Cradle to Cradle Certified® Product Standard Version 4.1 to Draft Version 4.2 Comparison: Summary of Modifications

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This document compares the requirements in Version 4.1 and draft Version 4.2 of the Cradle to Cradle Certified® Product Standard and highlights changes made. Please note: The requirements are cumulative. This means that all applicable lower-level requirements must be met at higher achievement levels unless explicitly stated otherwise. Therefore, any changes described at a lower achievement level also apply to higher levels unless otherwise noted.

3 // General Requirements

3.1 Compliance Assurance and 3.3 Measurable Improvement

The most significant modification to these sections is the addition of a standard-wide strategy requirement to Section 3.3 Measurable Improvement. This draft Version 4.2 strategy requirement replaces many of the more detailed strategy requirements present throughout all standard categories in Version 4.1. Please see the table below and the draft Version 4.2 standard for additional details.

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***Modified:*** 3.1: A compliance assurance system is in place. → *Minor modification: The two possible methods of controlling for material changes in the supply chain have been removed from the standard (requirements #3a-b). These will instead be noted in the Version 4.2 Certification Manual.*
	Modified: 3.3: At least one measurable improvement has been made in at least one of the five standard categories. (Required at Bronze and Silver level recertification.) → *A requirement to "Develop a strategy or plan towards achieving the next certification level" has been added in draft Version 4.2. The strategy is required at the Bronze and Silver levels only and replaces the majority of the strategies and plans located throughout the individual categories in Version 4.1.*

3.2 Transparency (new in draft Version 4.2)

The Version 4.1 transparency requirements (located in Product Circularity Section 5.5, Clean Air & Climate Protection Section 6.6, Water & Soil Stewardship Section 7.8, and Social Fairness Section 8.9) have been simplified, consolidated, and moved to this new section of the draft Version 4.2 standard. The draft requires applicants to *Publicly disclose information and/or data consistent with the product's level of achievement in each standard category, as defined by the requirements in the Cradle to Cradle Certified Transparency reference document*. The draft transparency requirements are fully detailed within the new Transparency Reference Document. Note that draft Version 4.2 includes both required and recommended disclosures, while Version 4.1 includes only required disclosures. Please see the table below, the draft Version 4.2 standard, and the new reference document for additional details.

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2

Bronze	• **Material Health – *No substantive change*** → *There are no required Material Health disclosures in Version 4.1 or draft Version 4.2. Recommended disclosures in draft Version 4.2 align with those required for the Material Health certificate.*
	• **Product Circularity 5.5 – *Modified:*** Circularity data and cycling instructions are publicly available. → *The disclosures required per Version 4.1 Section 5.5 and the related Circularity Data Report (CDR) are combined with the transparency requirements for all other standard categories in draft Version 4.2. (The CDR Is obsolete under the draft). Several disclosures that are required at the Bronze level under Version 4.1 have been removed, are only recommended, or have been moved to a higher achievement level in draft Version 4.2.*
	  ○ **Unchanged and required at Bronze:** Cycled and/or renewable content type and percentage (including disclosures if using the feasibility analysis pathway); Product's intended cycling pathways and percentage compatible; Tests conducted to determine compatibility.
	  ○ **Requirement moved to a higher achievement level:** Cycling instructions and relevant take-back programs (Silver); Product disassembly and extraction information (Gold).
	  ○ **Recommended instead of required:** Tests conducted for potential contaminants; Additional disclosures for chemical recycling; High-value cycling compatibility; Design for durability, maintenance, repair, or refurbishment; Percentage of product actively cycled; Other certifications relevant to the product (Note: Some aspects now a recommended disclosure in Material Health).
	  ○ **Removed:** Virgin non-renewable content sources (Note: Product composition by generic material type now a recommended disclosure in the new Transparency reference document); EPDs and other impact indicators (Notes: Optional in the Version 4.1 Circularity Data Report, EPDs are addressed in Clean Air & Climate Protection); Product cleaning, maintenance, and repair instructions; Product functional use and warranty period.
	• **Clean Air & Climate Protection (CA&CP) 6.6 – *Modified:*** Greenhouse gas emissions data for the applicant company, for all final manufacturing stage facilities, or for the final manufacturing stage of the product are made available to stakeholders. → *It is recommended (rather than required) to disclose how the CA&CP targets were achieved in draft 4.2. Otherwise, unchanged.*
	• **Water & Soil Stewardship 7.8 – *No change*** → *There are no required disclosures at the Bronze level in Version 4.1 or draft Version 4.2.*
	• **Social Fairness 8.9 – *No change*** →*There are no required disclosures at Bronze level in Version 4.1 or draft Version 4.2.*

Silver	• **Material Health – *No substantive change*** → *See note at Bronze level.* • **Product Circularity 5.5 – *Modified*** → *Several disclosures that are required at the Bronze level under Version 4.1 are instead required or recommended at the Silver level in draft Version 4.2. See Bronze level and Reference Document for details.* • **Clean Air & Climate Protection 6.6 – *No change:*** For construction products and building materials used to construct the primary building elements, make an Environmental Product Declaration (EPD) available to stakeholders. • **Water & Soil Stewardship 7.8** – ***Modified:*** Water use data are made available to stakeholders. → *Version 4.1 requires disclosure of withdrawals by source and stress level, consumption, and discharge by level of treatment and destination. Disclosure of withdrawals and consumption is required in draft Version 4.2. Disclosure by source and stress level and of discharge by level of treatment and destination is recommended instead of required.* • **Social Fairness 8.9 – *Modified:*** The company uses open and transparent governance and reporting, making information on how human rights risks are managed and adverse impacts are addressed publicly available. Includes required disclosure of: Human right policy, objectives, progress (activities, outcomes), description of adverse impacts and how they are addressed, and sourcing location information. → *There are no required Social Fairness disclosures in draft Version 4.2; it is recommended (rather than required) to disclose the applicant company's human rights policy and sourcing locations. The other required disclosures have been removed. Note that sourcing locations are recommended to be disclosed in the general transparency section of the reference document because this information is also relevant for Material Health and Circularity certificates.*
Gold	• **Material Health – *No substantive change*** → *See note at Bronze level.* • **Product Circularity 5.5 – *Modified*** → *Several disclosures that are required at the Bronze level under Version 4.1 are instead required or recommended at the Gold level in draft Version 4.2. See Bronze level and Reference Document for details.* • **Clean Air & Climate Protection 6.6 – *No change:*** For product types other than construction products and building materials used to construct the primary building elements, make embodied greenhouse gas emissions data for the product available to stakeholders. • **Water & Soil Stewardship 7.8 – *No substantive change*** → *There are no additional required disclosures at the Gold level in Version 4.1; draft Version 4.2 includes new recommended disclosures.* • **Social Fairness 8.9 – *No change*** → *There are no additional required disclosures at the Gold level in Version 4.1 or in draft Version 4.2.*
Platinum	• **Material Health – *No substantive change*** → *See note at Bronze level.* • **Product Circularity – *Modified:*** → *Several disclosures that are required at the Bronze level under Version 4.1 are instead required or recommended at Platinum level in draft Version 4.2. See Bronze level and Reference Document for details.*

	• **Clean Air & Climate Protection 6.6 – *No change:*** For product types other than construction products and building materials used to construct the primary building elements, make an Environmental Product Declaration (EPD) available to stakeholders. • **Water & Soil Stewardship 7.8 – *Removed:*** Make effluent quality data for the final manufacturing stage facilities available to stakeholders. • **Social Fairness – *No change*** → *There are no additional required disclosures at the Platinum level in Version 4.1 or in draft Version 4.2.*

3.2 Environmental Policy & Management

All requirements in Version 4.1 Section 3.2 have been removed in draft Version 4.2.

