

Recycled Content Certification for Electrical and Electronic Equipment SCS-103A

Certification Manual

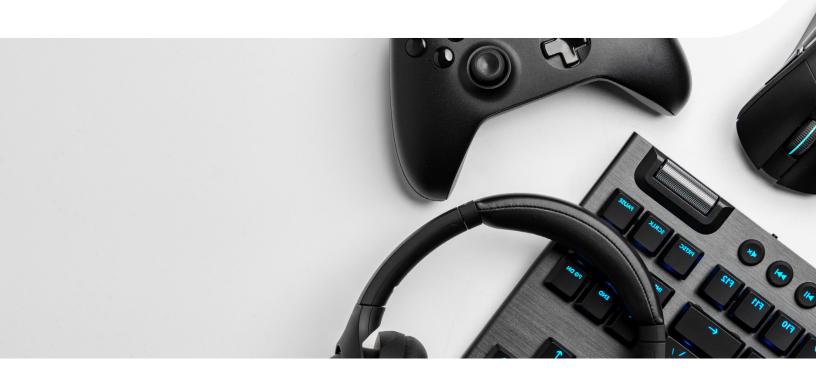




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1. Terms and Definitions

Combo and/or Bundle	Individual product types / models packaged and sold together.
Client	Organization seeking certification whose name is listed on the final certificate
Climate Pledge Friendly (CPF)	Requirement that shall be met to receive a CPF badge.
Desk Audit	Assessment of client information conducted by the auditor asynchronously via review of documentation and data submission.
Exemption	An exemption is granted throughout the certification period, does not need to be re-justified.
Interpretation	Additional guidance that SCS Standards provides to Certification Bodies (CBs) and Auditors to ensure consistent assessments and audits against SCS Standards. Interpretations aim to clarify the SCS Standards' intent and provide additional information and guidance to explain how a requirement should be interpreted and/or applied. They are not new requirements.
Onsite Audit	Assessment of client production/assembly/manufacturing processes at the client site(s)/ Onsite audits are conducted after data is submitted and deskaudit is complete.
Product	An item with defined materials, function, and styles. In this standard, products must be classified as electronic or electrical.
Product Type	A specific set of devices under a product sub-category (e.g., smartphones, tablets, eReaders, or smart displays are product types within the mobile devices product sub-category).
SCS-103	SCS Certification Standard for Recycled Content (SCS-103)
SCS-103A	SCS Certification for Recycled Content Annex A Supplemental Criteria for Electrical and Electronic Equipment (SCS-103A)
Site	Organization site (contract facility or wholly owned). A site is either owned by the client or is under direct contract with the client for the manufacturing and/or assembly of their device.
Variance	An adaptation of a SCS Standards' requirement to a unique local circumstance which was not considered in the standard at the time of development. A variance is granted temporarily and will need to be reviewed during renewal certification (annual) if it still is applicable. Variance is granted by the SCS Standards.
Virtual Audit	Assessment of client information by the auditor with the client present online, conducted synchronously. Virtual audits are conducted after data is submitted and desk-audit is completed.

2. Certification Process

2.1 Application

- Client completes <u>Application</u> and sends it to <u>recycledmaterials@scsglobalservices.com</u>
- Sales representative scopes the assessment (2-3 business days)
- Client signs the Work Order with the scope of the assessment
- Client and SCS sign Professional Services Agreement (PSA)

2.2 Initial Audit

- Client is introduced to an SCS Auditor (Audit Kick-off)
- Auditor sends the Client SCS Data Request Form (DRF) with planned audit timeline (2 business days after the kick-off)
- Auditor schedules an introduction meeting
- Week 0 Client completes the DRF and provides supplementary documents
- Week 1 Auditor provides desk-audit review feedback
- Week 1 Auditor and Client schedule Onsite/Virtual Audit date
- Week 2 Auditor issues findings during the audit, if applicable
- Week 3 Client responds to findings
- Week 4 Auditor drafts a report with certification recommendation
- Week 6 Report is reviewed for final certification decision.
- Outside of standard desk-audit timeline Onsite/Virtual audit is conducted
 - Onsite/Virtual audit conducted when production data is available
 - Determination of Onsite/Virtual audit requirement is based on regional risk assessment
 - Onsite/virtual audits are not required annually but may be requested by the auditor based on risk.
 - Client is informed of onsite/virtual audit requirement in the assessment report and annual re-engagement.
- If a positive decision is made client receives certification packet detailed in Section 2.3.

