Assessor Meeting

September 19th 2024

Confidential:

Not for further circulation or citation

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Agenda

1. **People:** new Certification Team Members
2. **Products** Update
   - Restricted substances declarations and Bills of Materials
   - Other Version 4.x and 3.1
   - Circularity standard
3. **Profile** Update
   - EU legislation mapping
4. Certification **Process** Update
   - Process metrics
   - Reviewers' quality assurance plan, ASF quality issues, actions and next steps
   - Digital platform development
5. AOB/Open discussion

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Introduction of New Team Members

We’re happy to announce that three great individuals have joined the C2CPII since our last assessor call:

- Sofia Mayorga – Certification Associate
- Kai Chong – Standards Manager
- Ishar Mayor – Certification Associate

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Products Update

1. Version 4.x Restricted substances declarations and Bills of Materials (Brandon)
2. Other Version 4.x and 3.1 updates (Esther, Susan)
3. Circularity standard (Elwyn, Monica, Elvira)

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Version 4x Restricted Substances Declaration and BoMs: Summary of Updates

Brandon Reid

- C2CPII recently made several significant changes to requirements for the Restricted Substances Declaration and Bill of Materials documents
- These changes are intended to increase the flexibility of documentation accepted by C2CPII
- C2CPII made these changes based on feedback from assessors, applicants, and suppliers, and after speaking with multiple legal consultants

Attestation Statements (Applies to Versions 4.0 and 4.1)

- The attestation statement required in restricted substances declaration and bill of materials templates has been simplified:
  - **Previous**: On behalf of [company name] I attest that the information provided in this declaration is complete, true, and accurate to the best of my knowledge and the knowledge of my staff. By typing my name below, on behalf of myself and the Company I represent, I hereby consent to the use of my typed signature to bind myself and the Company
  - **New**: I attest that I am the person named below, and that the information provided in this document is complete, true, and accurate to the best of my knowledge

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Attestation Statements (Applies to Versions 4.0 and 4.1)

- Supplier-formatted declarations may include an attestation statement in the supplier's chosen format if it matches the intent of the C2CPII wording above
  - Attestations deemed inequivalent by C2CPII will not be accepted

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Signatures (Applies to Versions 4.0 and 4.1)

- Typed signatures are accepted on new restricted substances declaration and bill of materials templates, due to the revised attestation statements

- The applicant bill of materials template will not be required to be signed, provided that the applicant has already signed the Client Certification Agreement
  - However, an attestation and signature **are** still required for **supplier** Bill of Materials submissions

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Signatures (Applies to Versions 4.0 and 4.1)

- Typed signatures will also be allowed on new versions of the Material Health Assessor Attestation and Assessment Summary Submission Authorization forms
  - **New** since the September General Assessor Update email
  - Currently available on the Assessor Resources page

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Regulatory Compliance Documentation (Version 4.1 only)

- Supplier Safety Data Sheets (SDSs) that declare compliance with the regulations cited in Version 4.1, Section 4.1 (REACH, POPs, RoHS, SVHCs, etc.) may be accepted
- Supplier regulatory compliance statements may be accepted without an attestation statement or signature, provided all other required elements are present

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Several C2CPII documents have been updated to reflect these changes

- Declaration Templates
  - v4.0 RSL Declaration
  - v4.1 Regulatory Compliance Declaration
  - v4.1 Organohalogens Declaration
  - v4.1 CMRs & SVHCs Declaration (also may be used for v4.0)
- Bill of Materials Templates
  - v4.0 Supplier BoM
  - v4.0 Applicant BoM
  - v4.1 Supplier BoM
  - v4.1 Applicant BoM, Single Material
  - v4.1 Applicant BoM, Multi Material

- Assessment Summary Submission Authorization
- Material Health Assessor Attestation

(all currently available on the Assessor Resources page)

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Future changes

- C2CPII will continue to consider how we can build efficiencies in the supplier outreach process without risking the reliability and integrity of the C2CC certification

- Please share feedback on these changes, and any suggestions for additional changes that may further refine this process

Products: Other Version 4.1 Updates

Esther Julier
Susan Klosterhaus

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C2C Certified Version 4.1 Resources

Applications and Assessment Forms for the Version 4.1 standard are now being accepted, effective 1 July 2024.

The following implementation resources are now available for use on the Assessor Resources page:

- Version 4.1 User Guidance
- Version 4.1 Assessment Form (formerly known as Assessment Summary Report)
- Version 4.1 Clean Air & Climate Protection form
- Version 4.1 Water & Soil Stewardship form
- Version 4.1 Social Fairness, Section 8.3 Monitor and Verify Performance form
- Version 4.1 Supplier Regulatory Compliance Declaration
- Version 4.1 Supplier Organohalogens and Functionally Related Chemical Classes of Concern (OPFR) Declaration
- Version 4.1 Supplier CMR and SVHC Declaration
- Version 4.1 Bill of Materials (for single material products)
- Version 4.1 Bill of Materials (for multi material products)
- Version 4.1 Recycled Content Materials Analyte List

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Version 4.1 User Guidance

- The initial version of the Version 4.1 User Guidance includes the updates relevant to the changes made in the Version 4.1 standard, as well as updates to address feedback and questions we've received on the Version 4.0 User Guidance and standard to date
- The Version 4.1 User Guidance will be updated again in Q1 2025 (possibly before) and routinely as needed going forward to address additional feedback from assessors and the C2C Certified Community
- A feedback form is currently being developed that will allow assessors and the community to easily provide feedback on the standards, user guidance, and other supporting documents.
- Assessors will be notified when this feedback form is available on C2CPII's webpage. Assessors are encouraged to invite your clients to make use of this form once it is available

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Version 4.1 User Guidance

When reviewing the Version 4.1 User Guidance, please note the following:

- The guidance on verifying amounts of cycled and renewable content in Section 5.3 Increasing Demand – This section of the guidance has been expanded and enhanced compared to the Version 4.0 guidance to ensure that the amount(s) of cycled and renewable content in certified products is properly verified
- The guidance on acceptable carbon offsets/carbon credits in Section 6.4 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing, Meeting the Carbon Offset Targets – Offsets/ credits supporting the high-risk projects types listed in the guidance (including those certified per a C2CPII-recognized standard) are no longer accepted unless the project or underlying methodology has been highly rated. These additional restrictions were deemed necessary to ensure the additionality, accuracy, and permanency requirements are met. Please refer to the User Guidance for further information on this topic
- C2CPII-recognized certification programs and standards are now primarily listed only in the list of C2CPII-Recognized Certification Programs and Standards, rather than in the User Guidance (with several examples remaining in the User Guidance). This document is available on the assessor and public resources webpages