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***Removed:*** 3.2.1: Environmental policy based on an understanding of the company's environmental risk areas.
	Removed: 3.2.2: Environmental risks assessed for the company, final manufacturing stage facilities, and product.
	Removed: 3.2.4: Strategy for implementing the environmental policy. At recertification, progress toward achieving the strategy is measured.
	Removed: 3.2.5: Company executives demonstrate commitment to establishing and maintaining a culture for achieving high levels of environmental performance.
Silver	***Removed:*** 3.2.3: Environmental performance data are requested from high-risk tier 1 suppliers. At recertification, progress is made on supply chain data collection and corrective actions taken, if needed.
	Removed: 3.2.6: Management systems in place that support the implementation and oversight of the policy within company operations and at final manufacturing stage facilities.
	Removed: 3.2.7: A grievance mechanism permits stakeholders to obtain redress for negative environmental impacts.
	Removed: 3.2.8: Transparent governance and reporting including information on management of environmental risks and how adverse impacts are addressed.
Gold	***Removed:*** 3.2.6: Responsible sourcing management systems that support the implementation and oversight of the environmental policy within the product's supply chain.
	Removed: 3.2.7: A grievance mechanism permits contract manufacturer stakeholders to obtain redress for negative environmental impacts.
	Removed: 3.2.8: Stakeholder engagement and feedback incorporated into environmental risk management. Stakeholder feedback informs strategy and operations.

Platinum	***Removed:*** 3.2.9: Environmental objectives incorporated into relevant employee performance evaluations. Incentives are provided to encourage senior management and employees to actively participate in achieving environmental goals.

4 // Material Health Requirements

The most significant modifications to the Version 4.1 Material Health requirements are as follows. Please see the table below and the draft Version 4.2 standard for additional details.

4.2 Avoidance of Organohalogens and Functionally Related Chemical Classes of Concern

- <u>Bronze level</u>: The restriction on highly halogenated carbon-based materials is limited to halogenated polymers (e.g., PVC, PTFE) at the Bronze level, rather than applying to all highly halogenated carbon-based materials (e.g., solvents, inks). Note that all highly halogenated substances and materials are still further restricted at the Silver and Gold levels (i.e., there is no change from Version 4.1 at Silver and Gold levels).

4.3 Material and Chemical Inventory & 4.4 Assessing Chemicals and Materials

- <u>Bronze level</u>: The requirement that finishes, coatings, and paints are subject to review (and therefore full data collection, assessment, and optimization by Gold level is required) if the part they are on is also subject to review has been removed in draft Version 4.2. Note that finishes, coatings, and paints are still in scope if present at ≥ 100ppm of the product overall or if they come into routine and direct human contact (regardless of concentration).

4.5 Material Health Optimization Strategy

- <u>Bronze and Gold levels</u>: The strategy requirements in Version 4.1 Section 4.5 are removed in the draft Version 4.2 standard. These requirements are replaced by a simplified standard-wide strategy requirement in draft Version 4.2 Section 3.3 to *Develop a strategy or plan towards achieving the next certification level*.

4.6 Using Optimized Materials (Section 4.5 in draft Version 4.2)

- <u>Platinum level</u>: The required % Aa/Bb assessed has been reduced from 50% to 25% in the Version 4.2 draft.

4.8 Volatile Organic Compound (VOC) Content (Section 4.7 in draft Version 4.2)

- <u>Silver level</u>: The VOC content requirement for liquid and aerosol consumer products has been moved to the Gold level. The VOC content requirement for liquid and aerosol construction products (e.g., paint) is unchanged and still applies at the Silver level.

4.9 Optimizing Chemistry in the Supply Chain (Section 4.8 in draft Version 4.2)

- <u>Platinum level</u>: The required % of certified inputs has been reduced from 75% MHC or 50% C2CC to 25% MHC or 15% C2CC (or equivalent).

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***No change:*** 4.1: Product complies with leading chemical regulations. → *Note: Although there is no change to the standard, additional flexibility on acceptable bill of materials formats*

	and declarations will be added to the Version 4.2 Certification Manual (e.g., additional flexibility on required signatures and e-mail confirmations).
	Modified: 4.2: Product does not contain organohalogen substances of special concern, or functionally related, non-halogenated classes of equivalent concern, above relevant thresholds. → *The restriction on highly halogenated carbon-based materials is limited to only halogenated polymers (e.g., PVC, PTFE) in draft Version 4.2. Under Version 4.1 all highly halogenated carbon-based materials (e.g., solvents, inks, etc.) are restricted at the Bronze level.*
	No change: 4.3: Product is 100% characterized by generic material.
	Modified: 4.3 and 4.4: Product is ≥ 75% assessed (complete formulation information collected for 100% of materials released directly into the biosphere). → *The requirement for finishes, coatings, and paints to be subject to review if the part they are on is also subject to review has been removed in draft Version 4.2. Note: These finishes, etc. are still subject to review if they are ≥ 100ppm of the product overall or come into routine and direct human contact.*
	Removed: 4.5: Strategy developed to phase-out or optimize all x-assessed or grey-rated chemicals. → *Detailed strategy requirements are removed in draft Version 4.2. However, Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level". Recommendations regarding what to include in the strategy will be provided in the Version 4.2 Certification Manual.*
Silver	***Modified:*** 4.3 and 4.4: Product is ≥ 95% assessed (complete formulation information collected for 100% of materials released directly into the biosphere). → *Minor modification as noted for Bronze level regarding finishes.*
	No change: 4.2: Product does not contain materials with > 1% carbon-bonded halogens by weight.
	Modified: 4.6 (V4.2 4.5): Product does not contain recognized PBTs or vPvBs. Product does not contain EU CLP Cat.1 and 2 CMRs or substances causing an equivalent level of concern, or exposure is unlikely or expected to be negligible. → *Administrative modification only. The specific lists used to define the substances restricted at Silver level (e.g., EU CLP) have been removed from the standard. These are listed in the Restricted Substances Reference Document (RSRD) only.*
	No change: 4.7 (V4.2 4.6): Product has low VOC emissions (required for products permanently installed in buildings).
	Modified: 4.8 (V4.2 4.7): Product complies with VOC content limits (required for liquid and aerosol consumer and construction products). → *In draft Version 4.2, the requirement for liquid and aerosol consumer products to comply with VOC content limits has been moved from Silver to Gold level. The requirement is unchanged at the Silver level for construction products.*
Gold	***Modified:*** 4.3 and 4.4: 100% of homogeneous materials subject to review are assessed (i.e., none have a grey rating due to insufficient data). → *See note at Bronze level regarding finishes.*

	No change: 4.2: Homogeneous materials do not contain organohalogen substances above chemical subject to review limits.
	No change: 4.6 (V4.2 4.5): Product is optimized for Material Health (i.e., all x-assessed chemicals replaced or phased out).
	Removed: 4.5: Strategy developed to either increase the percentage of preferred (A/a and/or B/b assessed) materials and chemicals in the product or optimize the chemistry in the supply chain.
	No change: 4.7 (V4.2 4.6): Product has very low VOC emissions or is inherently non-emitting (required for products permanently installed in buildings).
Platinum	***No change:*** 4.4 and 4.6 (V4.2 4.5): All product-relevant process chemicals are assessed (i.e., none have a grey rating due to insufficient data), and no x-assessed chemicals are used.
	Modified: 4.6 (V4.2 4.5): > 50% of the product is assessed as A/a or B/b. → *The required % Aa/Bb assessed is reduced from 50% to 25% in draft Version 4.2.*
	4.9 (V4.2 4.8): ***Modified:*** ≥ 75% of the product's input materials or chemicals have a C2C Certified Material Health Certificate (MHC) at the Gold or Platinum level or ≥ 50% of the product's input materials or chemicals are Cradle to Cradle Certified (C2CC) at the Gold or Platinum level or equivalent. A strategy is developed to increase percentages over time. → *The required percentage of certified inputs has been reduced in draft Version 4.2 from 75% MHC or 50% C2CC inputs (or equivalent) to 25% MHC or 15% C2CC inputs (or equivalent). In addition, the strategy is removed.* OR ***No change:*** Environmental health impact hotspot analysis based on life cycle assessment completed, emissions and resource use hotspots that impact human and environmental health are identified, and Material Health optimization strategy is developed based on the results. Progress is demonstrated at recertification.

