Policy for Accrediting Assessment Bodies Operating within the Cradle to Cradle Certified™ Product Certification Scheme

Version 1.3

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**THE CRADLE TO CRADLE CERTIFIED PRODUCTS PROGRAM**

**POLICY FOR ACCREDITING ASSESSMENT BODIES**

**REVISION HISTORY**

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1 General

1.1 Purpose

The purpose of this policy is to delineate the process for accrediting Assessment Bodies to operate within the Cradle to Cradle Certified™ Product Certification Scheme.

1.2 Applicability

This policy applies to Assessment Bodies operating within the Cradle to Cradle Certified Products Certification Scheme seeking initial accreditation or maintaining accreditation.

2 NORMATIVE REFERENCES

ISO 9001:2011, Quality Management Systems

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

ISO 14025, Environmental labels and declarations -- Type III environmental declarations -- Principles and procedures

ISO 19011, 2011, Guidelines for auditing management systems

Cradle to Cradle Certified™ Product Standard

Cradle to Cradle Certified™ Material Health Assessment Methodology

3. DEFINITIONS

3.1 Assessment Body (AB): An entity accredited by the C2CPII to conduct assessments sufficient in scope and rigor to support a certification decision based on the Cradle to Cradle Certified Product Standard (the ‘standard’). ABs may be accredited to conduct full assessments or assessments limited to specific categories of the standard.

3.2 Accredited Assessor (AA): An individual trained by the C2CPII to conduct Cradle to Cradle product certification assessments under the auspices of an accredited AB. The individual may be accredited to conduct full assessments or assessments limited to specific categories of the standard.
3.3 Certification Body (CB): An entity accredited by the C2CPII to perform conformity audits, render certification decisions, and issue certificates based on the standard in accordance with the principles of ISO 17065.

3.4 Certification Scheme Owner (Scheme Owner): The Cradle to Cradle Products Innovation Institute (C2CPII).

3.5 Cradle to Cradle Certified Product Standard (the ‘standard’): The governing standard that serves as the basis for all Cradle to Cradle product certifications.

3.6 Suspension: Accreditation is not in effect due to AB non-conformance to the terms of agreed upon corrective actions, or independent discovery of AB non-conformance with this policy.

3.7 Termination: An AB elects to cease its operations within the certification scheme.

3.8 Withdrawal: Accreditation is revoked due to a failure to execute agreed upon corrective action, AB malfeasance, or discovery of illegal acts by an AB.

4 QUALIFICATIONS

4.1 Quality Assurance: The AB shall maintain quality procedures to ensure uniformity of assessment practices.

4.1.1 Documentation
   a) Statements of quality policy and objectives
   b) Documentation and records maintained in a controlled system sufficient to effectively perform assessments in accordance with the standard and Cradle to Cradle Certified Product Certification Scheme.

4.1.2 Management
   a) Management shall be committed to the development and implementation of quality assurance.
   b) Management shall ensure availability of resources.
   c) Management shall ensure sufficient planning to establish measurable and consistent quality objectives.
   d) Management shall define and communicate responsibilities and authorities of personnel performing standard assessments.

5 SERVICE DELIVERY
5.1 General Requirements

5.1.1 AB shall be a legal entity.

5.1.2 Specific addresses of all locations of AB operations shall be provided to the C2CPII. Locations of individuals working from home or telecommuting are not part of this requirement.

5.1.3 AB shall enter into legally enforceable agreements with clients engaging in Cradle to Cradle Certified assessment services.

5.1.4 AB shall demonstrate adequate mechanisms for addressing financial and liability issues.

5.1.5 AB shall have policies establishing non-discriminatory conditions for conducting assessments.

5.1.6 AB shall have policies and procedures in place to ensure confidentiality and the security of confidential information.

5.1.7 AB shall make public information available in accordance with the policies of the C2CPII.

5.1.8 AB shall maintain adequate systems and resources to ensure assessments are completed in a timely fashion, and shall take measures to ensure it does not provide cause for certification extensions.

5.2 Structural Requirements

5.2.1 AB shall maintain accurate documentation of management and staff duties, responsibilities, and authorities.

5.2.2 AB shall have a mechanism for safeguarding impartiality.

5.3 Resource Requirements

5.3.1 Human Resource

a) AB shall maintain a staff and contractors in sufficient number to effectively operate within the requirements of the certification scheme

b) AB shall ensure and document staff and contractors are qualified to fulfill the requirements of operating within the certification scheme.

(i) Education: Individual assessors must have at a minimum a degree from an accredited institution equivalent to a United States Bachelor of Arts, Bachelor of Science, or an United States equivalent advanced degree in
physical/biological science, engineering, or a quantitative field: mathematics, economics, or statistics. Other fields with strong quantitative components, e.g. select social sciences, may be considered on an individual basis when approved by the C2CPII Vice President, Science and Certification or Director of Technical Development.