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Version 4.1 Circularity Data Report & Cycling Instructions Form

- The Version 4.1 Circularity Data Report Form has been updated and approved by the Standards Steering Committee in anticipation of the release of the new circularity standard
- The updated form is now available on the Resources page of the C2CPII website and the Assessor Resources page. Please use this updated form in your Version 4.1 assessments

This updated form incorporates recent feedback received from various stakeholders, including assessors, applicants, Standards Steering Committee members, and C2CPII's internal and external policy experts. Updates include the following:

- Several new reporting fields (including fields for reporting % compatible and % of product actively cycled)
- An optional impact indicator section has been added
- Definitions have been added to the Report tab

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Version 4.1 Assessment Report Form

- An updated Version 4.1 Assessment Form was posted on the Institute's website the week of 15 July
- Please be sure to use this updated version of the form in all assessment work moving forward
- Note that the first version of the form (dated 061224) did not yet include all of the changes made to the User Guidance, which was still in development at that time. **It is necessary to use the updated Version 4.1 Assessment Report Form (dated 071224) to ensure that all required documentation is provided**

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Version 4 Transition Policy Update

The Version 4 transition policy has been updated and is now available on the new Version 4.1 page of the C2CPII website. The policy now includes the following update for products currently certified to Version 3.1:

- Products certified to Version 3.1 for the first time in 2023 and expiring after 31 December 2024 may also recertify to Version 3.1 one additional time. However, assessment summary forms for these Version 3.1 recertifications will be accepted only until 31 December 2024, and these will be considered ‘early’ recertifications (i.e., any remaining time in the initial two-year certification will be lost)

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Version 4.1 Assessor Training

- The Version 4.1 training is in development and is expected to be released in October 2024
- In the meantime, please rely on the Version 4.1 User Guidance and forms, and contact C2CPII with any questions that arise

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Version 4 Transition Issue

- Some certification holders are inhibited from transitioning to Version 4.x because they are reliant on input material certificates (for their material health assessments) that are still certified to Version 3.1
- Primarily an issue in the textile/apparel and print and paper sectors.
- Please encourage your clients (especially those with certified input materials) to transition to Version 4.x as soon as possible
- C2CPII will provide free extensions to input material certificate holders who recertify their products early so that they will not lose any time due to the early recertification. For example, if recertifying one year early, the certificate will be extended for a year more than the three-year certification period free of charge (i.e. for a total certification period of four years)
- **Please let us know if you have other suggestions** for how C2CPII can help to encourage and/or incentivize these input material certification holders to transition as soon as possible

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Products: New C2CPII-Recognized Programs for Versions 4.0 and 4.1

Esther Julier

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New C2CPII-Recognized Programs

The list of C2CPII-Recognized Certification Programs and Standards for Version 4.0 and Version 4.1, has been updated as follows:

- **Ethical Supply Chain Program (ESCP) Certified** is now recognized for achieving the Version 4.0 and Version 4.1 Section 8.3 Monitor & Verify Performance (Bronze level) facility level social audit and corrective action plan requirements for all locations. The Bronze level requirements are fully achieved (without gaps) for facilities that have achieved ESCP “Certified” status

- **Ethical Supply Chain Program (ESCP) “Progressing” status audit reports** may be submitted in support of achieving the Section 8.3 Monitor & Verify Performance (Bronze level) facility level social audit and corrective action plan requirements. The report must be reviewed to verify that there are no open corrective action plans associated with the Section 8.3 “issues of high concern”

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New C2CPII-Recognized Programs

The list of C2CPII-Recognized Certification Programs and Standards for Version 4.0 and Version 4.1, has been updated as follows:

- The current version of the **Social and Labor Convergence Project Combined Assessment Framework (SLCP CAF v1.6)** has been reviewed. CAF audit reports may still be submitted in support of achieving the Section 8.3 Monitor & Verify Performance (Bronze level) requirements. The report must be reviewed to confirm there are no "issues of high concern". Corrective action plans for any other (i.e., non- issues of high concern) must be submitted separately. Note that the SLCP CAF provides verified audit data only. Correction actions are managed via cooperation between the participating brands and suppliers

- The **Aluminum Stewardship Initiative (ASI) Chain of Custody Standard** may be used to support achievement of the Version 4.0 and Version 4.1 requirements in Sections 5.4 and 5.3 (for 4.0 and 4.1 respectively) to use cycled and/or renewable content. This standard ensures a chain of custody documentation system is in place. Batch data to support specific recycled content claims is still separately required for C2C Certified. C2CPII is also continuing to explore how this standard may be used to achieve additional C2C Certified requirements

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Products: Version 3.1 Updates

Esther Julier

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Version 3.1 User Guidance Updates

The following updates have been added to the Version 3.1 User Guidance (now available on the resources page:

- Budgets are optional to include in all strategies
- Version 4.1 strategies will be accepted as an alternative compliance pathway to providing Version 3.1 strategies
- Greenhouse gas emissions due to transport between final manufacturing facilities is optional to include in the total final manufacturing stage emissions. Please note that these emissions must be included if applying under Version 4.0 or Version 4.1

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Assessor Attestation and Submission Authorization Forms

- These forms may be signed using typed signatures, in addition to physical and electronic signatures

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Products: C2C Certified Circularity Update

Elwyn Grainger-Jones
Monica Becker
Elvira Melkert

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C2C Certified Circularity

- C2CPII Board gave final approval for release
- Certification name: **C2C Certified® Circularity**
- Key dates: Release date October 2024 / Effective date January 2025
- C2CPII fees/costs: Same as full certification and MHC
- Certification Period: 3 years
- Site visits: Required, but many can be done virtually using forthcoming new policy and procedure
- MH requirements
  - New policies for RS declarations and BoMs will ease requirements
  - MH Assessor will be needed in some situations, but not all
- Recognition of external certifications in the standard: Focus on MH requirements, with aim to launch with 2 or 3 programs, e.g., ZDHC MRSL and OEKO-TEX STANDARD 100
- Recognition of standard in external programs: Work underway for green building schemes, retailer platforms, other certifications, government and corporate procurement
- Documentation: Draft of standard and form on Assessor Resources page
- Launch and marketing plans
  - Trademark/Logo
  - Marketing and communications plan
  - Key messages

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Circularity Communications

Main Launch

Institute	Press release
	Dedicated web page
	Blog post
	Social media post
	Community mailings

