Protocol for

ClimeCo Certified™ Product Program



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The ClimeCo Certified™ Product Program ("Program") focuses on increasing awareness of the greenhouse gas emissions (also referred to as "carbon footprint") of products and on recognizing companies that are taking action to assess and continually reduce their product's climate impact.

The Program was started by the Carbonfund.org Foundation in 2007, then called the Carbon*free*® Product Certification Program, and since 2022 is owned and operated by ClimeCo LLC. The Program has been renamed and rebranded, and the protocol has been reviewed and updated to reflect current standards. Program documents and this Protocol are reviewed at least annually to ensure compliance with all applicable standards and requirements. The last substantial update to this Protocol was made in August 2026.

This Protocol and all terms and conditions herein are incorporated by reference into ClimeCo's Program Agreement, which is a legally binding Agreement approved by ClimeCo counsel. Applicant companies seeking certification under the Program must agree to be legally bound by the terms of the Program Agreement and this Protocol.

Authors

The first version of the Carbon*free* Product Certification Carbon Footprint Protocol was developed jointly by the staff at the Edinburgh Centre for Carbon Management and Carbonfund.org in 2007. The Protocol has been updated several times since the original version by Carbonfund.org, with input from EarthShift, WAP Sustainability, ClimeCo, program participants, industry experts, and the general public through open comment periods.

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Purpose of this Document

The purpose of this Protocol is to establish the requirements for the ClimeCo Certified™ Product Program (formerly called the Carbon*free* Certified Products Program)

1. Background

Driven by corporate responsibility, consumer demand, investor expectations, and potential government regulation, companies are increasingly interested in quantifying, reducing, and offsetting the greenhouse gas (GHG) emissions associated with the products they manufacture and/or supply.

Carbonfund.org Foundation, a leading nonprofit provider of climate solutions for individuals and companies, developed the Carbon*free* Product Certification as a globally recognized climate action product label in 2007. In October 2022, leading global sustainability company ClimeCo LLC purchased certain commercial assets of the nonprofit Carbonfund.org Foundation, Inc., including the name "Carbonfund.org", the website, the Carbon*free*® Product Certification Program, and others.

Under the leadership and management of ClimeCo, the Carbon*free*® Product Certification Program has been renamed the **ClimeCo Certified™ Product Program** ("Program") and provides more opportunities to enhance value, reliability, and transparency to companies and their stakeholders. ClimeCo's expansive suite of services and credible, high-quality market-based solutions provide customers with additional trustworthy options to bolster their ClimeCo Certified™ Product certification and take targeted steps towards positive climate action.

This document provides Program participants and affiliates with a standard approach to follow when applying for the Program.

2. Key Objectives

This protocol provides a credible, transparent, and practical method to determine the Global Warming Potential (GWP) of products. The method can be consistently applied by qualified third party consultants and product manufacturers across a broad range of industries and products to discover and develop strategies to reduce product carbon footprint intensity. This method also can be used to inform decisions to take responsibility for unabatable product carbon impacts with high-quality verified carbon credits sourced from science-backed voluntary carbon offset projects.

The purpose of the ClimeCo Certified™ Product Program is to enable companies with registered products to participate in the sustainable economy by offering their customers products whose carbon footprints have been and continue to be *measured and reduced* through ongoing management of carbon emissions reduction strategies.

Participating companies also pursue additional positive climate change action through support of high-quality, third-party verified carbon offset projects. This certification Program enables companies to demonstrate a strong sustainability commitment to their consumers and provides a credible path to making progress towards reducing the carbon impact of the company's value chain.

3. Protocol Updates

This iteration of updates to the Protocol has been driven by and addresses the following:

- Change in ownership:
    - ClimeCo taking over the ownership and administration of the Program;
    - Expanded opportunities for partnering with ClimeCo on decarbonization strategies.
- Market factors, including increased public scrutiny and legislation of environmental labels, certifications and claims, and increasing inquiries into the quality and credibility of voluntary carbon offsets purchased as part of a company's broader sustainability strategy:
    - Relevant and applicable requirements of the EU Directive on Empowering Consumers for the Green Transition (Directive (EU) 2024/825, ECGT Directive);
    - Added stringency around acceptable requirements for achieving the certification;
    - Added stringency around requirements for developing and maintaining a product-level carbon emissions reduction plan;
    - Added transparency around acceptable categories of and standards for voluntary carbon offsets;
    - Requirements for program annual renewals and ongoing carbon emissions reduction plan monitoring.
- Ease of participation
    - Greater clarity on product certification process;
    - Recommended formats for submitting Product Life Cycle Assessment (LCA) report;
    - Guidance for communication and disclosure of ClimeCo Certified™ Product participation.
- Ease of administration via the ClimeCo Certified™ Product technology Portal:
    - The online Program Portal streamlines the entire certification process from submitting product Life-Cycle Assessments to downloading the Program Marketing Guidelines;

4. Glossary and Acronyms

ClimeCo Certified ™ ***Product*** – A Product that has been registered in the Program pursuant to the Program Agreement and this Protocol.

ClimeCo Certified ™ Product Portal, or "Portal" – The proprietary technology platform that administers the certification process. Companies will create an account to start and manage their certifications and registered products. The ClimeCo team will provide the link to the Portal to all interested applicant companies. All applicable Program documents are securely stored in the Portal.

Product Carbon Footprint (PCF) – A calculation of a product-level GWP based upon an analysis of the GHG (Greenhouse Gas) emissions produced during the "cradle-to-grave" life cycle of a product and calculated using an accepted LCA methodology. Product Carbon Footprint is usually reported as a numerical value expressed in kilograms of CO_2e per defined product functional unit. Product Carbon Footprint and product GHG Footprint/assessment/inventory are considered interchangeable terms in this protocol.

Life Cycle Assessment (LCA) – An accounting and evaluation practice for assessing the potential environmental aspects associated with a product (or service) by compiling an inventory of relevant inputs and outputs, evaluating the potential environmental impacts associated with those inputs and outputs, and interpreting the results of the inventory and impact phases in relation to the objectives of the study. For the purposes of this Protocol, any reference to LCA refers to an analysis conducted on and the calculation of the product's cradle-to-grave lifecycle GHG emissions, or product carbon footprint, while other environmental impacts associated with the product are excluded from consideration.

IPCC – Intergovernmental Panel on Climate Change

GHGs – Greenhouse Gases, currently including:

- CH_4 - Methane
- CO_2 – Carbon Dioxide
- *HFC* – Hydrofluorocarbon
- N_xO_x – Nitrous Oxides, Nitrogen Dioxide
- *PFC* – Perfluorocarbon
- SF_6 – Sulphur Hexafluoride

CO_2e – Carbon Dioxide Equivalent is a common, globally accepted way of measuring and expressing GHG emissions. To convert emissions of a gas into CO2 equivalent, its emissions are multiplied by the gas's Global Warming Potential (GWP). The GWP takes into account the fact that many gases are more effective at warming Earth than CO_2, per unit mass.

Global Warming Potential – Global Warming Potential (GWP) allows comparisons of the global warming impacts of different GHGs. Specifically, it is a measure of how much energy the emissions of one (1) metric tonne of a GHG will absorb over a given period of time, relative to the emissions of one (1) metric tonne of carbon dioxide (CO2). The larger the GWP, the more that a given GHG warms the Earth compared to CO2 over that time period. The time period used for GWPs for the purposes of this Protocol is 100 years ("GWP-100").

