



Recycled Content Standard

Environmental Certification Services

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Recycled Content Standard

Environmental Services Certification Program

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1.0 Purpose, Structure, and Intended Uses

1.1 Purpose

The purpose of the Standard is to describe the requirements for third-party substantiation of the recycled content claims asserted by companies with regard to specific products. This Standard allows a company to demonstrate that:

1. Its products contain materials that are classified using definitions based on ISO 14021:1999(E) Environmental labels and declarations – Self-declared environmental claims (Type II environmental labeling) and United States Code of Federal Regulations Title 40: Protection of the Environment, Part 261- Identification and Listing of Hazardous Waste;
2. Its marketing claims conform with the Federal Trade Commission (FTC) Guides for the Use of Environmental Marketing Claims; and
3. Its products contain materials that conform with the Material & Resources criteria for Recycled Content for building products according to the United States Green Building Council (USGBC) Leadership Energy and Environmental Design (LEED) Green Building rating system.

1.2 Structure of the Standard

The Standard provides:

1. The requirements for qualifying and quantifying materials that serve as the basis for recycled content claims asserted by companies about products;
2. Guidelines for suppliers and private label users; and
3. Labeling requirements that are applicable to all certified products.

1.3 Intended Users

Intended users of this Standard are product manufacturers (including individuals, businesses, organizations, or agencies) seeking third-party certification of conformance of selected products to the requirements of this Standard, as well as individuals, businesses, organizations, agencies, or consumers interested in purchasing products meeting the requirements of the Standard. The Standard also provides guidelines for material suppliers and private label users.

1.4 Voluntary Standard

This Standard is voluntary. It is not intended to replace any legal or regulatory requirements that may be applicable to user operations.

2.0 Scope, Goals, and Limitations

2.1 Scope

The Standard applies to any material used in a product for which the manufacturer is making a claim about the recycled content and type of material in the final product. The Standard allows the input materials to be qualified and quantified for the purposes of making a percentage-based recycled content claim. This includes, but is not limited to, materials that may be classified as post-consumer or pre-consumer recycled. The term “shall” is used

throughout the Standard to indicate mandatory requirements. The term “should” is used throughout the Standard to indicate preferred requirements.

2.2. Goals

The major goals of this Standard are:

1. To provide a uniform standard by which to assess and provide third-party certification of the recycled content of products for manufacturers making Type II environmental claims; and
2. To engender confidence in the marketplace that SCS-labeled products consistently meet the requirements of this Standard [and its normative references].

2.3. Limitations

2.3.1. Health and Safety

The Standard does not address safety, health and performance concerns, if any, associated with its use. Users shall note that compliance with the requirements of this Standard is no guarantee of regulatory compliance at the time of certification or in the period between audits.

It is the responsibility of the user to establish appropriate conditions for such considerations and to determine the applicability of regulatory limitations prior to use.

2.3.2. Environmental Tradeoffs

The Standard does not address any environmental tradeoffs that may be associated with the life-cycle phases of the product(s). Therefore, there may be environmental tradeoffs associated with a certified entity and/or the product it produces.

3.0 Key Terminology

Specific terms and definitions are provided below.

Certification Assessment. Independent evaluation of a product claim using specific, predetermined criteria and procedures with assurance of data reliability.

Certified Product. Finished product and raw materials, subassemblies, components and accessories for which a manufacturer has demonstrated full conformance to the requirements of the standard, and for which the manufacturer is therefore authorized to apply the SCS Certification Label, as evidence that the product complies with the program requirements.

Chain of Custody. The path that a product takes from its point of production to the end consumer, consisting of each entity that takes legal and/or physical possession along this pathway.

Claim. Oral, written, implied, or symbolic representation, statement, or advertising or other form of communication presented to the public or buyers of products that relates to a product's environmental claim such as the percentage of recycled content. An environmental marketing claim must be consistent and compliant with Federal Trade Commission guidelines.

Component. A material or ingredient used in the manufacture of a product.

Content. Proportion, by mass, of a type of material in a product or packaging.

Data Review Period. The 12-month period of time represented by the data submitted for an assessment. This is typically comprised of the four most recent consecutive quarters. The data review period shall be the same for all data included in the review. Data provided for this period shall be for materials used for salable production only.