Assessors	Social media post to reshare
	Updated info and marketing decks

Post-Launch

Institute	Sector specific PR campaigns in collaboration with 2 agencies

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Profile Update

EU Legislation Mapping (Elwyn Grainger-Jones)

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2B POLICY

Comparison of C2C Certified®

2B Policy conducted a gap analysis and helped the Institute navigate the following pieces of legislation to understand C2C Certified's alignment and where it goes beyond:

- Substantiating Green Claims Directive
- Empowering Consumers Directive
- Ecodesign for Sustainable Products Regulation (ESPR)
- EU Taxonomy
- Corporate Sustainability Reporting Directive (CSRD)
- Corporate Sustainability Due Diligence Directive (CSDDD)
- Forced Labour Regulation

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Join our next sessions

Join us for the next two sessions if you'd like a more detailed comparison of C2C Certified® against these key pieces of legislation:

24 September
15:30-16:30 CEST

C2C Certified® as a Supportive Tool for Meeting CSRD Requirements

In this second webinar, a detailed presentation of the different Environmental, Social and Governance (ESG) criteria will be presented and compared with C2C Certified® requirements.

Register here

1 October
15:30-16:30 CEST

How CSDDD, EU Forced Labour Regulation, and ESPR Align with C2C Certified®

In this third webinar, you will learn how C2C Certified® meets, and goes beyond, these three key pieces of legislation.

Register here

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Certification Process Update

1. Process metrics (Florian)
2. Reviewers' quality assurance plan, ASF quality issues, actions and next steps (Mohsin)
3. Digital platform development (Ben)

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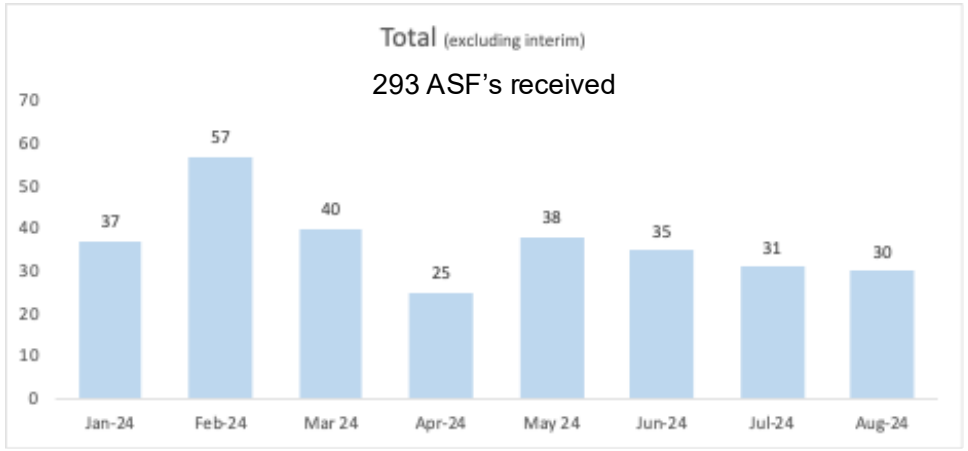
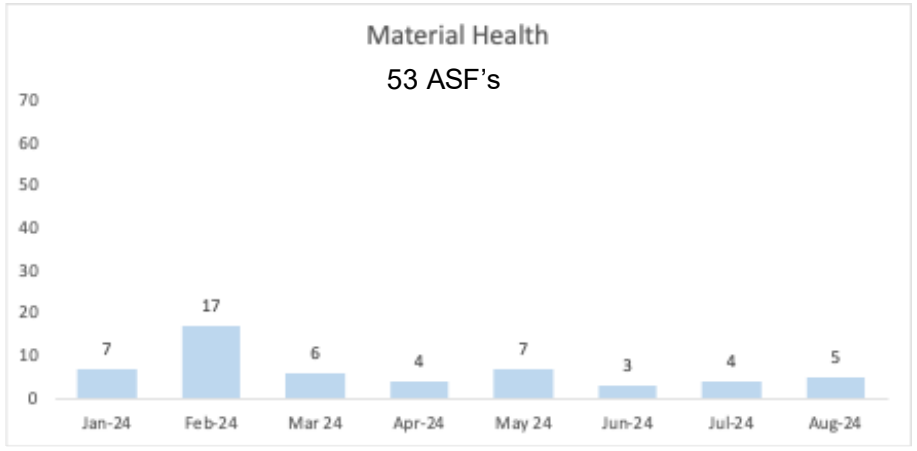
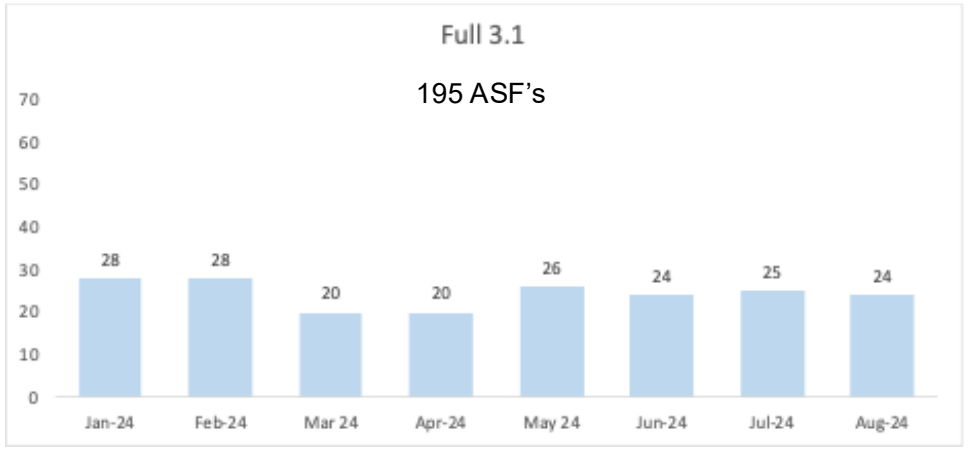
293 ASFs received in 2024 (August 31st YTD)

