



General

The Recycled Content Certification Program (RCCP) is developed under the environmental standards and guiding principles of the International Climate Intelligence System (ICIS). The RCCP provides a structured, transparent, and verifiable framework for assessing and certifying the use of recycled content in materials and products.

This program supports circular economy practices by encouraging manufacturers and supply chains to reduce dependence on virgin resources and increase the integration of post-consumer and post-industrial recycled inputs. Aligned with ISO 14021 and other relevant international standards, RCCP enhances credibility and comparability in environmental reporting.

The RCCP contributes to sustainable development by:

- **Standardization:** Offering a harmonized approach to measuring and declaring recycled content.
- **Accountability:** Promoting accurate and evidence-based documentation.
- **Recognition:** Supporting organizations in making verified environmental claims.
- **Compliance:** Enabling alignment with regulatory and voluntary market requirements.

Through rigorous third-party verification and life-cycle considerations, RCCP strengthens environmental claims and fosters greater market trust in sustainable product labeling.

Disclaimer for Recycled Content Certification Program (RCCP)

The content in this document is intended for informational purposes only and serves as a general introduction to the Recycled Content Certification Program (RCCP) under ICIS. It does not constitute legal, compliance, or regulatory advice.

While efforts have been made to ensure the accuracy and relevance of the information provided, users are encouraged to consult the latest version of ICIS guidelines and applicable environmental standards. Certification procedures and requirements are subject to revision and updates; therefore, stakeholders should regularly check www.climateintell.com for the most current documentation.

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1.0 INTRODUCTION

Recycled content refers to the portion of materials in a product that have been diverted from the waste stream, either during the manufacturing process (pre-consumer) or after consumer use (post-consumer). The RCCP provides independent verification that products contain the specified amount and type of recycled materials, offering credibility to sustainability claims and helping organizations demonstrate their commitment to circular economy principles. This certification plays a pivotal role in global sustainability initiatives by encouraging resource conservation, waste reduction, and lower environmental impacts across product lifecycles. As businesses and governments worldwide intensify their focus on sustainability, recycled content certification has become increasingly valuable for demonstrating environmental responsibility, meeting procurement requirements, and satisfying consumer demand for eco-friendly products.

ICIS (www.climateintell.com) has developed this certification framework to harmonize standards across industries and geographies. By aligning with international climate and resource efficiency standards, this program helps create market recognition for products with genuine recycled content while preventing greenwashing and unsubstantiated claims. Certification provides multiple benefits, including enhanced brand reputation, access to green markets and sustainable procurement opportunities, compliance with evolving regulations, and measurable contributions to sustainability goals and carbon footprint reduction. As we transition toward a more circular economy, this certification serves as a critical tool for validating authentic progress in material resource efficiency.

2.0 PURPOSE

This document serves as a comprehensive guide for manufacturers, suppliers, recyclers, and other stakeholders seeking to understand and fulfill the documentation requirements for the RCCP. Its primary purpose is to clarify the specific documentation needs throughout the certification process, from initial application to ongoing compliance and renewal. By providing accessible, straightforward guidance, we aim to simplify the certification journey for organizations of all sizes and across diverse industry sectors. The document outlines documentation requirements in clear, actionable terms, helping stakeholders prepare thoroughly while avoiding unnecessary administrative burden.

Additionally, this guide helps align stakeholder understanding with ICIS documentation standards, ensuring consistency across global sustainability reporting and certification processes. By following these guidelines, organizations can demonstrate their commitment to transparent, verifiable recycled content claims that meet both regulatory requirements and consumer expectations.

The document will serve as a reference throughout your certification journey, providing clarity on what documentation is needed, when it should be prepared, how it should be formatted, and who is responsible for its creation and verification. By adhering to these requirements, you'll help build a more transparent and trustworthy recycled materials marketplace.

3.0 OVERVIEW OF ICIS'S FRAMEWORKS

The ICIS provides the foundational framework for the RCCP. Developed as a comprehensive approach to climate and sustainability documentation and verification, ICIS creates standardized methods for measuring, reporting, and validating environmental claims across global supply chains. At its core, the ICIS framework emphasizes data integrity, transparency, and scientific rigor. It incorporates internationally recognized methodologies for quantifying recycled content while allowing sufficient flexibility to accommodate diverse industry sectors and material types. This balance between standardization and adaptability makes ICIS particularly valuable for establishing credible recycled content certification processes.

