

# Summary of Changes to the Second Draft of the Cradle to Cradle Certified® Product Standard, Version 4.0

This document summarizes each substantive change made to the second draft of the Cradle to Cradle Certified® Product Standard, Version 4.0. Clarifications, corrections, and other specific/individual changes made to the second draft are not provided in this summary document.

To view all changes made to the second draft of Version 4.0, please see the 'red-line' versions of the revised standard on the C2CPII website.

## 1. Introduction

### 1.3.3 Restrictions to Bronze Level Certification

A product may be certified at the Bronze level for a maximum of four years (i.e., two, two-year certification cycles) and must recertify at the Silver level or higher once the second, two-year Bronze level certification has expired or it will be delisted from the program. Alternatively, in cases where technical, performance, or market barriers prevent the achievement of the Silver level in any standard category, the product may be recertified at the Bronze level if:

1. The applicant publicly discloses an explanation of the limitation(s) preventing achievement of the Silver level requirements,
2. On-going measurable improvement is achieved (see Section 3.3), and
3. The product meets the Silver achievement level in at least one other category by the end of the fourth year of Bronze level certification (i.e., the expiration date of the second two-year certification).

## 2. Product Eligibility

### 2.1 Products Eligible for Certification

- The list of product types that are not eligible for certification has been moved to the Version 4.0 User Guidance, which will be published following the release of the Version 4.0 standard. The list is also available on the C2CPII website, [here](#).
- In the second draft, the list of ineligible products included all single-use plastic products and single-use plastic packaging. In the Version 4.0 User Guidance, the list will include only single-use plastic products and single-use plastic packaging types that are subject to leading regulations aiming to address plastic pollution (e.g., the European Union's directive on the reduction of the impact of certain plastic products on the environment). The list of ineligible products and packaging that will be included in the Version 4.0 User Guidance is as follows:
  - Single-use plastic cotton bud/swab sticks, cutlery (forks, knives, spoons, chopsticks), plates, straws, beverage stirrers, balloon sticks, food and beverage containers (including beverage cups) made from expanded polystyrene, bags < 50 microns (e.g., grocery, waste, and courier bags)\*, agricultural

mulch, and disposable plastic items for hotels. \*Exception: food bags with a thickness of < 15 microns intended for composting.

### **2.3 Products Not Eligible for the Bronze or Silver Achievement Level in Product Circularity**

- Eligible single-use plastic products and plastic packaging products (when certified as a separate product) are not eligible for certification at the Bronze or Silver achievement level in the Product Circularity category (i.e. they must meet the Gold or Platinum achievement level requirements in Product Circularity). See the Product Circularity section below for new requirements that have been added for this product type.

## **3. General Requirements**

### **3.2.3 Strategy for Environmental Policy Implementation**

- Bronze level: The requirement to ‘analyze environmental performance data to measure progress towards achieving environmental targets and objectives, and identify areas for improvement’ is now a recertification requirement beginning at the Bronze level rather than an initial Silver level requirement.

## **4. Material Health**

### **4.1 Restricted Substances List Compliance**

- All levels: The Restricted Substances List (RSL) reference document has been expanded to include a list of restrictions specific to cosmetics and personal care products. A few restrictions have also been updated or added to reflect changes in the referenced source regulations (see redline version of the reference document for details).
- Bronze level: The restriction on classes of special concern has been expanded to include not only organohalogen substances, but also functionally related, non-halogenated classes of equivalent concern (organophosphate ester flame retardants being used in lieu of halogenated flame retardants).

### **4.7 Volatile Organic Compound (VOC) Emissions & 4.8 Volatile Organic Compound (VOC) Content**

- Silver and Gold levels:
  - Minor changes have been made to the reference documents for the Volatile Organic Compound (VOC) Emissions and Content requirements (see redline versions of the reference documents for details).
  - It has also been clarified that products not covered by any of the standards or regulations listed in the *Volatile Organic Compound Content Limits* reference document are exempt from the VOC content requirement.
  - Additionally, water-based consumer products containing only legally mandated denaturants (e.g., 2-butanone for ethanol products) in addition to the previously listed VOCs in terms of organic substances with vapor pressure  $\geq 0.1$  mm Hg at 20°C are now also exempt from the VOC content requirement.

