

# C2CPII Material Health Assessor Meeting

June 6, 2024

cradle to cradle  
**products**  
**innovation**  
**institute**

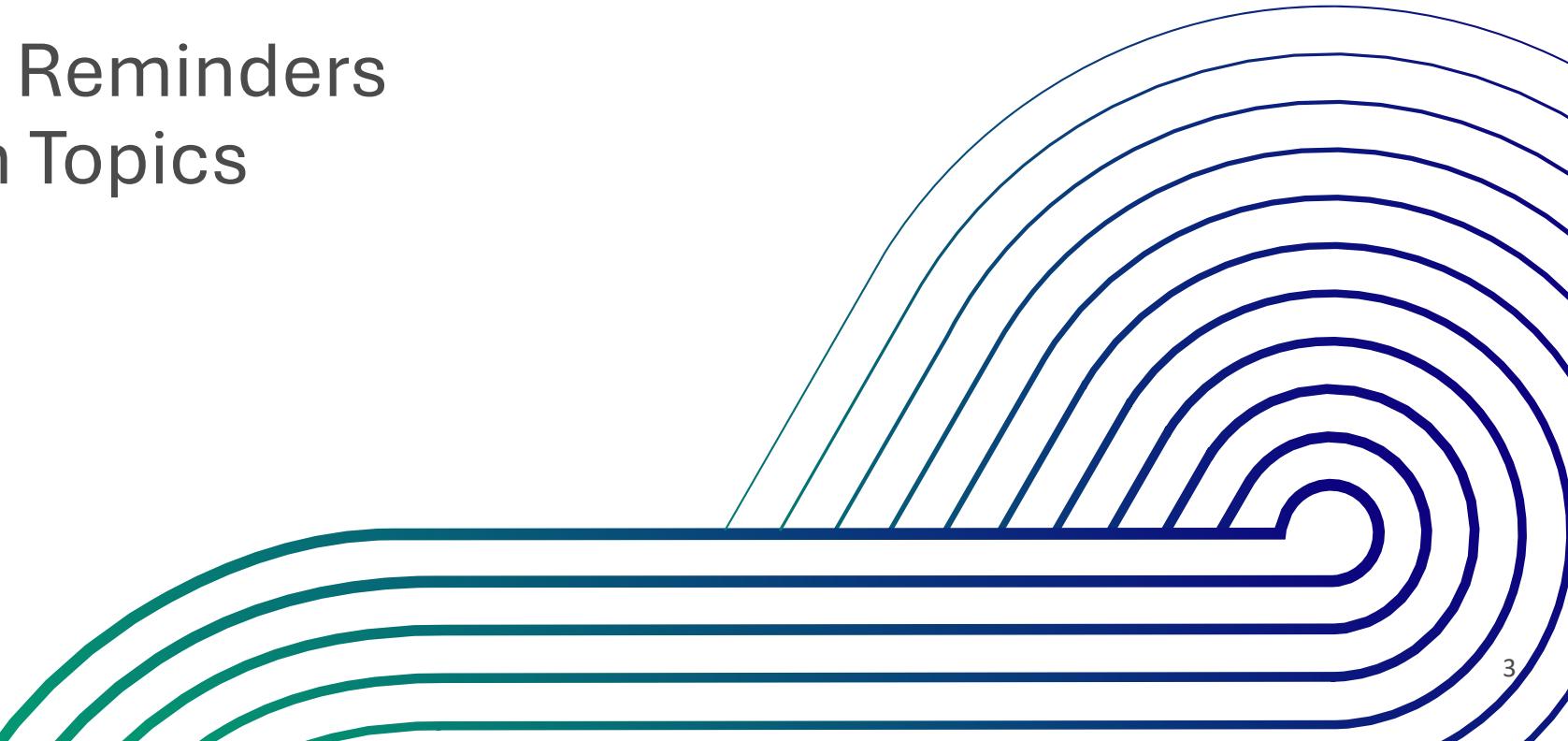


# Housekeeping

- 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!

# Agenda

1. Housekeeping
2. C2CPII Updates
3. MH Updates and Reminders
4. Open Discussion Topics



# Meeting Purpose

- Purpose: To increase the quality and consistency of MH assessments and encourage collaboration among MH Assessors.
  - Address inconsistencies in application submissions
  - Discuss technical questions and alternate pathways to compliance
  - Share new chemical classifications, resources, standard interpretations, etc. that will impact all ABs

# C2CPII Updates

- **General Assessor Call, 2nd Quarter**
  - **June 13, 10:30-12 EDT/4:30-6 CEST**

# Material Health Updates

- ASF Reminders

# ASF Submission Reminders

- Please screen supplier RSL/BL declarations to ensure that they are filled out properly.
- Common issues during audits:
  - Declaration states that RSL/BL chemicals are present, but does not declare name/CAS#/Concentration
  - Supplier made edits to the language in the standard C2CPII declaration
  - Supplier-formatted declaration missing required information/language from C2CPII checklist.

# ASF Submission Reminders

- If you are not sure whether a declaration is acceptable, please reach out to the Certification Team ([certification@c2ccertified.org](mailto:certification@c2ccertified.org)) prior to submitting the ASF.
- Declaration issues are contributing to review delays – please do your best to resolve these issues early.

