



Environmental & Consumer Compliance Organization

Certification Manual

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1. Introduction

This manual provides a comprehensive overview of ECCO's mission, processes, and requirements for certification, ensuring transparency, consumer safety, and industry accountability.

In California's legal cannabis industry, contamination with pesticides and harmful chemicals pose a serious threat to public health, consumer trust, and business viability. Investigative reports from the summer of 2024 revealed widespread issues with pesticide contamination, regulatory gaps, and the slow response of state agencies. For California licensed cannabis brands that sell through California licensed cannabis retailers, understanding these risks and taking proactive measures to ensure product safety is critical—not only to comply with regulations but to build consumer confidence and protect your business's reputation. Regulatory shortcomings have highlighted the urgent need for enhanced safety protocols and the importance of industry leaders coming together to implement these standards.

By participating in the ECCOSystem, we can ensure these protocols are met, while holding each other—and the industry as a whole—accountable for delivering safe, trustworthy cannabis products to consumers.

2. Overview of ECCO

a. What We Do

The Environmental & Consumer Compliance Organization (ECCO) is a nonprofit certification body launched by concerned stakeholders to offer independent, third-party testing and certifications to ensure that products meet the highest standards of consumer safety, product quality, and environmental responsibility. We empower brands to not only meet their own benchmarks but to exceed industry norms, helping them distinguish themselves in the marketplace. Through our rigorous certification process, we provide consumers with a trusted source of guidance on which brands uphold the values of health, safety, and sustainability.

b. Why We Do It

We believe that consumers deserve transparency and assurance when purchasing products that impact their health and the environment. Without the necessary regulations and enforcement in place, consumers are vulnerable to harmful products. Our mission is to protect public health, promote sustainable practices, and foster consumer confidence in the marketplace by certifying contaminant-free products. By raising the standards for safety, quality, and environmental responsibility, we inspire long-term change and encourage businesses to embrace higher ethical and environmental standards.



c. How We Do It

We achieve our mission through a meticulous certification process designed to ensure products meet ECCO's stringent standards. Our testing and evaluation procedures are designed to simulate how consumers would actually interact with and use the product: by purchasing SKUs in-store and DTC. Brands undergo an initial screening and testing phase conducted by accredited third-party labs. Products are evaluated for safety, quality, and compliance with updated ECCO Certification Standards. Upon passing, brands are awarded the ECCO Certification Mark, allowing them to showcase their commitment to consumers. We ensure ongoing compliance through monthly testing and public disclosure of certification results, creating a transparent system that drives trust and accountability.

3. The Certification Program

a. Introduction

ECCO's certification program ensures that products meet our stringent safety and quality standards. The program is designed to certify individual products, focusing initially on cannabis distillate and flower-based products.

b. Standards

ECCO will publish its standards on its official website and update and redistribute as needed. Certification Standards may be updated within 90 days' notice. Products will be purchased from retailers to replicate the consumer experience. ECCO will not certify at the brand level—only on the Member Brand's specified and agreed category level as verified and confirmed monthly through audits of individual products that pass technical specifications will be certified. ECCO will initially focus on cannabis oil based vaporizer and flower category products.

Click here to view the latest [ECCO Certification Standards](#).

ECCO Certified (CAT4) Distillate

Cannabis products that pass all 138 listed pesticides with an Anresco or Infinite Laboratory test that confirms each unique batch meets the standards for ECCO Certified (CAT4) Distillate.

ECCO Certified (CAT4) Non-Detect Distillate

Cannabis products that pass all 138 listed pesticides with an Anresco or Infinite Laboratory test that confirms a batch is below LOD (PPM) meet the standards for ECCO Certified (CAT4) Non-Detect Distillate.

Additional Requirements

Cannabis oil products will additionally be tested for the presence of Vitamin E acetate, MCT, and hemp CBD conversions, and must meet the limits defined in ECCO's Certification Standards.

