



CIRCULARITY CERTIFICATES: CLAIMS FRAMEWORK

Evidential Basis for CE Certificate Claims

Bloom Group Limited
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PURPOSE OF THIS DOCUMENT

This document sets out the evidential basis for claims made by holders of Circular Economy (CE) Certificates issued by the Bloom Registry. It is intended for legal counsel, ESG assurance teams, and compliance reviewers seeking to understand the integrity framework behind I-TEC and I-MAT certificates, and to assess the defensibility of any environmental claims made in reliance on them.

This document covers two distinct use cases: (1) Project Owner acting as a reseller or intermediary, transferring certificates to downstream customers (e.g., telcos) who will retire them for their own sustainability claims; and (2) Project Owner retiring certificates for its own Scope 3 reporting on a secondary basis.

Key conclusion

CE Certificates are specific, quantified, independently verified instruments. They do not make a generic 'carbon neutral' claim. Each certificate corresponds to a traceable, real-world physical event, the verified reuse or recycling of a defined weight of IT hardware. The Bloom Registry operates a book-and-claim system under which certificates can be transferred between parties and retired only once, preventing double-counting. Project owners may transfer certificates to downstream customers (such as telcos) for retirement against those customers' own Scope 3 reporting. This is structurally equivalent to how Renewable Energy Certificates (RECs) or Guarantees of Origin (GOs) are traded and retired in the energy sector. The claims they support are rooted in ISO 14064-verified methodology, third-party audit, and a public, non-double-counting registry, consistent with the EU Empowering Consumers for the Green Transition Directive (ECGT) and emerging SBTi CNZS V2 guidance on commodity Environmental Attribute Certificates.

CERTIFICATE TYPES

The Bloom Registry issues three types of CE Certificate, each representing a distinct, specific, and measurable claim:

Certificate	What it represents	Nature of claim
I-TEC	1 kg/unit of IT hardware refurbished and returned to circulation	Carbon intensity from extending product lifecycle; calculated against new device manufacturing baseline
I-TEC AE	1 kg of IT hardware refurbished and returned to circulation	Avoided emissions from extending product lifecycle; calculated against new device manufacturing baseline

I-MAT	1 kg tonne of materials produced from recycled e-waste sources	Circular material sourcing claim; proof that materials came from recovered rather than from virgin sources
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Important: what CE Certificates do NOT claim and how the resale model works

CE Certificates do not claim that any party's operations are 'carbon neutral', 'net zero', or 'climate positive'. They are environmental attribute instruments conveying a specific, quantified physical outcome. Resale and transfer: you may purchase and transfer certificates to downstream customers without retiring them. Until retirement, no sustainability claim may be made against the certificate by any party. Retirement is a one-time, irreversible action recorded on the Bloom Registry. Once a certificate is retired by a downstream customer, it cannot be claimed again by the Project Owner or any other party. This single-retirement rule is the structural guarantee against double-counting. Broader sustainability claims made by the Project Owner or their customers in their own communications remain the responsibility of the claiming party and must be substantiated separately against their own emissions inventory.

THE INTEGRITY FRAMEWORK

The following table maps each material claim element of a CE Certificate to its evidential basis. This table is intended for attachment to legal due diligence files and ESG assurance workpapers.

Claim element	Evidence / mechanism	Status
Methodology is independently verified	"Estimated Avoided Emissions and Emissions Intensity From Circular Re-Use And Recycling Activities", verified to ISO 14064-2 (project-level GHG quantification) and ISO 14064-3 (independent validation and verification) by an accredited third-party VVB	Verified ✓
Process integrity is independently endorsed	Methodology endorsed by e-Stewards, the leading ITAD certification programme operated under the Basel Action Network. e-Stewards certification requires chain-of-custody controls,	Endorsed ✓