3.1 Key ICIS's Principles

Key ICIS's principles are:

- Materiality and relevance of environmental data
- Completeness of scope and boundary definitions
- Consistency in measurement methodologies
- Transparency in data collection and reporting
- Accuracy and precision in quantification

3.2 ICIS's Documentation Approach

ICIS's documentation approaches:

- Standardized templates and formats
- Clear chain of custody requirements
- Evidence-based verification processes
- Tiered assurance levels
- Integrated data management systems

3.3 Integration with Global Sustainability Standards

By adopting the ICIS framework, the RCCP ensures alignment with other major sustainability initiatives and reporting frameworks, including the Greenhouse Gas Protocol, Science Based Targets initiative, and various Environmental Product Declaration systems. This integration helps organizations leverage their sustainability data across multiple reporting requirements, reducing duplication of effort while increasing the value of certification.

4.0 LEGAL AND REGULATORY CONTEXT

The RCCP operates within a complex and evolving legal and regulatory landscape. Understanding this context is essential for organizations seeking certification, as it influences documentation

requirements and verification processes. While specific regulations vary by region and industry, several key frameworks shape the global approach to recycled content claims and certification.

4.1 Global Framework

The United Nations Sustainable Development Goals (particularly SDG 12 on Responsible Consumption and Production) and the Paris Climate Agreement provide high-level direction for resource efficiency and circular economy initiatives. The Basel Convention governs transboundary movements of recyclable materials, while ISO 14021 sets standards for environmental claims including recycled content.

4.2 Regional Regulations

The European Union's Circular Economy Action Plan, Packaging and Packaging Waste Directive, and Single-Use Plastics Directive establish minimum recycled content requirements for certain products. In North America, the U.S. Federal Trade Commission's Green Guides and various state-level recycled content mandates (e.g., California, Washington) set requirements for claims and minimum content levels.

4.3 Industry Standards

Sector-specific standards include the Global Recycled Standard (textile industry) and International Standard Organisation (ISO). These programs establish verification methodologies and documentation requirements that have informed the ICIS approach.

Organizations must ensure their recycled content documentation complies not only with ICIS requirements but also with the specific regulations in their target markets. The certification program is designed to facilitate this compliance by incorporating elements required by major regulatory frameworks while maintaining a consistent, streamlined approach to documentation.

As regulations continue to evolve toward more stringent recycled content requirements and verification needs, the ICIS framework will be updated accordingly. Organizations are encouraged to monitor ICIS's platform for regulatory updates that may affect certification requirements.

5.0 REQUIRED TYPE OF DOCUMENTATION

The RCCP requires a comprehensive set of documentation to verify claims and ensure compliance with program standards. These documents establish the foundation for certification and ongoing verification, providing evidence of recycled content sourcing, processing, and final product composition.

Document Category	Required Documents	Purpose
Declarations	Recycled Content Declaration Form, Supplier Declaration of Conformity	Formal statements attesting to recycled content percentages and compliance with program requirements

Process Documentation	Material Flow Diagrams, Process Descriptions, Batch Formulations	Demonstrates how recycled materials are incorporated into products and traces material flows
Verification Evidence	Test Reports, Supplier Certificates, Chain of Custody Records	Provides objective evidence supporting recycled content claims
Compliance Records	Regulatory Compliance Statements, Legal Documentation	Shows adherence to relevant laws and regulations governing recycled materials
Quality Assurance	Quality Control Procedures, Nonconformance Reports	Demonstrates systems for maintaining consistent recycled content levels

All documentation must be current, accurate, and maintained in an organized system that facilitates review during certification and audit processes. Electronic documentation is preferred, when possible, with secure backup systems in place to prevent data loss. Organizations should establish clear document control procedures, including version tracking, approval processes, and regular review cycles.

For multi-site operations or complex supply chains, additional documentation may be required to establish clear boundaries and responsibilities. Small and medium enterprises may benefit from the simplified documentation options available through ICIS’s platform, which provides templates and guidance tailored to organizational size and complexity.

Documentation must be available in English or include English translations when documents originate in other languages. Technical terms should be clearly defined, and calculations should include explanations of methodologies used. All documentation must be retained for a minimum of five years from the date of certification or as required by applicable regulations, whichever is longer.