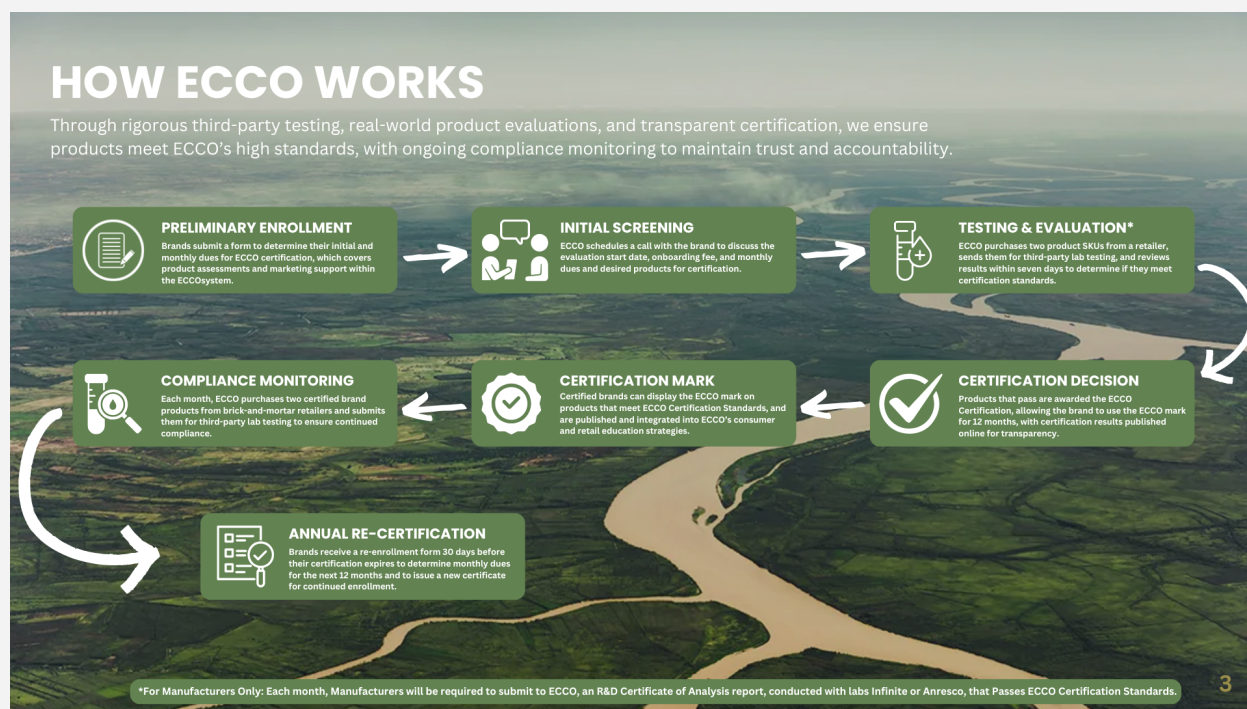
c. Approval

Products that meet or surpass ECCO's standards are eligible to receive ECCO certification. Unique ECCO labels will be issued to brands for their products, which will include instructions for labeling on individual packages. Certified products will also be added to ECCO's online product repository, and the certified brand featured on the website section ECCOsystem.

d. Certification Scope

ECCO Certification is offered to any legally state-licensed brands using cannabis distillate oil in the production of their products. The ECCO Certification is issued on an individual SKU basis.

e. Certification Process



Preliminary Enrollment:

Brands interested in obtaining ECCO certification complete a preliminary form. The form helps ECCO determine the brand's initial and monthly certification dues, which support the independent and randomized

assessment of their products and the marketing of ECCO and its brand partners, the ECCOsystem. The monthly dues are fixed for a 12-month period.

Initial Onboarding:

Upon receipt of the intake form, ECCO schedules a call with the brand point contact to align on the evaluation start period and the one-time onboarding fee and monthly dues.

Compliance Monitoring, Testing, and Evaluation:

- **Collection:** Each month, ECCO (i) purchases 2 Member product SKUs from Member Brands that have agreed to sell their specific products at retailers with the ECCO certification label, and (ii) for Manufacturers and Nurseries only, collects an R&D Certificate of Analysis meeting ECCO Certification Standards.
- **Laboratory Analysis:** Products are sent to an accredited, Department of Cannabis Control (DCC) third-party analytical laboratories designated by ECCO and are tested against the continuously updated ECCO Certification Standards. Currently, Infinite and Anresco are the only 2 ECCO Approved CA labs through which tests will be conducted, but more will be added as they are Approved to accurately test to the ECCO Technical Standard.