Projects are independently audited	responsible recycling standards, and data destruction protocols Three live projects verified by an accredited VVB against the Bloom methodology. Verification reports available on request	Live ✓
No double counting	Each CE Certificate carries a unique serial number, is tracked in the public Bloom Registry from issuance through retirement, and cannot be claimed more than once. Registry: registry.bloom-esg.com	Registry ✓
Additionality demonstrated	Bloom's Additionality Criteria V1.1 (December 2025) sets percentage thresholds by material type and requires legal surplus, evidence/MRV guardrails, and ex-post issuance. Available at bloom-esg.com/additionality-criteria	Published ✓
Alignment with ICVCM Core Carbon Principles	The Bloom Registry is structured in alignment with the Core Carbon Principles of the ICVCM: additionality, real/measurable/permanent reductions, avoidance of double counting, transparency, and robust governance	Aligned ✓
Relevant to end-user's value chain	IT hardware (e.g., smartphones, network equipment, laptops) is a direct procurement item for telecommunications companies (Scope 3, Category 1: Purchased Goods and Services; Category 2: Capital Goods; and Category 11: Use of Sold Products). I-TECs correspond to the physical mass flow of that same category of asset, structurally within-value-chain for the retiring corporate customer. Project Owner's role as intermediary does not affect the value-chain relevance for the end-user	Confirmed ✓

Consistent with emerging SBTi CNZS V2 guidance on commodity EACs	Bloom's SBTi guidance (bloom-esg.com/sbti-guidelines-registry) documents how I-TECs meet the five integrity criteria for commodity EACs in the SBTi CNZS V2 draft: additionality, traceability, conservative baselines, independent verification, and value chain alignment	Documented ✓
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GREENWASHING RISK ANALYSIS

The primary regulatory risk framework for environmental claims within European and US jurisdictions are as follows:

Jurisdiction Framework	Relevant rule	Position: Project Owner and downstream customers
EU ECGT (from Sept 2026)	Bans generic green claims; prohibits 'carbon neutral' claims based on offsets alone; applies to B2C commercial practices	CE Certificates are specific and quantified. The ECGT applies to B2C practices; B2B transactions are outside its direct scope. However, if a company uses retired certificates to support consumer-facing green claims (e.g., 'eco tariff' marketing), those downstream claims must be specific and substantiated. It is recommended that project owners should ensure transfer documentation makes this requirement explicit.
UK Green Claims Code (CMA)	Claims must be accurate, clear, not omit material information, and be substantiated	I-TECs are based on a published, ISO-verified methodology with public registry traceability. Claims by a Project Owner or downstream customers should reference the specific certificate type and quantity. Project Owners when acting as a certificate reseller, should not make sustainability claims against certificates it has transferred but not retired.
US FTC Green Guides	Prohibits unqualified general environmental benefit claims; requires specific, substantiated claims	Consistent: I-TECs are specific instruments. Neither project owners nor downstream customers should apply unqualified 'sustainable' or 'green' labels. Claims should

		state what the certificate represents and that it has been retired on the Bloom Registry.
CSRD / ESRS (EU)	Requires disclosure of Scope 3 methodology, data quality, and assumptions	Corporate customers retiring certificates can use them to support activity-based Scope 3 data under GHG Protocol (Category 1 or 11). The ISO-verified methodology and third-party verification provides auditable data for ESRS disclosure. The project Owner itself should not report retired certificates as reducing its own Scope 3 if those certificates have been transferred to a customer.
GHG Protocol: double-counting	Environmental attributes can only be claimed once; transfer of certificates does not transfer the claim until retirement	The Bloom Registry's single-retirement architecture directly addresses this. A project Owner's internal controls should ensure that transferred (but not yet retired) certificates are not included in its own Scope 3 disclosures.

RECOMMENDED CLAIM LANGUAGE

The following phrasing is recommended for Project Owners and for downstream customers (e.g., telcos) retiring certificates. Claims must reflect the actual role of the party making them.

Recommended: Project Owner reselling to a telco customer (transfer, pre-retirement)

We are an authorised reseller of CE Certificates issued by the Bloom Registry. These certificates represent verified circular economy outcomes for IT hardware and may be retired by the purchasing organisation against its own Scope 3 emissions inventory. Each certificate is uniquely numbered, publicly traceable, and can only be retired once.

Recommended: Telco customer retiring certificates (Scope 3 reporting)

[Telco name] has retired [X] I-TEC certificates via the Bloom Registry, representing [Y] metric tonnes of IT hardware verified as refurbished and returned to circulation through certified ITAD processors. These certificates are issued under an ISO 14064-verified methodology, independently audited by an accredited third-party verifier, and sourced via [Project Owner/ IT Processor] as an authorised Bloom Registry reseller.

