



**ECG**<sup>TM</sup>  
Global Solutions

# ECG Global Solutions Recycled Content Standard

Guidelines for Verification and Certification



**Standard Number: ECG 454 V1.1**

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**Overview and Application**

The purpose of this Standard is to outline the requirements for third-party verification of recycled content claims made by companies for specific products. It enables a company to demonstrate that its products contain materials classified according to ISO 14021:1999(E) and U.S. environmental regulations, that its marketing claims comply with the Federal Trade Commission (FTC) guidelines for environmental marketing, and that its products may meet the Material & Resources criteria for recycled content under the U.S. Green Building Council’s LEED Green Building rating system.

This Standard is voluntary and is not intended to replace or override any legal or regulatory requirements that apply to user operations.

The intended users of this Standard include product manufacturers such as individuals, businesses, organizations, or agencies seeking third-party certification that their products meet the Standard’s requirements. It is also intended for individuals, businesses, organizations, agencies, or consumers who want to purchase products that comply with these requirements. Additionally, the Standard provides guidelines for material suppliers and private label users.

## **Scope and Objective**

This Standard applies to any material in a product for which the manufacturer claims recycled content and material type. It allows input materials to be measured and verified for percentage-based recycled content claims. These claims can be based on the total recycled content in the final product (“minimum content”) or on a specific component “made with”. Claims may reflect production at a single site or a weighted average across multiple sites “plant-wide weighted average”. Materials may include post-consumer and pre-consumer recycled content.

The objective of this Standard is to provide a consistent method for assessing and certifying the recycled content of products for manufacturers making Type II environmental claims, and to build marketplace confidence that ECG-labeled products reliably meet the requirements of this Standard and its referenced guidelines.

## Achieving and Sustaining Certification

Section	Description
<b>Certification</b>	Once a product meets the Standard's requirements, ECG issues a Recycled Content Certificate of Achievement. Certificates are valid for one year, provided the manufacturer maintains conformance.
<b>Ongoing Conformance</b>	To keep the certification active, the manufacturer must undergo an annual audit demonstrating continued compliance with the Standard.
<b>Notice of Change</b>	If the manufacturer makes any changes to products or processes that affect compliance, they must notify ECG using the official Notice of Change Form.

## Audit Approaches

Audit Type	Description
<b>Remote Audit</b>	The manufacturer must submit all required forms, records, documents, and data to ECG for review. The auditor will examine this evidence to determine compliance with the Standard.
<b>Optional Onsite Audit</b>	The manufacturer and/or recycled material suppliers may undergo onsite audits if necessary, based on the submitted evidence and the auditor's ability to verify compliance with the Standard, at ECG's discretion.

## Audit Findings

Type	Definition	Action Required
<b>Non-Conformity Report (NCR)</b>	Failure to meet a specified requirement.	Must be resolved through root-cause analysis and corrective/preventive action before certification.
<b>New Information Request (NIR)</b>	Request for mandatory information needed to determine compliance.	Must be resolved through root-cause analysis and corrective/preventive action within the set deadline.

Type	Definition	Action Required
<b>Opportunity for Improvement (OFI)</b>	Suggestion to exceed minimum requirements.	No action required for certification; root-cause analysis and corrective action are optional.