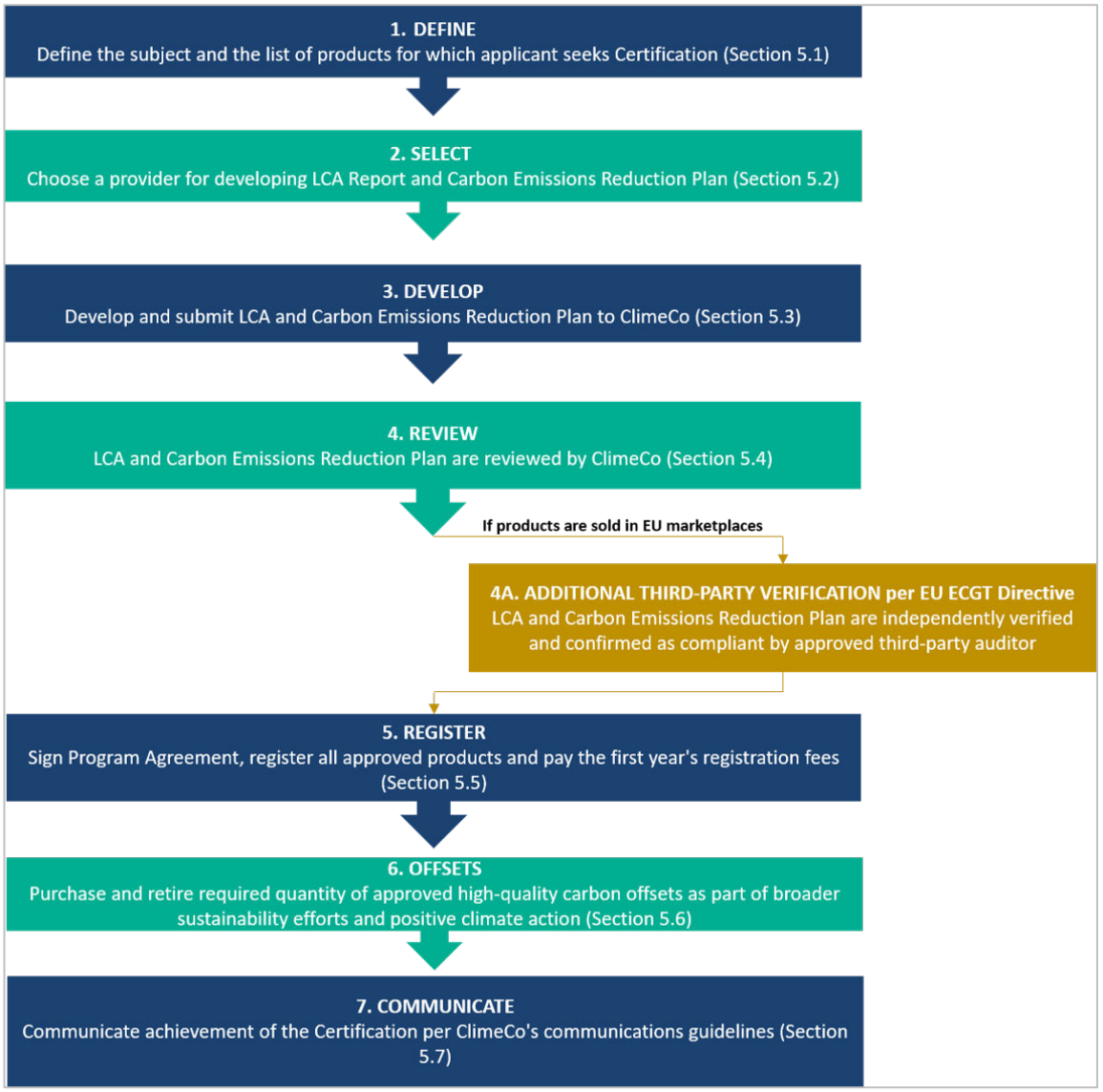
"cradle-to-grave" – Assesses the full product life cycle impacts to include the extraction of raw materials; the processing, manufacturing, and fabrication of the product;the transportation or distribution of the product to the consumer; the use of the product by the consumer; and the disposal or recovery of the product after its useful life.

Qualified third party consultants – Qualified third-party consultants are independent service providers who are listed in the EPD database of LCA Consultants (see list here) or are service providers able to provide requested credentials for ClimeCo's review and approval. A list of qualified third-party providers is also available upon request.

5. Certification Process

The figure below describes the process for applying to the Program. **Steps 4-7 are completed via the Portal.**

Process for achieving ClimeCo Certified™ Product certification



Applicants seeking to register their products into the Program shall adhere to the process and requirements described below.

Applicants seeking to register their products are required to create a Portal account to apply for certification. The steps described in sections 5.3 to 5.7 are all administered via the Portal.

The portal is also used for ongoing program management and secure data storage. Therefore, all Program participants must use the Portal to enter and complete all required program documentation, and each participant must maintain the participant account on the Portal including all periodic product sales reports as required by the ClimeCo team, invoice payments, adding/removing products, and completing annual program renewal and re-certification processes.

5.1 Define

5.1.1 Subject

Applicants shall clearly define the subject for which the certification is sought, including the name and description of the subject boundary, a detailed description of the product(s) and supporting information to uniquely identify the product(s) and the product functional unit to be assessed.

5.1.2 Scope and Boundaries

Applicants must include the product(s) full life cycle "cradle-to-grave" emissions inventory in the LCA. The LCA must include at least 95% of GHG emissions associated with the raw materials, manufacture and packaging of a product, and both upstream and downstream emissions from product distribution, product use and end of life. If a single product element or source contributes 50% of the total carbon emission, then at least 95% of the remaining sources of emissions shall be covered.

5.2 Select Provider

Applicants must work with qualified third-party consultants/providers to perform the LCA analysis and develop the LCA Report and Carbon Emissions Reduction Plan (see Section 5.3.3) as per the requirements stated in this Protocol. Applicants seeking to register products into the Program must bear all costs of the Product LCA assessment and any required third-party review.

5.3 Develop

Applicants are required to conduct an LCA analysis for all products for which certification is sought based on the boundaries and scope defined above. LCA Compliance Requirements are listed in **Section 5.3.1** below.

Applicants shall develop and submit to ClimeCo an LCA report (see **Section 5.3.2** for more details) based on the results of the LCA analysis. Applicants shall also develop and submit a Carbon Emissions Reduction Plan (see **Section 5.3.3** for more details).

5.3.1 LCA Requirements

Standards

The LCA report submitted by Applicants must be compliant with one or more of the following internationally recognized standards for assessing a product's carbon footprint:

- World Resources Institute/World Business Council for Sustainable Development Greenhouse Gas Protocol for Product Life Cycle Accounting & Reporting Standard (2011)
- ISO14067:2018 Greenhouse gases — Carbon footprint of products — Requirements and guidelines for quantification
- Any other relevant industry Standard as ClimeCo may deem necessary, and as approved by any related sustainable certification programs into which the ClimeCo Certified™ Product Program is accepted, based on a formal update of the Program Protocol.

Note: Standards are managed by independent international organizations and are subject to changes and updates by those organizations, keeping in line with stakeholder input, regulatory requirements, and market trends. Standards are sometimes even withdrawn or replaced.

ClimeCo continually monitors changes to Standards and strives to apply the most relevant, up to date, and widely accepted industry Standards to our Program to retain its authenticity and relevance to applicants and consumers. ClimeCo reserves the right to modify the requirements stated in this Protocol if needed, to maintain alignment with the latest Standards. Such modifications will be made via updates to this Protocol and applicants may also be notified of changes in requirements.

It is the responsibility of the preparer of the LCA report:

- to apply conservative processes and measurements in order to assure that the full carbon footprint of the product is analyzed and calculated,
- to attest that the resulting LCA report **is compliant** with the Program's Protocol and required Standards, and
- to identify the Standard(s) to which the LCA complies.
    - Any material deviations or exclusions from the Standard(s) followed in the product's carbon footprint assessment must be explained, justified according to the methodologies as allowed in the Standard(s), and accepted by ClimeCo prior to the product's consideration for program registration.

Emissions to Be Included
The LCA report shall include an assessment of all GHGs required by the UNFCCC/Kyoto Protocol and the applicable standard(s) at the time the product inventory is being compiled, and corresponding emissions shall be converted to CO_2 equivalents (CO_2e).

Global Warming Potential
The GHGs shall be assessed to the 100-year GWP values for these GHGs as defined in IPCC Assessment Reports.

Data Sources and Transparency of Data Quality

Product LCA estimates shall use primary and secondary data, and data sources consistent with the requirements of the chosen Standard and its required methodology.

All data sources, assumptions and sources of evidence shall be clearly stated in the LCA report.

5.3.2 LCA Report

The results of the LCA analysis, along with detailed descriptions of the subject, scope, boundaries, limitations, etc., must be summarized in the LCA report.

Methodology Consistency
Across iterations of LCA reports, consistency in the methodology is essential. If there are any changes in the methodology including but not limited to the allocation of utility resources, the inclusion and exclusion of non-attributable processes, the treatment of using recycled content and generating manufacturing waste for recycling, and other assumptions utilized in the product manufacturing stages, transportation and distribution stage, use stage and end of life stage, the changes should be documented, and the previous LCA result should also be re-calculated if any aspect subject to the change is considered sensitive to change as per the sensitivity analysis.

Changes resulting from background data updating are not considered as inconsistencies in the methodology. For example: the end-of-life pathway updated by a credible agency is not considered a change in assumption. However, switching the source of the end-of-life pathway may be considered an inconsistency if it cannot be justified.

Sensitivity Analysis
Sensitivity analysis is not required by the acceptable LCA standards but is added by ClimeCo to ensure the traceability of PCF. The LCA study shall include sensitivity analyses conducted on the significant life cycle phases, and the parameters subject to the sensitivity analyses shall include those relevant to the action described in the carbon emissions reduction plan. For example: if an Applicant plans to increase the use of renewable energy in the manufacturing as part of the initiative in the carbon emissions reduction plan, the percentage of renewable energy utilized should be considered as one parameter for sensitivity analyses.

