



Recycled Content Certification

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1.0 Background

Recycled Content certification demonstrates an organization's commitment to reuse materials in an effort to support circular economy as well as reduce their reliance on virgin materials.

GreenCircle Certified, LLC's (GreenCircle's) Recycled Content Certification was developed to evaluate the source of the recycled content raw materials to determine their pre- and post-consumer designations and ultimately determine the total percent (by weight) of the recycled content materials being used to manufacture the product in accordance with internationally accepted definitions (as defined in ISO 14021).

Recycled content is comprised of pre-consumer and/or post-consumer material that is used as a feedstock/raw material in the manufacturing of a product.

As part of GreenCircle's evaluation process, GreenCircle will obtain a complete understanding of the product's bill of material or product recipe and manufacturing operations to determine the amount of total recycled content within a product. GreenCircle will conduct a mass balance analysis of all material flows within the manufacturing or supplier facility to ensure enough recycled content raw materials were purchased and used in production to consistently meet the recycled content claims within the product recipe(s) during the certification period.

To ensure specificity and accuracy of the recycled content claims, GreenCircle certifies all recycled content claims on a per plant, per product (or product family) basis. Using this methodology, GreenCircle will then provide a certified percentage of pre- and post-consumer recycled content (percent by weight) within the product or raw material. Recycled content on a national average basis can be calculated upon request. This process ensures accuracy and authenticity of recycled content claims.

For building products Greencircle will evaluate the compliance to the LEED rating system. Additionally, GCC will evaluate the eligibility for Amazon Climate Pledge Friendly for any applicable products that meet the requirements set by Amazon.

2.0 Goal

The goal of Recycled Content Certification is to verify sources of recycled materials and distinguish recycled content by pre- and post-consumer content within the supply chain based on ISO 14021 definitions and Federal Trade Commission (FTC) requirements of recycled content. GreenCircle will then certify a product's total recycled content (percent by weight) based on pre- and post-consumer content definitions.

3.0 Company Qualifications

Companies who manufacture products or produce raw materials that contain or consist of recycled content will be eligible for recycled content product certification. During the proposal development process, GreenCircle will conduct initial meetings with the client to understand the products, operations, and recycled content materials being utilized 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 for recycled content until a thorough audit is completed by GreenCircle. Products must contain at least 1% recycled content to receive a recycled content certification.

It is the client's responsibility to communicate to GreenCircle that the product does not have 6-12 months of data. For pilot projects with only engineering-build documentation, GreenCircle will issue a certificate that references the analysis was based on a pilot project. GreenCircle will require at least 6 months of production data to remove the pilot language from the certificate. The client will be required to provide confirmation that the product recipe(s) and supplier(s) have remain unchanged; or provided updated information. The client will be required to provide updated data (per the Documentation Requirements below) no later than month ten (10) from initial certification start date to avoid expiration. GreenCircle will then complete an analysis to confirm no changes to the previous analysis; or incorporate changes to the bill of materials or supplier information has changed. At the completion of this analysis, new certificate(s) will be issued as applicable.

4.0 Documentation Requirements

To qualify for certification a company must provide documentation that clearly describes and includes:

- Product bill of material/recipe for recycled content products or materials detailing the amount and type of raw materials used to manufacture the product (percent by weight basis).
- Total production of the specified product or material, during the twelve-month period being examined.
- A list of current recycled content material suppliers including the material provided, the quantity of the material supplied, and the amount of post-consumer and pre-consumer recycled content in each material.
- Contact information for each of the recycled content material suppliers to conduct an audit of their claims and verify the pre- or post-consumer designation.

- Total raw material usage for the manufacturing of the specified product, during the twelve-month period being examined.
- A recycled content certification or an attestation from each recycled content raw material supplier of recycled content materials, verifying the pre-and post-consumer percentages within the raw materials supplied. GreenCircle will provide a form for each supplier to complete as a part of the audit process. This document must be completed and signed by a representative from the supplier's company.
- One sample purchase orders (during the evaluation period), per plant, for each recycled content material from each supplier.