## 5. Product Circularity

### 5.1 Circularity Education

- Bronze level: It has been clarified that the applicant company must have actively participated in an initiative within the last two years prior to certification or recertification (rather than only beginning participation during the certification period).

### 5.2 Defining the Product's Technical and/or Biological Cycles

- Bronze level: It has been clarified that materials commonly released to the biosphere must be designated for the biological cycle (rather than only those that are commonly composted).

### 5.4 Increasing Demand: Incorporating Cycled and/or Renewable Content

- All levels: It has been clarified that the target percentages of cycled and/or renewable content at the Silver level may represent common practice rather than industry averages. Several changes were made to the reference document for this requirement in response to public comments received (see redline version of the reference document for details).
- Gold level: For single-use plastic products and plastic packaging products (certified as separate products), excluding packaging that is part of a refill/reuse system (e.g., detergent refill pouch), the alternative compliance pathway to meeting the target percentages of cycled and/or renewable content has been restricted (Note: the Gold level is now the lowest eligible achievement level for these product types in this category, see Section 2 'Product Eligibility').

### 5.5 Material Compatibility for Technical and/or Biological Cycles

- Gold level:
  - Materials that contain at least 80% renewable or post-consumer recycled content now automatically count toward the required percentage (90%) of materials compatible with the intended cycling pathway(s) if they do not contain additives or features that are likely to result in low-value (i.e., low-quality) reprocessed material.
  - Also, fossil-based materials may now be designed and demonstrated as compatible for biological cycling pathways (i.e., if they are compostable per a C2CPII-recognized standard).
  - Additionally, for plastic beverage containers, plastic caps and lids must now remain attached to the container during the product's intended use for them to count toward the required percentage (90%) of materials compatible with the intended cycling pathway(s) (in addition to the other requirements).

### 5.6 Circularity Data and Cycling Instructions

- Bronze level: Several changes were made to the reference document for the Circularity Data and Cycling Instructions requirement (see redline version of the reference document for details).

## **5.8 Product Designed for Disassembly**

- Gold and Platinum levels: The requirements now only apply to a certain percentage of materials by weight in the product.

## **5.9 Active Cycling**

- Gold level: For select single-use plastic products and single-use plastic packaging (when certified as a separate product),  $\geq 50\%$  of the product's materials must now be actively cycled and a program to increase the cycling rate or quality of the product for its next use must be implemented (Note: the select single-use plastic products this applies to were not eligible for certification under the previous draft, see Section 2 'Product Eligibility').

# **6. Clean Air & Climate Protection**

## **6.2 Quantifying Electricity Use and Greenhouse Gas Emissions**

- Silver and Gold levels: Embodied emissions must now be estimated at the Silver level only for construction products and building materials used to construct the primary building elements (e.g., frame, walls, foundation) rather than for all products. For other product types, the requirement to estimate embodied emissions has been moved from the Silver to the Gold level.
- Silver level: The option to quantify scope 1-3 emissions instead of embodied emissions has been removed.

## **6.4 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing**

- Several alternatives to achieving the Bronze through Gold level targets to use renewable electricity and/or address greenhouse gas emissions in final manufacturing (previously referred to as renewable electricity and offset targets) have been added as follows:
  - Silver level: The performance improvement credit alone may now be used as a method of achieving the Silver level. This is allowed if absolute emissions reductions aligned with science-based targets are also achieved. Previously, the maximum performance improvement credit at Silver level was 10 percentage points, such that at least 10% renewable electricity and/or carbon offsets were still required.
  - Silver level: The embodied emissions target of 25% (required at the Gold level) may now be achieved at the Silver level as an alternative to meeting the Silver level targets applicable to the final manufacturing stage.
  - Bronze and Silver levels: Investment in on-site greenhouse gas emissions reductions projects (e.g., purchase of more energy efficient equipment) now receives credit as an alternative to purchasing carbon offsets (or achieving via the options described above for Silver level).