Note: In the case that requested data are not available for the most recent twelve consecutive months because of an acceptable circumstance, the data review period shall be set by SCS. Acceptable circumstances are subject to the discretion of SCS. If certification is granted based on a limited data review period, additional data may be requested to verify the claim after initial certification, per the auditor's recommendation.

Gross Production. The total amount of product coming off the manufacturing line, including any waste from trimming or finishing, defective products, and all non-saleable material. Not accounted for in gross production is waste generated in-process or prior to manufacturing.

Manufacturer. Organization or individual responsible for the production of the product undergoing certification assessment.

Net Production. The total amount of product manufactured that is of a saleable quality and in a saleable state. Not included in this figure is any scrap from starting up or shutting down a production line, waste from trimming or finishing, defective products, etc.

Post-Consumer Material. Material generated by households or by commercial, industrial, and institutional facilities in their role as end-users of the product that can no longer be used for its intended purpose. This includes returns of materials from the distribution chain. (Source: ISO 14021:1999)

Note: For the purposes of the SCS certification program this is being interpreted to mean that any material returned from the distribution chain must meet the requirement of being from end-users to be considered post-consumer.

Pre-Consumer Material. Material diverted from the waste stream during the manufacturing process. Excluded is the reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it. (Source: ISO 14021:1999)

Private Label Customer. The primary entity that purchases a SCS certified product directly from a SCS Certified Client for the purpose of selling said product as a private label product, with only label and/or packaging modifications.

Post-Industrial Material. Another name for pre-consumer material. Use of the term, "post-industrial material" has been phased out.

Recycled Material. Material that has been reprocessed from recovered [reclaimed] material by means of a manufacturing process and made into a final product or into a component for incorporation into a final product. (Source: ISO 14021:1999)

Note: SCS may interpret a material to be recycled if it is "used, reused, or reclaimed" according to United States Government Code of Federal Regulations Title 40: Protection of Environment Part 261.1:

(4) A material is "reclaimed" if it is processed to recover a usable product, or if it is regenerated...

(5) A material is “used or reused” if it is either:

(i) Employed as an ingredient (including use as an intermediate) in an industrial process to make a product (for example, distillation bottoms from one process used as feedstock in another process). However, a material will not satisfy this condition if distinct components of the material are recovered as separate end products (as when metals are recovered from metal-containing secondary materials); or

(ii) Employed in a particular function or application as an effective substitute for a commercial product (for example, spent pickle liquor used as phosphorous precipitant and sludge conditioner in wastewater treatment).

Records. Any information in written, visual, or electronic form that documents the activities undertaken by a user to demonstrate conformance with this Standard.

Stakeholders. People who are, or who might be, affected by any action taken by users of this Standard. Examples include: customers, workers, partners, contractors, suppliers, etc.

Standard. When capitalized, refers to this Standard (SCS Recycled Content Standard).

Supplier. Organization that supplies a material, product or service to the manufacturer.

Traceability. The ability to trace materials and/or products sequentially throughout a manufacturing process and/or value chain in a way that is verifiable through objective evidence.

4.0 Referenced Documents

4.1. Normative References

The following normative documents contain provisions that, through reference in this text, constitute provisions of this Standard.

1. ISO 14021:1999, “Environmental labels and declarations – Self-declared environmental claims (Type II environmental labeling).”
2. ISO 14024:1999, “Environmental labels and declarations – Type I environmental labeling – Principles and procedures.”
3. ISO 14020:2000, “Environmental labels and declarations – General principles.”

4.2. Additional References

1. U.S. Green Building Council Leadership in Environmental and Energy Design (LEED) Green Rating Guides (available at: www.usgbc.org)
2. Federal Trade Commission (FTC) Guides for the Use of Environmental Marketing Claims (available at: www.ftc.gov)
3. ISO 9001:2000, “Quality management systems – Requirements.”
4. ISO 14001:2004, “Environmental management systems – Requirements with guidance for use.”
5. ISO/IEC Guide 65:1996, “General requirements for bodies operating product certification systems”

5.0 Requirements

This section of the Standard describes general conformance requirements for manufacturers.