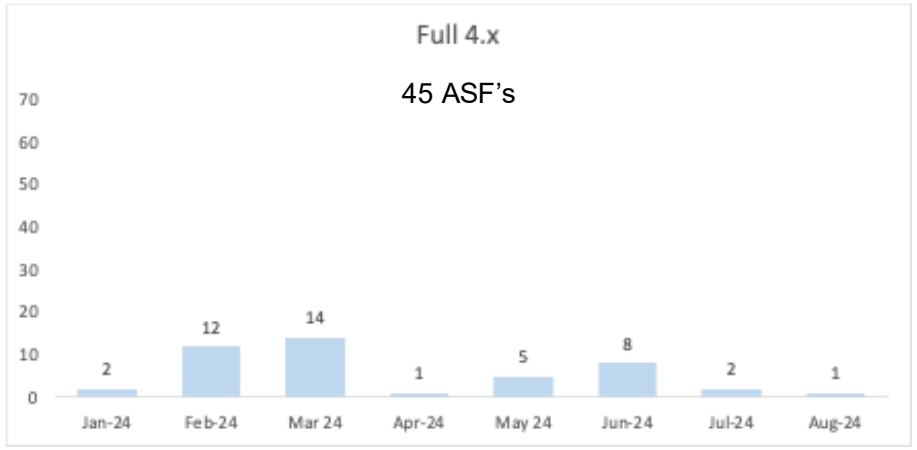
We expect to receive a total of 450+ ASF's in 2024 (vs. 387 in 2023)

Still need to see the increase in full 4.x submissions









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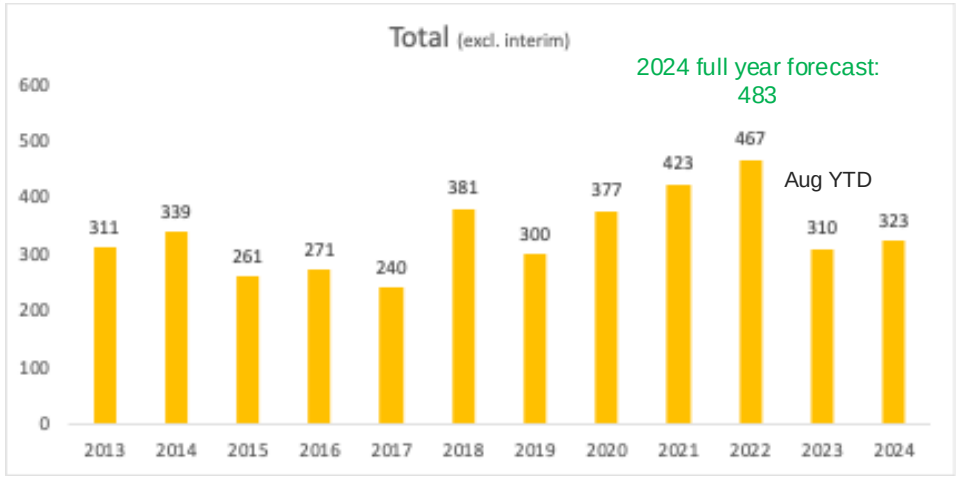
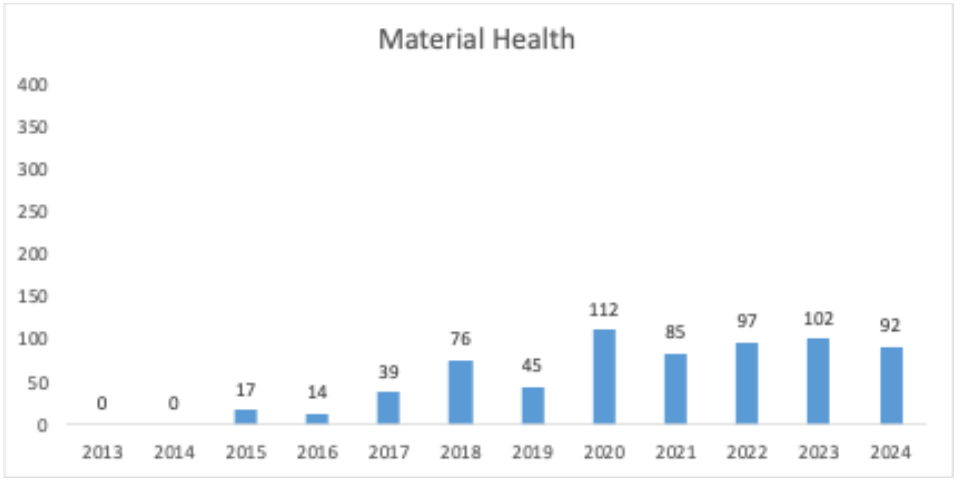
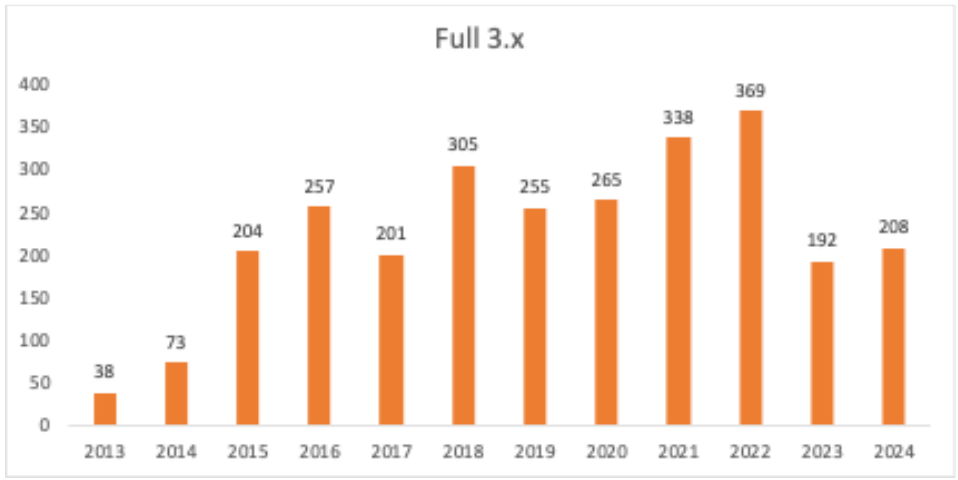
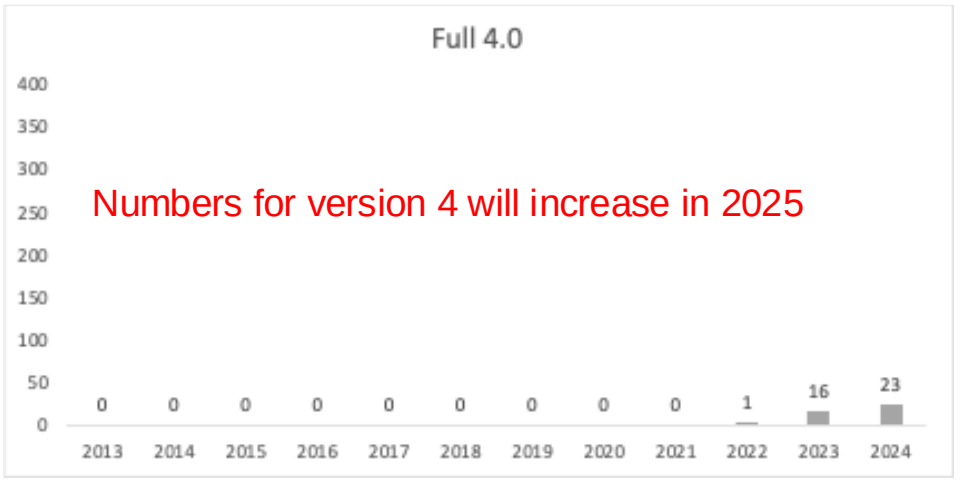
323 Certificates issued (August 31st 2024 YTD)