2.3 Certification Packet

- Final SCS Global Services Certificate detailing the claim is issued
- SCS provides Client logos specific to their achieved claim and product type.
- Assessment Report is completed and provided to Client.
- SCS Label and Logo Guidelines are shared with Client
- Product listing is placed on <u>SCS Green Products Guide</u> (upon request),
 which provides an opportunity to publicly display Client's certificate.
- Assistance with a press release and marketing coordination (upon request)

2.4 Climate Pledge Friendly Badging

- For the products that achieve Climate Pledge Friendly (CPF) badge, client submits to SCS the product assigned ASIN provided by Amazon. SCS uploads the product ASIN(s) to Amazon platform after the initial certification.
- CPF badge appears on the Amazon marketplace product page within 5-10 business days.

2.5 Annual Certification Renewal

- Product certification is renewed on an annual basis.
- SCS team reaches out to Client four months before expiration with a quote for the renewal of certification.
- Requirement for Onsite/Virtual audits is determined using risk-based and sampling approach (considerations include sites assembling/manufacturing the most products; multiple findings issued relevant to specific site during previous assessment, major changes in processes during the certification period).

2.6 Changes during Certification

- 2.6.1. **Major Product Change** means a change that would affect the total recycled content claim, recycled material content, or changes that require analysis by an auditor.
- Client must inform SCS Staff of change immediately, and provide information related to the change for review.
- Examples of major product change:

- Change in recycled material input supplier
- Change of the product bill of materials and/or accessories
- Change of the component manufacturers and/or assembly site.
- 2.6.2. **Minor Product Change** means a change that include address changes, adding new product colors that do not change RC content or suppliers, product name changes, or administrative changes, e.g., updates to Client's address or product name.
- Clients may reach out to SCS administrative staff for change and/or update requested.

2.6.3. Additional fees apply for all changes during the certification period. Fees are dependent on the change classification.

3. Eligibility

This section helps determine whether a product qualifies for certification under the SCS-103A standard. Eligibility is based on product type and minimum recycled content thresholds. Clients should review this section early in the certification process to confirm whether their products can proceed.

3.1 Product Eligibility

Determine your product category using Table 4 of the SCS-103A standard (Section 3.6.2).

If the product type is not listed, reach out to <u>SCS Standards</u>.

3.2 Identify the product eligibility using the minimum criteria options in *Table 1* in SCS-103A 3.5.1 or latest interpretation.

3.2.1 Option 1 Criteria

- The product shall contain at least two recycled material inputs
- The product shall meet material-level thresholds for recycled material inputs listed in Table 2 and/or Table 3 in SCS-103A
- The product shall meet the product recycled content threshold listed in Table 4 SCS-103A

3.2.2 Option 2 Criteria

- The product shall contain at least three recycled material inputs
- The product shall meet the material-level thresholds for recycled material inputs listed in Table 2 and/or Table 3 in SCS-103A
- The product shall meet a minimum of 5% recycled content (SCS-103 7.1)

CPF Only

The product shall meet a minimum of 10% recycled content.

3.2.3 Any exemptions to these options must be accompanied with justification to the SCS auditor during the assessment.

3.3 Recycled Material Threshold

To calculate the recycled material threshold, use the below formulation listed in SCS-103A 3.6.1.

• All the recycled materials and virgin counterpart must be available for auditor review. If the material cannot be traced, (e.g., copper in printed circuit boards), this should be submitted to SCS auditor for exemption evaluation.

% Recycled Content in a Material = Total Mass of Recycled Content used in the Material x 100%

Total Mass of the Material in the Product

3.4 Product Type Threshold

To calculate the product recycled content, use the below formulation listed in SCS-103A 3.6.2.

- Total mass of the final product is the weight of the assembled device plus any in-box accessories such as adapter, cable, screws and mounts (excluding packaging and instruction manuals).
- In box accessories that are listed in SCS-103A Table 4 and sold separately must be independently certified and submitted as a separate product certification and meet option 1 or 2 criteria.

% Recycled Content _____ Mass of Recycled Content Across all Materials _____ x 100% in the Product = _____ Total Mass of Final Product

Bundle Eligibility

Under Option 1 or Option 2:

- If each product in the bundle is independently certified to SCS-103A, the bundle can become a CPF-badged product bundle on Amazon with no further assessment. For example, a headset and webcam that are independently certified and CPF-badged can also be sold as a CPF-badged product bundle on Amazon.
- A product that is part of a bundle cannot be sold separately as CPF-badged on Amazon unless that product has been independently certified to SCS-103A.

