



# Recyclable Material: Metals Certification

**Standard Audit Plan  
April 2024**



## 1.0 Background

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Recyclable Metal certification demonstrates a company's commitment to support circular economy and sustainability through end-of-life management and the reduction of overall life cycle impacts of their products.

As part of GreenCircle Certified, LLC's (GreenCircle's) audit process, GreenCircle will obtain a complete understanding of the product's material composition through review of the bills of material/recipes for a product; raw material purchases, usage, and production numbers to determine if the product contains recyclable materials. Recyclable metals are materials or whole products that can be diverted from landfill at the end of life through available recycling infrastructure, processes and programs. These metals can be collected, processed and returned to use in the form of raw materials or products at the end of life. GreenCircle will conduct the audit for Recyclable Material: Metals Certification in accordance to the requirements and methods set forth in this audit plan and in GreenCircle's Certification Scheme; in compliance with ISO17065:2012.

GreenCircle will conduct a feasibility audit of the available end of life recycling infrastructure, and GreenCircle will validate the recyclability of the product in accordance with internationally accepted definitions and the Federal Trade Commission's (FTC) 2012 Green Guides, specifically 16 CFR Part 260.12. In the United States, per the FTC Green Guides, for a product to be deemed "recyclable", without qualified claims, if recycling facilities are available to a substantial majority of the population, defined as at least 60%. GreenCircle will analyze the metal components or the entire metal product's capability to be recycled within the end-of-life infrastructure. This process ensures accuracy and authenticity of recyclable metal claims.

If only a portion of the product can be recycled, or a special recycling scenario needs to be in place for the metal be recycled; a percentage will be issued with qualifying language clearly stating the recycling scenario needed for the metal to be recycled at the end of life. Using this methodology, GreenCircle will then provide a certificate with either percentage of recyclability (percent by weight) of the product or for the total product.

## 2.0 Goal

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To analyze and verify the end-of-life recycling infrastructure availability for the metal material or metal product in accordance with internationally accepted definitions and the Federal Trade Commission's (FTC) 2012 Green Guides. If a recycling infrastructure or process is available at the end of life, GreenCircle will then certify the metal component or entire metal product to be recyclable.



### 3.0 Company Qualifications

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Companies who manufacture products or produce metal alloy materials that are recyclable at the end of life will be eligible for recyclable metal product certification. During the proposal development process, GreenCircle will conduct initial conversations with the recyclable metal product manufacturer to understand the products, operations and end of life recycling scenarios of the material/product in order to verify if the proposed materials and process will most likely qualify for an audit and possible certification. It is not guaranteed that a product will be certified as a recyclable metal/ metal product until a thorough audit is completed by GreenCircle.

### 4.0 Documentation Requirements

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To qualify for certification a company must have six months of data, preferably twelve months, from the past year that clearly describes and includes:

- A list of recyclable material(s)/product(s) to be analyzed for certification.
- Bill of materials or formulations detailing the amount and type of materials used to manufacture the products (percent by weight basis).
- A summary document listing all locations within the end-of-life recovery chain of the metal/ metal product. GreenCircle will review locations and verify the recycling infrastructure availability for these materials/products.
- An overview of operations for the manufacturing facility including a list of manufacturing processes and the types of products being produced at the facility to better understand the metal/ metal product being analyzed.
- Total production of the specified metal/ metal product(s) on a monthly basis during the time period being examined. This time period will be determined upon project approval.
- A list of current metal material suppliers including the material provided and the quantity supplied. This includes collection and recycling of original products as part of the “take back” program. If the suppliers are providing “recyclable” metals to the manufacturer, a supplier questionnaire will need to be completed and returned to GreenCircle for review and analysis to verify the recycling infrastructure for the metal materials supplied.
- Data clearly describing existing inventories of metal materials, including purchasing records and invoices of these raw materials.



## 5.0 Audit and Certification Process

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### 5.1 Data Collection

Once the proposal and certification agreement are signed by the product manufacturer, GreenCircle will conduct an initial project meeting, via video or conference call, with contact(s) at each manufacturing facility to discuss the required data, GreenCircle's audit process and project schedule. Through this initial project meeting, GreenCircle will gain an understanding of the material flows and tracking system of the recyclable metal product manufacturer. GreenCircle will provide an initial data request to be completed by the facility contact(s). See the Documentation Requirements for information that will be requested in the data collection stage.

### 5.2 Site Audit (conducted on a per case basis)

GreenCircle may conduct a site visit of the manufacturing facility to audit and verify the metal material utilization and flows within the manufacturing process.

GreenCircle will conduct interviews with representatives at the facility as part of the audit process as well as review any additional data needed to complete the recyclable metal certification. GreenCircle will walk through the facility; conduct a visual inspection and collect photo documentation to verify the recyclable metals being used within the process to manufacture the products.

GreenCircle will conduct a review of the available recycling infrastructure for primary markets served for the product to ensure that FTC guidelines are being satisfied. This will include data collection and records review to confirm that the metal is recyclable. For international locations outside of North America, GreenCircle will conduct a review of typical recycling practices and infrastructure to evaluate the recyclability of the product or metal materials. The company is responsible to provide information on recycling capabilities and infrastructure in markets served for verification by GreenCircle.

### 5.3 Recyclable Material: Metals Calculations

GreenCircle will conduct a thorough review of the actual bill of material/recipe for the specified product. After verifying that the metal can be recycled in over 60% of the United States recycling infrastructure (per the FTC Green Guides), GreenCircle will validate the total amount of recyclable metal (on a percent by weight basis) within the final product. If a special recycling scenario needs to be in place for the metal to be recycled, qualifying language clearly stating the recycling scenario will be included on the issued certificate as well.