We expect to issue more certificates in 2024 than we did in 2022









Numbers for version 4 will increase in 2025

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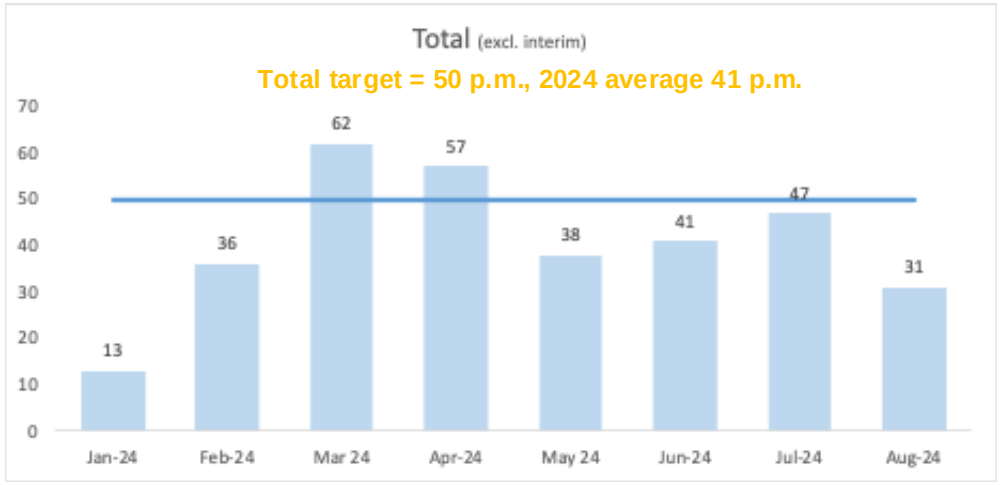
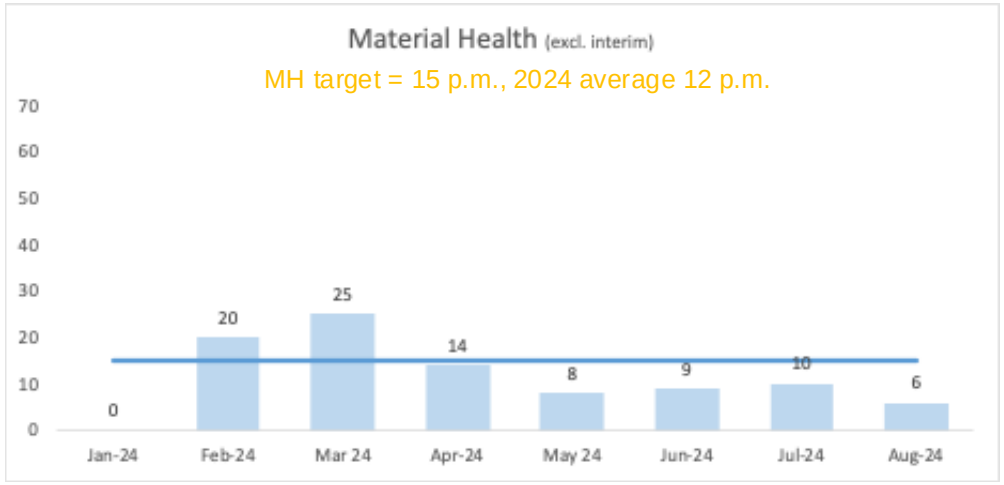
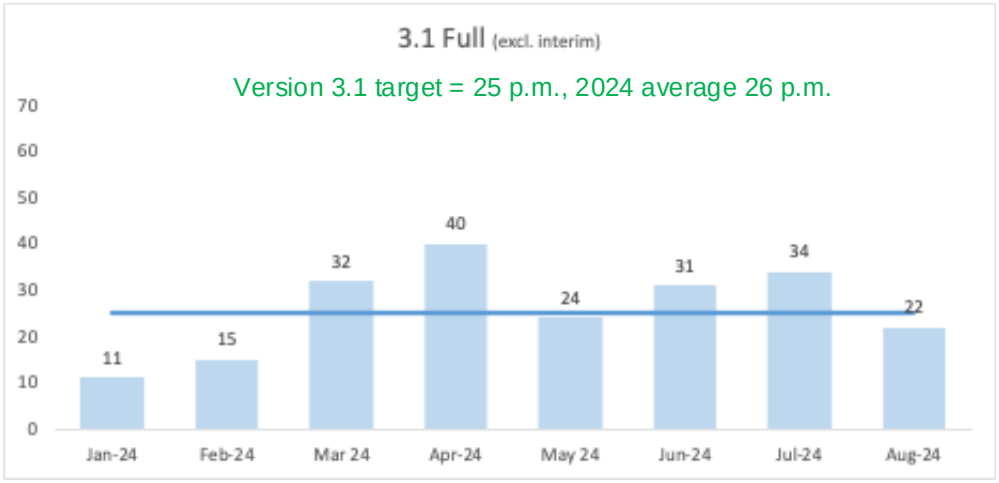
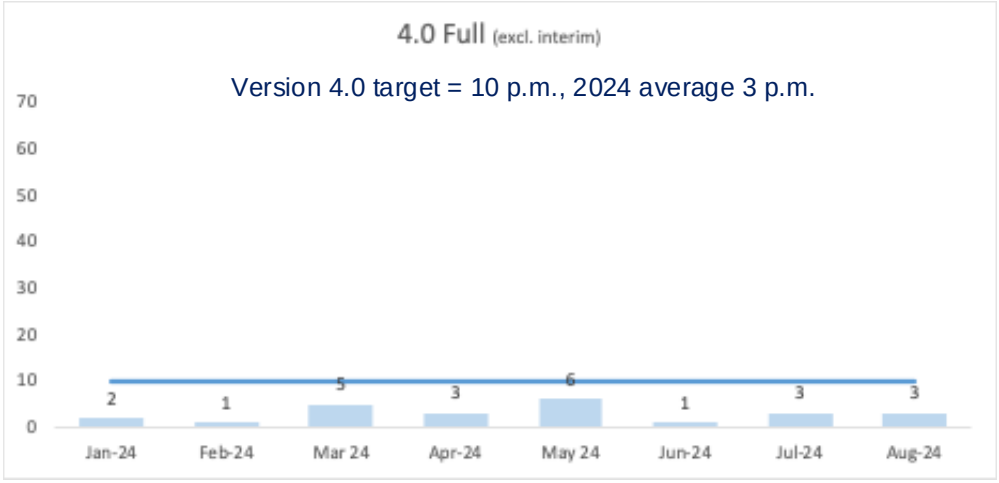
323 Certificates Issued (August 31st 2024 YTD)