5 // Product Circularity Requirements

The most significant modifications to the Version 4.1 Product Circularity requirements are as follows. Please see the table below and the draft Version 4.2 standard for additional details. Note that changes described at a lower achievement level apply at all higher levels unless otherwise indicated.

5.1 Defining the Product's Technical and/or Biological Cycles

- Platinum level: The requirement to define two cycling pathways for all materials has been removed.

5.2 Preparing for Active Cycling

- Bronze level: The requirement to develop an active cycling plan has been removed in the draft Version 4.2 standard (identification of cycling partners is still required). This requirement – and several other strategy or plan requirements in the Product Circularity category – are replaced by a simplified standard-wide requirement in draft Version 4.2 Section 3.3 to *Develop a strategy or plan towards achieving the next certification level*.

5.3 Increasing Demand: Incorporating Cycled and/or Renewable Content

- Bronze level: All products are allowed to meet the required percentages of cycled and/or renewable content either at the material-level or product-level per the Version 4.2 draft. Product-level percentages may be met flexibly regardless of material type. Under Version 4.1, this is allowed for select products only.
- Bronze level: The requirement that commonly recycled virgin renewable materials (defined as paper and sawdust only per the Version 4.1 Certification Manual) count half towards achieving the required percentages of cycled and/or renewable content has been removed. These receive full credit in the draft Version 4.2 standard.
- Gold level: The requirement to use post-consumer cycled content has been moved from the Version 4.1 Gold level to the draft Version 4.2 Platinum level. Exception: Use of post-consumer cycled content is still required for single-use products and single-use packaging at the Gold level under draft Version 4.2. This means that for products that are not single-use, the requirements may be met by using either pre- or post-consumer material. The alternative pathway (to conduct a feasibility analysis and disclose the limitations of achieving the required percentages) is unchanged and may still be applied at the Bronze through Gold levels in draft Version 4.2.
- Gold level: The requirement that all renewable content must have a responsible sourcing certificate to count towards the required percentages of cycled and/or renewable content has been moved from the Version 4.1 Gold level to the draft Version 4.2 Platinum level. Note: High-risk materials like wood still require responsible souring at Bronze to receive credit. The alternative pathway (to conduct a feasibility analysis and disclose the limitations of achieving the required percentages) is unchanged and may still be applied at the Bronze through Gold levels in draft Version 4.2.

5.4 Material Compatibility for Technical and/or Biological Cycles

- Bronze: Compatibility requirements for solid geological materials entering biological cycles have been added to the draft Version 4.2 standard. Requirements applicable to this scenario are not defined in Version 4.1. The result is that only compostable or biodegradable solid materials are accepted for biological pathways under Version 4.1.
- Gold level: The high value cycling potential requirements must be met for at least one intended cycling pathway in draft Version 4.2. These requirements must be met for all intended cycling pathways under Version 4.1.
- Gold level: In draft Version 4.2, *for materials intended for technical cycles and solid materials intended for biological cycles,* a material must achieve at least one of the two high value cycling potential requirements to count towards the required percentage of the product with high value cycling potential. Under Version 4.1, both of the high value cycling requirements must be met.

5.5 Circularity Data and Cycling Instructions

- Bronze level: These requirements have been moved to the draft Version 4.2 (new) Section 3.2 Transparency. This new section includes transparency requirements applicable to all standard categories. A summary of the draft Version 4.2 transparency requirements is provided in the General section at the beginning of this document. Note that several Product Circularity disclosures that are required under Version 4.1 have been removed or are only recommended under draft Version 4.2. In addition, some Version 4.1 required disclosures have been moved to higher certification levels. The Circularity Data Report reference document does not exist under draft Version 4.2.

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***Modified:*** 5.1: Intended cycling pathway(s) for the product and its materials are defined. → *Paper is not required to be designated to the biological cycle in all cases, but only in select cases, in draft Version 4.2. This will be further defined in the Version 4.2 Certification Manual (e.g., a paper book will not be required to be designated to the biological cycle and therefore will not be subject to compostability requirements.)*
	Modified: 5.2: A plan has been created to address challenges with the cycling infrastructure at the end of the product's first use; potential cycling partners have been identified. → *The requirement to develop a plan has been removed in draft Version 4.2 (identifying potential partners is still required). Note that draft Version 4.2 Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level". Recommendations regarding what to include in the strategy/plan will be provided in the Version 4.2 Certification Manual.*
	Modified: 5.3: Select product and material types contain cycled and/or renewable content. Alternative: Limitations that prevent achievement of this requirement are publicly reported. → • *All products are allowed to meet the required percentages either at the material-level <u>or</u> product-level in draft Version 4.2. Under Version 4.1 meeting the requirements at product-level is allowed for select products only. Product-level percentages may be met flexibly regardless of material type. Note that the Required Percentages of Cycled and Renewable Content by Product and Material Type reference document will be updated soon after Version 4.2 is released as well to adjust for this modification and to make other necessary upgrades.* • *The requirement that commonly recycled virgin renewable materials count half towards the required percentages has been removed. Note: This requirement applies to paper and sawdust only under Version 4.1. Renewable paper and sawdust now receive full credit in draft Version 4.2.* • *The chain of custody exemption for steel and aluminum that can be "traced via specification" is removed in draft Version 4.2.* • *The requirement for verification of mass balance chain of custody via a C2CPII-recognized certification program is removed in draft Version 4.2. In the near term, this requirement will instead be noted in the Version 4.2 Certification Manual. This will allow C2CPII to develop its own mass balance methods in future without requiring a change to the standard.* • *Disclosure requirements applicable to chemical recycling (i.e., the technology pathway, available alternatives, rationale for selecting chemical recycling over mechanical, and description of impacts and trade-offs) have been moved to the draft Version 4.2 (new)*

	Section 3.2 Transparency and related reference document. These disclosures are recommended (rather than required) per the draft Version 4.2.
	Modified: 5.4: ≥ 50% of materials by weight are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable). → *Compatibility requirements for solid geological materials entering the biological cycles have been added to the Version 4.2 draft. Version 4.1 does not include requirements for this scenario.*
	Modified and moved: 5.5 (V4.2 3.2): Circularity data and cycling instructions are publicly available. → *Simplified and moved to draft Version 4.2 Section 3.2 Transparency.*
Silver	***No change:*** 5.2: Partnerships for cycling (recovery and processing) of the product have been initiated. If the product is intended for cycling via municipal systems, materials are compatible with those systems.
	Modified: 5.3: Percentage of cycled and/or renewable content, by weight, is equal to or higher than industry averages and/or is consistent with common practice. Alternative: Limitations that prevent achievement of this requirement are publicly reported. → *See modifications noted for Bronze level, which also apply at the Silver level. In addition, note that language has been added to draft Version 4.2 to allow for flexibility in setting the required percentages (as detailed in the Cycled and Renewable Content reference document) when sufficient industry average data are not available.*
	Modified: 5.4: ≥ 70% of materials by weight are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable). → *See modifications noted for Bronze level, which also apply at the Silver level.*
	Removed: A strategy for improving product circularity is developed including plans for: • 5.3: Increasing the amount of post-consumer recycled content and/or responsibly sourced renewable material, as relevant to the product type, • 5.6 (V4.2 5.5): Implementing a circular opportunity or innovation, and • 5.7 (V4.2 5.6): Improving the product's design for disassembly (if relevant). → *Detailed strategy and plan requirements are removed in draft Version 4.2. However, Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level". Recommendations regarding what to include in the strategy/plan will be provided in the Version 4.2 Certification Manual.*
Gold	***Clarified:*** 5.2: Partnerships for cycling (recovery and processing) of the product according to <u>all</u> intended cycling pathways have been initiated. → *Clarified in draft Version 4.2 that intermediate products and liquid formulations are exempt from this requirement at both Silver and Gold levels (rather than Silver level only). Note that this is how the requirement has been interpreted in practice under Version 4.1.*