Certification Decision:

Analysis of Results: ECCO reviews the laboratory results within 7-days to determine if each product meets, exceeds, or falls short of the established standards.

Certification Issuance: Products that pass the evaluation are awarded the ECCO Certification. The brand is issued a certificate and digital marketing collateral valid for 12-months.

Certification Mark Authorization:

- **Display of Certification:** Certified products are permitted to use the ECCO Certification Mark on their packaging and marketing materials, signifying compliance with ECCO's rigorous standards.



- **Public Disclosure:** Certification results are published on the ECCO website, on a pass or fail basis, enhancing transparency and consumer trust in accordance with our confidentiality policy in section 6 of this manual.
- **Integration with Marketing:** ECCO integrates certification data into consumer education initiatives, budtender appreciation days, and retail marketing strategies to promote certified products

Annual Review and Recertification:

30-days before the end of their 12-month certification period, brands will be issued a re-enrollment form. Similarly to the initial enrollment form, this will determine the monthly dues for the next certification period and issue a new 12-month certificate.

4. Complaints and Appeals

Concerns about the integrity of the ECCO Certified program or its certified products will be addressed systematically. Appeals or complaints regarding certification denial or suspension should be submitted in writing and will be reviewed by the ECCO Board of Directors. The decision will be based on certification data and information from all involved parties.

Procedure for Complaints and Appeals:

- **Initial Submission:** Complaints or appeals should be submitted in writing to the relevant ECCO, including a comprehensive explanation, evidence, and relevant documentation.
- **Resolution Efforts:** The certification body will first attempt to resolve the issue directly with the complainant or appellant. If no resolution is reached, the case will be escalated to the ECCO Certified Board of Directors.

Board Review:

- **Conflict of Interest:** Board members or associated personnel who have had professional ties with the entity in question within the past two years will be excluded from the review process.
- **Evaluation:** The ECCO Certified Board or a designated subcommittee will thoroughly assess the case to fully grasp the situation.
- **Decision:** Post-evaluation, the Board will determine necessary actions for the certification body to resolve the complaint or appeal.
- **Outcome Notification:** The final decision will be formally communicated to the complainant or appellant, concluding the appeal or complaint process.

Basis for Review

- The review and decision-making process will be based on certification data, information from the involved parties, and any other pertinent sources.
- This structured approach ensures fairness, transparency, and the maintenance of high standards within the ECCO certification process.

5. Management of Impartiality and Conflicts of Interest

For certification bodies and their staff to maintain trust in their operations, it is crucial that they are impartial and are seen as such. This principle is foundational for ECCO Certified, ensuring that all certification activities are carried out with integrity.

Certification Team Responsibilities

Impartiality: Certification Teams must conduct all activities impartially, free from commercial, financial, or any other pressures that could compromise this impartiality. They must operate without bias or conflict of interest, ensuring objectivity, fairness, and an open-minded approach in all processes.

Potential Risks to Impartiality:

Impartiality risks can stem from various sources, including but not limited to:

Self-Interest: Over-reliance on specific contracts or fear of losing clients or jobs that might affect certification decisions.

Self-Review: Evaluating the outcomes of services previously provided by the same body.

Advocacy: Supporting or opposing a client's interests.

Over-Familiarity: Inappropriate trust or familiarity that might bypass rigorous evidence-based assessment.

Intimidation: Being influenced by threats or fears from clients or stakeholders.

Competition: Conflicts arising from competitive interests between clients and personnel.

Safeguards Against Conflict of Interest

ECCO implements strict policies to detect and mitigate potential conflicts of interest. Staff involved in any stage of certification, including application review, on-site inspections, and decision-making, must declare no conflicts of interest and use designated ECCO forms for this purpose. Any discovered conflict mandates the recusal of the involved individual from related certification activities.

Example of Conflict Avoidance:

An auditor having familial or commercial connections with a certification applicant must not participate in any certification process for that applicant to avoid bias or the perception thereof.

Handling Complaints:

Concerns about the impartiality of ECCO can be formally addressed by submitting complaints in writing to the ECCO Board of Directors or the appropriate subcommittee, as detailed in the "Complaints and Appeals" section of our guidelines, and directed to info@eccocert.org.