Upside potential for Material Health and Version 4.x









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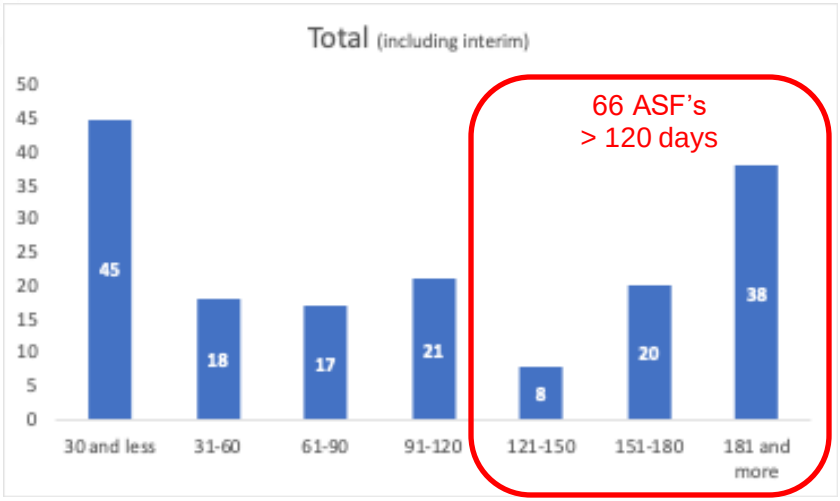
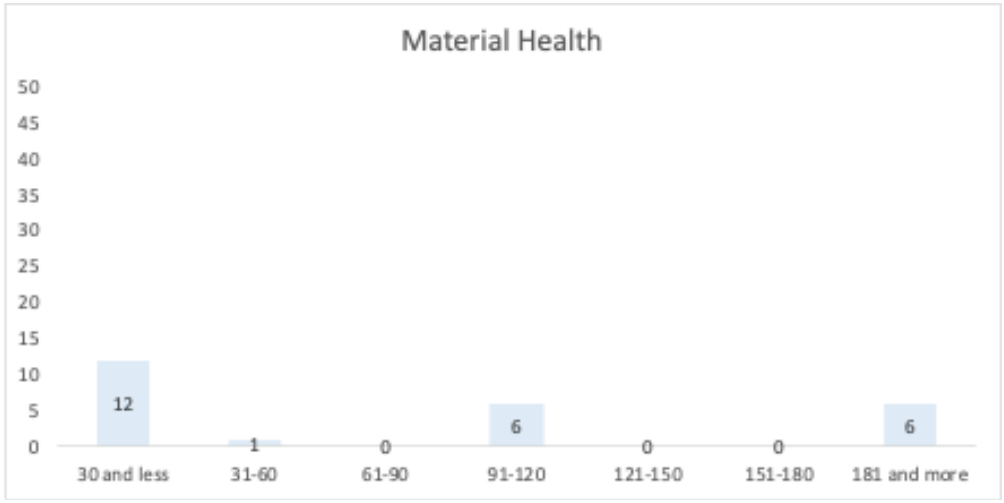
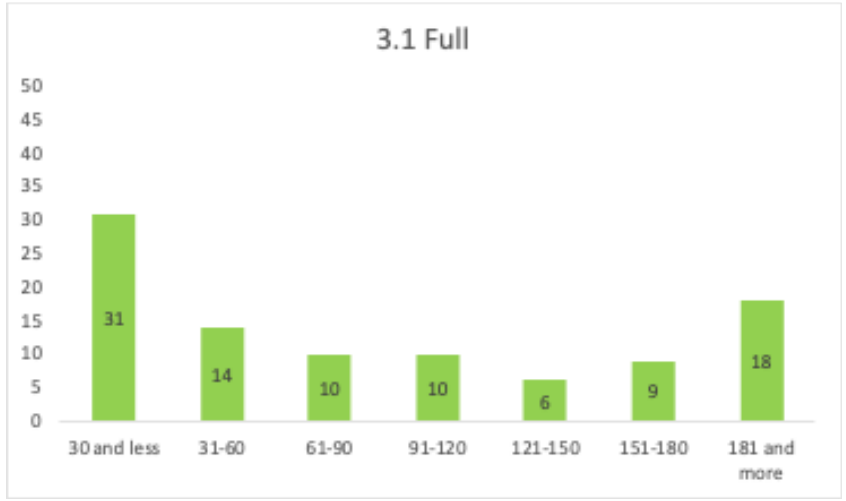
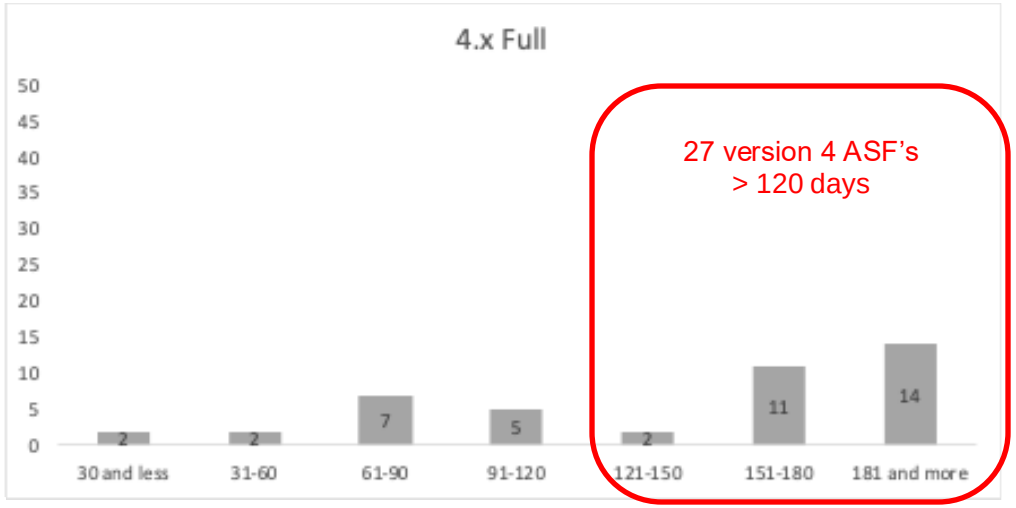
167 ASFs in the Queue – Ageing Buckets August 31st 2024