## 5.4 Certification Audit Deliverables

Upon verification of the recyclable metal claims, GreenCircle will issue GreenCircle Certified, LLC certificates and marks for the specified product manufactured at a specific facility. The certificate will document that an independent evaluation of the recyclable metal claims has been conducted on behalf of the company for the specified product(s). The certificate will include the percentage of recyclable metal contained within the product(s) analyzed. All certificate holders must notify GreenCircle Certified, LLC of any significant changes in products or operations that could alter any of the claims detailed in certification.

GreenCircle will prepare a written report on the audit process and findings and provide this report to the Client. GreenCircle will also list the final certificates on the GreenCircle Certified Product Database and provide GreenCircle marks for use in marketing.

## 6.0 Annual Recertification Process

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All certified claims are recertified annually. It is important for GreenCircle to evaluate any changes within the operations or manufacturing processes, including any information on supplier variability, or changes in source locations to ensure continued compliance with the established criteria. Completion of recertification ensures continued transparency and further use of the GreenCircle Mark.

## 7.0 Complaints, Appeals and Disputes

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GreenCircle must be contacted immediately if there is a complaint, appeal and or dispute brought against a certification that GreenCircle has verified. GreenCircle will follow the Appeals, Complaints and Disputes procedure to review and resolve the issue.

## 8.0 Guidelines for Private Label User

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The recyclable metal certification is for the exclusive use of the Client. Companies that produce private label products will require any private label customers or downstream re-sellers of the certified product(s) who desire to utilize the GreenCircle recyclable metal certification, to enter into a separate Licensing Agreement with GreenCircle regarding the use of the GreenCircle Mark on private label product and promotional materials. Please contact GreenCircle directly for more information.

## 9.0 Labeling Requirements

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The Client agrees to promptly cease display and use of the GreenCircle Certified, LLC mark: (1) Upon expiration of the certification period; (2) If Client is no longer in



compliance with one or more of the terms and conditions of the GreenCircle Certification Agreement. Please reference the **GreenCircle Certified Mark Usage Guidelines** for further details and more information on using the mark. The Client shall take caution to ensure that the GreenCircle Certification mark is not associated with products and/or operations which do not comply with the GreenCircle Certification Scheme (GCCS). The Client will be asked to remove the GreenCircle mark immediately if it is found that they have applied the mark on a non-conforming GCCS product and/or operation. If the Client fails to remove the misused mark, an investigation will be conducted pertaining to the misuse, in which the full cost of the investigation shall be borne by the Client. The Client shall not allow the GCCS Certification mark to remain on non-conforming products offered for sale. Such action could invite prosecution under U.S. Trademark statutes or attract other penalty provisions in other U.S. or State law.

## 10.0 Key Terminology

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**Audit Plan:** Specifies how GreenCircle intends to conduct a particular audit. The audit plan describes the activities to achieve the audit objectives.

**Certification Period:** A six month or preferably twelve month period in the recent past in which GreenCircle identifies at the beginning of each certification. During this period, GreenCircle will collect various documentation needed to certify the specific claim.

**Component:** A constituent part of something (such as a system or mixture).

**Design for Disassembly:** The process of designing products so that they can be easily, cost-effectively and rapidly taken apart at the end-of- life of the product for reuse or recycling of the product's components.

**End-of-Life:** A phase in the life cycle of a product in which the product can no longer be used and will need to be either disposed of or recycled. Within the recyclable material/product certification GreenCircle will be analyzing those products/materials that have been designed to be recyclable at the end of life.

**Life Cycle Thinking:** A method used in sustainable product development that includes considering the environmental impacts of each stage of a product/material's life cycle. These life cycle stages include: raw material extraction, manufacturing, use, and end-of-life disposal. Organizations that use life cycle thinking and design products



that are recyclable, recoverable, or reusable at the end of life will be considered for the recyclable material product certification.

**Material Inputs:** All incoming materials including collected original products, reclaimed or recycled materials or components, virgin materials or purchased materials.

**Material Outputs:** All outgoing materials or products from a manufacturing or processing facility.

**Recyclable/Non-Recyclable:** “Recyclable” is a characteristic of a product, packaging or associated component that can be diverted from the waste stream through available processes and programs and can be collected, processed and returned to use in the form of raw materials or products. The Federal Trade Commission’s Green Guides require that a product be able to be recycled within 60% of the current U.S. infrastructure in order to be considered “recyclable”. GreenCircle will analyze the product for recycling capability as well as the local recycling infrastructure in markets served to ensure that materials can be recycled. If the infrastructure for the specific materials within the product is not locally prevalent, GreenCircle will consider this material non-recyclable.

**Recycler:** An organization that collects and processes materials into a usable raw material or product for reuse in the production of new products or materials.

**Recycling:** A process that turns materials that would otherwise be waste into valuable resources.

**Recycling Infrastructure:** The available physical and organizational recycling processes and facilities in a specific geographic area that are capable of recycling and recovering the specific recyclable materials to be certified.

## 11.0 Reference Documents

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**ISO 14021:2016-** *Environmental labels and declarations – The International Standards Organization*

**The 2012 Federal Trade Commission’s Green Guides** – *Guides for the Use of Environmental Marketing Claims, Definition of Recyclable.*

**Title 16 Code of Federal Regulations (CFR) Part 260.12** – *Recyclable Claims*



## Amendment History

Date	Issue	Summary of Amendments
1/22/2013	Rev. 0	Official issue date of document.
11/15/2015	Rev. 1	Update language and definitions.
5/20/2022	Rev. 2	Editorial Updates
12/1/2023	Rev. 3	Editorial Updates
4/1/2024	Rev. 4	Reissued Rev. 4 for metals only

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