Under Option 1:

- If the products in the bundle share the same product-level threshold and the bundle meets that same product-level threshold, then the bundle is eligible for CPF-badging. For example, the recycled content product level threshold for a mouse and a keyboard is 50% recycled content. If 50% of the bundle mass is recycled content (i.e., meets the total products' 50% product level threshold), the bundle can become a CPF-badged product bundle on Amazon.
- If the products in the bundle do not share the same product-level threshold (e.g., a headset and webcam that have a 30% and 15% minimum total recycled content threshold respectively), then the bundle is not eligible for CPF-badging unless each product in the bundle is independently certified to SCS-103A.
- A product for which there is no product level threshold (i.e., the product type is not listed in Table 4 of the Annex) cannot be part of a bundle.

4. Data Requirement

4.1 Recycled Materials

4.1.1 All recycled material inputs contributing to the overall recycled content must be listed in Table 2 and/or Table 3 in SCS-103A. If material does not have an assigned material-level threshold, client should request new material(s) be added to Table 2 or Table 3 as needed.

SCS Standards

- However, if 100% of the material is recycled (as per the equation in 3.6.1.1), then the material may be considered as part of the total product recycled content (as per the equation in 3.6.2.1) and be used to meet Option 1 or Option 2 of the Annex.
- 4.1.2 Recycled material shall be certified to SCS-103 or recognized scheme, to confirm that the material has been qualified using ISO 14021 recycled material definition (SCS-103A 3.2).
- 4.1.3 A third party certificate for all recycled material input shall be submitted. The certificate must be valid and contain the following information:
- Name of the certification body,
- Name of the scheme,
- Recycled material,
- Recycled content,
- Chain of custody, and
- Certification validity
- 4.1.4 For recycled precious metals or 3T metals inputs, material due diligence (Know Your Counterparty) must be submitted for review.

4.2 Legal Compliance

- 4.2.1 (SCS-103A 3.1.1) The client shall confirm, via affidavit, that it complies with all applicable international, national, and local laws and regulations.
- A template affidavit is provided by the SCS auditor at audit kick-off

- Affidavit must be signed by the client (i.e., organization applying for certification)
 and an authorized representative of the final product assembly location (if this is
 not wholly owned by the client).
- 4.2.2 The client shall confirm, via an affidavit, that it complies with all applicable Restricted Substances list (RSL), including but not limited to European Union Registration, Authorization, and Restriction of Chemicals (REACH), Restriction of Hazardous Substances (RoHS), Chinese Ministry of Industry and Information Technology (MIIT), and the U.S Toxic Substances Control Act (TSCA). (SCS-103A 3.1.2)
- A template affidavit is provided by the SCS auditor at audit kick-off
- Affidavit must be signed by the client (i.e., organization applying for certification)
 and an authorized representative of the final product assembly location (if this is
 not wholly owned by the client).
- 4.2.3 The client shall provide documented evidence, such as procurement procedures, that it has implemented a process to ensure compliance with both applicable legal requirements and the RSLs for their scope of product(s). (SCS-103A 3.1.3)
- Client submits procedures to SCS during initial audit. Any updated versions
 directly impacting legal compliance and RSLs must be shared directly with the SCS
 auditor as soon as they become known.
- If such procedures are not available, SCS auditor will request all upstream supply chain actors to sign the legal affidavit.

4.3 Supplier Verification and Validation

4.3.1 (SCS-103 6.3.1) The client shall implement a procedure for supplier selection criteria.

 Supplier selection criteria should contain a description of supplier evaluation, and detailed procedures outlining how the client will be informed of any changes that may impact product quality, sourcing, or compliance. This includes, but is not limited to, changes in upstream suppliers, materials, processes, or production locations. 4.3.2 (SCS-103 6.3.3) The client shall provide the certification body with signed supplier affidavit form(s) containing supplier information, business license, material supplied, and source of material.

- The template for the supplier affidavit is provided by the SCS auditor
- Supplier affidavit is required from each upstream suppliers performing component manufacturing with recycled material input (listed in 4.1)

4.3.3 SCS Auditor may require desk-audit and/or onsite/virtual audit of component manufacturer if supplier affidavit is missing, inconsistent with client submission or qualified as high-risk.