6.0 ROLES AND RESPONSIBILITIES

Effective documentation management for recycled content certification requires clear depiction of roles and responsibilities throughout the organization and supply chain. Understanding who is responsible for producing, reviewing, and maintaining various documents ensures accountability and facilitates smooth certification processes.

- **Manufacturers:** Primary responsibility for overall documentation package, final product specifications, recycled content calculations, and claims verification. Must designate a Certification Coordinator to oversee the process and serve as the main contact point with certification bodies.

- **Suppliers:** Responsible for providing accurate documentation on the recycled content of supplied materials, including material declarations, chain of custody documentation, and any relevant test reports or certifications for their products.
- **Internal Auditors:** Conduct regular reviews of recycled content documentation, verify compliance with internal procedures, identify gaps or inconsistencies, and recommend corrective actions before external verification.
- **External Certifiers:** Perform independent verification of documentation, conduct site assessments, validate recycled content claims, and issue certification decisions based on objective evidence provided.

Cross-functional collaboration is essential for comprehensive documentation. Product development teams must work with procurement, manufacturing, quality control, and sustainability departments to ensure accurate tracking and reporting of recycled content throughout the product lifecycle. Legal and compliance teams should review claims and documentation to ensure alignment with regulatory requirements.

For organizations with integrated management systems, recycled content documentation responsibilities should be incorporated into existing roles and procedures. This integration helps ensure consistency and efficiency while reducing duplication of effort. The designated Certification Coordinator serves as the central point for document collection, organization, and submission, regardless of which departments generate individual components.

Training requirements vary by role, with all personnel involved in recycled content documentation needing basic awareness training on program requirements. Those directly responsible for generating or verifying critical documentation should receive more comprehensive training on specific methodologies, calculation techniques, and verification procedures as outlined in ICIS guidance materials.

7.0 APPLICANT ELIGIBILITY CRITERIA

The RCCP is designed to accommodate a wide range of organizations while maintaining rigorous standards for certification. Understanding eligibility criteria helps potential applicants determine if their products and processes qualify for certification before investing significant resources in the documentation process.

7.1 Organizational Eligibility

- Legally registered business entities or non-profit organizations.
- Manufacturers, processors, or brand owners with direct control over product specifications.

- Organizations with established quality management systems (ISO 9001 certification preferred but not required).
- Entities able to demonstrate at least six months of consistent recycled content use.
- Compliance with all applicable environmental regulations (no major violations in the past 24 months).

7.2 Product Eligibility

- Finished products or intermediate materials containing verifiable recycled content.
- Products that meet applicable safety and performance standards for their intended use.
- Products with established batch or lot identification systems for traceability.
- Products where recycled content does not compromise essential product functions.
- Products with documented consistent formulations or manufacturing processes.

7.3 Minimum Recycled Content Thresholds

- **Plastics:** Minimum 10% postconsumer or 25% pre-consumer recycled content.
- **Paper/paperboard:** Minimum 30% post-consumer or 50% pre-consumer recycled content.
- **Metals:** Minimum 15% postconsumer or 25% pre-consumer recycled content.
- **Textiles:** Minimum 20% postconsumer or 30% pre-consumer recycled content.
- **Construction materials:** Varies by specific material type (see detailed guidance).

Special considerations exist for innovative products and emerging technologies. Organizations developing new recycling processes or working with novel recycled materials may qualify for conditional certification with modified documentation requirements. These modified requirements focus on establishing proof of concept and verifying the recycling process while recognizing that standard thresholds may not initially be achievable.

Small and medium enterprises (SMEs) may access simplified documentation requirements and phased implementation options that recognize potential resource constraints while maintaining certification integrity. ICIS's platform provides specific guidance for SMEs, including streamlined templates and calculation tools.

Pre-assessment services are available to help organizations determine eligibility before beginning the full certification process. These optional assessments review basic organizational and product information to provide preliminary feedback on eligibility and identify potential documentation challenges.

8.0 CERTIFICATION PROCESS OVERVIEW

The recycled content certification process follows a structured pathway from initial application through assessment, certification decision, and ongoing compliance monitoring. Understanding this process helps organizations prepare appropriate documentation at each stage and allocate resources effectively throughout the certification journey.

8.1 Application Submission

Organization submits application form, preliminary documentation, and scope definition. Required documents include company profile, product specifications, recycled content sources, and preliminary calculations. Application review typically takes 2-3 weeks, after which eligible applicants receive documentation checklists tailored to their specific products and processes.