- Gold level: If renewable electricity is procured to match 100% of all electricity use at final manufacturing stage facilities, then on-site renewable electricity production and long-term power purchase agreements supporting new renewable electricity installations (otherwise required for 25% of electricity used in the final manufacturing stage) are no longer required at the Gold level.
- All levels: Hydroelectricity is now counted as renewable only if it is certified to a C2CPII-recognized renewable (hydro) electricity standard or is from non-impoundment sources.
- All levels: When procuring renewable energy attribute certificates in a region with a cap and trade program, if a mechanism exists to retire emissions allowances (thereby reducing the emissions cap in support of environmental claims associated with the renewable energy attribute certificates), this mechanism must now be used. (Note: this is currently an option in the United States.)
- All levels: The nuclear power penalty has been removed from the standard and is replaced by a requirement that carbon offsets may not be used to address greenhouse gas emissions attributable to purchased electricity in countries where the nuclear power share is >10%.
- Gold and Platinum levels: An allowance to accept other procurement options that meet the intent of the requirement to procure renewable electricity via long-term power purchase agreements supporting new renewable installations has been added.
- Platinum level: For non-electrical energy demands in final manufacturing, an allowance to accept other energy types in addition to the eligible sources of bioenergy has been added.

## 7. Water & Soil Stewardship

### 7.1 Characterizing Local and Product Relevant Water and Soil Issues & 7.6 Water and Soil Conservation

- All levels:
  - Soil erosion and pesticide use are now listed in the Key Materials reference document as potential issues of concern for all crop types rather than a small sub-set of crops.
  - In addition, for the Gold level, a C2CPII-recognized certification or equivalent that addresses these concerns must be in place for agricultural materials present at ≥25% of the product by weight or by cost (excluding untraceable commodity type agriculturally derived material, e.g., ethanol). Previously, this was only required for ‘agricultural raw materials where there is extensive evidence of highly negative water quantity and/or quality related impacts’ (with a list of such materials to be included in the Version 4.0 User Guidance). Note that the alternative to publicly disclose the limitations preventing the use of certified material is still available through the Gold level.

### 7.8 Transparency

- Silver and Platinum levels: The requirement to disclose water data specifically per GRI Water has been removed and replaced with a requirement to disclose ‘withdrawals by source and stress level, consumption, and discharge by level of treatment and destination’.

## 8. Social Fairness

### 8.2 Human Rights Policy

- Bronze level: Fair and ethical business practices, including anti-corruption/bribery, have been added as required policy elements.

### 8.3 Monitor and Verify Performance

- Silver level: The requirement to request and eventually collect social audit data from tier 1 suppliers in high risk locations is now limited to materials that are also subject to review in the Material Health category. Previously the requirement applied to all tier 1 suppliers in high risk locations.
- Gold level: An allowance to waive the Gold level requirement to use materials certified to a C2CPII-recognized standard for de fact high-risk components and raw materials has been added for cases where a certification may exist but certified material is not available.

### 8.4 Strategy for Policy Implementation

- Bronze level: The requirement to 'analyze performance data to measure progress toward achieving social targets and objectives, and identify areas for improvement' is now a recertification requirement beginning at the Bronze level rather than an initial Silver level requirement.

### 8.9 Transparency and Stakeholder Engagement

- Silver level: The transparency requirements have been moved from the Gold to the Silver level. The Silver level requirement now reads: 'Use open and transparent governance and reporting, making information on how human rights risks are managed and adverse impacts are addressed publicly available.'

### 8.11 Fostering a Culture of Social Fairness

- Platinum level: The requirements to foster a diverse and inclusive work environment have been revised for clarity to better highlight the importance of equal opportunity and allow for waiving of the requirements that entail collection of employee demographic data for locations where collecting such data is prohibited.

## 9. Packaging for Certified Products

- The second draft standard section titled Plastic Packaging Products (Certified as Separate Products) has been removed from the standard. This section was no longer necessary with the changes made to the eligibility requirements applicable to single-use plastics combined with updates to the Product Circularity category.
- The option to do a combined assessment of a product and its packaging (such that packaging and product are part of the same bill of materials and are considered together when determining percentage assessed) has been removed.

- The requirements applicable to the packaging of certified products have been updated to increase flexibility and better align with the requirements in the Product Circularity category.

## **10. Animal Welfare Requirements**

No changes

## **11. Private Label Product Requirements**

No changes

## **12. Definitions**

- Definitions for the terms 'recycled content', 'renewable content', 'refillable', and 'reusable' have been added or modified to align with ISO norms.