5.1. General Conditions

5.1.1. Traceability

Traceability practices shall be employed by the manufacturer to ensure that products conforming to the Standard can have their material basis tracked back to the origin of all input materials.

5.1.2. Chain of Custody

5.1.2.1. Tracking Forward

Practices shall be employed by the manufacturer to assure that products conforming to the Standard can have their material basis tracked forward through the chain of custody, and to ensure that labeled products at the point of sale are conformant with the requirements of the Standard.

5.1.2.2. Segregation

The manufacturer shall maintain a documented procedure for segregating and clearly identifying conformant and non-conformant products in stages such as receiving, storage, transfer to shipping, and shipping.

5.2. Requirements for Material Qualification & Quantification

5.2.1. Material Qualification [Process]

5.2.1.1. Product Performance Testing

The manufacturer should provide documentation of product efficacy and/or performance tests specific to product type. Examples include performance testing for strength, flexural, fire resistance, etc.

5.2.1.2. Manufacturing Process Description

The manufacturer shall provide a diagram and description of the manufacturing process showing all inputs of materials, all internal material flows (e.g., reuse or recycling of scrap) and all material outputs.

5.2.1.3. Supplier Verification & Validation

The manufacturer shall provide letters of affidavit from each¹ supplier of recycled material. The affidavit shall include information about the material composition, the material source(s), and processes occurring before reaching the manufacturer. The affidavit shall be signed by a duly authorized representative of the supplier company. Suppliers may be contacted by SCS to confirm validity and, on condition of their consent, may be subject to further review.

At its discretion, SCS may choose to employ alternative or supplemental means of qualifying sources of recycled material.

¹ At its discretion SCS may choose to validate a representative and/or statistically significant set of suppliers.

If SCS is unable to obtain information considered necessary to determine product conformance, the assessment may cease and the product may be deemed non-certifiable.

5.2.1.4. Records of Suppliers

The manufacturer shall maintain records that demonstrate it has an active business relationship with each supplier of recycled material. These records might include invoices, bills of lading, or delivery receipts.

5.2.1.5. Registry of Suppliers

The manufacturer shall maintain records of current suppliers and supplies.

5.2.2. Material Quantification [Production]

5.2.2.1. Material Supply Data

Summary data containing the amount of recycled material obtained from each supplier of material under review shall be maintained and provided for the data review period. Data should be provided on a dry weight measurement basis, or in standard reporting units with any conversion(s) that allow(s) calculation to a dry weight basis.

5.2.2.2. Product Formulation

The manufacturer shall provide the formulation/composition of each of the finished products under review. These data shall include a list of all components, the amount (by dry weight or some other measure that can be converted to dry weight) of each component in the finished product, and the percentage of each component in the finished product (total dry weight basis).

5.2.2.3. Scrap Reuse and Waste Rates

For the material used in each product under review, the manufacturer shall maintain records for the data review period of the amounts and units of measurement for scrap generated and reused and the waste generated and sent to disposal, incineration, or additional recycling.

5.2.2.4. Gross Production Totals

For the material of each product under review, the manufacturer shall provide gross production totals (numbers of units and weight of units) for the data review period.

5.2.2.5. Recycled Material Inventories

The manufacturer shall maintain inventory records of the amount and types of recycled materials used in the product for the previous four consecutive quarters preceding the certification assessment.

5.2.2.6. Mass Balance

For the scope of every assessment, a mass balance calculation with the data supplied in 5.2.2 must demonstrate that there are sufficient supplies of recycled material to produce the amount of product reported.

5.3. Requirements for Management

5.3.1. General Requirements

The manufacturer shall operate a quality management system appropriate to its size and operations to ensure adequate and continued compliance to the Standard. At a minimum the manufacturer shall:

- a) Maintain documented procedures for attaining and maintaining compliance to the Standard;
- b) Have and implement a process for reviewing and updating procedures to current practices; and
- c) Maintain complete and organized documents and records demonstrating compliance to all sections of the Standard for at least 5 years.

5.3.2. Roles and Responsibilities

The manufacturer should maintain and communicate clearly articulated roles and responsibilities for affected management and staff.

5.3.2.1. Staff

The manufacturer shall demonstrate that qualified personnel conduct operations affecting the implementation of the Standard's requirements.

