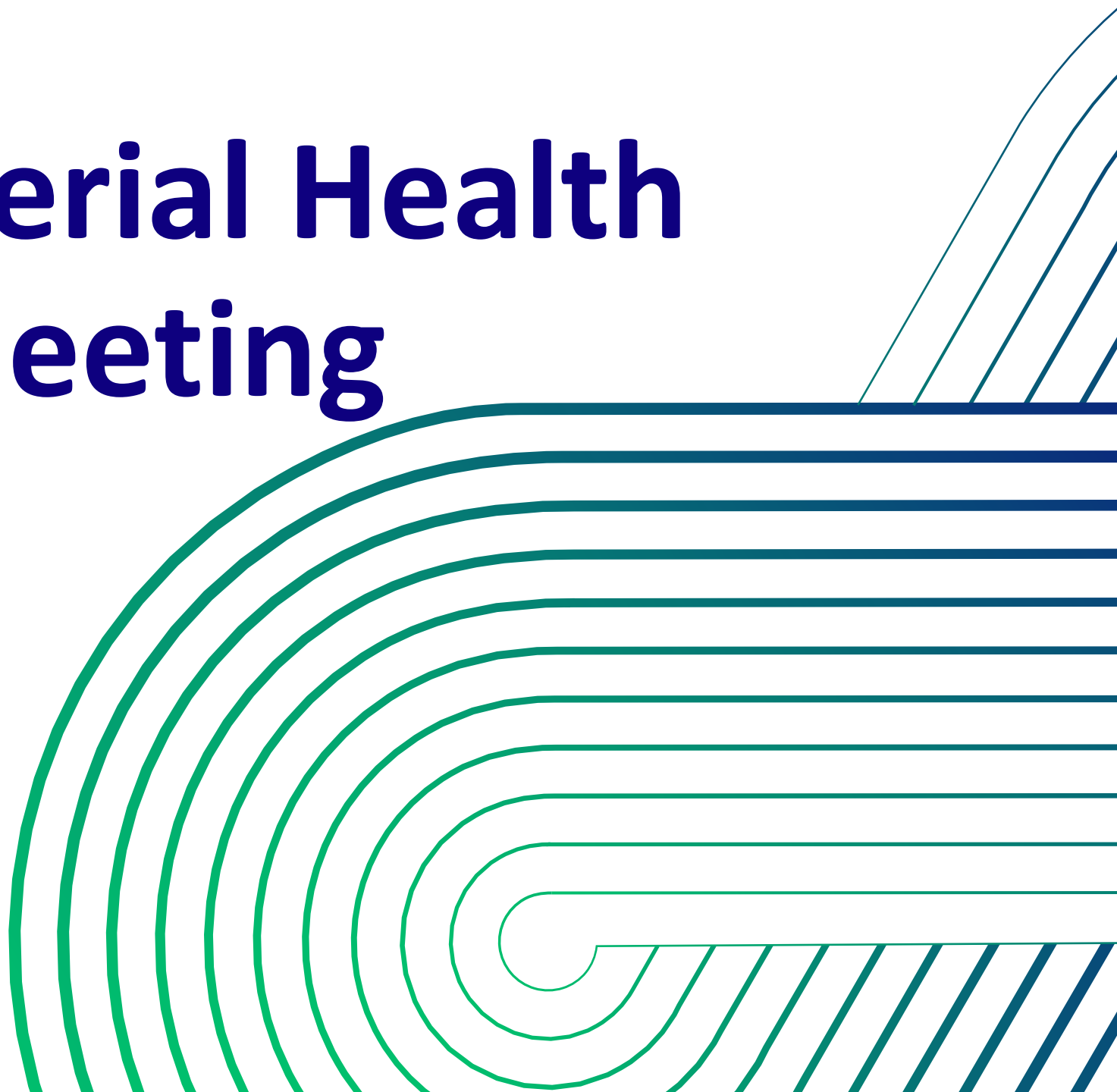


C2CPII Material Health Assessor Meeting

August 8, 2024

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Agenda

1. Housekeeping
2. C2CPH Updates
3. Updates to v4.1 Documents
 - I. Declarations
 - II. Restricted Substances Reference Document
 - III. V4.1 User Guidance, MH Highlights

Housekeeping

- Please be aware that this meeting will be recorded for C2CPII internal use.
- Questions and comments are welcomed throughout the meeting! Feel free to raise your hand or type your question in the chat.
- If you are comfortable turning your camera on, it is highly encouraged!