8.2 Documentation Preparation

Organization compiles comprehensive documentation package according to program requirements. This includes detailed material flow analyses, supplier declarations, calculation methodologies, test reports, and quality control procedures. ICIS templates from climateintell.com streamline this process. Documentation preparation typically takes 4-8 weeks depending on organizational complexity.

8.3 Assessment and Verification

The Certification body reviews documentation and conducts verification activities, which may include remote document review, supplier verifications, site visits, and product testing. Assessment focuses on traceability, calculation accuracy, and evidence validity. Organizations must address any identified non-conformities or documentation gaps within specified timeframes (typically 30-60 days).

8.4 Certification Decision

Based on assessment results, the certification body decides to grant, defer, or deny certification. Successful applicants receive a formal certificate valid for three years, with annual surveillance requirements. Certification includes permissions to use the Recycled Content Certification mark according to program rules. Decisions typically occur within 4 weeks of completed assessment.

8.5 Ongoing Compliance and Renewal

Certified organizations maintain documentation systems, undergo annual surveillance activities, and report significant changes to products or processes. Full recertification occurs every three years, requiring updated documentation and comprehensive reassessment. Organizations must maintain records of internal monitoring between external assessments.

Throughout this process, the ICIS framework provides standardized templates and methodologies that streamline documentation preparation while ensuring consistency and comparability across certified products. ICIS's platform offers process tracking tools that help organizations monitor their progress through each certification stage and anticipate upcoming documentation needs.

For organizations with multiple products or facilities, phased certification approaches are available to manage resource requirements effectively. These approaches allow sequential certification of product lines or facilities while maintaining the integrity of individual certifications.

9.0 CHAIN OF CUSTODY DOCUMENTATION

Chain of custody documentation forms a critical component of the Recycled Content Certification Program, establishing traceability for recycled materials from their origin through processing and into final products. This documentation verifies that claimed recycled content actually flows through the supply chain as reported, maintaining the integrity of certification claims.

- **Material Sourcing:** Documentation identifies original source of recycled materials, distinguishing between pre-consumer and post-consumer sources with supplier declarations, collection receipts, and waste transfer notes.
- **Processing:** Processing records demonstrate how recycled materials are prepared for use, including sorting, cleaning, and conversion records with batch identification and processing dates.
- **Transfer:** Transportation and transfer documentation shows material movements between supply chain stages with shipping records, bills of lading, and material transfer forms.
- **Manufacturing:** Production records demonstrate incorporation of recycled materials into final products, including batch formulations, production logs, and material balance calculations.

Organizations must implement one of three recognized chain of custody models based on their specific operational context: Identity Preservation (physical segregation and tracking of specific recycled material batches), Mass Balance (reconciliation of recycled material inputs and outputs over time while allowing mixing), or Book and Claim (certificate trading system for recycled content attributes). Each model has specific documentation requirements detailed in ICIS guidance materials.

Digital traceability systems are increasingly important for efficient chain of custody documentation. While not mandatory, electronic tracking systems, block-chain applications, and integrated enterprise resource planning modules can significantly enhance documentation reliability and reduce administrative burden. The certification program recognizes several approved digital platforms that align with documentation requirements.

For complex supply chains involving multiple tiers of suppliers, documentation responsibilities must be clearly defined. Primary certificate holders typically maintain overall responsibility for chain of custody integrity, collecting and verifying documentation from upstream suppliers through formal agreements. Supplier audits, either conducted by the certificate holder or third parties, provide additional verification of chain of custody documentation accuracy.

10.0 RECYCLED CONTENT CALCULATION METHODS

Accurate calculation of recycled content percentages forms the foundation of credible certification claims. The RCCP recognizes several calculation methodologies, each appropriate for different material types and manufacturing processes. Organizations must select and consistently apply the

appropriate method for their products, documenting both the calculation process and supporting evidence.

10.1 Weight Based Method

- **Application:** Most solid materials (plastics, metals, paper).
- **Formula:** $\text{Weight of recycled content} \div \text{Total product weight} \times 100\%$.
- **Required documents:** Material weight records, batch formulations, scale calibration records.

10.2 Volume Based Method

- **Application:** Liquids, some construction materials.
- **Formula:** $\text{Volume of recycled content} \div \text{Total product volume} \times 100\%$.
- **Required documents:** Volume measurement records, density calculations, metering system verification.