5.3.2.2 Training

The manufacturer should maintain procedures to ensure that personnel who conduct operations affecting the implementation of the Standard's requirements have adequate training and experience.

5.3.3. Corrective and Preventative Action

The manufacturer shall establish and maintain documented procedures for implementing corrective and preventive action including:

- a) The effective handling of customer complaints and reports of product nonconformities as they relate to the application of the Standard;
- b) Investigation of the cause of these nonconformities relating to product, process and quality system, and recording the results of the investigation;
- c) Determination of the corrective action needed to eliminate the cause of nonconformities; and,
- d) Application of controls to ensure that corrective action is taken and that it is effective.

6.0 Evaluation of Requirements

6.1. Desk Audit

The manufacturer shall submit all necessary forms, records, documents, and data to SCS for review. The auditor will review the submitted evidence and assess the manufacturer's conformance with respect to the requirements of the Standard (Section 5.0 Requirements).

6.2. Site Audit

The manufacturer shall undergo an onsite audit of each location involved in the manufacturing of the products under review for recycled content certification. The auditor will assess each site for conformance with respect to the requirements of the Standard (Section 5.0 Requirements).

6.3. Audit Findings

After the completion of the desk or site audit the auditor may have formal audit findings regarding the degree of the manufacturer's compliance with the requirements of the Standard. The three types of findings include:

6.3.1. Non-Conformity

Non-conformities, defined as non-fulfillment of a specified requirement, shall be adequately resolved through root-cause analysis and corrective/preventative action before certification can be granted.

6.3.2. New Information Request

New information request, defined as a request for mandatory information that may be necessary to determine compliance, shall be adequately resolved through root-cause analysis and corrective/preventative action within an established deadline.

6.3.3. Opportunity for Improvement

An opportunity for improvement, defined as a concept that will surpass minimum requirements, should be adequately resolved through root-cause analysis and corrective/preventative action within an established deadline.

7.0 Guidelines for Suppliers and Private Label Users

7.1. Suppliers

The manufacturer shall provide and facilitate the availability of supplier information relevant to the certified claim.

7.2. Private Label Customers

7.2.1. Conditions for Use of Certification Label

Private Label Customers are permitted to use the SCS Certification Label as a pass-through certified claim only, as delineated in the *SCS Private Label Requirements Annex* to the *SCS Services Agreement* and the *SCS Certification, Validation and Verification Program Labeling and Language Guidelines*.

7.2.2. No Changes

Private Label Customers are not permitted to make any changes to the final product before it is sold, or embellish the recycled content or other environmental claims associated with the product.

7.2.3. Application and Fees

Such users are required to obtain permission for private label use by obtaining and completing the *SCS Private Label Application* form, and are subject to rules and administrative fees for using the SCS Certification Label.

8.0 Certification and Continued Conformance

8.1. Certification

Once a product qualifies for certification, based on conformance with the Standard, an SCS Recycled Content certificate of achievement is issued. Certificates are valid for one year, provided that the manufacturer maintains conformance with the requirements.

8.2. Continued Conformance

An annual audit to demonstrate continued conformance with the Standard is required if the manufacturer wishes to continue making a certified claim.

8.3. Notice of Change

If the manufacturer makes changes to its products or processes that affect its conformance with the requirements of the Standard, it shall notify SCS of these changes.

9.0 Labeling Requirements

9.1. National Requirements

All uses of the SCS Certification Label or references to the certification on the product and in product advertising shall be conducted in conformance with U.S. Federal Trade Commission guidelines or other national guidelines if outside of the U.S.

9.2. SCS Requirements

9.2.1. Guidelines

The manufacturer shall comply with the requirements of the *SCS Certification, Validation and Verification Program Labeling and Language Guidelines* at all times.²

9.2.2. Trade names

A certified and non-certified product cannot have the same trade name or trademarked designation.

10.0 Complaints, Appeals and Disputes

10.1. Complaints

All complaints, appeals and disputes are handled in accordance with the *SCS Complaint, Appeals and Disputes Procedure*.³

² Provided as a supplement to the SCS Assessment Services Agreement. This document is also available on the SCS website at: www.scscertified.com and upon request.

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