Use of Renewable Energy Certificates, Guarantee of Origins or other Energy Attribute Certificates
Reference to renewable energy certificates, energy attribute certificates, or similar environmental commodities (“Energy Certificates”) in the LCA study is permitted only to represent the Applicants’ effort to increase the use of renewable energy in the production stage. Energy Certificates may not be used to quantify the PCF in the original baseline LCA report.

See **Appendix B** for the Product LCA review checklist that ClimeCo uses to ensure compliance with World Resources Institute/World Business Council for Sustainable

Development Greenhouse Gas Protocol for Product Life Cycle Accounting & Reporting Standard (2011) or ISO14067:2018 methodology compliance.

5.3.3 Carbon Emissions Reduction Plan (CERP)

The LCA report can be used to help Applicants identify and target GHG savings and reduction opportunities in their product supply chain. Emissions avoidance and reduction is a critical component of climate action and generally, reductions must be pursued **before** purchasing offsets (with the exception that companies may rely on planned reductions **only** during the first year of Program participation for the products in question). Offset purchases are considered additional steps taken by the applicant company to bolster its broader sustainability efforts and support positive climate action. Offset purchases do not eliminate or diminish the need for direct emission reduction planning for registered products and the actual emissions reductions required to satisfy ClimeCo's Program and international directives.

Pursuing avenues for product-level emissions avoidance and reductions, implementing reduction plans, and reporting on the reductions achieved are important and mandatory requirements for continued participation in the Program.

For Applicants in their first year of Program participation, the ClimeCo Certified Product certification may be issued based on clearly documented planned reductions, provided all other requirements in this Protocol are met.

The Program's Carbon Emissions Reduction Plan template is currently included in the Portal and requires a breakdown of the life-cycle emissions per product at each life cycle phase with a detailed, written reduction plan to lower each registered product's carbon footprint. Both the breakdown and the written reduction plan are to be submitted at the time of application via the Portal.

EU ECGT Directive Compliance:

For any Applicant that is subject to the EU ECGT Directive and currently is selling or intends to sell any ClimeCo Certified Product Program certified product in any EU country marketplace ("EU-selling Applicants"), the Applicant must complete an EU ECGT compliance audits by a qualified third-party auditor at the time of application and at Program renewal intervals. An EU ECGT compliance audit ensures the Carbon Emissions Reduction Plan meets the EU ECGT requirements for "making an environmental claim related to future environmental performance", as cited below in the **ECGT Article 1 Amendments to Directive 2005/29/EC section 2b:d requirements for future claims:**

"making an environmental claim related to future environmental performance without clear, objective, publicly available and verifiable commitments set out in a detailed and realistic implementation plan that

includes measurable and time-bound targets and other relevant elements necessary to support its implementation, such as allocation of resources, and that is regularly verified by an independent third-party expert, whose findings are made available to consumers."

During annual renewal, Applicants must submit an updated Carbon Emissions Reduction Plan to demonstrate any product-level emissions reductions achieved or in progress. Actual emissions reduction **must be achieved and demonstrated** before the end of the first two-year certification term through the updated Carbon Emissions Reduction Plan that is submitted annually to ClimeCo. Offsets must be purchased only after reductions have been documented.

Requirements for the Carbon Emissions Reduction Plan are listed below.

Requirements
The Applicant shall submit a Carbon Emissions Reduction Plan using ClimeCo's provided template which includes the following:

- Each registered product's emissions by life-cycle stage measured in kg CO_2e.
- Planned and achieved product carbon footprint reductions.
- A description of planned reductions and projections measured in either percentages or MT/kg CO2e.
- A detailed and realistic implementation plan that includes measurable and time-bound targets and other relevant elements necessary to support its implementation, such as allocation of budget and resources.
- A description of calculation methods and software used.

It is mandatory that the Carbon Emissions Reduction Plan defines and quantifies the CO2 emissions reductions at the registered product carbon footprint level, including target completion dates. The reductions must be defined in absolute or relative terms and the target base year for all registered products' carbon footprint must be specified.

Elements of a product's Carbon Emissions Reduction Plan should include targets for annual product GHG emissions reductions and progress towards achieving these targets, and should include an assessment of changes to areas in the product's life cycle that may have affected the product's carbon footprint, including but not limited to:

- changes in processes, equipment, technology and/or transportation methods due to improvements or upgrades made by the reporting organization;
- changes in energy sources including switching to renewable energy sources;

- selection and/or changes to suppliers in any stage of the product's life cycle;
- deliberate and verifiable process improvements made by reporting organization and/or suppliers;
- improvements in the use stage and in the end-of-life stage achieved through improved product design or an improved end-of-life procedure;
- Use of relevant and applicable market-based instruments that are accepted and approved by international organizations and Standard-setters such as SBTi.

Each Applicant's Carbon Emissions Reduction Plan must clearly identify and quantify emissions reductions achieved, its direct reduction impact to Product Carbon Footprint values of all registered products and must provide documented and verifiable carbon emissions reduction strategies and processes implemented that will directly lower the registered products' carbon footprint intensity. For EU-selling Applicants, the EU ECGT Directive also requires that the Applicant's Carbon Emissions Reduction Plan includes details of planned/implemented emissions reduction steps, clearly defined, time-bound and measurable targets, and budget and resource allocation put in place by the Applicant to ensure continual and ongoing emissions reduction.

Achieved emissions reductions must endure throughout the renewing four-year certification cycle. For instance, any use of environmental commodities and market-based instruments such as Renewable Energy Certificates (RECs) or similar products to reduce Scope 2 emissions related to registered product manufacturing or distribution must be accompanied by a minimum four-year purchase contract.

5.4 Review

Applicants shall submit the LCA Report and Carbon Emissions Reduction Plan information via the Portal for ClimeCo's review.

The submitted LCA Report and Carbon Emissions Reduction Plan will be reviewed and approved by ClimeCo. In the event of any non-compliance findings from the review process, the findings will be shared with the Applicant to enable the Applicant to explain, edit or modify their reports and resubmit the LCA Report for approval. ClimeCo conduct up to a maximum of two reviews and provide findings to the Applicant. Should an LCA require more than two (2) reviews by ClimeCo, additional LCA reviews may result in additional charges to the Applicant.

Upon ClimeCo's approval of the LCA Report, the carbon emission result therein is deemed the PCF.

5.4A Additional Third-party Verification per EU ECGT Directive

EU-selling Applicants must submit the ClimeCo-reviewed and approved LCA Report and Carbon Emissions Reduction Plan, along with any additional documentation required, to a ClimeCo-approved independent third-party auditor qualified to perform the required EU ECGT audit to seek a formal statement of ClimeCo Certified Product Program and EU ECGT compliance. This third-party auditor statement of compliance must be submitted to and approved by ClimeCo before the Applicant's products may be registered.

In order to become a ClimeCo-approved independent third-party auditor qualified to perform an EU ECGT audit of an EU-selling Applicant, the third-party auditor must:

- be ISO 17065 certified, or document mechanisms provided for in Regulation (EC) No 765/2008 etc.;
- successfully complete training by ClimeCo in the ClimeCo Certified™ Product Program requirements;
- document safeguards against conflicts of interest with either ClimeCo or Applicant,
- demonstrate quality control of the assessments and resulting audit reports,
- provide traceability and retention for the assessment documentation, and
- establish a complaints and appeal process for the Applicant.

5.5 Register

Upon successful completion of the Review steps, including the requirements of section 5.4A for EU-selling Applicants, the Applicant's products are eligible to be registered into the ClimeCo Product Certification Program. The Applicant will be notified of approval via email from the Portal.

The Applicant then shall sign a four-year Program Agreement with ClimeCo and pay the first year's Program registration fees and carbon offset purchases based on each PCF multiplied by each registered product's first year forecasted sales for all registered products in applicable marketplaces. This invoice is generated via the Portal and will be automatically sent to the Applicant.

5.6 Carbon Offsets and Credit Retirement

The Applicant shall pay ClimeCo to retire, on behalf of the Applicant, a sufficient quantity of carbon credits to satisfy ClimeCo's Program requirements ("Sufficient Credits"). Sufficient Credits are typically calculated as the number of carbon credits needed to offset the unavoidable GHG emissions from the total Product Carbon Footprint of each registered product, based on each product's annual forecasted sales multiplied by that product's assessed carbon footprint.

The retirement of Sufficient Credits is a required part of ClimeCo's Certified Product Program, and is intended to be an additional measure that Applicants take to bolster their broader sustainability efforts and further positive climate action.