# Open Discussion topics

- Material Health Verification Checklist
- V4.1 Restricted Substances Reference Document Feedback
- V4.1 Material Health Declarations
- Azo Dyestuffs vs Azo Pigments

# Material Health Verification Checklist (ISO 17065)

- This checklist is intended to list all C2CC requirements that involve chemical composition knowledge. Due to confidentiality limitations, C2CPII is unable to verify this information.
  - When applicants and suppliers do not share confidential information with C2CPII, C2CPII relies on MHAs to verify Standard requirements based on confidential information.
- This information is related to the Institute's goal of receiving ISO 17065 certification.

# Material Health Verification Checklist (ISO 17065)

- **Feedback:**
  - Is this checklist missing any C2CC requirements that you **regularly** verify?
  - Does this checklist include any C2CC requirements that you **never** verify?
  - MH Assessors: when partnering with a GA, are you able to verify all these requirements?

# v4.1 Restricted Substances List (now Restricted Substances Reference Document)

- This document now describes all restricted substances in the Standard, including restrictions from Sections 4.1, 4.2, and 4.6.
  - 4.1: Compliance with Leading Chemical Regulations
  - 4.2: PFAS, HFRs, OPFRs, and Highly Halogenated Materials
  - 4.6: CMRs, SVHCs, and x-assessed chemicals
- Purpose
  - To consolidate reference information on substances that are restricted in C2CC products.
  - To more accurately communicate all C2CC restricted substances at all achievement levels, not just substances restricted in Section 4.1
- Feedback from assessors?

## V4.1 Material Health Declarations

- In v4.1, the RSL Declaration will be split into two separate declarations:
  - Section 4.1 Declaration: Compliance with Leading Chemical Regulations
    - Includes pathway to declare compliance with chemical regulations (REACH, POPs, RoHS, Toy Directive, Cosmetics Regulation)
  - Section 4.2 Declaration: Organohalogens and Functionally Related Chemical Classes of Concern
    - Requests information from supplier on any organohalogens or OPFRs present in the material
- The CMRs & SVHCs declaration (4.6) will also be updated for v4.1, but the content will not be changed.

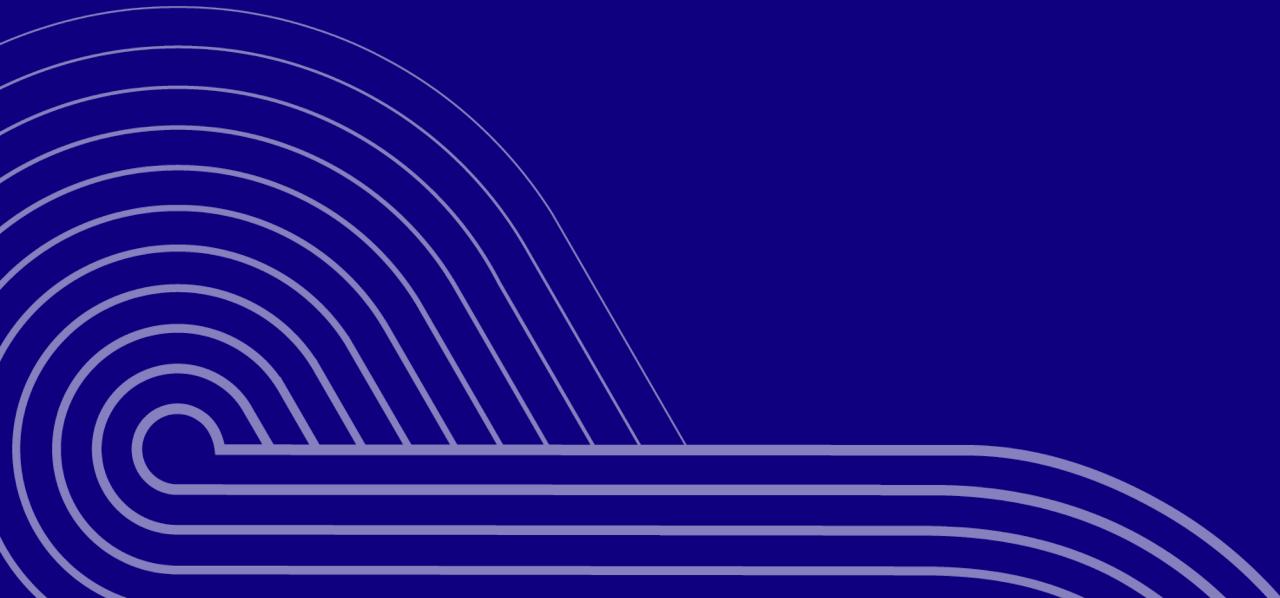
# V4.1 Material Health Declarations - Feedback

- Are these declarations clear? Is any language confusing, or could it be misinterpreted?
- Some of the declaration language has changed. Do you expect that suppliers would object to any of the statements they would be asked to attest to?
- Is the declaration language for the new Section 4.1 compliance pathway (section 3b: Regulatory Compliance) clear?
  - Would a typical regulatory compliance statement provided by suppliers meet the requirements in the supplier-formatted declaration checklist (section 5), or would there be additional roadblocks (required attestation, signature, etc.)?
- Would it be more helpful to combine these two declarations, or keep them separate?

# Azo Dyestuffs vs Azo Pigments

- Based on the Colorants Assessment Methodology (CAM), azo dyestuffs must be evaluated for their potential to cleave carcinogenic aromatic amines (3.5.3). Have any assessors evaluated a product that contained an azo dye and found that cleavage was not possible? If so, how was the chemical assessed?
- As follow-up, have any assessors considered whether azo pigments should be subject to the same requirements? (CAM, Section 4.3.1) Currently, 4.3.1 states that products with azo pigments greater than 100 ppm cannot achieve higher than Bronze.

# 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 August!