	Modified: 5.3: Percentage of cycled and/or renewable content, by weight, is consistent with values achieved by industry leaders for the product type. Alternative: Limitations that prevent achievement of this requirement are publicly reported. → • *Moved the requirement to incorporate post-consumer cycled content from Version 4.1 Gold level to draft Version 4.2 Platinum level (except for single-use products and single-use packaging for which post-consumer cycled content is still required at the Gold level under draft Version 4.2). Alternative feasibility analysis and disclosure of limitations is unchanged and still allowed at Bronze through Gold level.* • *Moved the requirement for all renewable content receiving credit towards achieving the required percentages to have a responsible sourcing certificate from the Version 4.1 Gold level to draft Version 4.2 Platinum level. Note: High-risk materials like wood still require responsible souring at Bronze to receive credit. Alternative feasibility analysis and disclosure of limitations is unchanged and still allowed at Bronze through Gold level.* • *See modifications noted for Bronze and Silver level, which also apply at Gold level.*
	Modified: 5.4: ≥ 90% of materials by weight are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable) and support high-value cycling. This means that the materials are of high quality and are likely to retain their value for subsequent use. → • *Draft Version 4.2 requires that the high value cycling potential requirements be met for at least <u>one</u> intended cycling pathway (not all intended pathways as required in Version 4.1).* • *Under Version 4.1 there are two high value cycling requirements for materials intended for technical cycles and solid materials intended for biological cycles in: "**1.a.i.** Must not contain additives or features that are likely to result in low-value (i.e., low-quality) reprocessed material, and **1.a.ii.** Must be able to substitute for virgin material without loss of essential product function or material durability, contain at least 80% renewable or post-consumer recycled content, or have at least two plausible next uses." Under draft Version 4.2 these are two options instead of both being required. In addition, minor modifications were made to the second option (i.a.ii). See draft for details.* ***No change:*** 5.7 (V4.2 5.6): If relevant, parts containing these materials are designed for easy disassembly.
	The strategy has been implemented including: ***Removed:*** 5.3: Increased use of post-consumer and/or responsibly sourced renewable material as relevant to the product type. Alternative: Limitations that prevent increased use are publicly reported. ***No change:*** 5.6 (V4.2 5.5): A circular opportunity or innovation that increases product circularity.
	Modified: 5.8 (V4.2 5.7): The product is actively cycled (recovered and processed) and/or a program is implemented to increase the cycling rate or quality of the product's

	materials after use. (Both are required for short-use phase products and for products required to be cycled per leading regulations; one is required for long-use phase products.) For select single-use plastic products, a minimum cycling rate of 50% is achieved. → *Minor modification: The example list of select single-use plastics has been removed from the standard in draft Version 4.2. These examples will be listed in the Version 4.2 Certification Manual instead.*
Platinum	***Removed:*** 5.1: At least two intended cycling pathways are defined for the product and its materials.
	Modified: 5.3: Percentage of cycled and/or renewable content, by weight, has reached the technically feasible maximum. → *See changes noted at Bronze level which also apply at the Platinum level. In addition, note that per the modifications described above for the Gold level, use of post-consumer cycled content and/or responsibly sourced renewable content for low-risk materials is required for all products at the Platinum level only under draft Version 4.2 (rather than at both Gold and Platinum).*
	Modified: 5.4: ≥ 99% of materials by weight are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable). → *See changes noted for Bronze and Gold levels which also apply at Platinum level.* ***No change:*** 5.7: If relevant, parts containing these materials are designed for easy disassembly.
	No change: 5.8 (V4.2 5.7): The product is actively cycled in an amount consistent with the product's use phase (the shorter the use phase, the higher the minimum percentage required) and a program is implemented to increase the cycling rate or quality of the product's materials after use.
	No change: 5.8 (V4.2 5.7): Cycling rates and quality are monitored over time, and an increase in cumulative cycling rate or quality is demonstrated.

6 // Clean Air & Climate Protection Requirements

The most significant modifications to the Version 4.1 Clean Air & Climate Protection requirements are as follows. Please see the table below and the draft Version 4.2 standard for additional details.

Clean Air & Climate Protection Strategy

- Bronze level: The strategy requirements in Version 4.1 Section 6.3 are removed from the draft Version 4.2 standard. These requirements are replaced by a simplified standard-wide strategy requirement in draft Version 4.2 Section 3.3 to *Develop a strategy or plan towards achieving the next certification level*.

6.4 Using Renewable Electricity and Addressing GHG Emissions in Final Manufacturing (Section 6.2 in draft Version 4.2)

- Bronze level: The requirement that renewable energy procurement support new renewable energy generators (≤15 years age limit) is removed in draft Version 4.2. Under Version 4.1, the requirement to support new generators applies to unbundled attribute certificate procurement beginning at the Bronze level and to long-term power purchase agreements at the Gold and Platinum levels.

6.5 Energy Efficiency During Product Use

- <u>Bronze level</u>: This section has been removed from the standard in draft Version 4.2

6.8 Addressing Embodied GHG Emissions (Section 6.5 in draft Version 4.2)

- <u>Gold level</u>: Additional acceptable methods for demonstrating that embodied emissions have been addressed have been added to the draft Version 4.2. This includes an allowance to compare LCAs for similar products (if EPDs are not available) and to compare to government or other similar benchmarks.

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***No change:*** 6.1: Final manufacturing facilities comply with air emissions regulations or guidelines—i.e., permits, international guidelines, or industry best practice. → *Note: Although there is no change to the standard, the documentation required to be submitted for verification will be reduced for low-risk locations and situations. This will be further detailed and explained in the Certification Manual when it is updated for Version 4.2.*
	No change: 6.2: Annual electricity use and greenhouse gas emissions associated with the final manufacturing stage of the product have been quantified.
	Removed: 6.3 (V4.2 3.3): A strategy for increasing use and/or procurement of renewable electricity and addressing greenhouse gas emissions has been developed. The strategy includes near- and mid-term targets. → *Detailed strategy requirements are removed in draft Version 4.2. However, draft Version 4.2 Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level".*
	Modified: 6.4 (V4.2 6.3): 5% target(s)* for procuring or producing renewable electricity and/or addressing greenhouse gas emissions have been achieved. Applicable to final manufacturing stage electricity and emissions only. → *"Unbundled" energy attribute certificates are not required to support new (≤ 15 years) renewable electricity generators in draft Version 4.2 (while this is required in Version 4.1). In addition, a minor modification has been made to allow for accepting forms of assurance that are considered equivalent to C2CPII-recognized standards for demonstrating that impoundment hydroelectricity is sustainable.*
	Removed: 6.5: Products that use energy during the use phase (e.g., appliances) or that greatly impact the energy efficiency of buildings (e.g., windows, insulation), are certified using a C2CPII-recognized energy efficiency standard or similar, if available. → *Note that energy label or efficiency certification information is recommended to be disclosed per the draft Version 4.2 (new) Section 3.2 Transparency.*
	No change but moved: 6.6 (V4.2 3.2): Greenhouse gas emissions data for the applicant company, for all final manufacturing stage facilities, or for the final manufacturing stage of the product are made available to stakeholders. → *Moved to draft Version 4.2 Section*