5.0 Audit and Certification Process

5.1 Data Collection

Once the proposal and certification agreement are signed by the client, 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. GreenCircle will gain an understanding of the material flows and tracking system for the recycled content product.

GreenCircle will provide an initial data request to be completed by the facility contact(s). The data collection process also includes GreenCircle's outreach to suppliers of recycled content materials to verify the pre-and post-consumer percentages within the raw materials supplied. See Section 4.0 Documentation Requirements for specific data that will be requested in the data collection stage.

5.2 Mass Balance Analysis

Upon receiving initial data, GreenCircle will conduct a mass balance analysis of all material flows within the manufacturing facility to ensure enough recycled content raw materials were purchased and used in production to consistently meet the recycled content claims within the product recipe for the certification period.

5.3 Site Audit

GreenCircle will conduct a site visit and audit of the manufacturing facility and suppliers (suppliers as deemed necessary) to audit and verify the material utilization and material 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 recycled content certification. GreenCircle will walk through the facility; conduct a visual inspection and collect photo documentation to verify the recycled content materials being used within the process to manufacture the products. As part of the auditing and verification process GreenCircle will conduct a

detailed review of documentation and chain of custody records of material flows during the site visit.

5.4 Recycled Content Calculations

GreenCircle will conduct a thorough review of the bill of material/recipe for the specified product. GreenCircle will also verify the pre-and post-consumer designations of the raw materials through supplier interviews, site audits, and a documentation collection and verification process. GreenCircle will then validate the total amount of post-consumer and pre-consumer recycled content (on a percent by weight basis) within each constituent within the final product. The total percentage of recycled content within the product or materials is subsequently determined by summing the total pre-and post-consumer recycled content within the constituents. After completion of the GreenCircle recycled content audit process, GreenCircle will certify the minimum recycled content product claim and certify the minimum percentage by weight of recycled content utilized to make the products or materials.

5.5 Audit Deliverables

Upon verification of the recycled content 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 recycled content claims has been conducted on behalf of the client for the specified product(s). The certificate will include the minimum percentage of pre-consumer, post-consumer and the minimum total recycled content contained within the product(s) analyzed. 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 Recycling Recapture Audit

GreenCircle can review the client's tracking of recycled material received, for the last 12 months, from a specific supplier to provide verification of the processing of the material into an outgoing product.

GreenCircle will perform the requested audit by collecting documentation on the quantities received, type of material received, and processing methods of the material. This will include interviews with the client and a site visit to the processing facility(s).

Data Request may include the client's previous 12 months of data and documentation on material quantities received and recycling/processing methods through the following:

- a. Total incoming material quantities by type monthly for the previous 12 months
- b. Process flow diagram or pictorial representation of material processing
- c. Weights and types of contaminants from the incoming material and the end destination of those materials
- d. Visual evidence of the end processing of the materials
 - i. GreenCircle may request a virtual or in person site visit to the processing facility for further confirmation

At a client's request, and if data is available, GreenCircle can provide a percentage of the materials processed that include a specific supplier's recycled materials.

This audit can also be customized as verification of a client's take back program.

7.0 Annual Recertification Process

All certified claims are recertified annually. It is important for GreenCircle to evaluate any changes within the product, operations, or manufacturing processes to ensure continued compliance with the established criteria, including information of supplier variability or source location of recycled content material, etc. The completion of recertification ensures continued transparency and further use of the GreenCircle mark.

8.0 Complaints, Appeals, and Disputes

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.

9.0 Guidelines for Private Label User

The recycled content 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 recycled content certification to enter into a separate Licensing Agreement with GreenCircle regarding the use of the GreenCircle Mark on private label product and promotional materials.

10.0 Labeling Requirements

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.

11.0 Key Terminology

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

Certification Period: A twelve-month period immediately following the completion of a certification during which the recycled content claims are valid. Prior to the end of the certification period, the manufacture must complete annual recertification requirements in order to maintain certification credentials.