A high number of ASFs > 120 days









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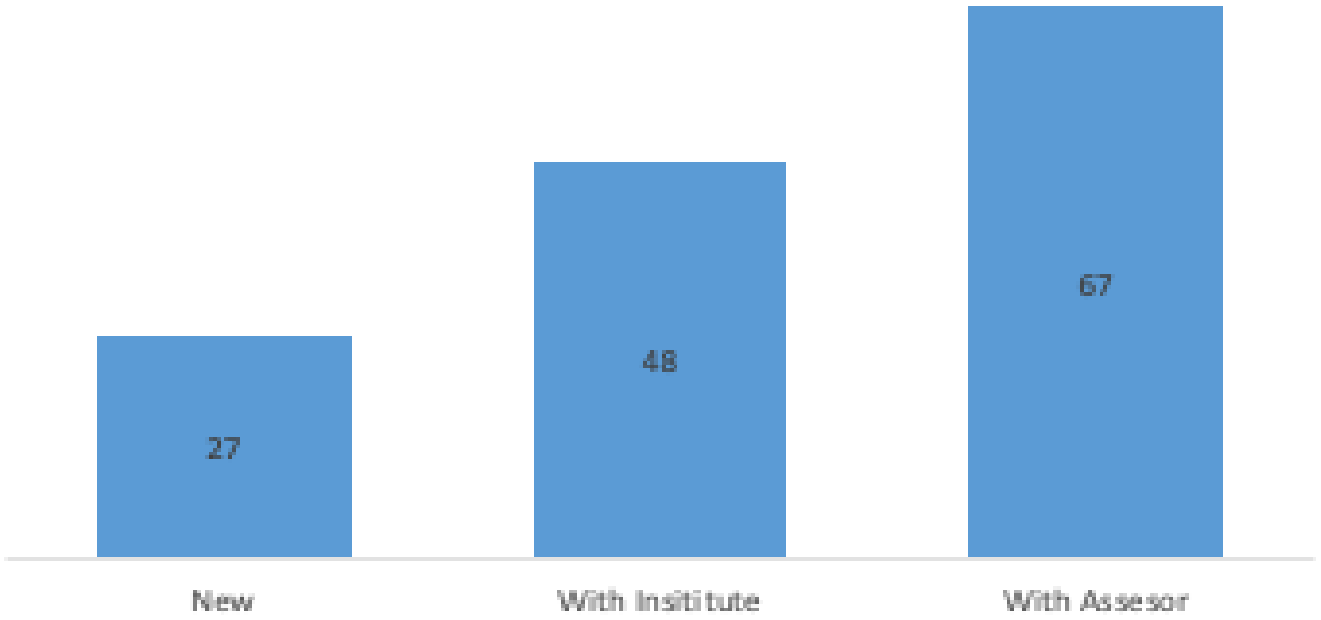
Assessments in the Queue August 31st 2024

Around 50% of ASFs in the queue are with the Assessment Bodies
Increase of New ASFs in the queue expected as we will focus more on AFS which are already under review



ASF received, but review not started yet (due to capacity or unpaid fees)

Under Review

Review questions sent to assessor for further information – awaiting response

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Reviewers' Quality Assurance Plan

1 Reviewer Training

Before a new reviewer begins assessing ASFs independently, they complete the following training steps:

- Complete the C2C Certified Online Training
- Pass the Knowledge Test and Practice Assessment
- Read and align with the C2CC Standard Operating Procedures (SOP) for the ASF Review Process and Benchmark ASF
- Complete the first ASF review (2-3 ASF reviews are required for training purposes)
- Detailed secondary reviews are conducted by a C2CPII experienced reviewer of the first ASF reviews

2 Ensuring Reviewer Alignment and Consistency

Existing ASF Review Process Enhancements:

To maintain consistency during the ASF review process, reviewers:

- Use the 24/7 MS Teams channel for real-time questions and alignment with the other team members of the reviewer team
- Participate in weekly technical meeting discussions
- Discuss technical issues in weekly 1:1 check-ins with supervisors

New Enhancements:

- Resolutions from the ASF review process and responses to technical questions received in the certification inbox will be added to the FAQ section of the Assessor Community. This will include only new topics not covered in the User Guidance, with all confidential information removed.
- Experienced reviewers' ASFs to be spot-checked on a regular schedule (TBD). Learnings and any identified alignment issues will be communicated to the review team.

3 Enhancement of Processes and Documentation

Learnings from the reviewer alignment and consistency efforts are systematically applied to enhance several foundational resources, including:

- Updating the C2CC Standard Operating Procedures (SOP) for the ASF Review Process
- Improving the Benchmark Report
- Updating the C2C Certified Online Training
- Refining User Guidance and Forms

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Current ASF quality issues

- Please use the same file names for the shared documentation as mentioned in the ASF/BoM/Social Fairness Section 8.3 Monitor & Verify Performance Worksheet
- FMS process definitions: Please list processes included in or excluded from the final manufacturing stage that differ from those listed in the guidance and **rationale**. The latter is often not provided.
- Assessor explanations: Please be sure to complete these as requested; it helps speed up the review process by indicating where reviewers can find the relevant evidence.