(ii) Experience: Individual assessors must have academic or professional experience in one or more of the main criteria areas of the standard: Material Health, Material Reuse, Water Stewardship, Renewable Energy, and Social Fairness.

(iii) Individual assessors conducting material health assessments in accordance with the standard must have at a minimum a degree from an accredited institution equivalent to a United States Bachelor of Arts or Bachelor of Science in a physical/biological science or engineering, preferably in chemistry or toxicology, or any United States equivalent advanced degree in one of these fields

(iv) Individual assessors conducting material health assessments in accordance with the standard must have two years professional experience, or a combination of two years of degree-track academic work and professional experience performing chemical alternatives and/or chemical hazard assessments.

c) AB shall ensure and document staff and contractors are trained to fulfill the requirements of operating within the certification scheme.

(i) At least two staff members must complete assessor training conducted by the C2CPII. Staff trained by the C2CPII may assume the designation Accredited Assessor. Should the number of staff trained by the C2CPII fall below two, additional staff should be trained by the C2CPII at the earliest possible mutual convenience of the AB and the C2CPII. It is the responsibility of the AB to inform the C2CPII if the number of accredited assessors on staff falls below two. Failure by an AB to report an incidence of accredited assessor staff falling below the threshold level shall result in immediate assignment to provisional status or suspension of accreditation. During the course of remedying a circumstance of insufficient accredited assessor staff, the C2CPII may find it necessary to assign the AB temporary provisional status. The same conditions of provisional certification would apply as those for a new AB seeking accreditation, with the exception that audits overseen by the C2CPII may not be required or the number of such audits could be fewer than three, as determined solely by the C2CPII. At the sole discretion of the C2CPII, provisional accreditation or suspension of accreditation may be required if the AB has no accredited assessors on staff.

(ii) Staff members trained by the C2CPII may train additional staff and verify competence to conduct C2C assessments. Training logs and records with demonstrations of competence are required for each assessor. Staff members trained internally by Accredited Assessors are not Accredited Assessors. Only staff trained by the C2CPII may be designated Accredited Assessors.
(iii) The AB is encouraged to develop additional training materials for internal training of staff in the Cradle to Cradle Certified product assessment methodology. Such training materials are subject to review and approval by the C2CPII.

d) Continuing education: All personnel conducting Cradle to Cradle Certified product assessments must meet the continuing education requirements established by the C2CPII.

e) AB shall maintain personnel records. All personnel records related to qualification to conduct Cradle to Cradle Certified product assessments must be provided to the C2CPII as a requirement of accreditation.

(i) AB shall have a CV or resume for each staff member and contractor conducting Cradle to Cradle Certified product assessments.

(ii) AB shall maintain training logs, records, and demonstrations of competence for each staff member and contractor conducting Cradle to Cradle Certified product assessments.

(iii) AB shall have a confidentiality and conflict of interest contract with each staff member and contractor involved in any way with Cradle to Cradle Certified product assessments. Confidentiality and conflict of interest shall be an ongoing obligation revisited with individual staff at least annually and whenever conditions change, e.g. onboarding new personnel, revision of individual conflict of interest, etc. Such changes shall be documented and transmitted to C2CPII at the time of each occurrence.

5.4 Infrastructure and Workplace Environment

5.4.1 AB shall provide workspace conducive to operating within the certification scheme.

a) Lighting
b) Air quality
c) Chemical exposure
d) Technical infrastructure
e) Sufficient individual and communal workspace

5.4.2 AB shall provide a safe work environment conducive to operating within the certification scheme.

5.5 Resource Evaluation

5.5.1 Outsourcing
AB ensures the following regarding outsourcing of assessment related activities

a) Written outsourcing policies and procedures
b) Outsourcing entity is qualified
c) Outsourcing entity meets AB requirements to perform service
d) Legally binding contract with outsourcing entity
e) System for oversight of outsourced work
f) Complete list of outsourced services
g) Clients are informed of all outsourced services related to assessment services

5.6 AB Operates within Certification Scheme

5.6.1 AB follows all protocols and process steps required by the certification scheme.

5.6.2 AB maintains assessment documentation.
   a) Date of service delivery
   b) Client name and address
   c) Scope of service
   d) Term or expiration date of service
   e) Authorized signature

5.6.3 AB maintains an auditable database of all information sufficient to support a certification recommendation.

5.6.4 AB maintains a document management system capable of accessing all documents essential to the assessment process.

5.6.5 AB has a complaint and appeals policy that meets the requirements of the C2CPII.

6 ACCREDITATION AUDIT PROCESS

The accreditation audit shall be conducted by the scheme owner in accordance with ISO 19011: Guidelines for auditing management systems.

