

Policy for Certification Extension

Version 1.5

January 2025

Copyright

Copyright $\ensuremath{\mathbb{C}}$ 2025 by Cradle to Cradle Products Innovation Institute. All rights reserved.

No part of this publication is to be reproduced or utilized in any form or by any means, without prior written permission from the Cradle to Cradle Products Innovation Institute.

Trademark

Cradle to Cradle Certified® is a registered trademark of the Cradle to Cradle Products Innovation Institute.

Cradle to Cradle® and C2C® are registered trademarks of MBDC, LLC.

For more information about the Cradle to Cradle Products Innovation Institute and the Cradle to Cradle Certified Products Program, visit <u>www.c2ccertified.org</u>.

Table of Contents

THE CRADLE TO CRADLE CERTIFIED PRODUCTS PROGRAM POLICY FOR CERTIFICATION EXTENSION REVISION HISTORY	1
1 General	
1.1 Purpose	7
1.2 Applicability	7
2 Normative references	7
3 Definitions and acronyms	7
4 Conditions	8
4.1 Good standing	8
4.2 Cause for extension	9
4.3 Decision	10
5 Process	11
5.1 Initiation	
5.2 Review	
5.3 Decision and Extension Issuance	
5.4 Fees	12
5.5 Termination, reduction, suspension, and withdrawal	
5.6 Assessment Body obligations during extension	
5.7 Timely reporting by Assessment Bodies	14

THE CRADLE TO CRADLE CERTIFIED PRODUCTS PROGRAM POLICY FOR CERTIFICATION EXTENSION REVISION HISTORY

REVISION	SECTION		TYPE OF CHANGE	DATE	
1.0	Initial R	Initial Release			
1.1	5.1.2.1	after a ce	extension requests within two weeks rtificate has expired if notification he expiration date is provided.	March 2015	
1.1	5.1.4	circumsta certificati	exceptions due to extenuating ances regarding engagement in the on process at least two months prior rtification expiration date.	March 2015	
1.1	5.2		examples of sufficient cause for an extension.	March 2015	
1.1	5.2.2		actions by an Assessment Body to grounds for granting an extension	March 2015	
1.1	6.6		extensions longer than six months at discretion of the Institute.	March 2015	
1.1	6.17	Introduci	ng the 'pending recertification' status.	March 2015	
1.2	2.6	initial six documen	onal extension period beyond the months may be granted, based on Ited justification and at the sole n of C2CPII.	April 2015	
1.3	4.1.2		l provision allowing an additional 2 er the expiration date to file an n request	February 24, 2016	
1.3		day exter Summary	ovision requiring an automatic 60- nsion in cases where an Assessment / arrives at the CB within a timeframe nt to render a certification decision	February 24, 2016	

1.5	4.1.4	Revised policy to state that the Client shall be engaged in the re-certification process at least three months prior to certification expiration, rather than two months.	January 1, 2025
1.5	4.1.2	Added reference to granting a certification extension due to extenuating circumstances after the expiration date.	January 1, 2025
1.5	4.1.2	Clarified that any applicable program fees must be paid to automatically grant a 90-day extension of the certification.	January 1, 2025
1.5	4.1.1	Clarified that financial obligations includes any applicable program fees.	January 1, 2025
1.4	5.4	Revised the fees associated with extensions	January 14, 2019
1.4	5.3.7	Revised policy to state that extensions do not prolong the period of the subsequent certification	January 14, 2019
1.4	5.3.5	Added specific reference to disclaimers in Certified Products Registry as a contingency to extension	January 14, 2019
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 14, 2019
1.4	5.3.3	Revised extension length and invoice and fee information related to the extension	January 14, 2019
1.4	4.2.2	Clarified that a change in the category achievement level may be a cause for extension	January 14, 2019
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 14, 2019
1.3	6.1.7	Removed 'Pending recertification' status	February 24, 2016
		prior to the certification expiration date or a certification decision depends on additional information that cannot be provided prior to the expiration date	

1.5	5.1.4	Added reference to the automatic granting of a 90-day extension of the certification as one of the means for initiation of an extension.	January 1, 2025
1.5	5.3.7	Updated policy to include the three-year certification period for Version 4 certifications.	January 1, 2025

1 General

1.1 Purpose

This policy addresses the requirements and procedures for extending an existing Cradle to Cradle Certified® product certification 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 Cradle to Cradle Certified® product certification beyond its expiration date.

2 Normative references

Cradle to Cradle Certified® Product Standard (Full Scope) Cradle to Cradle Certified® Circularity Standard Cradle to Cradle Certified® Material Health Standard Cradle to Cradle Certified® Products Program Fees Schedule

3 Definitions and acronyms

Assessment Body (AB): An entity recognized by C2CPII to conduct assessments sufficient in scope and rigor to support a certification decision based on the Cradle to Cradle Certified® standards (the 'standards'). ABs may be accredited to conduct full assessments or assessments limited to specific categories of the standards.

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

Certification Body (CB): An entity recognized by C2CPII to perform conformity assessments, render certification decisions, and issue

certificates based on the standards 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).

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

Cradle to Cradle Certified Products Program (CPP): The program operating within the C2CPII that oversees and conducts certification activities in accordance with ISO 17065.

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

Certification Agreement: The legally binding document that governs the use of trademarks, logos, and intellectual property of C2CPII.

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 and any applicable program fees must be paid prior to the issuance of an extension.

4.1.2 The certificate has not expired, or one of the following conditions applies.

- a) In the event the CB is unable to render a certification decision prior to the <u>initial</u> certification expiration date and the re-certification and applicable program fees have been paid, the CB shall automatically grant a 90-day extension of the certification.
- b) It has been less than 90 days since the certificate expired and the CB, at its discretion, has determined that extenuating circumstances exist that allow for an extension to be granted after the expiration date.

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 three 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 condition in 4.1.2.a applies, 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 C2CPII.

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 Form 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, OR

5.1.4 The condition in 4.1.2.a applies.

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 Cradle to Cradle Certified Products 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, 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 (two 90- day extensions). 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 Cradle to Cradle Certified 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 (for Version 3.1) or three years (for Version 4.0/4.1) after the previous certification's expiration date. For example, if a Version 4.0 certification expires in June 2025, and two 90-day extensions were issued (until December 2025), the next certification would still expire in June 2028.

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 *Cradle to Cradle Certified Products 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 Cradle to Cradle Certified Products 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 Certified Products 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 Certified Products 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 Certified Products 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 Form 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 Forms 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 Form.

c) The Assessment Form 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 Forms 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.