The retirement of Sufficient Credits does not impact the product's carbon footprint and cannot be construed or used to indicate a reduction in the product's carbon footprint. The retirement of carbon credits also does not form the basis of the ClimeCo Certified Product Program certification. Only planned and actual emissions reductions within the product's supply chain count as emissions reductions and form the basis of the ClimeCo Certified Product Program certification.

To ensure retirement of Sufficient Credits to meet Program requirements, Applicants must report actual registered product sales from all product sales outlets on a semi-annual basis in arrears but must pre-pay for retirements based on forecasted annual sales, then report and manage the "bank" of carbon credits with ClimeCo on a semi-annual basis, purchasing more retirements during each registration year as required by actual versus forecasted registered product sales. All sales reporting will be submitted through the Portal.

ClimeCo shall facilitate the selection and retirement of approved, relevant, high-quality carbon credits on behalf of the Applicant. All carbon credits for the ClimeCo Certified™ Product Program must be retired through ClimeCo.

Carbon credits retired through ClimeCo are carefully vetted for the highest quality, credibility and transparency and meet the following internationally accepted standards for credible carbon credits:

- Carbon credits are procured from globally recognized Standards including:
    - Gold Standard
    - Verified Carbon Standard
    - American Carbon Registry
    - Climate Action Reserve
- Projects have been validated, and carbon credits have been verified by a third-party verifier against one or more of the above established Standards.
- Credits are generated from GHG reduction or removal enhancement projects.
- Projects generating the credits meet the criteria of additionality, leakage and double counting as defined in the WRI GHG Protocol for Project Accounting and/or ISO 14064:2.
- Carbon credits are retired by ClimeCo by unique serial numbers on the public registry maintained by the applicable Standard.
    - Final carbon credits retirement information and corresponding e-certificates are delivered directly to each Applicant company making those purchases.
- Offsets sourced from large-scale (10 MW+) renewable energy projects are ineligible.

ClimeCo's Certified™ Product Program utilizes carbon offset credits and projects that adhere to the following requirements:

- The methodology and types of credits used must represent genuine, additional reductions.
- Carbon credits must:
    - be verified by an independent third-party verifier.
    - be issued only after the emissions reduction associated with the offset project has taken place.
    - meet conditions that avoid double-counting.
    - be supported by publicly available project documentation on a registry or equivalent publicly available record, which must provide information about the offset project, quantification methodology and validation and verification procedures.
    - be stored and retired in an independent and credible registry or equivalent publicly available record.

ClimeCo provides carbon retirement related documentation that includes:

- which GHG emissions have been offset,
- the actual amount of carbon credit required,
- the type of offset and projects involved,
- confirmation that the carbon offset scheme was used in compliance with the policy listed herein,
- the number and type of carbon credits used,
- the time period over which the credits have been generated and the date of retirement,
- the third-party verifier,
- company letterhead,
- and standard and methodology used to achieve carbon offset.

5.7 Communicate

Once all Program requirements have been met by the Applicant, including the retirement of forecasted first year Sufficient Credits from ClimeCo, the ClimeCo Certified Product evidence of certification will be given to the Applicant. Applicant will receive a certificate, the ClimeCo Certified™ Product Program Marketing Guidelines and will be permitted the use of the ClimeCo Certified™ Product badge for the relevant products.

The Applicant now can communicate their achievement of the ClimeCo Certified™ Product certification status and may use the ClimeCo Certified™ Product badge on their website, in advertising, literature, publicity, labels, and technical bulletins in printed or electronic media. All communications related to the ClimeCo Certified™ Product certification must be in accordance with the guidelines provided in the Program agreement and Marketing Kit.

ClimeCo can provide additional communication support, upon request, to enable Applicants to communicate their achievement effectively and in accordance with relevant standards.

Please note that the ClimeCo Certified Product certification program is not a product carbon neutrality certification, and therefore **does not support any claims of carbon neutrality** and related terms thereof, including but not limited to terms such as "carbon neutral", "zero carbon", "carbon free", climate neutral", "zero carbon", "fully offset", "100% offset", "fully financed", etc. Applicants must communicate their achievement in accordance with the guidelines in the Marketing Guidelines provided, Applicants shall not make any claims of product carbon neutrality on the basis of being certified under this ClimeCo Certified Product Program.

In addition, the ClimeCo Certified™ Product Program does not address and is not applicable to any assessment of or claims regarding a product's durability and reparability, as addressed in EU ECGT; therefore, no Applicant may make product claims regarding a product's durability and reparability in relation to the product's registration in the ClimeCo Certified™ Product Program.

Disclosure of Key Information

ClimeCo has also developed online Product ID pages which will contain all relevant information about the registered products' certification status, validity, Carbon Emissions Reduction Plan and progress updates, and a link (if applicable and as desired by the Applicant) to the Applicant's product listing on e-commerce marketplaces or the Applicant's own website.

For Applicants selling or intending to sell in the EU, the Product ID pages may also contain information confirming their compliance with the EU ECGT Directive.

ClimeCo provides all of these features to participating Applicants to help Applicants maintain transparency, attract more sustainably-minded consumers, and help Applicants demonstrate necessary compliances.

Disclosure Required by EU ECGT for EU-selling Applicants

Applicants selling or intending to sell in EU marketplaces are subject to the EU ECGT Directive which, among other requirements, lays out specific disclosures that the Applicant/trader must make (see Article 4 of the EU ECGT Directive).

The EU ECGT Directive requires that environmental claims, in particular **climate-related claims, be supported by:**

(i) commitments and targets given by the trader which are:

- Clear,
- Objective,
- Publicly available and
- Verifiable

(ii) And the commitments and targets must be:

- set out in a detailed and realistic implementation plan that
- shows **how those commitments and targets will be achieved and**

- **and include all the relevant elements** necessary to fulfil the commitments, such as
  - **budgetary resources and**
  - **technological developments**

(iii) Such claims should also be verified by a third-party expert

- who should be independent from the trader,
- free from any conflicts of interest,
- with experience and competence in environmental issues and
- who should be **able to monitor the progress of the trader regularly with regard to the commitments and targets**, including the milestones for achieving them

(iv) Traders should ensure that the **regular findings of the third-party expert** are available to consumers

ClimeCo has made enhancements to its Carbon Emissions Reduction Plan template (available on the technology Portal for all Applicant companies) to enable Applicants to easily submit all the necessary information outlined above. ClimeCo has also developed individual Product ID pages with relevant and required information to help make it easier for Applicants to publicly disclose product and certification information and achieve compliance. While ClimeCo strives to make the process as easy as possible for Applicants and provides a medium to disclose and communicate key information, it is ultimately the Applicant/trader's responsibility to ensure required disclosures are being made in order to achieve and maintain compliance.

Recommended Disclosure

In addition to disclosure requirements outlined above for EU-selling Applicants, all Applicants are encouraged to disclose the following key information to further enhance transparency and build trust with their stakeholders. As a best practice, ClimeCo recommends that all Applicants (irrespective of the marketplaces they may sell products in), disclose the following

- The carbon footprint of their product(s) registered into the Program
  - When the carbon footprint of the product is disclosed to the public, the results shall be clearly shown in kilograms of carbon dioxide equivalent per LCA-assessed functional unit of product, and in accordance with any requirements for carbon footprint reporting and/or communication as set forth in the applicable standards in **Section 5.3.1.**
- The certificate along with details of products covered under the certification
- The scope of the certification and date of certification
- The offset registry or program
- The project identification number
- The project name as listed in the registry or program
- The offset project type and site location

- The specific methodology used to estimate all greenhouse gas emission reductions

6. Renewal Requirements

The ClimeCo Certified™ Product certification is valid for a period of twenty-four (24) months from the date of issue ("certification term"). Annual program renewal is required to continue use of the certification and badge.

For successful annual renewals, the Applicant shall provide the following information via the Portal:

- A formal confirmation of renewal in the program and attestation that no changes were made that would affect the Product Carbon Footprint by more than 10% in previously submitted product LCAs. If any such significant changes were made, the Applicant will submit the updates to affected LCAs via the portal within 30 days.
- At every two-year certification term renewal when demonstrated emissions reductions are required to be documented and submitted, evidence of such emissions reduction must be provided by the Applicant via an updated LCA that clearly shows a reduction in the Product Carbon Footprint that was reported at the time of application in the original LCA ("baseline").
    - In case of emissions reduction achieved through renewable energy certificates (RECs), green energy certificates (GECs), or International Renewable Energy Certificates (I-RECs), the actual certificate showing the purchase by the Applicant, a Confirmation Letter (template will be provided) and in the case of GECs, a Cancellation Information Sheet may be submitted to ClimeCo (and to the third-party auditor in case of EU-selling Applicants) in lieu of an updated LCA report.
    - In all other instances, an updated LCA report attested by the LCA provider and clearly showing the emissions reduction at the product level and by relevant lifecycle phase will be considered as demonstrated evidence of product-level emissions reductions achieved in the two-year period.