C2CPH Updates and Reminders

- **General Assessor Call, 3rd Quarter**
 - September 19, 10:30-12 EDT/4:30-6 CEST
- 2021 RSL is now expired
 - Please check ongoing projects for 2021 RSL declarations – they are no longer valid.
- Application Documentation Reminder
- C2C Certified Circularity Certification

Application Reminder: Section 4.1 Declarations

- In v4.0 and v4.1, **all nonexempt materials** must have documentation indicating Section 4.1 compliance, **even if full chemical composition information has been obtained** (see p. 48, v4.1 UG).
- Documentation options include:
 - RSL/Regulatory Compliance Declaration
 - Supplier Regulatory Compliance Statement (v4.1 only)
- One of these pieces of documentation is **also required** for 100% recycled/geological/biological materials (along with Bronze-level analytical testing), unless the material undergoes Silver-level analytical testing.

C2C Certified Circularity Certification

- Approved by C2CPH Standards Steering Committee on July 30, must still be approved by the Institute's Board of Directors.
- An unreleased and unformatted draft standard is available through the Assessor Resources page. **Please do not share or distribute this draft standard until the final version is released publicly on the C2CPH website.**
- We encourage assessors to inform current and potential clients about this exciting new opportunity for certification!

C2C Certified Circularity Certification

- Standard Requirements:
 - The requirements in Section 3.1, Certification Compliance Assurance
 - The requirements in **Sections 4.1 and 4.2, Material Health**
 - The requirements for the desired achievement level in Section 5, Product Circularity, and
 - The requirements for the desired achievement level in **Section 9, Packaging for Certified Products**, if applicable.

V4.1 Document Updates

- Declarations (Sections 4.1, 4.2, 4.6)
- Restricted Substances Reference Document (updates only)
- V4.1 User Guidance, MH Highlights

Update on v4.1 Declarations

- Current files have been updated to ensure that text forms are populating correctly. Please ensure you are using the most recent files!
- As a friendly reminder, in v4.1 the Section 4.2 restrictions are **not** included in the Section 4.1 declaration. Each section now has its own individual declaration.

Update on v4.1 Declarations – Attestations and Signatures

- C2CPH is currently in discussion with legal consultants regarding changes to the attestation and signature requirement in v4.1 declarations, based on assessor and supplier feedback.
- If these discussions result in any changes to our requirements, we will release updated forms and send out an immediate announcement to assessors.

Update to v4.1 Restricted Substances Reference Document

- The 4.1 All Products tab now includes a Product/Material Applicability column (Column E).
- This column describes which types of products/materials are subject to the chemical restriction.
 - Ex: Tris (2,3 dibromopropyl) phosphate (CAS #126-72-7; REACH XVII Entry 4)
 - Product/Material Applicability: Textiles
 - Therefore, if the product being certified is not a textile, the REACH XVII restriction on this substance does not apply.

Update to v4.1 Restricted Substances Reference Document

- Use the filter in Column E to select all product and material types that apply to the product being certified.
 - Always check the “All Products” and “Several – see regulation” categories.
- Check the specific regulation for more detailed descriptions of the restriction, including thresholds and applicable product types.

v4.1 User Guidance, Section 4.1: Compliance with Leading Chemical Regulations

- Added compliance pathways for Section 4.1
 - Statement of regulatory compliance, to be used at the material or product level.
 - Mill certificates for alloys, demonstrating full chemical composition.
 - SDS for low-concentration (<100 ppm) input materials
- Added guidance on which supplier tiers must be contacted for declarations.
- Added guidance on required documentation for biological, geological, and recycled content materials.