	3.2 Transparency. A summary of the draft Version 4.2 transparency requirements is provided in the General section at the beginning of this document.
Silver	***No change:*** 6.2: For construction products and building materials used to construct primary building elements, the embodied emissions associated with the product from cradle-to-gate or through end-of-use have been quantified, a third-party critical review is conducted, and an Environmental Product Declaration (EPD) produced.
	Removed: 6.3 (V4.2 3.3): The renewable electricity and greenhouse gas reduction strategy includes long-term target(s) in addition to the near- and mid-term targets. → *Detailed strategy requirements are removed in draft Version 4.2. However, draft Version 4.2 Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level".*
	Modified: 6.4 (V4.2 6.3): 20% target(s)* for procuring or producing renewable electricity and/or addressing greenhouse gas emissions have been achieved. Applicable to final manufacturing stage electricity and emissions only. → *See notes at Bronze level which also apply at Silver level.* Alternative: 25% of the embodied emissions associated with the product from cradle to gate or through end-of-use are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). Note: This is required at the Gold level in all cases. → *See note for 6.8 Gold level.*
	No change but moved: 6.6 (V4.2 3.2): For construction products and building materials used to construct the primary building elements, make an Environmental Product Declaration (EPD) available to stakeholders. → *Moved to draft Version 4.2 Section 3.2 Transparency.*
Gold	***No change:*** 6.2: For all other product types, the embodied emissions associated with the product from cradle-to-gate or through end of use have been quantified and third-party verification or an internal review is conducted.
	Modified: 6.4 (V4.2 6.3): 50% target(s)* for procuring or producing renewable electricity and/or addressing greenhouse gas emissions have been achieved. Applicable to final manufacturing stage electricity and emissions only. 50% of the renewable electricity (25% of total electricity used) is either produced on site or procured through long-term power purchase agreements (PPAs) or PPAs signed pre-financing supporting new renewable electricity installations. Alternative: Renewable electricity procurement matches 100% of electricity used at final manufacturing facilities. → *Version 4.1 requires that "unbundled" attribute certificates and PPAs support new (≤ 15 years) renewable electricity generators. This requirement is removed in draft Version 4.2. In addition, equivalent forms of assurance to C2CPII-recognized standards for demonstrating that impoundment hydroelectricity is sustainable are accepted per draft Version 4.2.*
	No change but moved: 6.6 (V4.2 3.2): For product types other than construction products and building materials used to construct the primary building elements, make embodied greenhouse gas emissions data for the product available to stakeholders. → *Moved to draft Version 4.2 Section 3.2 Transparency.*

	No change: 6.7 (V4.2 6.4): Blowing agents used in the manufacture of the product's foam materials (any foam > 1% of product by weight) have low to no global warming potential and no ozone depletion potential.
	Modified: 6.8 (V4.2 6.5): 25% of the embodied emissions associated with the product from cradle-to-gate or through end of use are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). → *Additional methods of demonstrating that embodied emissions have been addressed have been added to draft Version 4.2, including allowances to (1) compare LCAs for similar products (for cases where EPDs are not available), and (2) compare to government or other similar benchmarks.*
Platinum	***No change:*** 6.2: For all other product types, a third-party critical review of the quantification of embodied greenhouse gas emissions associated with the product from resource extraction through end-of-use is conducted, and an Environmental Product Declaration (EPD) produced.
	Modified: 6.4 (V4.2 6.3): Fully electrify, use renewable electricity for total energy demand, and eliminate on-site greenhouse gas emissions: > 100% of electricity is renewably sourced. The electricity is produced on site or procured through long-term power purchase agreements (PPAs) or PPAs signed pre-financing that support new renewable electricity installations. Eligible sources of bioenergy receiving full credit (e.g., wastewater methane) may be used. Applicable to final manufacturing stage electricity and emissions only. → *It is not required to support new (≤ 15 years) renewable electricity generators when using PPAs in draft Version 4.2 (while this is required in Version 4.1).*
	No change but moved: 6.6 (V4.2 3.2): For product types other than construction products and building materials used to construct the primary building elements, make an Environmental Product Declaration (EPD) available to stakeholders. → *Moved to draft Version 4.2 Section 3.2 Transparency.*
	Modified: 6.8 (V4.2 6.5): 100% of the embodied emissions associated with the product from cradle-to-gate or through end of use are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). → *See note at Gold level.*

*Depending on the achievement level, the "targets" may apply to renewable electricity procurement or onsite production and use, performance improvements (emissions intensity reductions), absolute emissions reductions, use of eligible bioenergy sources, purchase of carbon offsets, and/or financial donations or investments.

7 // Water & Soil Stewardship Requirements

The most significant modifications to the Version 4.1 Water & Soil Stewardship requirements are as follows. Please see the table below and the draft Version 4.2 standard for additional details.

7.1 Characterizing Local and Product-Relevant Water & Soil Issues

- Bronze and Silver levels: The requirements to characterize local and product-relevant water and soil issues (for final manufacturing at Bronze and for tier 1 suppliers at Silver) have been removed in draft Version 4.2. The definition of high water stress locations is still applicable. This definition has been moved to the draft Version 4.2 standard section where it directly applies (Version 4.1 Section 7.6, now draft Version 4.2 Section 7.3 Water & Soil Conservation).
- Bronze level: The concepts of key materials and key materials in scope (first mentioned and defined in Version 4.1 Section 7.1) is fully removed from the draft Version 4.2 standard. The related Key Materials reference document does not exist (i.e., it is obsolete) in draft Version 4.2. The definition of pollutant-intense processes from the Key Materials Reference Document has been added to the draft Version 4.2 standard section where it directly applies (Version 4.1 Section 7.6, now draft Version 4.2 Section 7.3 Water & Soil Conservation).

7.2 Effluent Quality Compliance (Section 7.1 in draft Version 4.2)

- Bronze through Gold levels: The requirements to confirm the compliance status of off-site, independently operated treatment facilities have been moved to the Gold level only under draft Version 4.2. This means that it is not required to request compliance information from off-site independently operated facilities at the Bronze level, or to obtain information from (privately owned) off-site facilities at the Silver level. In addition, these requirements apply only to facilities in high-risk locations in draft Version 4.2. High-risk will be defined in the Version 4.2 Certification Manual as facilities in locations without leading regulations and without adequate enforcement.

7.4 Providing Drinking Water, Sanitation, and Hygiene

- Bronze level: This section has been removed in draft Version 4.2. However, note that this topic is addressed in the Social Fairness category.

7.5 Water & Soil Stewardship Strategy

- Bronze and Silver levels: The strategy requirements in Version 4.1 Section 7.5 are removed from the draft Version 4.2 standard. These requirements are replaced by a simplified standard-wide strategy requirement in draft Version 4.2 Section 3.3 to *Develop a strategy or plan towards achieving the next certification level*.

7.6 Water & Soil Conservation (Section 7.3 in draft Version 4.2)

- Silver level: The requirement to take "one additional action" to conserve water or soil has been removed in the draft Version 4.2 standard.
- Gold level: Under draft Version 4.2 It is required to take action in the supply chain for ≥ 25% of materials by weight (or optionally, cost), rather than for all “key materials in scope”. In addition, the scope of the alternative compliance pathway to work directly with suppliers to meet the Water & Soil Stewardship requirements is limited to tier 1 suppliers initially with progress required at recertification.
- Definitions of high-volume, pollutant-intense, and high stress have been moved from other locations to this section given this is where they are directly applied.