- Carbon Emissions Reduction Plan
    - Submitted and updated annually, in compliance with the Program Protocol.
        - The updated Carbon Emissions Reduction Plan submitted during annual renewal must include emissions reduction at the product level. Emissions reduction must be achieved before the end of the first two-year certification term and demonstrated via the updated LCA report and the updated Carbon Emissions Reduction Plan which is submitted during each annual renewal.
        - Each updated Carbon Emissions Reduction Plan updated must also include the Applicant's plan for emissions reduction for the subsequent two-year period, when the next demonstration of emissions reduction becomes due.
        - The Carbon Emissions Reduction Plan may describe reduction plans/targets/initiatives that span more than a two year period,

but must include a clear and measurable target for the emissions reduction that the Applicant plans to achieve in the next two years.

- Reviewed by ClimeCo and confirmed to demonstrate meaningful, documented and verifiable carbon emissions reductions that will lower Product Carbon Footprint of registered products.
- For EU-selling Applicants, the Program renewal documents and Carbon Emissions Reduction Plan, along with any additional documents that confirm the achieved Product Carbon Footprint reductions required at least bi-annually, and reviewed and approved by ClimeCo must be submitted to a third-party auditor qualified to conduct the EU ECGT required audit per Section 5.4A and as approved by ClimeCo. Applicant then must submit to ClimeCo evidence of successful third-party compliance audit, as required by EU ECGT.

- Ensure their signed Program Agreement is current and valid, pay all applicable product registration renewal fees and next registration year's carbon offsets purchases, based on each registered product's forecasted annual sales multiplied by that product's carbon footprint.

6.1 Statement of Confirmation or Updates to LCA Report

The recommended format and the requirements in the form of checklist can be found in Appendix B and Appendix C respectively. While ClimeCo uses the checklist to facilitate the review of the LCA report to ensure the LCA is compliant with the acceptable LCA standard, some requirements are added with specification by ClimeCo to enhance transparency and the comparability between the reports of different iterations and the LCA reports with carbon emissions reduction plans and/or other documents claiming changes in the PCF.

If there are no changes to any areas in the product's life cycle that affected the product's carbon footprint, the Applicant shall formally state this as the first step of the renewal process in the Portal.

If there are any changes to areas in the product's life cycle that may have affected the product's carbon footprint, the Applicant must submit an updated LCA report summarizing the changes to the product carbon footprint.

At every two-year certification term renewal, the Applicant must submit an updated LCA report that reflects the product-level emissions reduction it has achieved thus far.

Changes to the product's life cycle may include, but are not limited to:

- changes in processes, equipment, technology and/or transportation methods due to improvements or upgrades made by the reporting organization;
- selection and/or changes to suppliers in any stage of the product's life cycle;
- deliberate and verifiable process improvements made by reporting organization and/or suppliers;

- improvements in the use stage and in the end-of-life stage achieved through improved product design or an improved end-of-life procedure.

All Product LCAs submitted for product registration into the Program must be fully updated at least every four years. This update must include updated emissions sources, emissions factors and quantitative emissions reductions achieved till date from when the Applicant company first registered the product into the Program.

6.2 Updated Carbon Emissions Reduction Plan via ClimeCo-provided template

A Carbon Emissions Reduction Plan must be submitted at application then updated annually, based on factors including the findings identified in the LCA report through exercise of contribution analysis and sensitivity analysis. It will also need to be updated each time the Applicant adds new products to be certified. As an effective method to help ClimeCo track the changes, either incremental or transformational, the proposed items in the plan are required to be relevant, measurable, transparent, time bound and EU ECGT compliant.

6.2.1. Relevance

The proposed items shall relate to the products in the LCA study, so that any changes to the execution of the Carbon Emissions Reduction Plan directly result in reductions to the PCFs of registered products. For example: reductions in the electricity consumed by the production facility can be tracked to reductions in the registered product's carbon footprint.

6.2.2. Measurability

Regardless of a reduction goal in absolute terms or relative terms, the change is required to be measured in relation to the functional unit in the LCA study. The original data item that is used in the LCA study should be reported as a baseline for comparison. For example, if the action item is to reduce the electricity usage in the production facility, then the electricity usage per functional unit of the registered product utilized in the LCA study should be reported as the baseline, and the reduction item is executed, the progress should be reported in the same manner.

6.2.3. Transparency

The calculation of PCF involves much data processing, and a change in a life cycle phase may unintendedly influence another life cycle phase. To ensure the execution of an action per the plan will result in a net decrease in PCF, transparent communication is necessary. ClimeCo may request more information about the action Plan and validate the effect.

An updated Carbon Emissions Reduction Plan must provide information, calculations and validation regarding:

- Progress of emissions reduction initiatives described in previous Carbon Emissions Reduction Plan

- Amount of actual reductions achieved every two years that is reported and demonstrated at the time of every two-year certification term renewal and the areas in which they were achieved
- Methodology and verifiable calculations of carbon emissions reduction and direct reduction impact to Product Carbon Footprint values of all registered products
- Areas where reductions did not meet the set targets and the Applicant's plans to address the same
- Updated targets and timelines for continued and upcoming emissions reduction
- Budget and resource allocations being made by the Applicant to achieve its emissions reduction targets
- Technological innovation or interventions planned or put in place by the Applicant to achieve emissions reduction
- Applicant's use of relevant and applicable market-based instruments that are widely accepted in the industry and approved by international Standard setters such as SBTi
- New or updated initiatives to achieve additional reductions.

Product-level emissions reduction is an important and mandatory requirement for continued participation in the Program. Applicants must make efforts to reduce product-level emissions and report said reductions in the Updated Carbon Emissions Reduction Plan and in the updated LCA report (every two years) in a manner that easily permits validation of quantified emissions reductions. Product-level carbon emissions reductions must be verified and documented in the Applicant's Carbon Emissions Reduction Plan by the end of the first two-year certification term.

For EU-selling Applicants, the Updated Carbon Emissions Reduction Plan and updated LCA report must also be verified and validated by a ClimeCo-approved independent third-party auditor before every two-year certification term renewal, and this auditor shall provide the final approval for the product's continued participation in the Program.

6.3 UPDATED List of LCA-assessed and Approved Products

An updated list of LCA-assessed and approved products to be registered for the upcoming annual program period.

7. Risk of Decertification

The ClimeCo Certified™ Product Program requires annual renewal, but the certification term is considered to be up to two (2) years, barring any program changes or changes to the registered product's carbon footprint value.

Product LCAs used to determine a registered product's carbon footprint must be fully updated after the initial two (2) certification terms (a total of four (4) years), and every four (4) years thereafter, and must be updated as to any product carbon footprint change annually if those changes are anticipated to have increased the product carbon footprint values by 10% or more. Between the iterations of LCA updating, the registered product's carbon footprint is tracked by the Carbon Emissions Reduction Plan submitted annually.

Each Applicant's compliance with Program requirements is monitored at least annually by the ClimeCo Certified™ Program staff.

If at annual program renewal, an Applicant:

- has failed to demonstrate registered product-level carbon emissions reductions by the end of each two-year certification term,
- has failed to meet EU ECGT Directive requirements (for EU-selling Applicants) as outlined and updated annually as necessary in the Protocol
- has failed to meet ClimeCo Certified™ Product Program's Protocol and requirements, including:
    - failure to complete any annual renewal requirements;
    - failure to pay any applicable Program fees or costs;
    - failure to use ClimeCo Marks, logos, badges and Program descriptions in accordance with current Program Agreement and Marketing Guidelines;
- has failed to correct any of the above listed annual renewal requirements within thirty (30) days notification by ClimeCo

then the registered product will be decertified from the Program.

8. Updating the Protocol

The Protocol will be reviewed and updated periodically. ClimeCo will lead the review and update process, and will include input from program participants, qualified third-party consulting firms and the public, as ClimeCo determines is necessary and beneficial to the program, its Protocol and achieving the Program's goals. If updates to the protocol are significant, ClimeCo will also seek input from the public via a 30-day public comment period. After the public comment period, recommendations will be incorporated into the document and posted to the website for common use.

9. Contact Information

Please send comments and suggestions to:

ClimeCo Certified™ Product Program
Attn: Linda Kelly or Catherine Bates
4201 Main Street, Suite 428Houston, TX 77002

Or by e-mail to: lkelly@climeco.com and cbates@climeco.com

Additional Information

Below are databases that may be useful in the development of the LCA report:

National Renewable Energy Laboratory's US Life Cycle Inventory Database (NREL) (http://www.nrel.gov/lci/)
NREL and its partners created the U.S. Life Cycle Inventory (LCI) Database to help LCA experts answer their questions about environmental impact. This database provides a cradle-to-grave accounting of the energy and material flows into and out of the environment that are associated with producing a material, component, or assembly. It's an online storeroom of data collected on commonly used materials, products, and processes.