4.4 Bill of Materials

4.4.1 (SCS-103A 3.4) The client shall provide a bill of materials (BOM) or other comparable document that contains at least the following detail to determine the overall percentage of recycled content:

- Component/material type,
- Component/material supplier name (only required for recycled material(s)),
 Classification (i.e., pre-consumer, post-consumer, or virgin),
- Dry weight of the component/material in the final product and units (e.g., grams, kilograms, pounds), accounting for the total weight of the final product; and
- Dry weight of recycled content in the component/material and units (e.g., grams, kilograms, pounds)

4.4.2 The BOM shall include the weight of the device, any –in-box accessory (e.g., power adaptors, cables, mounts, etc.), excluding packaging.

- A separate bill of materials shall be provided for any product variations (i.e., size, color, or in-box accessories) that affect the total recycled content claim, as this is considered an Additional Product
- Product variations that do not affect the total product recycled content must be declared/shared with the SCS Auditor, identifying the variation type

4.5 Site Quality Procedures

4.5.1 Site quality procedures shall be submitted by the final assembly site.

- The site shall provide a description of the manufacturing process/component assembly or a flow chart as an attachment. The description or flow chart shall show all inputs of materials, all internal material flows (e.g., reuse or recycling of scrap), and all material outputs (including, but not limited to, finished products, intermediary products, and waste).
- 4.5.2 The site shall provide a description of the material's/component's chain of custody.
- The description shall include how traceability/segregation of recycled and non-recycled materials is achieved or component identification from entering site's location until it is shipped. Photographic evidence can be provided as an attachment.
- 4.5.3 Client must provide a description of mechanisms for controlling product formulation.
- 4.5.4 Possible supporting documentation for requirements listed in SCS-103 6 and 7.2 is provided in Appendix 1 to this manual.

4.6 Production Data

- 4.6.1 The client must have a minimum of three months of production data for review4.6.2 Products not yet produced may be assessed if the following conditions are met:
- The client informs the SCS auditor of the production start date
- The start of production is no more than 45 days from the audit kick-off date to ensure the data provided is accurate and true at the time of production
- Provisional certification may be granted until production data is reviewed by the auditor. Product certification may remain at provisional status for no more than 90 days from the date of issuance
- If data provided in parts 4.1 to 4.5 change after production commences, the client risks suspension and/or termination of product certification

4.6.3 Depending on the site operations, the following information is requested:

Standard Reference	Final Assembly	Component Manufacturer
SCS-103 7.5	Total production of the device during the data review period.	Total production of the component during the data review period.
SCS-103 7.3.1 & 7.5.1	Site must report the net saleable and the waste/scrap (defect components).	Site must report the net saleable and the waste/scrap.
SCS-103 7.6	Site must report components with recycled material input inventory at the start and at the end of the review period. Inventories reported as a snapshot at the start and end.	Site must report recycled material input inventory at the start and at the end of the review period. Inventories reported as a snapshot at the start and end.
SCS-103 7.4	Site must report purchases of the components with recycled material input. Purchases must be listed by supplier (component manufacturer) and component name. Site must be able to show invoices of purchases upon auditor request.	Site must report recycled material input purchases by recycled material name and supplier.
	Site may report components with recycled material input consumed/assembled during the data review period.	Site may report recycled material input consumed during the data review period

4.6.4 The site must represent that there is enough material and/or components onsite and consumed to justify total production during the data review period.

 An acceptable margin of error between the required material input and available material is +/-5%.

[Required Material Input] – [Actual/Reported Material Input] x 100%
[Required Material Input]

- Required material input is determined by the client's bill of materials and total production of the product and/or component.
- Actual and/or Reported material input is determined by the site's total purchases and inventory snapshots at the start and end of the data review period.

5. Audit Findings

- 5.1. All findings must be closed no later than 90 days after the finding was issued.
- 5.2. If review of corrective actions for Non-Conformances (NCs) per product certification takes longer than one working day, the client will be charged an additional fee for additional rounds of review.
- **5.3. Major Non-Conformance** 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.
- SCS Auditor reviews root cause analysis and corrective action and determines if the action is acceptable.
 - 5.3.1. Corrective action must be implemented within 90 days of the finding being issued.
- **5.4. Minor Non-Conformance** defined as a request for mandatory information that is necessary to determine compliance, shall be adequately resolved through root cause analysis and corrective/preventative action within an established deadline.
- SCS Auditor reviews root-cause response and corrective action and determines if action is acceptable.
- Corrective action must be implemented within 90 days of the finding being issued.