7.7 Assessing and Optimizing Product-Relevant Chemicals in Effluent and Sludge (Section 7.4 in draft Version 4.2)

- Platinum Level: The requirement to assess and optimize product-relevant chemicals entering effluent and sludge at *Tier 1 suppliers to the final manufacturing stage that produce key materials using pollutant intense processes for materials that are ≥ 25% of the product by weight or by cost* has been removed in the draft Version 4.2 standard. The Platinum requirement now applies only to products that are ≥ 25% leather, metal with finish, pulp, paper, or textile.

7.8 Transparency

- Silver level: These requirements have been moved to draft Version 4.2 Section 3.2 Transparency. A summary of the Version 4.2 transparency requirements is provided in the General section at the beginning of this document. Note that several Water & Soil Stewardship disclosures that are required under Version 4.1 are only recommended under draft Version 4.2.
- Platinum level: The requirement to *Make effluent quality data for the final manufacturing stage facilities available to stakeholders* is removed in the draft Version 4.2 standard.

7.9 Positive Impact Project

- Gold and Platinum levels: This section has been removed in the draft Version 4.2 standard.

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***Removed:*** 7.1: Local and product-relevant water and soil issues are characterized. (Required for final manufacturing stage facilities.) → *Under draft Version 4.2, the requirement to characterize local and product-relevant water and soil issues, the concept of key materials, and the related Key Materials reference document have been removed. (Note: The concept of key materials and the Key Materials Reference Document are first introduced in Version 4.1 Section 7.1.) The Key Materials Reference Document is obsolete under draft Version 4.2. The definition of high water stress locations has been moved to draft Version 4.2 Section 7.2 Water & Soil Conservation (this is Section 7.6 in Version 4.1).*
	Modified: 7.2 (V4.2 7.1): • ***No change***: Final manufacturing facilities comply with water quality regulations or guidelines (i.e., permits, international guidelines, or industry best practice). → *Although there is no change to the standard, the documentation required to be submitted for verification will be reduced for low-risk locations and situations. This will be detailed in the Certification Manual when it is updated for Version 4.2.* • ***Modified:*** Data to demonstrate the compliance status of off-site, independently operated, effluent treatment facilities (if any) are requested. → *Moved to the draft Version 4.2 Gold level.*
	No change: 7.7 (V4.2 7.4): Product-relevant chemicals entering effluent or sludge comply with leading chemical regulations. (Required for final manufacturing stage.)
	No change: 7.3 (V4.2 7.2): Water use at final manufacturing stage facilities is quantified. → *Note: Although there is no change, the definition of facilities with high-volume processes has been moved from this section to draft Version 4.2 Section 7.3 Water & Soil Conservation (Version 4.1 Section 7.6) where it is directly applied.*
	Removed: 7.4: Adequate drinking water, sanitation, and hygiene (WASH) are provided (final manufacturing stage facilities only). → *This Version 4.1 requirement is redundant to a*

	requirement in the Social Fairness category. The requirement to provide adequate WASH is still included in draft Version 4.2 Social Fairness.
	Removed: 7.5 (V4.2 3.3): A strategy for achieving the Silver level water and soil conservation requirements has been developed. For facilities using high volumes of water in stressed locations, the strategy includes water use reduction targets. Progress is reported at recertification. → *Detailed strategy requirements are removed in draft Version 4.2. However, draft Version 4.2 Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level".*
Silver	***Removed:*** 7.1: Water and soil related risks are characterized. (Required for select tier 1 suppliers of key materials.)
	Modified: 7.2 (V4.2 7.1): Privately owned, off-site, independently operated effluent treatment facilities (if any), comply with effluent quality guidelines or regulations. Alternatively, a strategy to address the issue has been developed. → *Moved to the draft Version 4.2 Gold level.*
	Modified: 7.6 (V4.2 7.3): The Bronze level water and soil conservation strategy has been implemented including: • ***No change:*** At least one conservation technology or best practice at facilities expected to have the greatest water- or soil-related impacts. (Required for final manufacturing facilities with high-volume processes in stressed locations and facilities with pollutant-intense processes.) → *Although the detailed Bronze level strategy in Section 7.5 has been removed, this Section 7.6 Silver requirement to have taken action to conserve water and soil at certain final manufacturing facilities in unchanged. Note that the definition of pollutant-intense processes has been moved from the Key Materials Reference document to this section of the standard in draft Version 4.2. The list of pollutant-intense and high-volume processes included in the Key Materials reference document will be included in the Version 4.2 Certification Manual.* • ***Removed:*** One additional action to conserve water and/or soil either at final manufacturing facilities or in the supply chain. (Required when there are any facilities with high-volume or pollutant-intense processes and/or in stressed locations.)
	No change: 7.7 (V4.2 7.4): Product-relevant process chemicals entering effluent and sludge are defined and assessed.
	Modified: 7.7 (V4.2 7.4): Product-relevant effluent and sludge does not contain recognized PBTs, vPvBs, or EU CLP Cat.1 and 2 CMRs, or substances causing an equivalent level of concern, or exposure via effluent and sludge is unlikely or expected to be negligible. (Required for final manufacturing stage.) → *Administrative modification only: The specific lists used to define the substances restricted at Silver level (e.g., EU CLP) have been removed in draft Version 4.2. These are listed in the Restricted Substances Reference Document (RSRD) only under the draft Version 4.2.*
	Modified and moved: 7.6 (V4.2 3.2): Water use data are made available to stakeholders. → *Moved to draft Version 4.2 Section 3.2 Transparency. Version 4.1 requires disclosure of withdrawals by source and stress level, consumption, and discharge by level of treatment and*

	destination. Disclosure of withdrawals and consumption is required in draft Version 4.2, while disclosure by source and stress level and of discharge by level of treatment and destination is not required but recommended. A summary of the draft Version 4.2 transparency requirements is provided in the General section at the beginning of this document.
	Removed: 7.5 (V4.2 3.3): A strategy for achieving the Gold level water and soil conservation requirements has been developed. Progress is reported at recertification. → *Detailed strategy requirements are removed in draft Version 4.2. However, draft Version 4.2 Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level".*
Gold	***Modified:*** 7.2 (V4.2 7.1): <u>Government owned,</u> off-site, independently operated effluent treatment facilities (if any), comply with effluent quality guidelines or regulations. Alternatively, a strategy to address the issue has been developed. For recertification at the Gold level, all off-site, independently operated effluent treatment facilities (if any), comply with effluent quality guidelines or regulations. Alternatively, manufacturing facilities comply with effluent quality guidelines for direct discharge or otherwise address the issue. → *In draft Version 4.2 these requirements apply to both privately owned <u>and</u> government owned off-site independently operated treatment facilities at the Gold level. Under Version 4.1, requirements applicable to privately-owned off-site treatment facilities are at Silver level, and it is required to request compliance information from all off-site independently operated treatment facilities at Bronze.*
	7.6 (V4.2 7.3): The Silver level water and soil conservation strategy has been implemented including: • ***No change:*** Conservation technologies and best practices at facilities expected to have the greatest water- and/or soil-related impacts. (Required for all final manufacturing facilities with high-volume or pollutant-intense processes and/or in stressed locations.) → *Although the detailed Silver level strategy in Section 7.5 has been removed, this Section 7.6 (draft Section 7.3) Silver requirement to have taken certain actions is unchanged in draft in Version 4.2.* • ***Modified:*** Actions to conserve water and/or soil in the supply chain, including the use of certified materials, working as part of multi-stakeholder group(s), and/or working directly with suppliers to implement water and soil stewardship requirements and address the processes of concern. (Required for key materials in scope.) → *The concept of key materials has been removed, and the scope of these requirements has been reduced in draft Version 4.2. The draft requires action in the supply chain for ≥ 25% of materials by weight or by cost, while Version 4.1 requires action "For <u>key materials</u> that make up ≥ 25% of the product by weight or by cost". In addition, the scope of the alternative pathway to work directly with suppliers to meet standard requirements has been narrowed to tier 1 suppliers initially with progress required at recertification.*
	No change: 7.7 (V4.2 7.4): Product-relevant chemicals in effluent and sludge are assessed and optimized (i.e., none are x-assessed or grey-rated). (Required for the final manufacturing stage.)
	Removed: 7.9: A positive impact project that addresses local and/or product-relevant water and/or soil issues has been implemented.