6.1 Documentation

6.1.1 Scheme owner shall provide an application to prospective AB.

6.1.2 Scheme owner shall provide prospective AB with documentation that shall inform the AB of the scope and requirements to attain accreditation.

6.2 Audit Process

6.2.1 The scheme owner reviews application.

6.2.2 The scheme owner decides to accept or reject the application.
6.2.3 If the application is accepted, the scheme owner initiates the accreditation audit process by offering a legally binding document delineating the terms, roles and responsibilities of the AB and C2CPII, including associated costs for attaining accreditation.

6.2.4 The accreditation auditor shall provide AB with an audit plan that includes an audit schedule.

6.2.5 AB shall submit any documentation requested by the auditor prior to the audit.

6.2.6 The auditor and AB shall schedule an audit at a mutually acceptable time.

6.2.7 The auditor and responsible AB representative shall hold an opening meeting that shall establish the scope and terms of the audit, and clarify any questions concerning the audit.

6.2.8 The auditor conducts the audit using the tools and audit protocols established by the scheme owner, in accordance with ISO 19011.

6.2.9 The auditor documents findings in an annotated checklist.

6.2.10 The auditor and responsible AB representative shall hold a closing meeting where the findings are discussed.

6.2.11 The auditor and responsible AB representative agree upon a corrective action plan for any Opportunities for Improvement (OFI) and Non-conformance Reports (NCR.) If agreement cannot be reached, further discussion shall be conducted later between the scheme owner and AB. These discussions may lead to employing the scheme owner’s complaints and appeals process. OFIs shall be revisited and addressed in the next accreditation audit. NCRs shall be closed within 60 days, unless documented circumstances render that timeframe unrealistic. In such cases an appropriate, explicitly defined timeframe may be applied once approved by the auditor and the VP, Science and Certification.

6.2.12 The findings of the audit and corrective action plan are incorporated into a draft report, which is reviewed and approved by authorized scheme owner personnel.

6.2.13 The final approved report is sent to the AB.

6.2.14 The authorized representative of the AB signs and returns the report to the scheme owner.

6.2.15 Authorized scheme owner personnel sign the report and send to the AB.

6.2.16 The scheme owner oversees any corrective action plan execution and closes out OFIs and NCRs.
6.2.17 Accreditation is granted through a fully executed Accreditation Agreement between the AB and C2CPII. *(note: accreditation may be provisional, per the Certification Scheme).*

a) AB is listed on C2CPII website as a Cradle to Cradle Certified Accredited Assessment Body.
b) AB is issued a Cradle to Cradle Certified Accredited Assessment Body badge for use in marketing its services.

### 6.3 Maintaining Accreditation

6.3.1 All requirements for attaining accreditation shall be met throughout the term of accreditation.

6.3.2 Throughout the term of accreditation the scheme owner may issue OFIs and NCRs based on the AB operational activities that do not conform to the scheme’s requirements. OFIs shall be revisited and addressed in the next accreditation audit. NCRs shall be closed within 60 days, unless documented circumstances render that timeframe unrealistic. In such cases an appropriate, explicitly defined timeframe may be applied once approved by the auditor and the VP, Science and Certification.

### 7 SUSPENSION, WITHDRAWAL, and TERMINATION of ACCREDITATION

#### 7.1 SUSPENSION

7.1.1 Failure to close an NCR within the required timeframe shall result in suspension of accreditation until the NCR is closed.

7.1.2 Discovery at any time of AB non-conformance with this policy that compromises the integrity of the C2C Certified Products Program shall result in suspension until conformance is achieved.

7.1.3 All AB activities shall cease at the time of suspension, and may resume only when the scheme owner verifies conformance.

#### 7.2 Withdrawal

7.2.1 An AB may choose to cease performing assessment services in accordance with the terms of its AB Agreement with the scheme owner.
7.2.2 The AB shall make a good faith effort to conclude any assessment activities currently underway at the time of withdrawal, or shall take reasonable steps to ensure continuity of service by another AB, e.g. sharing data, findings, evaluations, etc.

7.3 Termination

7.3.1 If agreed upon corrective action is demonstrated to be irrevocably impossible for the AB to achieve, or the AB chooses not to enact agreed upon corrective action, accreditation shall be terminated.

7.3.2 Discovery of malfeasance in the form of AB activities or statements that undermine the integrity or credibility of the C2CPII Certified Products Program shall result in termination of accreditation.

7.3.3 Discovery of AB engagement in illegal activities shall result in termination of accreditation.