5.5. Opportunities for Improvement (OFI): Current circumstances observed during an audit that, if addressed, would enhance conformity to the applicable accreditation/certification/verification/validation standard). Opportunities for Improvement are optional to address.

6. Deliverables

6.1. Product Certificate

- Final product certification shall include product market name and all product variations that do not directly affect the recycled content
- Total certified recycled content under SCS-103 and SCS-103A requirements
- Recycled material inputs (optional)
- Conformance language detailing the Option 1, Option 2 and/or any granted exemption or variance
- Client may request sub-claims listed on the certificate during the assessment.
 Sub-claims may be added if they are verified during the audit, e.g.:
 - Material level claims or waste stream sources
 - Made with 100% Recycled PET
 - Post-Consumer PET is sourced from bottles

6.2. Achieved Logos

- SCS shall provide, upon request, a certification logo which may be used on-product or off-product.
- Clients shall follow the Label and Language Guidelines provided by SCS for use of the certification logo.

6.3. Assessment Report

 SCS Auditor prepares a report indicating the client's compliance with SCS-103 and SCS-103A.

Appendix 1 - Site Quality Procedures

MANUFACTURING PROCESS	Possible Supporting Documentation
1. Storage and Handling	
Describe how recycled materials are physically stored. How are they kept separate from virgin	Photos of labeled bins/silos/warehouses
materials? Attach photos or maps of storage areas clearly showing separation, Standard Operating	SOP for material segregation, container labeling
Procedures for Material Segregation and/or Facility layout map showing separate storage areas	Facility layout map showing separate storage
2. Weighing and Recording	Calibration logs
Describe the weighing process for incoming recycled material. <i>Attach calibration certificates</i>	
and Standard Operating Procedures for weighing process.	Weighing SOPs
How are weights recorded and linked to specific materials? <i>Provide examples of log sheets or digital system records.</i>	Batch records with weights
3. Processing Controls	
Describe your blending process (if applicable). Describe how the recycled content is controlled during production. Attach process flow charts, blend control Standard Operating Procedures, or	Blending SOPs
	Batch tracking logs
feeder calibration records	Production flow charts
4. Quality Checkpoints	
What quality controls are in place to verify recycled content is properly integrated during the	
manufacturing process? How frequently are quality checks performed? Where in the process do they	Inspection Logs
occur? Is finished product testing performed? Attach quality assurance records, laboratory results, or material inspection forms	Quality Control SOPs or reports

MATERIAL CHAIN OF CUSTODY

1. Incoming Material Identification

How are incoming recycled materials identified and labeled upon receipt (are material IDs or batch numbers assigned at receipt)? *Provide photos of labels, barcodes, or incoming log entries*

Material tags or barcodes (photos)

Receiving logs with material types

Incoming material inspection forms

2. Documentation of Material Flow

Describe your system for tracking recycled material through your facility. What systems are used to maintain traceability? *Attach flow diagrams or ERP reports clearly showing material tracking*

At what stages are inputs, intermediates, and outputs assigned batch numbers? Attach an example of batch records linking recycled material inputs to specific outputs. Highlight relevant batch numbers to demonstrate recycled material tracing.

ERP screenshots

Flow diagrams

Traceability reports

3. Documentation

Are there written Standard Operating Procedures for recycled material tracking and segregation? Provide a copy of current SOP and revision history

Who is responsible for monitoring segregation and traceability practices? *Include job descriptions or training records*

Are internal audits performed? How often and by whom? *Attached completed audit reports or checklists*

Internal audit checklists

Staff training logs

SOPs

FORMULATION CONTROL MECHANISM

1. Blending Control

If blending occurs, how are recycled-to-virgin ratios determined and monitored?

Provide BOM, set point sheets or control system screenshots highlighting relevant parameters

Are blend formulations locked into production settings or adjusted batch-by-batch?

Blending SOPs + Blending formulation

Control system logs

Batch tracking logs

2. Supplier Selection

What documentation is required from suppliers to verify recycled content? *Provide supplier certifications and complete affidavits that indicate the percent virgin material added.*

Affidavits

Certifications

3. Incoming Material Inspection

How are incoming recycled materials inspected and determined to meet quality standards?

Provide inspection forms, lab test results, or visual checklists

Describe any procedures for rejecting non-conforming material.

IInspection SOPs

Test reports

Non-Conformance logs

Material inspection logs



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