Platinum	***Removed:*** 7.8: Water quality data are made available to stakeholders.
	Modified: 7.7 (V4.2 7.4): Product-relevant chemicals in effluent and sludge are assessed and optimized (i.e., none are x-assessed or grey-rated). (Required for key materials where pollutant-intense processes occur at tier 1, or at any tier for leather, metal finishing, pulp/paper and textiles.) → *The portion of the requirement applicable to key materials at tier 1 is removed in draft Version 4.2. These requirements apply to products that are ≥ 25% leather, metal with finish, pulp, paper, or textile only in draft Version 4.2.*
	Removed: 7.9: Impact of positive impact project demonstrated.
	Modified: 7.10 (V4.2 7.5): For final manufacturing stage facilities: • A comprehensive effluent and sludge quality management system has been established, and • Effluent and sludge produced as a result of all manufacturing processes used at the facility are optimized. → *Minor modification: Option added to draft Version 4.2 to meet limits on Total Organic Carbon (TOC) as an alternative to meeting limits on Chemical Oxygen Demand (COD).*

8 // Social Fairness Requirements

The most significant modifications to the Social Fairness requirements are as follows. Please see the table below and the draft Version 4.2 standard for additional details.

8.1 Human Rights Policy

- Bronze level: Human right policy is removed as a separate section of the standard in draft Version 4.2. However, the policy requirements have been moved and combined with Version 4.1 Section 8.3 Monitor and Verify Performance. Under draft Version 4.2, the policy requirements may be met at the facility level by applicants or by suppliers (for contract manufacturing or other cases where supplier facilities are part of the final manufacturing stage). If any of the policy elements are not in place at initial certification, a corrective action plan is required and demonstration of progress on improving the policy is required at recertification. Under draft Version 4.2, this is an option at all achievement levels. The requirement to publicly disclose if policies are not fully aligned with the requirement has been removed in draft Version 4.2.

8.2 Assessing Risks and Opportunities

- Bronze, Silver and Gold levels: This section has been removed in the draft Version 4.2 standard. This means that conducting a formal human rights risk assessment is not required. The definition of de facto high-risk locations (including in Version 4.1 Section 8.2) will be moved to the Version 4.2 Certification Manual. This definition and designation will still be used to determine when third-party social audits are required for final manufacturing facilities (at Bronze) and must be requested of tier 1 suppliers (at Silver). The definition of high-risk components and raw materials (applicable at Gold level) has been moved to the draft Version 4.2 Monitor and Verify Performance section where it is directly applied.

8.3 Monitor and Verify Performance

- Bronze level: This section has been expanded to more directly require checking for evidence of policies and procedures applicable to the list of key human rights topics at final manufacturing stage facilities. The required topics (listed in Version 4.1 Section 8.1 and referred to as "required policy elements") are listed in the Monitor and Verify Performance section under draft Version 4.2 instead. Note that this is primarily an editorial change because facilities are already being asked about these topics via C2CPII's Version 4.1 Section 8.3 Monitor and Verify Performance Form. This form will be updated for Version 4.2, but C2CPII does not expect major changes to the questions asked. See notes in the table below and draft standard for additional details.

8.4 Strategy for Policy Implementation

- Bronze level: The strategy requirements in Version 4.1 Section 8.4 have been removed from the draft Version 4.2 standard. These requirements are replaced by a simplified strategy requirement in draft Version 4.2 Section 3.3 to *Develop a strategy or plan towards achieving the next certification level*.

8.5 Demonstrating Commitment

- Bronze level: This section has been removed in the draft Version 4.2 standard.

8.6 Management Systems

- Silver level: The Silver level requirement to *Implement a management system that supports achievement of the human rights policy commitments within company operations* has been removed from the draft Version 4.2 standard. Note that questions about management systems and related procedures applicable to key human rights topics are already (and will still be) included in the Monitor and Verify Performance form (which applies to final manufacturing stage facilities rather than to the entire applicant company).

8.7 Grievance Mechanisms

- Silver level: The scope of this requirement has been reduced from applicant company to final manufacturing facilities and stakeholders of those facilities in draft Version 4.2. The Silver level requirement has also been moved to the Gold level and combined with the requirement that contract manufacturing facilities have a grievance mechanism. This means that grievance mechanism requirements exist only at Gold level under draft Version 4.2.

8.8 Positive Impact Project

- Silver and Gold levels: This section has been removed in the draft Version 4.2 standard.

8.9 Transparency and Stakeholder Engagement

- Silver level: The transparency requirements have been moved to draft Version 4.2 Section 3.2 Transparency. A summary of the Version 4.2 transparency requirements is provided in the General section at the beginning of this document. Note that disclosure/transparency is only recommended (rather than required) for Social Fairness topics under draft Version 4.2.
- Gold level: The stakeholder engagement requirements have been moved from the Version 4.1 Gold level to the draft Version 4.2 Platinum level.

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***Modified:*** 8.1 (V4.2 8.1): A human rights policy based on international human rights standards and an understanding of the company's risk areas is in place. → *Removed from the standard as a separate section in draft Version 4.2. However, the policy requirements have been moved and combined with Version 4.1 Section 8.3 Monitor and Verify Performance (Section 8.1 in draft Version 4.2). Under draft Version 4.2, the policy requirements may be met at the facility level by applicants or by suppliers (for cases where a supplier owns the facility), while the policy requirements must be met by the applicant company in all cases under Version 4.1. If any of the policy elements are not in place at initial certification, a corrective action plan is required, and demonstration of progress is required at recertification. This is an option at all achievement levels. The requirement to publicly disclose if policies are not fully aligned with the requirement has been removed.*
	Removed: 8.2: Human rights risks are assessed for the applicant company, final manufacturing stage, and direct suppliers to the final manufacturing stage (tier 1). Progress is made on assessing risks beyond tier 1 (i.e., tier 2 and beyond). → *Although this section is removed in draft Version 4.2, the definition de facto high-risk locations will be retained within the Version 4.2 Certification Manual. This designation will still be used to determine when a full (typically third party) social audit is required for final manufacturing stage facilities and when social audit data must be requested from tier 1 suppliers for achieving the Monitor and Verify Performance requirements.*
	Removed: 8.4 (V4.2 3.3): A strategy for implementing the human rights policy is developed. At recertification, progress toward achieving the strategy is measured. → *Detailed strategy requirements are removed in draft Version 4.2. However, Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level". Recommendations regarding what to include in the strategy will be provided in the Version 4.2 Certification Manual.*
	Modified: 8.3 (V4.2 8.1): For final manufacturing stage facilities, performance against the human rights policy is measured and corrective actions for select issues (e.g., child labor, forced labor) are complete. Corrective actions are planned for any other poor performance issues and, at recertification, progress is demonstrated. → • *Under draft Version 4.2 this section more directly requires checking for evidence of policies and procedures (in addition to outcomes) applicable to the list of policy elements/key human rights topics included in Version 4.1 Section 8.1. These topics are listed in draft Version 4.2 Section 8.1 Monitor & Verify Performance instead. Note that facilities are already being asked about/checked on these topics under Version 4.1 via C2CPII's Monitor and Verify Performance Form.* • *In addition to the standard changes mentioned above facilities in low-risk locations will no longer be required to provide documentation to support their responses within the Monitor and Verify Performance form (i.e., a completed form with comments will be accepted). This allowance will be further developed and detailed in the Version 4.2 Certification Manual and the updated form. Low- vs. high-risk locations will be defined in the Version 4.2 Certification Manual using the Version 4.1 approach: "De facto high-*