European LCA platform (http://eplca.jrc.ec.europa.eu/)

The European LCA platform was created to help LCA experts integrate life cycle thinking into product development and policy making by providing them with structured, cost free and independent information.

EDP List of LCA Consultants (https://www.environdec.com/resources/lca-consultants)
EPD International AB offers a list of LCA consultants as an Information Service, without any warranties, for manufacturers and consultancies to facilitate for the initial contact between manufacturer and external LCA consultancy firms.

It provides a list of organizations that claim that they offer technical support for LCA/EPD and have requested to be listed on the EPD page.

APPENDIX A

Short Summaries of Relevant Standards Publications

WRI/WBCSD Greenhouse Gas Protocol for Product Life Cycle Accounting & Reporting Standard:
The World Business Council on Sustainable Development (WBCSD) – World Resources Institute (WRI) GHG Protocol Product Life Cycle Accounting and Reporting Standard (referred to as the Product Standard) provides requirements and guidance for Applicants and other organizations to quantify and publicly report an inventory of GHG emissions and removals associated with a specific product.

The primary goal of this standard is to provide a general framework for Applicants to make informed choices to reduce greenhouse gas emissions from the products (goods or services) they design, manufacture, sell, purchase, or use. In the context of this standard, public reporting refers to product GHG-related information reported publicly in accordance with the requirements specified in the standard. It is widely expected to become one of the leading standards used for product LCAs, particularly in the United States.

The Standard is available for public download at: http://www.ghgprotocol.org/files/ghgp/public/Product-Life-Cycle-Accounting-Reporting-Standard_041613.pdf

ISO14067:2018
The ISO 14067 is an international standard that defines the requirements necessary for companies to determine the carbon footprint of their products. The main goal of ISO 14067 is to determine the greenhouse gas emissions produced during each stage in the life cycle of a product.

The ISO 14067 standard is not available for public download, but is available for a fee: ISO 14067:2018 - Greenhouse gases — Carbon footprint of products

DIRECTIVE (EU) 2024/825 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 28 February 2024 (also called the EU ECGT Directive or EmpCo Directive)

The Empowering Consumers for the Green Transition (ECGT) Directive is an EU law designed to "contribute to the proper functioning of the internal market, based on a high level of consumer protection and environmental protection, and to make progress in the green transition. Further, ECGT states that "it is essential that consumers can make informed purchasing decisions and thus contribute to more sustainable consumption patterns. That implies that traders have a responsibility to provide clear, relevant and reliable information".

By September 27, 2026, any company marketing or selling products or services to EU consumers— regardless of where the company is headquartered—must comply with strict new rules regarding sustainability labels and environmental claims.

APPENDIX B

Product LCA Review Checklist in Compliance with World Resources Institute/World Business Council for Sustainable Development Greenhouse Gas Protocol for Product Life Cycle Accounting & Reporting Standard (2011), ISO 14067:2018

LCA Review and Approval Checklist

ClimeCo Certified™ Product Program

LCA Review Checklist

ClimeCo Certified™ Product Program LCA Review Checklist	
LCA Date:	
Product Name:	
Product Company:	
LCA Provider:	
Reviewed by:	
PCF(s) in kgs CO2e:	
Review Status:	

Requirement	Description	Included (Yes / No)
1. Goal & Scope		
LCA title, completion date & ID	LCA report title, date of completion, and unique LCA ID number if available.	
Compliance declaration	Explicit statement of conformity with ISO 14067:2018 and/or the GHG Protocol Product Standard, including scope of compliance and any deviations.	
Goal of the study	Stated objective of the study and reasons for carrying it out.	
Intended application & audience	Intended use (e.g., certification, external communication, internal decision-making) and intended audience explicitly stated.	

Comparative assertions	Statement of whether comparative assertions are intended; if yes, confirmation that additional ISO / GHG Protocol comparison requirements are met. Note: if results are ever publicly disclosed with a comparative assertion, an independent critical review (ISO 14071) is required.	
Prior PCF/LCA & consistency	Whether a prior study exists for the same product(s), with confirmation of methodological consistency or justified recalculation.	
Product description	Description of assessed product(s) with dimensions, mass (incl. packaging), and photo(s).	
Bill of materials	Table of all raw materials and packaging by weight (kg) and/or % of total product weight.	
Attributional approach	Methodology confirmed as attributional.	
PCR / sector guidance	Any product category rules or sector guidance used are referenced (optional) and do not override the standard.	
System, function & functional unit	Description of the product system under study and its function(s); functional or declared unit clearly defined, with corresponding reference flow.	
GHGs included	List of GHGs assessed (CO2, CH4, N2O, PFCs and HFCs at minimum), with GWP characterization factors applied over a 100-year time horizon and the IPCC source (e.g., AR5/AR6) stated.	
System boundary	Cradle-to-grave boundary; all attributable processes included, and any non-attributable process reported.	
Time period & data recency	Inventory time period and period of validity (incl. publication date) stated; data no older than 3 years from LCA completion.	
Land-use change	Relevance of land-use change assessed and reported separately per GHG Protocol Appendix B / ISO 6.4.9.5–6.4.9.6, incl. method used and dLUC/iLUC separation, where applicable.	
Scope exclusions	Any excluded processes or data listed with justification, including the cut-off criteria / threshold applied (e.g., mass, energy, or environmental-significance basis).	
2. Life Cycle Inventory (LCI)		

Life cycle stages & scenarios with process map	Description of each life cycle stage, including use-phase and end-of-life scenarios, with a process map covering all attributable processes in the inventory.	
Data collection & sources	Data collection method described, with primary vs. secondary sources identified per stage; key activity data (energy, fuel, transport, material quantities) sufficient to support activity-level attribution.	
Upstream transportation	Raw-material transport distances and modes are logical and realistic (not identical/placeholder values).	
Production stage data	Electricity (kWh/FU), fuel use per FU, and packaging material per FU reported and logical.	
Product distribution	Distance and mode of finished-product distribution logical; any air transport quantified and reported separately.	
Use phase	Use-phase described, including electricity consumption (kWh/FU) where applicable (may exclude if zero).	
End of life	End-of-life / disposal / recycling data included and logical.	
Market-based instruments	Any use of EACs, RECs or Guarantees of Origin transparently documented (scope, quantity, time period, retirement evidence).	
Assumptions	Description of any assumptions or estimates made.	
Data quality & representativeness	Quantitative and qualitative assessment of data quality; secondary data justified and referenced, with temporal, geographic, and technological representativeness assessed for the reporting period.	
Allocation	States whether allocation is used; procedures for co-products and recycling described where applicable.	
Raw-material datasets table	Table listing each raw material, its emission-factor dataset, emission-factor ID (if available), and the database name and version.	
3. Life Cycle Impact Assessment (LCIA)		
PCFs by life cycle stage per functional unit	Total PCF in kg CO2e per functional/declared unit separated by each life cycle stage, in absolute and relative (%) terms.	
PCF excludes offsets & credits	No weighting factors, offsets, avoided emissions, or substitution credits included in the PCF results.	

Carbon storage & delayed emissions	Delayed emissions and biogenic carbon storage are treated as occurring at the start of the assessment period, with no temporary-storage credit in the PCF.	
Biogenic carbon reporting	Fossil, biogenic, and land-use-change CO2 emissions and removals reported separately, with removals shown as negative.	
4. Interpretation		
Completeness & consistency check	Inventory completeness confirmed (all in-scope life cycle stages and flows captured); methods, assumptions, and data sources applied consistently throughout (e.g., a single IPCC GWP set and consistent data-quality treatment across processes).	
Sensitivity & contribution analysis	Sensitivity analysis and contribution analysis included.	
Uncertainty analysis	Quantitative and qualitative uncertainty analysis, with a qualitative statement on inventory uncertainty.	
Value choices	Disclosure and justification of value choices made in the study.	
Limitations & communication	Limitations stated relative to intended use, incl. restrictions on product-to-product comparison; statement of whether results are for external communication and, if so, that ISO 14067 communication requirements are met.	
5. CCPP Program-Specific		
Manufacturer name & location	Manufacturer name and address; city, state/province, and country at minimum.	
Product identifiers & brand	Each product listed by GTIN(s), UPC(s), and/or ASIN(s), with seller/brand name(s) per product. ASIN required if selling on Amazon.	
Product grouping & variations	Explanation of why products are grouped in this LCA, including product variations.	
Emissions reduction suggestions	Opportunities to reduce the product's emissions identified.	