10.3 Attribution Method

- **Application:** Continuous process with material mixing.
- **Formula:** Input-output balance over defined time period with allocation rules.
- **Required documents:** Material input-output logs, allocation methodology explanation, process flow diagrams.

10.4 Component Method

- **Application:** Multi-component products.
- **Formula:** Weight average of recycled content across components.
- **Required documents:** Component bills of materials, assembly diagrams, component weight verification.

Organizations must clearly distinguish between pre-consumer (post-industrial) and post-consumer recycled content in their calculations and documentation. Different regulatory frameworks and certification levels may apply different weighting factors to these recycled content types, potentially affecting overall calculated percentages. The ICIS framework provides specific guidance on how to categorize and document various recycled material sources to ensure consistency.

Calculation boundaries must be clearly defined and documented. For products with complex manufacturing processes, organizations must establish where in the process recycled content is measured and how process losses are accounted for. The selected boundaries should be consistent with industry norms and clearly explained in documentation.

Calculation verification requires multiple forms of evidence. Direct measurements (weight, volume) must be supported by calibrated measurement systems with verification records. Material origin claims require supplier documentation and may necessitate supplier audits. Mass balance calculations require comprehensive input-output records over defined time periods. ICIS's platform provides calculation tools and templates that incorporate proper documentation requirements for each calculation method.

11.0 TEST METHODS AND LABORATORY REPORTS

In many cases, laboratory testing plays a crucial role in verifying recycled content claims, particularly for materials where visual inspection or supplier documentation alone cannot provide sufficient verification. The RCCP recognizes specific test methods and establishes requirements for laboratory qualifications and report formats to ensure reliable, consistent results.

11.1 Accepted Testing Standards

- ISO 16620 series (Plastics - Biobased and recycled content)
- ASTM D6866 (Carbon dating for biobased materials)
- EN 15343 (Plastics recycling traceability)
- TAPPI T 529 (Paper recycled fiber content)
- ASTM E3212 (Metal recycled content verification)
- ISO 14021 (Self-declared environmental claims)
- EN 15343:2007 (Plastics recycling traceability)
- Product-specific test methods as identified in ICIS guidance

Laboratory testing provides objective verification of recycled content through methods such as chemical marker analysis, isotope testing, spectroscopy, and physical property evaluation. Testing requirements vary by material type and claimed recycled content percentage.

11.2 Laboratory Qualifications

Laboratory qualifications are essential for ensuring test result credibility. Laboratories conducting recycled content verification testing must meet at least one of the following criteria: ISO/IEC 17025 accreditation for the specific test methods used, recognition by relevant industry associations for recycled content testing, or approval by the certification program based on demonstrated competence. Organizations must verify and document laboratory qualifications before accepting test results for certification purposes.

11.3 Test Report Requirements

Laboratory reports must contain specific elements to be considered valid for certification documentation. These include: unique report identifier, testing laboratory identification and qualifications, sample description and chain of custody information, test method reference and any deviations from standard methods, detailed test results with measurement uncertainty, interpretation of results related to recycled content claims, and authorized signature with date. Reports must be current (typically less than 12 months old at time of certification) and directly relevant to the materials being certified.

11.4 Testing Frequency

Testing frequency requirements depend on production volume, material variability, and risk assessment. For high-volume or highly variable production, quarterly testing may be required, while more stable processes with established track records may require only annual verification testing. The certification program provides guidance on determining appropriate testing frequency based

on material type and production characteristics. Organizations must document their testing frequency rationale as part of their overall quality control procedures.

12.0 ENVIRONMENTAL CLAIMS AND LABELING DOCUMENTATION

Once certified, organizations may make specific environmental claims and use approved labeling to communicate recycled content to consumers and other stakeholders. Proper documentation of these claims and labels is essential to ensure accuracy, prevent greenwashing, and maintain certification compliance. All environmental claims and labels must be substantiated by appropriate documentation that connects certification evidence to specific marketing statements.

12.1 Claim Documentation Requirements

- Precise wording of all recycled content claims used in marketing materials.
- Cross-reference to specific certification documentation that supports each claim.
- Approval records showing internal review and authorization of claims.
- Market-specific compliance verification for regulated claims.
- Periodic claim review records showing ongoing validity assessment.

