concluded with
 - i. Reinstatement of certification
 - ii. Reinstatement of certification at a reduced/expanded level or scope
 - iii. Withdrawal of certification

5.2.3 Certification reduction in level or scope

- a) Reduction in certification shall occur when an investigation concludes conditions exist that indicate a certified product(s) no longer meets the requirements for maintaining its current level of certification. Also, reduction in certification may be requested by the client at any time and for any reason.
- b) Reduction may take the form of lowering the level of certification or removing specific product(s) from the scope of certification.
- c) When a certification is reduced, C2CPH shall make all necessary modifications to formal certification documents, the Cradle to Cradle Certified Products Registry, public information, authorizations for use of marks, and any other instruments to ensure the reduction in certification level or scope is communicated to the client and clearly specified in certification documentation and public information.

- d) 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.

5.2.4 Certification withdrawal

- a) C2CPH shall withdraw certification
 - i. When a product no longer meets the requirements for any level of certification and fails to resolve issues related to suspension.
 - ii. If a client fails to meet the terms of remediation set forth to restore a suspended certification.
 - iii. Automatically, if a product has been suspended for six months and the client has not terminated the certification or submitted the assessment documentation required for the recertification process.
 - iv. Automatically, if a client is found to be engaged in illegal activities, practices antithetical to the principles of the C2CPH, or any activity that negatively impacts the integrity or public image of the C2CPH, the Cradle to Cradle Certified Product Standard, or the Cradle to Cradle Certified Products Program.
- b) All communications of withdrawal of a certification shall be communicated by C2CPH to the client in writing.
- c) When a certification is withdrawn, C2CPH shall make all necessary modifications to formal certification documents, the Cradle to Cradle Certified Products Registry, public information, authorizations for use of marks, and any other instruments to ensure it provides no indication the product continues to be certified.

6 Scientific advancement or discovery

- a) 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 and processes, as well as new ways of understanding and evaluating the human and environmental health impact of those factors. These impacts are

- being continually researched and re-evaluated and may result in changes to the standard, assessment methodologies, or certification requirements.
- b) As part of the certification maintenance process, the C2CPH may disseminate technical guidance or manuals, updates, interpretations, or other forms of information based on the latest research, which may impact certification renewal. The intent of conveying such information is to provide clients with tools for determining a course of action to renew certification under a new version of the standard, or a current version with interpretations, assessment methodologies, or other requirements not in place at the time of a product's current certification.
 - c) 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 or the C2CPH Standards Steering Committee to present danger to human health or the environment, the C2CPH shall 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 restriction of a material or process must be based on objective evidence that such a restriction, with resulting certification withdrawal and product de-listing, is the appropriate course of action for maintaining the integrity of the C2CPH, the Cradle to Cradle Certified Products Program, and the Cradle to Cradle Certified standards.