

RMS Requirements for Certification Bodies

About GreenBlue

GreenBlue is an environmental nonprofit dedicated to the sustainable use of materials in society. Our mission is to promote the principles of sustainable materials management — use wisely, eliminate toxicity, and recover more. Through our projects, we achieve our goal by influencing the debate, enhancing supply chain collaboration, and creating action. GreenBlue is the parent nonprofit to The Sustainable Packaging Coalition, How2Recycle, CleanGredients, Forests in Focus and other programs.

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Introduction

The Recycled Material Standard (RMS) certification program is based on a three party system (often referred to as third-party certification). The three parties involved are:

- 1. GreenBlue the scheme owner for the Recycled Material Standard
- 2. Participant an organization that meets the requirements of the standard
- 3. Certification Body an accredited third party carrying out the auditing functions required for certification

This document describes the requirements for all certification bodies operating RMS certification programs. The objective of these requirements is to ensure that these programs are managed in a manner that fosters consistency and impartiality for all participants seeking certification.

We expect certification bodies to demonstrate the traits required by recognized accreditation entities including: competency, impartiality, reliability and transparency.

A list of accredited certification bodies will also be made available online at www.rmscertified.com

Part 1: Scope

This document is for use by certification bodies operating programs for the RMS Framework and RMS Plastics Module, and any other material modules that are developed by GreenBlue under the RMS program.

The RMS Framework features average content and mass balance accounting systems as well as an environmental commodity trading system referred to as the Attributes of Recycled Content (ARCs). Certification bodies must be able to audit for conformity with all of the allowable systems.

This is the first version of this document. It is effective until replaced.

Part 2: References

The following references have been consulted in the development of these requirements.

ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards V2-0

ISO 14065:2020 General Principles and Requirements for Bodies Validating and Verifying Environmental Information

ISO 14066:2011 Greenhouse gases — Competence requirements for greenhouse gas validation teams and verification teams

ISO 17011:2017, Conformity assessment - Requirements for accreditation bodies accrediting conformity assessment bodies

ISO 17021-1:2015 Conformity assessment - Requirements for bodies providing audit and certification of



management systems - Part 1: Requirements

ISO 17065:2012 Conformity assessment - Requirements for bodies certifying products, processes and services

Standards Council of Canada (SCC) Accreditation Program Overview, 2020

Part 3: Terms and Definitions

- **3.1** Auditor: A certification body representative who conducts audits.
- **3.2** Audit: An evaluation undertaken by a certification body to verify conformity with the RMS. It may be conducted on-site or remotely and may involve visual inspection, interviews, and/or document reviews.
- **3.3 Certification Body (CB)**: An accredited third party carrying out auditing and certification in accordance with the provisions set out in the RMS.
- **3.4 Certified Participant**: A legal entity which is certified to a standard; also referred to simply as "participant".
- **3.5 Certification Scheme**: The system related to specified products to which the same requirements, rules and procedures apply. We refer to the RMS Certification Scheme as the RMS Program.
- **3.6** Recycled Material Standard (RMS): The relevant standards owned by GreenBlue including the RMS Framework and RMS Plastic Module, or any other material modules that are developed by GreenBlue under the RMS program.
- **3.7 Scheme Owner**: The organization responsible for developing and maintaining a certification scheme. GreenBlue is the scheme owner for the RMS Program.
- **3.8 Subcontractor**: An independent legal entity hired by a certification body to provide services related to certification activities.

Part 4: General Requirements for Certification Bodies

- 4.1 Legal and contractual matters
- 4.1.1 Certification bodies must abide by the conditions defined under legal and contractual matters according to ISO 17065 section 4.1.
- 4.1.2 Certification bodies must allow GreenBlue to conduct shadow assessments which may include one or more of the following conducted by a representative of GreenBlue:
 - a) observation of an on-site audit:
 - b) observation of a remote surveillance audit (e.g., through a video conference);
 - c) documentation review of an audit report, checklists and related documentation.



4.2 Impartiality

- 4.2.1 Certification bodies must abide by the management of impartiality conditions described by ISO 17065 section 4.2.
- 4.2.2 An individual auditor shall not audit the same participant in more than three consecutive years.
- 4.2.3 Business relationships between the certification body and other interested parties are permitted as long as the CB can account for any potential risks to impartiality and can address those risks.

4.3 Fees

- 4.3.1 Certification bodies are responsible for collecting fees from participants only for services rendered by the certification body for RMS certification.
- 4.3.2 Participants will be billed directly from GreenBlue in accordance with the current RMS Fee Schedule.
- 4.3.3 Accreditation application fees are described in the RMS Certification Body Fee Schedule.
- **4.4 Non-discriminatory conditions** Certification bodies must abide by the non-discriminatory conditions as defined by ISO 17065 section 4.4.

4.5 Confidentiality

- 4.5.1 The certification body shall be responsible, through legally enforceable commitments, for the management of all confidential information obtained from participants during the performance of certification activities.
- 4.5.2 The certification body shall inform the participant, in advance, of information that will be placed in the public domain.