This framework ensures that ECCO maintains its reputation for unbiased, reliable certification, upholding the trust of all stakeholders in the process.

6. Confidentiality

All information maintained or collected for certification purposes will remain strictly confidential between the brand requesting certification and ECCO. Records shall be transported, transmitted and transferred in a way that ensures confidentiality is preserved. The certified brand shall have access to information and records pertaining to their own certification upon request.

Absolutely no proprietary information is disclosed to third parties without the certified entity's written consent.

During complaint and appeal investigations, ECCO Board of Directors or applicable subcommittee may also have access to certification information and records relating to the scope of the appeal or complaint, with the written consent of the complainant or applicant, as applicable.

Public information about the certified brand may be made available on the ECCO website. Information made available to the public about a certified brand may include the following:

- Business Name
- Certification Date
- Status of Certification (Pass or Fail)
- Photos of Product Certified

7. Maintaining Certification

A. For Brands

1. Auditing Process:

A. In the first month of the audit process, Brands will be required to submit to ECCO, an R&D Certificate of Analysis report on the oil/distillate used exclusively for the final formulation of ECCO designated SKUs, conducted with labs Infinite or Anresco, that Passes ECCO Certification Standards representing the exact oil utilized for the final formulation of their production of finished goods.

B. Brands will be subjected to two (2) random SKU audits per month. To maintain transparency and accountability batch numbers will not be repeated during these audits. Monthly testing fees are covered by ECCO via membership dues.

2. Policy & Remedy for Failed Audits:

(I). If a specific product initially fails ECCO's testing standards, ECCO will conduct a re-test to confirm the initial result.

(II). If the failure is confirmed after a retest and the product is within 20% or less of the limit on ECCO's expanded list of 69 analytes:

The Brand will receive a warning and must complete a root cause analysis. Additionally, the Brand is required to submit a preventative and mitigation action plan to ECCO within 14 days of receiving the retest confirmation.

(III). If the failure is confirmed and the product exceeds the limit by 20% or more:

A. The brand agrees to conduct a comprehensive supply chain audit

to address and remediate the issue.

B. The specific SKU that failed both the initial, and secondary re-test must undergo a voluntary recall of the products included in the batch-SKU combination of the failed SKU.

Suspension/Ban Criteria:

Brands are permitted up to 3 confirmed failures (exceeding pesticide limits or containing harmful additives like synthetically converted THC, MCT oil, or Vitamin E Acetate) within a year before suspension for 12 months. Future reinstatement in the program after suspension is subject to ECCO's review and approval as well as a renewed commitment by Brands and verification that ECCO standards are being adhered to.

B. For Oil Manufacturers

1. Auditing Process:

Each month, oil manufacturers will be required to submit to ECCO, an R&D Certificate of Analysis report, conducted with labs Infinite or Anresco, that Passes ECCO Certification Standards representing at least 40 KG of oil production per month. Manufacturers must also attest to, and commit to refrain from using or producing synthetically produced THC, MCT oil, or vitamin E acetate. At any time, ECCO can request from the Oil Manufacturer a 5g sample from the Batch represented to be ECCO Certified by the R&D Certificate of Analysis report, to be tested and confirmed both compliant and consistent with the monthly submittal.

2. Policy & Remedy for Failed Audits:

(I). If the Certificate of Analysis results initially fails ECCO's testing standards, the Manufacturer must conduct a re-test to confirm the initial result.

(II). If the failure is confirmed after a retest and the Certificate of Analysis results are within 20% or less of the limit on ECCO's expanded list of 69 analytes:

The Manufacturer will receive a warning and must complete a root cause analysis. Additionally, the Manufacturer is required to submit a preventative and mitigation action plan to ECCO within 14 days of receiving the retest confirmation.

(III). If the failure is confirmed and the Certificate of Analysis results exceeds the limit by 20% or more:

A. The Manufacturer agrees to conduct a comprehensive supply chain audit to address and remediate the issue.

B. The specific tested batch that failed both the initial, and secondary re-test must undergo a voluntary recall.

Suspension/Ban Criteria:

Manufacturers are permitted up to 3 confirmed failures (exceeding pesticide limits or containing harmful additives like synthetically converted THC, MCT oil, or Vitamin E Acetate) within a year before suspension for 12 months. Future reinstatement in the program after suspension is subject to ECCO's review and approval as well as a renewed commitment by Manufacturers, and verification that ECCO standards are being adhered to.