v4.1 User Guidance, Section 4.2: Avoidance of Organohalogens and OPFRs

- Expanded guidance on identifying PFASs, HFRs, and OPFRs (see Restricted Substances Reference Document).
- Added decision tree to determine whether OPEs are subject to the OPFR restriction.
- Specified that SDSs alone are not sufficient to establish PFAS/HFR/OPFR compliance.
- Added description of new Section 4.2-specific supplier declaration.

v4.1 User Guidance, Section 4.2: Avoidance of Organohalogens and OPFRs

- Added exemption for colorants (dyestuffs and pigments) used as intermediate products.
 - Dyestuffs and pigments used as intermediate products may contain over 10% carbon-bonded halogen, provided that the applicant specifies the use level to limit the concentration of halogens to 10 ppm in the final product.
 - Note that substances using this exemption are still subject to Silver/Gold-level restrictions on CMRs & SVHCs and X/x-assessed materials and chemicals, respectively, and that these restrictions are applied at the homogeneous material level, not the final product.

v4.1 User Guidance, Section 4.3: Material and Chemical Inventory

- Added guidance on using mill certificates to define full composition of metal alloys.
- Added reference to EMC methodology under Additional Information/Resources.
- Added documentation guidance regarding materials for which full chemical composition cannot be obtained.

v4.1 User Guidance, Section 4.4: Assessing Chemicals and Materials

- Specified that the final Aa/Bb/Cc rating must consider the worst-case rating across all use cycle stages and added guidance on identifying the worst-case stage.
 - Final manufacturing, professional use, installation, consumer use, and end-of-use
- Expanded guidance on percentage assessed calculations.
- Added guidance on percentage assessed for biological materials.

v4.1 User Guidance, Section 4.5: Material Health Optimization Strategy

- One new alternative optimization strategy was added and one modification was made:
 - **New:** At Gold and Platinum only, applicants may submit a strategy based on keeping abreast of developments for future optimization that would allow for the identification of suitable alternatives that would increase the percentage of A/a and/or B/b assessed materials and chemicals.
 - **Modified:** At Gold and Platinum only, research into alternative materials may now be counted for more than one certification period.

v4.1 User Guidance, Section 4.6: Using Optimized Materials

- Links to ECHA CLP List and SVHC Candidate List are now also maintained in Restricted Substances Reference Document.
- Added minor note reminders:
 - CMR/SVHC declarations are needed for GREY assessed materials at Silver level.
 - Exempt components (as defined in Section 4.3) do not require CMR/SVHC declarations.
 - Mill certificates are accepted for full chemical composition and may be used by a MH Assessor to determine the presence or absence of CMRs/SVHCs.

v4.1 User Guidance, Section 4.7: VOC Emissions

- Guidance added to distinguish which products are subject to the requirements in this section
 - Permanently installed products (floors/walls/ceiling) and products that are used to install them (adhesives/sealants) or are applied to them (paints/coatings).
 - Permanent or long-term equipment (furniture).
 - Testing is not required for products not permanently installed or intermediate products.

v4.1 User Guidance, Section 4.8: VOC Content

- Specified that aerosol adhesives are subject to these regulations.
- Clarified that products regulated only by CARB may not need to be tested if their %VOC content is below CARB limits for that product category.

v4.1 User Guidance, Section 4.9: Optimizing Chemistry in the Supply Chain

- Added clarity on recognized standards applicable to Pathway 1 (reduce percentage of hazardous chemicals in the product supply chain).
- Updated links related to the hotspot analysis and EU Product Environmental Footprint (PEF).

v4.1 User Guidance, Section 9: Packaging for Certified Products

- Aligned updated guidance on Section 4.1/4.2 requirements for packaging materials.

Thank you!!



- Thank you for your input and discussion.
- Please be thinking about discussion topics for the next meeting, and reach out to me if you would be willing to present on a topic at a future meeting.
- See you in October!