### Requirements of Assessment

Category	Requirement
<b>Supplier Verification &amp; Records</b>	<p><b>Supplier Verification &amp; Validation:</b> Submit signed ECG Supplier Affidavit Forms from all suppliers providing <math>\geq 2\%</math> of total recycled material by weight, covering at least 95% of recycled material. ECG may audit suppliers or review vendor selection processes.</p> <p><b>Records of Suppliers:</b> Maintain documentation of active business relationships (e.g., invoices, bills of lading, delivery receipts, supplier affidavits, evaluations/audits). For precious metals and 3T metals, implement “Know Your Customer” procedures.</p>
<b>Material Supply Data</b>	Maintain and provide data on recycled material obtained from each supplier for the review period, reported on a dry weight basis.
<b>Recycled Material Inventories</b>	Maintain inventory records of the amount and types of recycled materials used in the product for the review period.
<b>Product Component Information</b>	Provide a Bill of Materials (BOM) or similar documentation detailing the dry weight of each component, identifying virgin, pre-consumer, and post-consumer recycled material. Include mechanisms for controlling product formulas.
<b>Scrap Reuse &amp; Waste Rates</b>	Maintain records (if required by auditor) for scrap generated and reused, and waste sent to disposal, incineration, or additional recycling during the review period.
<b>Production Totals</b>	Report total production weight for each product under review, including waste from trimming or finishing, defective products, and non-saleable material.

Category	Requirement
<b>Chain of Custody</b>	<p><b>Traceability:</b> Implement practices to ensure products can be traced back to the origin of all input materials.</p> <p><b>Segregation:</b> Maintain documented procedures for segregating and clearly identifying conformant and non-conformant products during receiving, storage, transfer, and shipping.</p> <p><b>Manufacturing Process Description:</b> Provide a diagram and/or description of the manufacturing process showing recycled material tracking, internal flows (e.g., scrap reuse), and outputs (finished products, intermediates, waste).</p>
<b>Mass Balance</b>	<p>Perform mass balance calculations for each assessment to confirm sufficient recycled material supply for reported production quantities.</p>

## **Appendix A - Glossary of Terms**

**Affidavit** - A written statement of facts voluntarily made under oath or affirmation, administered by a legally authorized person.

**Chain of Custody** - The documented path a material or product follows from its point of origin to the end consumer, including every entity that takes legal or physical possession along the way.

**Claim** - Any oral, written, implied, or symbolic statement or representation about a product's environmental attributes—such as recycled content percentage—made to the public or buyers. Claims must comply with Federal Trade Commission (FTC) environmental marketing guidelines.

**Manufacturing Site** -The physical location where the product undergoing certification is produced.

**Post-Consumer Material** – Material discarded by households or commercial, industrial, and institutional facilities after being used for its intended purpose. This includes returns from the distribution chain, provided they originate from end-users. *(Source: ISO 14021:1999)*

**Pre-Consumer Material** - Material diverted from the waste stream during manufacturing, excluding scrap or rework that can be reused within the same process without further processing. *(Source: ISO 14021:1999)*

*(Note: “Post-Industrial Material” is an outdated term for pre-consumer material.)*

**Product Category** - A group of products that share similar material composition and serve a similar function.

**Recycled Content** - The proportion (by mass) of recycled material in a product or its packaging. Only pre-consumer and post-consumer materials count as recycled content. *(Source: ISO 14021:1999)*

**Recycled Material** -Material reprocessed from recovered or reclaimed material through a manufacturing process and incorporated into a final product or component. *(Source: ISO 14021:1999)*

**Scrap** -Rejected or discarded material generated during manufacturing, such as trimmings, sanding residue, or off-spec products. Scrap reused in the same process without further processing does not qualify as pre-consumer recycled material.

**Traceability** - The ability to track materials and products throughout the manufacturing process and supply chain, verified through objective evidence.

## **Appendix B - References**

ISO 14021:1999, “Environmental labels and declarations – Self-declared environmental claims (Type II environmental labeling).”

ISO 14024:1999, “Environmental labels and declarations – Type I environmental labeling – Principles and procedures.”

ISO 14020:2000, “Environmental labels and declarations – General principles.”

U.S. Green Building Council Leadership in Environmental and Energy Design (LEED) Green Rating Guides (available at: [www.usgbc.org](http://www.usgbc.org))

Federal Trade Commission (FTC) Guides for the Use of Environmental Marketing Claims (available at: [www.ftc.gov](http://www.ftc.gov))

ISO/IEC Guide 17065:2012, “Conformity assessment – Requirements for bodies certifying products, processes and services.”