12.2 Labelling Documentation Requirements

- Visual representation of all labels, marks, and icons used.
- Certification scope documentation showing which products are covered.
- Label application control procedures.
- Licensing agreements for certification marks and eco-labels.
- Packaging artwork approval records showing correct label usage.

12.3 Compliance References

- ISO 14021 compliance documentation for self-declared claims.
- Relevant national marketing guidelines (e.g., FTC Green Guides).
- Industry-specific claim requirements.
- Documentation of qualified claims when absolute statements aren't supported.
- Records of claim language translations and market-specific adaptations.

The certification program provides specific language templates and label designs that align with certification levels and types of recycled content. Documentation must show that only approved language and designs are used, with proper distinction between pre-consumer and post-consumer recycled content claims. Organizations must maintain a claims and labeling register that inventories all active claims, connecting each to its supporting documentation and approval status.

Comparative claims require additional documentation, including baseline data, calculation methodologies, and context explanations. When claiming improvements in recycled content, organizations must document the previous content levels, measurement methodologies, and

timeframes to substantiate the comparison. All comparative claims must be specific, quantified, and directly related to the certified products.

Market-specific requirements for environmental claims must be documented for each jurisdiction where certified products are sold. This includes records of legal reviews, compliance assessments, and any necessary adaptations to meet local regulations. For global products, organizations typically maintain a compliance matrix that maps claim language variations to specific market requirements, with supporting documentation for each variation.

13.0 SUPPORTING DATA AND RECORDS

Beyond the core certification documentation, organizations must maintain comprehensive supporting data and records that provide additional verification of recycled content claims. These records establish the ongoing operational evidence that reinforces formal certification documentation and demonstrates consistent compliance with program requirements.

13.1 Historical Records

Organizations must maintain historical data showing recycled content usage over time, including material procurement records, production data, and previous testing results. These records establish the consistency and credibility of recycled content claims. Minimum retention period: 5 years or as required by applicable regulations.

13.2 Quantitative and Monitoring Data

Detailed quantitative records include material purchase volumes, weights, and percentages; inventory management data; production batch records; and mathematical calculations supporting recycled content percentages. These must be maintained in organized, retrievable formats with clear data trails. Electronic data must include backup and recovery provisions.

Ongoing monitoring records document continuous compliance, including quality control test results, internal audit findings, supplier performance evaluations, and corrective action implementations. These demonstrate active management of recycled content rather than point-in-time certification only.

13.3 Process Documentation

Detailed process records connect recycled materials to production activities, including standard operating procedures, work instructions, training records, equipment maintenance logs, and production schedules that demonstrate how recycled content is consistently incorporated into products.

13.4 Traceability and Record Systems

Data format requirements ensure that records remain accessible and usable throughout the required retention period. While both paper and electronic records are acceptable, electronic formats are preferred for efficiency and searchability. Organizations must document their record

management systems, including file naming conventions, storage locations, backup procedures, and access controls. For critical records, version control and change management procedures must be implemented to maintain data integrity.

Records must establish clear links between material inputs, production processes, and finished products. This traceability requires consistent use of lot numbers, batch identifiers, or other tracking mechanisms that connect supplier documentation to internal processing records and final product data. The record system should allow auditors to trace recycled content from source to final product through complete documentation chains.

Small and medium enterprises may implement simplified record-keeping systems while maintaining essential data integrity. The certification program provides templates and guidance for scaling record requirements appropriately to organizational size and complexity. Regardless of scale, all organizations must maintain sufficient supporting data to verify recycled content claims throughout the certification period and respond to verification requests with timely, accurate information.

14.0 MONITORING AND VERIFICATION REQUIREMENTS

Maintaining recycled content certification requires ongoing monitoring and periodic verification activities to ensure continued compliance with program requirements. Organizations must implement structured monitoring systems and prepare for various levels of verification throughout the certification cycle.

14.1 Internal Monitoring

Internal monitoring forms the foundation of ongoing verification, requiring organizations to establish systematic procedures for tracking recycled content on a regular basis. This includes monthly material balance calculations, input-output reconciliations, and quality control checks. Organizations must document these monitoring activities with formal records that identify responsible personnel, methodologies used, findings, and any corrective actions implemented. Internal monitoring documentation serves as essential evidence during external verification activities.