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C2CPII Actions & Next Steps

- Development of Version 4.1 Assessor training and practice assessment (To be released in October)
- Quarterly assessor calls will be replaced by: (ongoing)
  - Regular calls between ABs and Florian for discussing topics like pipeline, general process challenges, marketing communication, etc. (ongoing, frequency to be agreed)
  - Technical calls between ABs and reviewers. After round two ASF reviews, assessors are encouraged to set up calls to address critical unresolved issues with the corresponding C2CPII reviewer. Please ensure to provide the Agenda/Questions well ahead of the meeting.
- Version 4.0 Benchmark ASF – Bronze level is now available. Updates for Version 4.1 are in process. (ongoing)

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C2CPII Actions & Next Steps

- Review capacity for Version 4:
  - Training additional reviewers to increase the capacity (ongoing)
  - Due to the initial training, turnaround times for the reviews in Q4 2024 might be behind expectations
  - We are expecting a full capacity by Q1 2025
- Review capacity for V3.1:
  - Due to limited resources and a high number of submissions expected, it may take longer to begin the initial review of the V3.1 ASFs in the coming months
  - Once the review process starts, we will ensure it proceeds more smoothly

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Requested Assessor Actions & Next Steps

- Improve ASF quality
  - Follow instructions and ensure all requested information is included in each ASF
  - Ensure all standard requirements have been met and QA'ed before submission
  - Address all questions/requests for additional information in response
  - No partially completed ASFs or responses

- Inform clients about:
  - Certification process (C2CPII review of ASF needed prior to certificate issuance)
  - The current turnaround times for C2CPII's initial review of assessment forms are the following:
    - Version 3.1 Material Health Certificates: Ranging from 1-4 weeks, averaging two weeks
    - Version 3.1 full C2C Certificates: Ranging from 2-7 weeks, averaging four weeks
    - Version 4.0 Material Health Certificates: Ranging from 3-10 weeks, averaging five weeks
    - Version 4.0 full C2C Certificates: Ranging from 6-10 weeks, averaging eight weeks

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Version 4.0 2021 RSL No Longer Valid

- Please ensure that the shared RSL declarations are using the valid C2CC RSL. We are still receiving RSL declarations that show the compliance with 2021 RSL
- RSL Validity Periods:
  - 2021 RSL: Effective 1 July 2021 to 30 June 2024
  - 2022 Update: Effective 1 July 2022 to 30 June 2025
  - 2023 Update: Effective 1 July 2023 to 30 June 2026
  - 2024 Update*: Effective 1 July 2024 to 30 June 2027 (*to be released 1 July 2024)
- Declarations attesting compliance with the 2021 RSL must be updated prior to submitting any ASF for Version 4.0

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DIGITAL PLATFORM
Selecting the Right Platform (Partner)
Vendor Selection Process

May 6 — June 30

1	2	3	4	5	6	7
Request for Information (RFI)	Vendor Demos	Vendor Shortlist	Fit/Gap Analysis	Reference Calls	Request for Proposal (RFP)	**Final Vendor Selection & Contract Signing**
Gather initial vendor capabilities and offerings for evaluation	Observe product demonstrations to assess functionality and fit	Narrow down to top contenders based on demo performance and fit	Identify compatibility and customization needs with preferred vendors	Contact other companies for feedback on shortlisted vendors' performance	Formalize specific requirements and expectations for final vendor selection	Expected Go-live end **Q1 2025**

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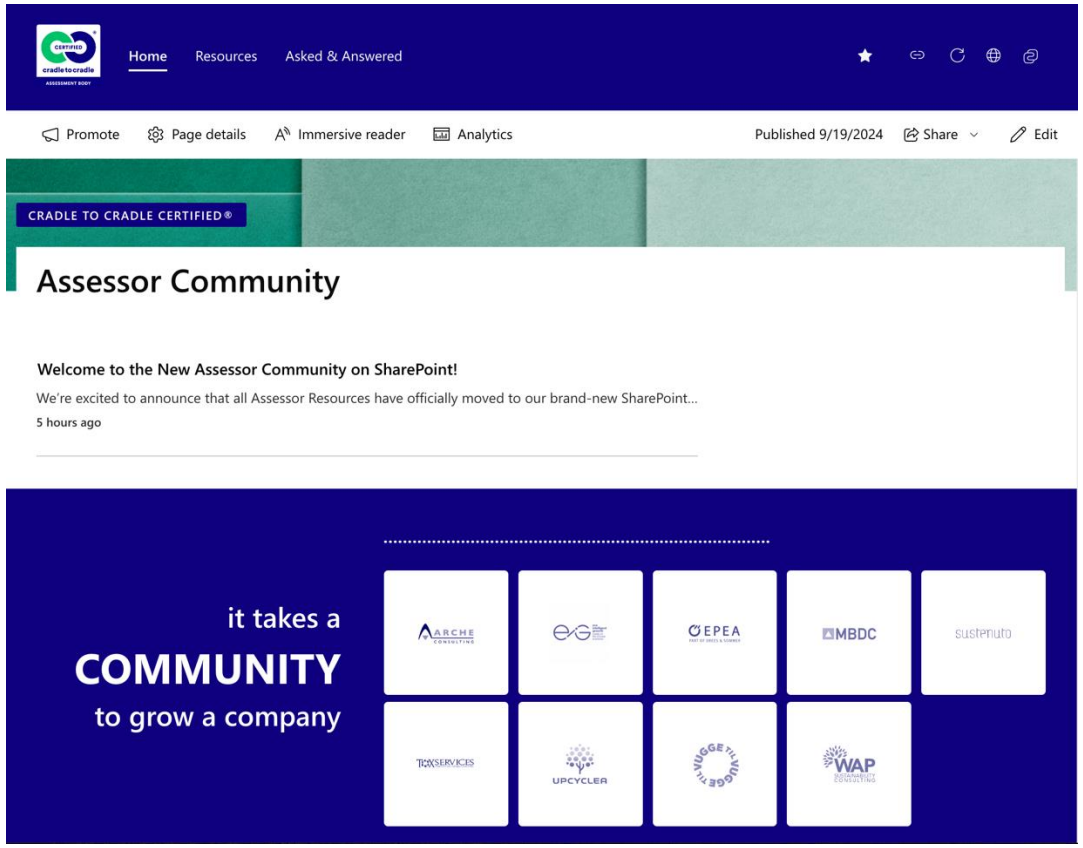
Streamlining Access to Key Resources and Insights

Introducing the Assessor Community SharePoint

Assessor resources are transitioning from the website to SharePoint – now called the **Assessor Community**.

Watch for an email with access details next week.



Key Features & Benefits

- **Centralized Resources**: Access all certification documents and guidance in one place with easy navigation and filtering.
- **Asked & Answered** Page: Find answers to previously asked questions, categorized by Standard Version, Certificate Type, Category, Section, and Level.
- **Video Recordings**: Review recordings of past quarterly calls directly on the site.

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Q&A/Open Discussion