4.6 Publicly available information

- 4.6.1 The certification body shall make the following information available to interested parties:
 - a) fees charged for services related to RMS certification
 - b) procedures for handling complaints and appeals
 - c) requirements or restrictions related to the use of the certification body's name and any applicable certification marks
- 4.6.2 The certification body shall provide the following information to GreenBlue in a timely manner:
 - a) information tied directly to the scope of certification for the RMS Certificate Database
 - b) information requested by GreenBlue for inclusion in the RMS Annual Impact Report



4.7 Language

- 4.7.1 Certification bodies shall make their services available in predominant national languages of the country where services are offered, including French in Canada and Spanish in Mexico.
- 4.7.2 English is the official language of the RMS. The certification body shall translate any of its documents and records requested by GreenBlue into English on request, at the certification body's expense. All regular reporting by the certification body shall be submitted in English.

Part 5: Structural Requirements

5.1 Organizational structure

- 5.1.1 The certification body shall structure and manage RMS certification activities so as to safeguard impartiality.
- 5.1.2 The certification body shall identify responsible parties for each of the following aspects of the program, at a minimum:
 - a) authority for decisions on certification
 - b) delegation of authority
 - c) contractual arrangements
 - d) responsiveness to complaints and appeals
 - e) personnel competence

5.2 Safeguarding impartiality

- 5.2.1 The certification body shall have a mechanism for safeguarding impartiality.
- 5.2.2 The mechanism for safeguarding impartiality shall be documented.

Part 6: Requirements for Personnel and Other Resources

6.1 Certification body personnel

- 6.1.1 Personnel shall be competent for the functions they perform, including making required technical judgments.
- 6.1.2 The certification body shall establish, implement and maintain a procedure for management of competencies of personnel.
- 6.1.3 The certification body shall maintain records on personnel involved in the RMS certification process, including at a minimum:
 - a) experience and training
 - b) assessment of competence
 - c) performance monitoring



6.2 Resources for Evaluation

- 6.2.1 All outsourced evaluation activities shall undergo a documented review by the certification body.
- 6.2.2 Delegation of certification decisions to subcontractors is not permitted.
- 6.2.3 Certification bodies shall maintain a comprehensive knowledge and operation of certification schemes in accordance with Canadian, Mexican and US standards and regulations. This shall be demonstrated by
 - a) engagement with relevant regulatory authorities
 - b) participation on relevant Standards Development Organizations, or
 - c) interpreting, applying and promoting standards and regulations as it relates to certification schemes

Part 7: Certification Process Requirements

7.1 Obtaining information

7.1.1 The certification body shall obtain all necessary information to complete the certification process.

7.2 Reviewing information

- 7.2.1 The audit team may be composed of participants with various roles, proportionate to the needs and scale of the audit.
- 7.2.2 If more than one auditor is used, the lead auditor must be designated and has overall responsibility for ensuring the audit is complete.
- 7.2.3 Technical experts and translators who are not auditors may be used if needed.
- 7.2.4 If the certification body relies on certifications it has granted to the participant to omit any activities, then the certification body shall reference the existing certificates in its records.
- 7.2.5 The certification body may rely on work carried out under recognition agreements between certification bodies or scheme owners.

7.3 Certification Decisions

- 7.3.1 The certification body shall be responsible for all decisions relating to certification.
- 7.3.2 The certification decision shall be made by a person or group of persons that has not been involved in the review process (section 7.2).
- 7.3.3 The certification body shall notify the participant of a decision not to grant certification and shall identify the reasons why.



7.4 Directory of Certified Participants and Products

- 7.4.1 The certification body shall be responsible for maintaining records in the RMS Certificate Database, including at a minimum:
 - a) identification of the participants and status (validity) of certification
 - b) the standard to which conformity has been certified
 - c) identification of sites within the scope of certification
 - d) identification of products within the scope of certification
 - e) identification of accounting systems within the scope of certification

7.5 Changes affecting certification

- 7.5.1 When the RMS Program introduces new or revised requirements that affect the participants, the certification body shall ensure changes are communicated to their clients and shall verify implementation of changes as required.
- 7.5.2 Other changes affecting certification, such as those initiated by the participant, shall be considered and decided upon by the certification body. Such changes may include:
 - a) addition of products to the scope of certificate
 - b) addition of a sites to a multi-site certificate
 - c) change of accounting methods within the scope of certification

7.6 Termination, reduction, suspension or withdrawal of certification

- 7.6.1 When a nonconformity with certification requirements is substantiated the certification body shall consider and decide upon the appropriate action which may include:
 - a) continuation of certification under specified conditions
 - b) reduction of scope (e.g., removal of a product group or site)
 - c) suspension of the certification
 - d) withdrawal of the certification
- 7.6.2 If the certification is suspended, the certification body shall formulate and communicate actions needed to restore certification.

7.7 Complaints and Appeals

- 7.7.1 The certification body shall have a documented process to receive, evaluate and make decisions on complaints and appeals.
- 7.7.2 The certification body shall acknowledge receipt of complaints and appeals and shall be responsible for gathering information for resolution.
- 7.7.3 The certification body shall give formal notice of the outcome of the complaint process to the complainant.



7.7.4 Certification bodies shall have procedures to inform clients that GreenBlue is the final level of appeal in disputes regarding conformance with accreditation criteria.

Part 8: Management System Requirements

- 8.1 The certification body must have a management system that addresses the requirements of the RMS Program including:
 - a) documentation (e.g., policies, definitions of responsibilities)
 - b) control of documents and records
 - c) management review
 - d) internal auditing
 - e) corrective actions