Certified Product: In order for a product to be certified by GreenCircle, the product must complete the GreenCircle audit process and certification requirements. In order to achieve certification GreenCircle will identify a minimum percentage of recycled content that is certifiable for the product. The certification process must be completed per GreenCircle's guidelines and internal procedures.

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

Evaluation Period: GreenCircle requires twelve months of consistent data to support certified claims. This period is typically the twelve-month period immediately preceding the initiation of Certification, which GreenCircle identifies at the beginning of each certification, and is called the Evaluation Period. GreenCircle will collect various documentation needed to certify the specific claim from this period. If consistent data is not available for the most recent twelve-month period, or if attributes have changed within the past twelve months, GreenCircle may allow a six-month or three-month evaluation period and will require additional information to be submitted to validate the claims.

Internal Loop Material: If an organization does not purchase or use external recycled content materials (as defined by ISO 14021 definitions of pre/post-consumer

recycled content) internal material utilized within the same process that generated it will not count as recycled content materials. If an organization does purchase or use external recycled content materials and also recycles internal material within the same process, the percentage of externally purchased recycled content within the internal loop material will be counted toward the total recycled content percentage of the product.

Material Inputs: All incoming materials including: ingredients, collected materials or components, reclaimed or recycled materials, virgin materials and/or purchased materials.

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

Post-Consumer Recycled Content: Material that has reached its intended end-user of the product and is no longer being used for its intended purpose. This material can be generated by households or by commercial, industrial, and institutional facilities. This includes returns of material from the distribution chain.

Pre-Consumer Recycled Content: Material diverted from the waste stream during a manufacturing process that never reached the end-user. A waste or recovered material that has been reprocessed, by another manufacturing process prior to use, can be classified as pre-consumer. Excluded is reutilization of materials such as rework, regrind, or scrap generated in a process and capable of being reclaimed with the same process that generated it without being modified.

Pilot Product: This is a product that is in an engineering-build phase in which the product was recently launched or soon to be launched and have limited production data.

Recycled Content: Proportion, by mass, of recycled material in a product, material, or packaging. Only pre-consumer and post-consumer materials shall be considered as recycled content.

Recycled Material: Material that has been reprocessed from recovered (reclaimed) material by means of a manufacturing process and made into a final ingredient, raw material, or component for incorporation into a product.

Recovered (reclaimed) Material: Material that would have otherwise been disposed of as a waste or used for energy recovery but has instead been collected and recovered (reclaimed) as a material input, in lieu of new primary material, for a recycling or manufacturing process.

Recycler: An organization that performs collection and processing of materials and makes it into another usable raw material or product so the recycled materials can be reutilized in the production of new products or materials.

Reusable: Products that are designed to be, and can be, used more than once.

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 US infrastructure in order to be considered “recyclable”.

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

12.0 Reference Documents

16 CFR 260.13 *Federal Trade Commission – Recycled content claims*

ISO 14021:2016 *Environmental labels and declarations -- Self-Declared environmental claims (Type II environmental labeling)*, The International Standards Organization

The Federal Trade Commission’s Green Guides (2012) - *Guides for the Use of Environmental Marketing Claims*

ISO/IEC 170965:2012 *Conformity assessment -- Requirements for bodies certifying products, processes, and services*, The International Standards Organization

LEED Materials and Resources (MR) credit, U.S. Green Building Council

Amendment History

Date	Issue	Summary of Amendments
1/01/2011	Rev. 0	Official issue date of document.
7/15/2014	Rev.1	Update certification boundary to include language surrounding internal regrind recycled content.
6/30/2015	Rev. 2	Update basic language and definitions.
3/18/2019	Rev. 3	Update various language and definitions per revised internal procedures.
6/9/2022	Rev. 4	Update various language and definitions per revised internal procedures.
3/14/2023	Rev. 5	Added pilot product language and definitions

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