Senior Program Specialist

Signature:

Senior Management:

Signature:

APPENDIX C

EU ECGT Directive (EU) 2024/825 - REQUIREMENTS MAPPING MATRIX

EU ECGT Directive - Requirements Mapping Matrix

How to read the Citation column:
BLUE = Layer 1 — the amending Directive (EU) 2024/825 (the instruction).
GREEN = Layer 2 — the resulting rule inserted/amended in the older directive (2005/29/EC or 2011/83/EU).

Finding-aid page numbers column *refers to the sequential page of the EUR-Lex downloadable PDF version (Directive_-_EU_-_2024_825_-_EN_-_EUR-Lex.pdf, 20 pp.) and is provided for navigation convenience ONLY. This EUR-Lex rendition carries no Official Journal pagination, so the authoritative citation is the ELI + Article/point in the Citation cell — not the page number. ELI:*
http://data.europa.eu/eli/dir/2024/825/oj

S. No	Citation - trace to the Directive text	Finding aid: PDF page	ECGT requirement / Definition	Applicable to CCPP?	Mapping to CCPP documents (if applicable) / Reason (for non-applicability)
SECTION 1 — DEFINITIONS & SCOPE					
1	**Dir. (EU) 2024/825 — Art. 1(1)(b) [PDF p. 12] ↳ adds point (o) to Art. 2, Dir. 2005/29/EC**	p. 12	Definition — 'environmental claim'. Verbatim: “any message or representation which is not mandatory under Union or national law, in any form, including text, pictorial, graphic or symbolic representation, such as labels, brand names, company names or product names, in the context of a commercial communication, and which states or implies that a product, product category, brand or trader has a positive or zero impact on the environment or is less damaging to the environment than other products… or has improved its impact over time.”	Yes	The ClimeCo Certified Product Program ("CCPP") permits the use of the CCPP badge for registered products that meet all the requirements of the CCPP certification program. The CCPP badge is a distinct pictorial badge, which meets the definition of an environmental claim described in the EU ECGT Directive, and the terms of its use are governed by **Section 5 and Schedule C of the Legal Agreement** and **pages 5 and 6 of the CCPP Marketing Guidelines.**
2	**Dir. (EU) 2024/825 — Art. 1(1)(b) [PDF p. 12] ↳ adds point (p) to Art. 2, Dir. 2005/29/EC**	p. 12	Definition — 'generic environmental claim'. Verbatim: “any environmental claim made in written or oral form, including through audiovisual media, that is not included on a sustainability label and where the specification of the claim is not provided in clear and prominent terms on the same medium.”	Yes	Generic environmental claims are expressly prohibited. Refer to **Page 9 of the CCPP Marketing Guideline**s provided to all Applicant companies.

3	**Dir. (EU) 2024/825 — Art. 1(1)(b) [PDF p. 13] ↳ adds point (q) to Art. 2, Dir. 2005/29/EC**	p. 13	Definition — 'sustainability label'. Verbatim: “any voluntary trust mark, quality mark or equivalent, either public or private, that aims to set apart and promote a product, a process or a business by reference to its environmental or social characteristics, or both, and excludes any mandatory label required under Union or national law.”	Yes	The CCPP badge can be considered a sustainability label that recognizes products ("ClimeCo Certified Product") whose product carbon footprints have been measured and are on a path of continual carbon emissions reduction. ClimeCo Certified Product is defined in **Section 4 of the ClimeCo Certified Product Program ("CCPP") Protocol.**
4	**Dir. (EU) 2024/825 — Art. 1(1)(b) [PDF p. 13] ↳ adds point (r) to Art. 2, Dir. 2005/29/EC**	p. 13	Definition — 'certification scheme'. Verbatim: “a third-party verification scheme that certifies that a product, process or business complies with certain requirements, that allows for the use of a corresponding sustainability label, and the terms of which… meet the following criteria: (i) the scheme is open under transparent, fair, and non-discriminatory terms to all traders willing and able to comply…; (ii) the scheme's requirements are developed… in consultation with relevant experts and stakeholders; (iii) the scheme sets out procedures for dealing with non-compliance… including withdrawal or suspension of the use of the sustainability label…; and (iv) the monitoring of a trader's compliance… is carried out by a third party whose competence and independence from both the scheme owner and the trader are based on international, Union or national standards and procedures.”	Yes	The CCPP certification is a "certification scheme" as defined in the EU ECGT Directive and meets the criteria set forth in the Directive. The CCPP certification scheme's requirements, procedures, and monitoring mechanisms are established in the **CCPP Protocol.**
5	**Dir. (EU) 2024/825 — Art. 1(1)(b) [PDF p. 13] ↳ adds point (s) to Art. 2, Dir. 2005/29/EC**	p. 13	Definition — 'recognised excellent environmental performance'. Verbatim: “environmental performance compliant with Regulation (EC) No 66/2010… or with national or regional EN ISO 14024 type I ecolabelling schemes officially recognised in the Member States, or top environmental performance in accordance with other applicable Union law.”	No	The CCPP program is intended to provide recognition ONLY to products whose product carbon footprints have been measured and are on a path of continual carbon emissions reduction, and that meet the requirements set forth in the CCPP Protocol. **The CCPP program does not recognize any environmental performance beyond the scope of its CCPP Protocol.**

6	**Dir. (EU) 2024/825 — Art. 1(1)(b) [PDF pp. 13–14]** **↳ adds points (t),(u),(v),(w) to Art. 2, Dir. 2005/29/EC**	pp. 13–14	Definitions — 'durability' (t), 'software update' (u), 'consumable' (v), 'functionality' (w), each defined by cross-reference to Directives (EU) 2019/771 and (EU) 2019/770 (e.g. 'consumable' = "any component of a good that is used up recurrently and that needs to be replaced or replenished for the good to function as intended"). Scope the durability/obsolescence prohibitions below.	No	The CCPP program is intended to provide recognition ONLY to products whose product carbon footprints have been measured and are on a path of continual carbon emissions reduction, and that meet the requirements set forth in the CCPP Protocol. **Durability/obsolescence claims and requirements related to consumables are outside the scope of the CCPP certification program.**
SECTION 2 — PROHIBITED PRACTICES (new Annex I entries — banned in ALL circumstances)					
Sustainability labels					
7	**Dir. (EU) 2024/825 — Annex, point (1) [PDF p. 19]** **↳ inserts Annex I, point 2a into Dir. 2005/29/EC**	p. 19	Verbatim (Annex I 2a): "Displaying a sustainability label that is not based on a certification scheme or not established by public authorities."	Yes	CCPP label/badge IS based on a third-party audited independent certification scheme with a publicly available Protocol. The CCPP Protocol is published on ClimeCo's website.
Environmental claims					
8	**Dir. (EU) 2024/825 — Annex, point (2) [PDF p. 19]** **↳ inserts Annex I, point 4a into Dir. 2005/29/EC**	p. 19	Verbatim (Annex I 4a): "Making a generic environmental claim for which the trader is not able to demonstrate recognised excellent environmental performance relevant to the claim."	Yes	Generic environmental claims are expressly prohibited. Refer to **Page 9 of the CCPP Marketing Guidelines** provided to all Applicant companies.
9	**Dir. (EU) 2024/825 — Annex, point (2) [PDF p. 19]** **↳ inserts Annex I, point 4b into Dir. 2005/29/EC**	p. 19	Verbatim (Annex I 4b): "Making an environmental claim about the entire product or the trader's entire business when it concerns only a certain aspect of the product or a specific activity of the trader's business."	No	CCPP Program is based on the measurement of the entire product's lifecycle (cradle-to-grave) and on reductions made to product's carbon footprint, which is reflected in all Program documents and communications. **The Program does not, and is not intended to, highlight a certain aspect of the product.**