C. For Nurseries

1. Auditing Process:

Each month, Nurseries will be required to submit to ECCO, an R&D Certificate of Analysis report, conducted with labs Infinite or Anresco, that Passes ECCO Certification Standards representing at least 30,000 of clone production per month. At any time, ECCO can request from the Nursery a customer sample from the Batch that was represented to be ECCO Certified by the R&D Certificate of Analysis report, to be tested and confirmed both compliant and consistent with the monthly submittal.

2. Policy & Remedy for Failed Audits:

(I). If the Certificate of Analysis results initially fails ECCO's testing standards, the Nursery must conduct a re-test to confirm the initial result.

(II). If the failure is confirmed after a retest and the Certificate of Analysis results are within 20% or less of the limit on ECCO's expanded list of 69 analytes:

The Nursery will receive a warning and must complete a root cause analysis. Additionally, the Nursery is required to submit a preventative and mitigation action plan to ECCO within 14 days of receiving the retest confirmation.

(III). If the failure is confirmed and the Certificate of Analysis results exceeds the limit by 20% or more:

A. The Nursery agrees to conduct a comprehensive audit to address and remediate the issue.

B. The specific tested batch that failed both the initial, and secondary re-test must undergo a voluntary recall.

Suspension/Ban Criteria:

Nurseries are permitted up to 3 confirmed failures (exceeding pesticide limits) within a year before suspension for 12 months. Future reinstatement in the program after suspension is subject to ECCO's review and approval as well as a renewed commitment by Manufacturers, and verification that ECCO standards are being adhered to.

8. Fees

Fees are collected upfront and are scaled based on the organization's monthly revenue. These fees cover the onboarding, certification assessments, and education efforts of certified brands.

Gross Revenue	1x Onboarding fee	Monthly dues
<\$250k	\$700	\$700
\$251 - \$500k	\$1,500	\$1,500
\$501k - \$1M	\$2,200	\$2,200
> \$1M	\$3,000	\$3,000

Fees further contribute to the mission delivery by educating the consumer and advocating for their safety with an updated [online](#) repository of articles and research and public awareness events.



**Environmental
& Consumer
Compliance
Organization**



The Hidden Risks of Cannabis Contamination: What Every Brand, Lab, and Manufacturer Needs to Know

In California's legal cannabis industry, contamination with pesticides and harmful chemicals poses a serious threat to public health, consumer trust, and business viability.

These recent investigative reports reveal widespread issues with pesticide contamination, regulatory gaps, and the slow response of state agencies. For cannabis brands and operators, understanding these risks and taking proactive measures to ensure product safety is critical—not only to comply with regulations but to build consumer confidence and protect your business's reputation.

The following summaries highlight the urgent need for enhanced safety protocols and the importance of industry leaders coming together to implement these standards. By participating in the ECCOsystem, we can ensure these protocols are met, while holding each other—and the industry as a whole—accountable for delivering safe, trustworthy cannabis products to consumers.



9. Logo Use and Name

Only ECCO Certified Brands may use ECCO logos. The ECCO Certified logo can be used for promotion and marketing and in any color or size but must not be altered in any other way.

Specific to product packaging, the ECCO Certified Logo can only be used on products that have passed ECCO Certification Standards. An ECCO Certified Brand may use the ECCO logo on other digital assets or print materials such as flyers to designate themselves as an ECCO Certified Brand, but they must refrain from designating the logo on products that have not passed ECCO Certification Standards. Logo usage by non-certified entities to market products or promote their business is generally not allowed and is considered an infringement of ECCO Certified trademark rights.



Certified

10. Logo Use Monitoring

ECCO Certified auditors will periodically survey retail venues to check that use of the ECCO Logo is being done in accordance with the ECCO Logo Use Agreements and with conformity to the ECCO Certified Standards. Any misuses of the logo will be reported to the ECCO Board of Directors along with applicable and necessary notices to involved parties.

Brands retain the right to *not* use the ECCO Logo on products that *do* conform with ECCO Certified Standards, if they wish.