	risk locations, defined as countries that fall below the 65th percentile when taking an average of the six World Bank Worldwide Governance Indicators."
	Removed: 8.5: Company executives demonstrate commitment and support for establishing, promoting, maintaining, and improving a culture of social fairness.
Silver	***Modified:*** 8.3 (V4.2 8.1): Social audit performance data are requested from tier 1 suppliers in high-risk locations. At recertification, progress is made on supply chain data collection and corrective actions, if needed. Corrective actions for select issues (e.g., child labor, forced labor) are complete. → *Minor modifications made to adjust for changes made elsewhere in this category. Note that low- vs. high-risk locations will be defined in the Version 4.2 Certification Manual only, using the Version 4.1 list of de facto high-risk locations.*
	Removed: 8.6 (V4.2 8.2): Management systems support the implementation and oversight of the human rights policy within company operations.
	Modified: 8.7 (V4.2 8.3): A grievance mechanism permits company employees and other stakeholders to obtain redress for negative human rights impacts. → *Scope reduced to apply to final manufacturing facilities only (rather than applicant company) and moved to Gold level in the Version 4.2 draft.*
	Removed: 8.8: The company has implemented a positive social impact project that measurably improves the lives of employees, the local community, or a social aspect of the value chain.
	Modified and moved: 8.9 (V4.2 3.2): The company uses open and transparent governance and reporting, making information on how human rights risks are managed and adverse impacts are addressed publicly available. → *Moved to draft Version 4.2 Section 3.2 Transparency. A summary of the draft Version 4.2 transparency requirements is provided in the General section at the beginning of this document. Note that under draft Version 4.2 Social Fairness related disclosures are all recommended rather than required.*
Gold	***No change but moved:*** 8.2 (V4.2 8.1): Human rights risks are assessed for the product's components and raw materials (regardless of tier). → *Moved to Section 8.1 in draft Version 4.2 at Gold level (Version 4.1 Section 8.3 Monitor and Verify Performance.*
	No change: 8.3 (V4.2 8.1): Materials associated with high risk of child or forced labor or support of conflict are certified to a C2CPII-recognized certification program or an equivalent alternative is in place. If a certification program is not available, a traceability exercise is conducted upon recertification.
	No change: 8.6 (V4.2 8.2): Responsible sourcing management systems support the implementation and oversight of the policy within the product's supply chain. → *Minor edits only to adjust for having removed Version 4.1 Section 8.1 which requires the applicant company to have a corporate-wide human rights policy.*
	Modified: 8.7 (V4.2 8.3): A grievance mechanism permits contract manufacturer employees and other stakeholders to obtain redress for negative human rights impacts. → *Combined with the grievance mechanism requirements for applicant owned facilities (which is at Silver level under Version 4.1).*

	Removed: 8.8: An assessment has been conducted to determine the impact of the positive impact project using quantitative metric(s). Measurable progress is demonstrated at recertification.
	Modified: 8.9 (V4.2 8.4): The company incorporates stakeholder engagement and feedback into human rights risk management. Stakeholder feedback informs strategy and operations. → *Moved to Platinum level under draft Version 4.2. In addition, several minor modifications made to account for changes made elsewhere in the Social Fairness category.*
Platinum	***No change:*** 8.10 (V4.2 8.5): The company is collaborating to develop and scale solutions to an intractable social issue within the value chain of the product.
	No change: 8.11 (V4.2 8.6): The company fosters a diverse, inclusive, and engaged work environment in which social fairness operates as a core part of recruitment, training, remuneration, performance evaluation, and incentive structures.

9 // Packaging for Certified Products

Level	Version 4.1 Requirements and Explanation of Modification in Draft Version 4.2
Bronze and Silver	***Modified:*** Packaging complies with the Restricted Substances List and the Bronze level organohalogen and functionally related chemical classes of concern restrictions (per Material Health Sections 4.1 and 4.2). → • *The Section 4.1 and 4.2 chemical restrictions apply to primary packaging only under draft Version 4.2 rather than to all non-exempt packaging types (which typically includes both primary and secondary packaging).* • *In the Version 4.2 draft, these chemical restrictions apply to packaging materials present at ≥ 1000 ppm within the packaging overall (rather than 100 ppm) with the following exception: Materials that come into routine and direct human contact during normal use of the product are always subject to these restrictions regardless of concentration (excluding inks, adhesives and labels).* • *The restrictions on halogenated flame retardants (HFRs) and organophosphate ester flame retardants (OPFRs), which are part of the Material Health Section 4.2 restrictions, have been removed from the draft Version 4.2 packaging section. Note that these restrictions do still apply at the Bronze level to the product itself under draft Version 4.2.* ***Modified:*** Packaging meets <u>one</u> of the following circularity requirements: • ***No change:*** (V4.1 #3a, V4.2 #1) The sum of post-consumer cycled and renewable content is ≥ 20% or equal to the percentage of cycled and renewable content required for the Silver level in Product Circularity. • ***Modified:*** (V4.1 #3b, V4.2 #2) Materials are compatible with municipal cycling systems (required for ≥ 90% of the packaging by weight); materials intended for composting are compostable. → *Under draft Version 4.2, packaging must have at least limited compatibility for municipal cycling (as defined at Bronze and Silver levels*

	for the product itself). The requirement for high value cycling potential has been removed for packaging. • ***No change:*** (V4.1 #3c, V4.2 #3) The packaging is reusable/refillable, is part of a refill system, and/or has a product-specific take-back program. • ***No change:*** (V4.1 #3d, V4.2 #4) The applicant has demonstrated efforts to reduce the amount or weight of packaging materials for the certified product without reducing compatibility for cycling. → *Under the Version 4.2 draft, the packaging circularity requirements (#1-4 as listed above) may newly be met via a weighted average compliance score across the four circularity options. This approach may be applied to the packaging of single products, and also across all packaging within a product group. A total compliance score of 100% is required for Bronze and Silver levels. A total score of 200% is required for Gold* and Platinum,. *For example, packaging that contains 10% renewable material (50% compliance to option #1) and demonstrated weight reduction of 5% (50% compliance to option #4) meets the requirement at Bronze and Silver levels.*
Gold and Platinum	Packaging meets <u>two</u> of the circularity requirements listed above. → *See notes at Bronze and Silver levels. No additional changes at Gold and Platinum.*

10 // Animal Welfare Requirements

Level	Version 4.1 Requirements and Explanation of Modifications in Draft Version 4.2
Bronze	***Modified***: Company policy forbids animal abuse including practices of high concern relevant to the species (e.g., mulesing, live plucking), requires provision of the five freedoms, and includes provisions for immediately addressing cases where it becomes known that abuse is occurring. A strategy for implementing a mechanism to ensure adherence to the policy is developed. → *The strategy requirement for implementing a mechanism has been removed from the draft Version 4.2 standard. Draft Version 4.2 Section 3.3 newly requires "Develop a strategy or plan towards achieving the next certification level". All other requirements remain unchanged in this section of the draft Version 4.2 standard.*
	No change: Recertification – Progress on implementing the policy, including an implementation mechanism, is demonstrated.
Silver	***No change:*** ≥ 50% of animal material in scope is certified to a C2CPII-recognized animal welfare certification or equivalent. Alternative: Limitations that prevent achievement of this requirement are publicly reported.
Gold	***No change:*** 100% of animal material in scope is certified to a C2CPII-recognized animal welfare certification or equivalent.

11 // Private Label Product Requirements

Minor edits made to account for changes made elsewhere in the standard.