Recommended: Project Owner retiring certificates for its own use (secondary basis)

[We] have retired [X] I-TEC certificates via the Bloom Registry, representing [Y] metric tonnes of IT hardware verified as refurbished and returned to circulation through certified ITAD processors. These certificates are issued under an ISO 14064-verified methodology and independently audited by an accredited third-party verifier. Certificates retired for [our] own reporting are separate from and not included in certificates transferred to customers.

Avoid: Regulatory and double-counting risk

Do not use 'carbon neutral', 'climate neutral', 'net zero', or 'carbon positive' in connection with CE Certificates without separate, independently verified Scope 1, 2, and 3 accounting. These terms carry specific regulatory meaning and are subject to increasing enforcement under the ECGT and national consumer protection frameworks.

Do not make sustainability claims against certificates that have been transferred to a customer and not yet retired. Only the retiring party may claim the environmental attribute.

Do not retire and separately transfer the same certificate. The Bloom Registry's architecture prevents this technically, but commercial arrangements should reflect this constraint explicitly.

ACCREDITATION CONTEXT AND FORWARD ROADMAP

Bloom has been asked if it holds or plans to seek accreditation from Verra, Gold Standard, or ICVCM or other emerging Scope 3 standards. The following provides the factual context:

- a. **Verra & Gold Standard accreditation:** No Verra or Gold Standard methodology for IT asset reuse or recycling currently exists for either avoided emissions or commodity Environmental Attribute Certificates ("commodity EACs"). These bodies do not have an approved pathway for the instrument class that I-TECs represent. This is a market structure gap. It reflects the fact that Bloom is operating at the frontier of a new instrument category, analogous to the position that sustainable aviation fuel certificates or green steel EACs occupied before their frameworks matured.
- b. **Bloom's approach:** The ISO 14064 standard that underpins Bloom's methodology is the same standard on which Verra and Gold Standard methodologies are built. Independent VVB verification, the Bloom Registry's no-double-counting infrastructure, alignment with ICVCM Core Carbon Principles, and the e-Stewards endorsement collectively provide a verification architecture that is substantively comparable to the oversight applied to other voluntary carbon market instruments.

- c. SBTi alignment:** The SBTi Corporate Net-Zero Standard V2, due for final publication in 2026, is the most significant near-term regulatory development for instruments like I-TECs. The draft standard explicitly provides for commodity EACs as a tool for Scope 3 target setting, with five integrity criteria: additionality, traceability, conservative baselines, independent verification, and value chain alignment. Bloom's documented position against each of these criteria is set out at www.bloom-esg.com/sbti-guidelines-registry.

Pathway	Timeline	Current Status
ISO 14064 methodology verification	Complete	Verified ✓
Third-party VVB engagement	Complete	Active across 3 projects ✓
e-Stewards endorsement	Complete	Endorsed ✓
SBTi CNZS V2 commodity EAC alignment	2026 (standard publication)	Documented position published ✓
Verra methodology development (ITAD)	3–5 years	Monitoring;
Gold Standard new methodology submission	2–4 years	Under evaluation
ICVCM CCP-Eligible programme status	5+ years	Requires programme-level accreditation first

REGISTRY REFERENCES AND FURTHER DOCUMENTATION

The following resources are publicly available and may be cited in due diligence and assurance workpapers:

- **Bloom Registry homepage:** bloom-esg.com/registry
- **CE Certificate definition (I-TEC, I-TEC AE, I-MAT):** bloom-esg.com/i-tec-inset-certificate-definition
- **ISO 14064 framework explanation:** bloom-esg.com/building-trust-iso-standards
- **Book-and-claim system description:** bloom-esg.com/book-and-claim-system-for-i-tec
- **Core Carbon Principles alignment:** bloom-esg.com/core-principles-commitment
- **SBTi CNZS V2 commodity EAC guidance:** bloom-esg.com/sbti-guidelines-registry

- **Additionality Criteria V1.1 (December 2025):** bloom-esg.com/additionality-criteria
- **Circularity Standard:** bloom-esg.com/circularity-standard
- **Live registry (issued and retired certificates):** registry.bloom-esg.com

VVB verification reports and the full ISO 14064 verified methodology document are available on request from Bloom ESG.