14.2 Full Recertification

External verification occurs at defined intervals throughout the certification period. Annual surveillance activities typically include document reviews, focused audits of critical processes, and verification of internal monitoring records. Full recertification assessments occur every three years, involving comprehensive document review, site inspections, process verification, and possibly product testing. Organizations must maintain records of all external verification activities, including audit reports, nonconformity resolutions, and verification conclusions.

14.3 Random Verification

Random or unannounced verification may occur in addition to scheduled activities, particularly for high-risk products or in response to complaints or concerns. Organizations must be prepared to provide prompt access to relevant documentation during these verification events. The certification program maintains the right to conduct market surveillance, including product sampling and testing, to verify ongoing compliance with recycled content claims.

Verification preparation requires maintaining organized, current documentation systems that allow efficient response to audit requests. Organizations should conduct regular internal readiness assessments using certification program checklists available on ICIS's platform. These assessments help identify and address potential documentation gaps before external verification activities, reducing the risk of nonconformities and ensuring smooth certification maintenance.

15.0 CORRECTIVE ACTION AND NON-CONFORMANCE DOCUMENTATION

Even with robust systems in place, organizations may occasionally encounter situations where recycled content documentation or processes do not fully conform to certification requirements. RCCP requires structured approaches to documenting, addressing, and resolving these non-conformances to maintain certification integrity.

- **Identification:** Document on how non-conformances are detected through monitoring, audits, or testing.
- **Documentation:** Record non-conformance details, extent, causes, and potential impacts.
- **Correction:** Implement immediate containment and corrective measures.
- **Verification:** Confirm effectiveness of corrective actions before closure.

15.1 Documentation Requirements

Non-conformance documentation must include specific elements to facilitate proper resolution and prevent recurrence. Each non-conformance should be recorded with a unique identifier, discovery date, detailed description, classification of severity, identification of affected products or processes, root cause analysis results, immediate containment actions taken, long-term corrective action plan with timelines and responsibilities, verification methodology, and formal closure authorization. This comprehensive documentation creates an accountability trail that demonstrates the organization's commitment to maintaining certification integrity.

15.2 Severity Classification

The certification program distinguishes between minor and major non-conformances, with different documentation and resolution requirements for each. Minor non-conformances typically involve isolated documentation gaps or process inconsistencies that don't directly compromise recycled content claims. Major non-conformances represent systematic issues that could affect claim validity or suggest intentional misrepresentation. Major non-conformances require more extensive

documentation, including expanded root cause analysis, preventive measures for similar processes, and independent verification of corrective actions.

15.3 Reporting Requirements

Mandatory reporting requirements apply to certain types of non-conformances. Organizations must proactively report to their certification body any discovered issues that might significantly affect recycled content claims, including supplier fraud, material contamination, major calculation errors, or unauthorized label use. This reporting must occur within specified timeframes (typically 30 days of discovery) and include preliminary corrective action plans. The certification program provides standardized reporting templates for these situations, available through ICIS's platform.

15.4 Preventive Measures

Documentation of corrective actions must demonstrate not only problem resolution but also system improvements that prevent recurrence. This includes updated procedures, enhanced monitoring protocols, additional training programs, or improved supplier management systems. Organizations should maintain a corrective action register that tracks all non-conformances through to verified resolution, providing a systematic overview of continuous improvement in recycled content management.

16.0 DATA PRIVACY AND CONFIDENTIALITY

The RCCP involves sharing potentially sensitive business information with certification bodies and auditors. Proper documentation of data privacy and confidentiality measures helps protect proprietary information while enabling effective verification of recycled content claims. Certification bodies maintain specific confidentiality policies aligned with ISO 17065 requirements and the ICIS framework. Organizations should request and maintain documentation of these policies, particularly regarding information sharing with accreditation bodies, regulatory authorities, and other stakeholders. Understanding these policies helps organizations appropriately prepare and mark sensitive documentation submitted for certification purposes.

16.1 Confidentiality Agreements

Organizations must maintain records of all confidentiality agreements with certification bodies, auditors, laboratories, and other entities involved in the certification process. These agreements should clearly identify what information is considered confidential, permitted uses of the information, storage requirements, retention periods, and destruction protocols. Standard confidentiality agreement templates are available through ICIS's platform but should be reviewed by legal counsel before implementation.

16.2 Information Classification System

A documented information classification system helps identify which recycled content documentation contains sensitive business information requiring special handling. Classification levels typically include public information, internal information, confidential business information,

and restricted information. Each level should have defined handling protocols, access restrictions, and sharing limitations. The classification system must be communicated to all personnel handling certification documentation.