10	**Dir. (EU) 2024/825 — Annex, point (2) [PDF p. 20] ↳ inserts Annex I, point 4c into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 4c): "Claiming, based on the offsetting of greenhouse gas emissions, that a product has a neutral, reduced or positive impact on the environment in terms of greenhouse gas emissions."	Yes	Product carbon neutrality claims are not in the scope of the CCPP Program. Carbon neutrality claims are expressly prohibited - See **page 17 of the CCPP Protocol** and **pages 7 and 10 of the CCPP Marketing Guidelines.** Offset purchases are a part of the CCPP Program and communication related to Offset purchases are governed by the CCPP Marketing Guidelines **- see page 10 of the Marketing Guidelines.**
Legal-requirement-as-feature					
11	**Dir. (EU) 2024/825 — Annex, point (3) [PDF p. 20] ↳ inserts Annex I, point 10a into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 10a): "Presenting requirements imposed by law on all products within the relevant product category on the Union market as a distinctive feature of the trader's offer."	Yes	See **Section 5.7 of the CCPP Protocol**
Durability, repair & obsolescence (mostly producer-facing)					
12	**Dir. (EU) 2024/825 — Annex, point (4) [PDF p. 20] ↳ inserts Annex I, point 23d into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 23d): "Withholding information from the consumer about the fact that a software update will negatively impact the functioning of goods with digital elements or the use of digital content or digital services."	No	The CCPP Program recognizes products based ONLY on their measured carbon footprint and continual carbon emissions reduction measures. **Software updates impacting the functioning of goods are outside the scope of the CCPP Program.**
13	**Dir. (EU) 2024/825 — Annex, point (4) [PDF p. 20] ↳ inserts Annex I, point 23e into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 23e): "Presenting a software update as necessary when it only enhances functionality features."	No	The CCPP Program recognizes products based ONLY on their measured carbon footprint and continual carbon emissions reduction measures. **Software updates impacting the functionality of goods are outside the scope of the CCPP Program.**

14	**Dir. (EU) 2024/825 — Annex, point (4) [PDF p. 20] ↳ inserts Annex I, point 23f into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 23f): "Any commercial communication in relation to a good containing a feature introduced to limit its durability despite information on the feature and its effects on the durability of the good being available to the trader."	No	The CCPP Program does not address and is not applicable to any assessment of or claims regarding a product's durability and reparability. Durability and reparability claims based on participation in the CCPP Program are expressly prohibited - see **Section 5.7 of the CCPP Protocol**.
15	**Dir. (EU) 2024/825 — Annex, point (4) [PDF p. 20] ↳ inserts Annex I, point 23g into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 23g): "Falsely claiming that under normal conditions of use a good has a certain durability in terms of usage time or intensity."	No	The CCPP Program does not address and is not applicable to any assessment of or claims regarding a product's durability and reparability. Durability and reparability claims based on participation in the CCPP Program are expressly prohibited - see **Section 5.7 of the CCPP Protocol**.
16	**Dir. (EU) 2024/825 — Annex, point (4) [PDF p. 20] ↳ inserts Annex I, point 23h into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 23h): "Presenting a good as allowing repair when it does not."	No	The CCPP Program does not address and is not applicable to any assessment of or claims regarding a product's durability and reparability. Durability and reparability claims based on participation in the CCPP Program are expressly prohibited - see **Section 5.7 of the CCPP Protocol**.
17	**Dir. (EU) 2024/825 — Annex, point (4) [PDF p. 20] ↳ inserts Annex I, point 23i into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 23i): "Inducing the consumer to replace or replenish the consumables of a good earlier than necessary for technical reasons." → Relevant to products with consumables (e.g. cartridges).	No	**Durability/obsolescence claims and requirements related to consumables are outside the scope of the CCPP certification program.**
18	**Dir. (EU) 2024/825 — Annex, point (4) [PDF p. 20] ↳ inserts Annex I, point 23j into Dir. 2005/29/EC**	p. 20	Verbatim (Annex I 23j): "Withholding information concerning the impairment of the functionality of a good when consumables, spare parts or accessories not supplied by the original producer are used, or falsely claiming that such impairment will happen." → Relevant to products with consumables/spare parts.	No	**Durability/obsolescence claims and requirements related to consumables are outside the scope of the CCPP certification program.**

SECTION 3 — CLAIMS (CASE-BY-CASE)

	Misleading actions — Article 6, Dir. 2005/29/EC				
19	**Dir. (EU) 2024/825 — Art. 1(2)(a) [PDF p. 14] ↳ replaces Art. 6(1)(b) of Dir. 2005/29/EC**	p. 14	Verbatim (new Art. 6(1)(b), main characteristics now include): "…environmental or social characteristics, accessories, circularity aspects, such as durability, reparability or recyclability…"	Yes	The CCPP Program recognizes the environmental characteristic of a product ONLY to the extent that it relates to the product's carbon footprint measurement and emissions reduction. The trader's communication of this environmental characteristic is governed by the **CCPP Marketing Guidelines**. **Any other environmental characteristics the product may or may not have are outside the scope of the CCPP Program.**
20	**Dir. (EU) 2024/825 — Art. 1(2)(b) [PDF p. 14] ↳ adds Art. 6(2)(d) to Dir. 2005/29/EC**	p. 14	Verbatim (Art. 6(2)(d)): "making an environmental claim related to future environmental performance without clear, objective, publicly available and verifiable commitments set out in a detailed and realistic implementation plan that includes measurable and time-bound targets and other relevant elements necessary to support its implementation, such as allocation of resources, and that is regularly verified by an independent third party expert, whose findings are made available to consumers."	Yes	See "**Disclosure Required by EU ECGT for EU-selling Applicants**" sub-section under **Section 5.7 ("Communicate") of the CCPP Protocol**.
21	**Dir. (EU) 2024/825 — Art. 1(2)(b) [PDF p. 14] ↳ adds Art. 6(2)(e) to Dir. 2005/29/EC**	p. 14	Verbatim (Art. 6(2)(e)): "advertising benefits to consumers that are irrelevant and do not result from any feature of the product or business."	Yes	See the "Also Prohibited" section on **page 7 of the CCPP Marketing Guidelines**
	Misleading omissions — Article 7, Dir. 2005/29/EC				
22	**Dir. (EU) 2024/825 — Art. 1(3) [PDF p. 14] ↳ adds Art. 7(7) to Dir. 2005/29/EC**	p. 14	Verbatim (Art. 7(7)): where a trader provides a product-comparison service on environmental/social/circularity characteristics, "information about the method of comparison, the products which are the object of comparison and the suppliers of those products, as well as the measures in place to keep that information up to date,	No	Comparative claims are not within the scope of the CCPP Program.

			shall be regarded as material information."		
Pre-contractual information duties — Dir. 2011/83/EU (items that may touch CCPP clients)					
23	**Dir. (EU) 2024/825 — Art. 2(2)(b), (3)(c) + Art. 2(5) [new Art. 22a] [PDF pp. 15–16] ↳ inserts Art. 5(1)(ea) / 6(1)(la) and new Art. 22a into Dir. 2011/83/EU**	pp. 15–16	Verbatim (Art. 5(1)(ea)): where the producer offers a commercial guarantee of durability "at no additional cost, covering the entire good and with a duration of more than two years and makes that information available to the trader, the information that that good benefits from such a guarantee, its duration… using the harmonised label referred to in Article 22a."	No	**Durability/obsolescence claims and requirements related to consumables are outside the scope of the CCPP certification program.**
24	**Dir. (EU) 2024/825 — Art. 2(2)(b), (3)(c) [PDF pp. 15–16] ↳ inserts Art. 5(1)(ed) / 6(1)(lc) into Dir. 2011/83/EU**	pp. 15–16	Verbatim (Art. 5(1)(ed)): for goods with digital elements, digital content and digital services, "the minimum period, whether expressed as a period of time or by reference to a date, during which the producer or the provider provides software updates."	No	The CCPP Program recognizes products based ONLY on their measured carbon footprint and continual carbon emissions reduction measures. **Software updates impacting the functionality of goods are outside the scope of the CCPP Program.**
25	**Dir. (EU) 2024/825 — Art. 2(2)(c), (3)(d) [PDF pp. 15–16] ↳ inserts Art. 5(1)(i)-(j) / 6(1)(u)-(v) into Dir. 2011/83/EU**	pp. 15–16	Verbatim (Art. 5(1)(i)-(j)): "where applicable, the reparability score for the goods;" and, where no score exists, "information about the availability and estimated cost of, and procedure for ordering, spare parts… the availability of repair and maintenance instructions and… repair restrictions."	No	The CCPP Program does not address and is not applicable to any assessment of or claims regarding a product's durability and reparability. Durability and reparability claims based on participation in the CCPP Program are expressly prohibited - see **Section 5.7 of the CCPP Protocol**.

26	**Dir. (EU) 2024/825 — Art. 2(3)(a) [PDF p. 16]** **↳ replaces Art. 6(1)(g) of Dir. 2011/83/EU**	p. 16	Verbatim (Art. 6(1)(g), amended): the arrangements for payment, delivery, “including environmentally friendly delivery options where available…”	No	CCPP Program is based on the measurement of the entire product's lifecycle (cradle-to-grave) and on reductions made to product's carbon footprint. Traders are required to demonstrate continual emissions reductions and as part of their reduction initiatives, a trader may explore environmentally friendly delivery options to reduce its transportation-related emissions - see **Section 5.3.3 of the CCPP Protocol** for a list of initiatives a trader may take to reduce their product's carbon footprint.