16.3 Access Control Documentation

Organizations must document access control procedures for certification information, including authorization processes, access levels, authentication requirements, and monitoring systems. For electronic documentation, this includes user management protocols, password policies, and system security measures. Physical documentation requires documented storage security, access logs, and handling procedures. Regular access control reviews should be conducted and documented.

16.4 Data Processing Agreements

When third parties process certification data (e.g., cloud storage providers, data analysis services), formal data processing agreements must be maintained. These agreements should address data ownership, permitted processing activities, security requirements, breach notification procedures, and compliance with relevant data protection regulations such as GDPR or CCPA where applicable.

Documentation of data breach response procedures is essential for addressing potential confidentiality failures. These procedures should include notification responsibilities, containment steps, impact assessment methods, and recovery processes. Certification bodies must be promptly informed of any data breaches affecting certification documentation, with formal incident reports submitted according to program requirements.

17.0 RENEWAL AND RECERTIFICATION DOCUMENTATION

Recycled Content Certification is not a one-time achievement but an ongoing commitment requiring periodic renewal and recertification. Understanding and preparing for these processes ensures continuous certification without gaps or complications. Proper documentation management throughout the certification period significantly streamlines renewal activities.

17.1 Annual Renewal Requirements

Annual renewal focuses on confirming continued compliance without the comprehensive assessment required for initial certification or full recertification. Key documentation requirements include:

- Updated recycled content calculation summaries showing current percentages.
- Significant changes to suppliers, materials, or processes since last verification.
- Summary of internal monitoring activities and results.
- Corrective actions implemented for any previously identified non-conformities.
- Declaration of continued compliance signed by authorized representative.
- Current product list with any additions or removals clearly identified.

17.2 Full Recertification (Three-year cycle)

Full recertification involves a comprehensive reassessment similar to initial certification. Documentation requirements include:

- Complete updated certification documentation package.
- Historical data showing consistent compliance over the certification period.
- Process improvement summaries showing certification system maturation.
- Updated testing results confirming continued compliance.
- Renewal application with current organizational information.
- Documentation of how previous certification recommendations were addressed.

17.3 Change Notifications and Documentation Reviews

Significant changes between renewal periods must be documented and reported according to specific requirements. These changes include modifications to recycled content sources, alterations to calculation methodologies, expansions of certification scope, changes in key personnel, or modifications to manufacturing processes that might affect recycled content. The certification program provides change notification templates that specify required documentation for different change types. Timely change notification may trigger additional verification activities but prevents compliance gaps that could jeopardize certification status.

Documentation updates between renewal cycles should be managed through a formal system that maintains version control while ensuring certification records remain current. Organizations should implement scheduled documentation reviews (typically quarterly) to identify needed updates and maintain alignment with actual practices. These review activities should be documented as part of the overall certification management system, creating evidence of ongoing maintenance rather than last-minute renewal preparation.

17.4 Renewal Planning

Renewal planning documentation helps organizations prepare efficiently for upcoming renewal and recertification activities. This includes maintenance of a certification calendar with key dates and milestones, resource allocation plans for documentation updates, and gap assessment records identifying areas needing attention before renewal submissions. ICIS's platform provides renewal planning tools and automated reminders to support proactive certification maintenance.

18.0 SUMMARY

The RCCP documentation requirements establish a comprehensive framework for verifying and communicating recycled content claims. By following the guidance provided throughout this document, organizations can prepare and maintain the necessary documentation to achieve and maintain certification while demonstrating their commitment to resource efficiency and circular economy principles.

Key documentation elements include material sourcing records, chain of custody documentation, calculation methodologies, test reports, quality control procedures, and environmental claims substantiation. These elements work together to create a complete picture of recycled content throughout the product lifecycle, from raw materials through manufacturing to final product claims.

Successful documentation management involves clear allocation of responsibilities, systematic record-keeping procedures, regular monitoring and updates, and preparation for verification activities. Organizations should approach documentation as an ongoing process rather than a one-time certification requirement, integrating documentation practices into regular operations for maximum efficiency and effectiveness.

As recycled content requirements continue to evolve in response to regulatory developments and market expectations, the ICIS framework and associated documentation guidance will be updated accordingly. Organizations should monitor ICIS's platform for notifications of significant changes and prepare to adapt their documentation systems as needed.