

**Comply with the Ecodesign  
for Sustainable Products  
Regulation (ESPR)  
with Cradle to  
Cradle Certified®**

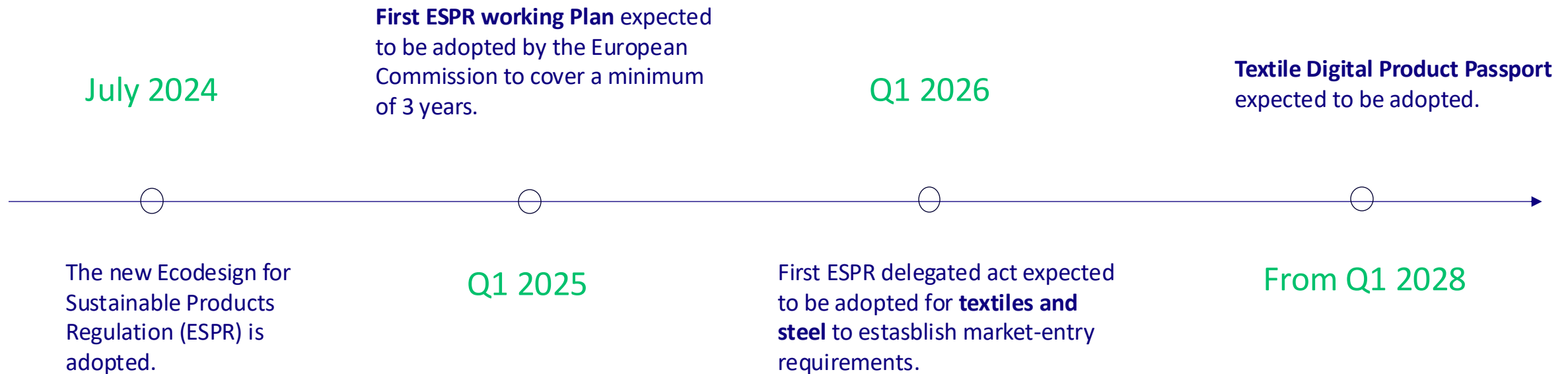
**cradle to cradle  
products  
innovation  
institute**

# The Ecodesign for Sustainable Products Regulation (ESPR)

- Central to achieving the objectives of the [2020 Circular Economy Action Plan](#)
- This Regulation aims to significantly improve the circularity, energy performance and other environmental sustainability aspects of products placed on the EU market.
- A sustainable product typically exhibit some of these traits:
  - Uses less energy
  - Lasts longer
  - Can be easily repaired
  - Parts can be easily disassembled and put to further use
  - Contains fewer substances of concern
  - Can be easily recycled
  - Contains more recycled content
  - Has a lower carbon and environmental footprint over its lifecycle



# The timeline



# Prioritized products listed in ESPR first Working Plan

## Intermediate products

- **Iron & Steel**
- **Chemicals**
- **Aluminium**

## Final products

- **Textiles (garments and footwear)**
- **Furniture & Mattresses**
- **Energy-related products (including new measures and revisions of existing ones)**
- **Paints**
- **Information and Communication Technologies (ICT)**
- **Tyres**
- **Detergents**
- **Lubricants**

# Other key measures part of the ESPR

Digital Product Passport

**Digital identity card** for products, components and materials that:

- Stores relevant information
- Promotes circularity
- Strengthens legal compliance

Rules to address the destruction of unsold products

First measures to **ban the destruction of unsold textiles and footwear**. Similar bans are expected to come in other sectors.

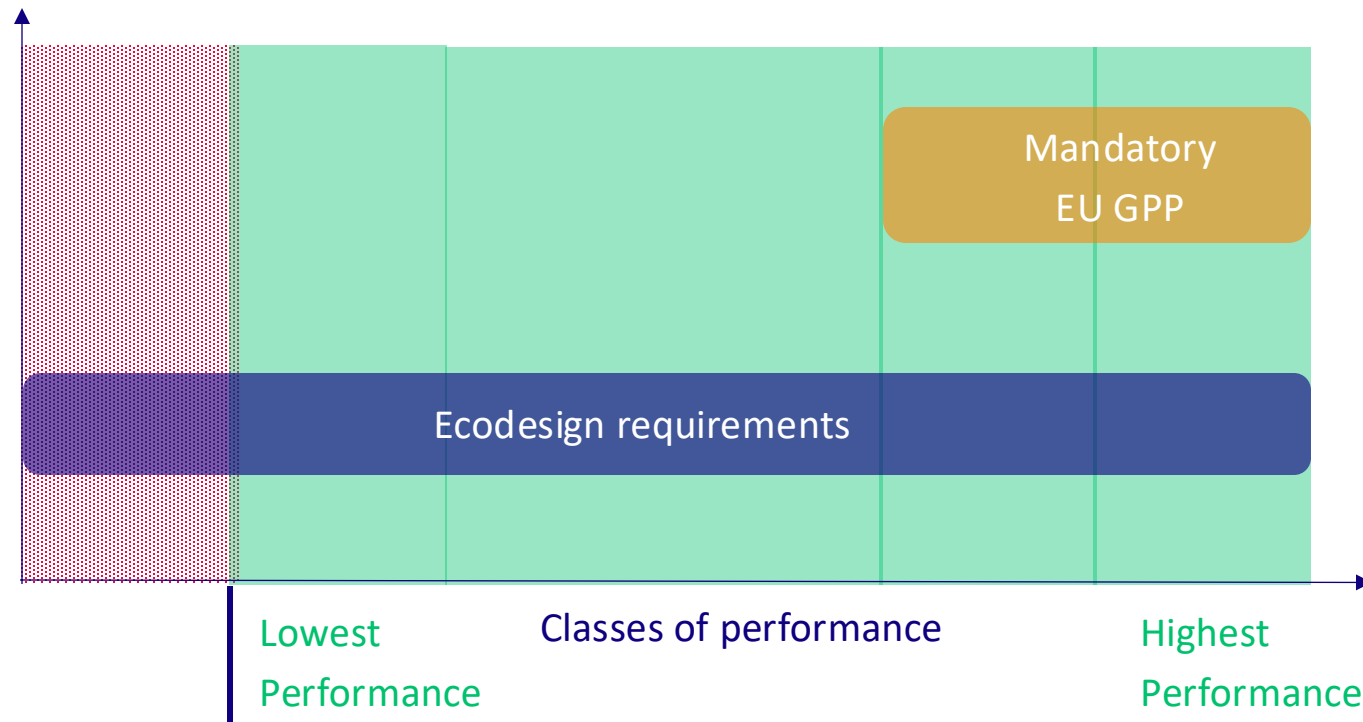
**Transparency requirements** for companies choosing **to discard unsold articles** (number and weight of products and reasons for discarding them).

Green Public Procurement

**Mandatory Green Public Procurement criteria** set for EU authorities who purchase regulated products.

# Mandatory Green Public Procurement

Products excluded from the market



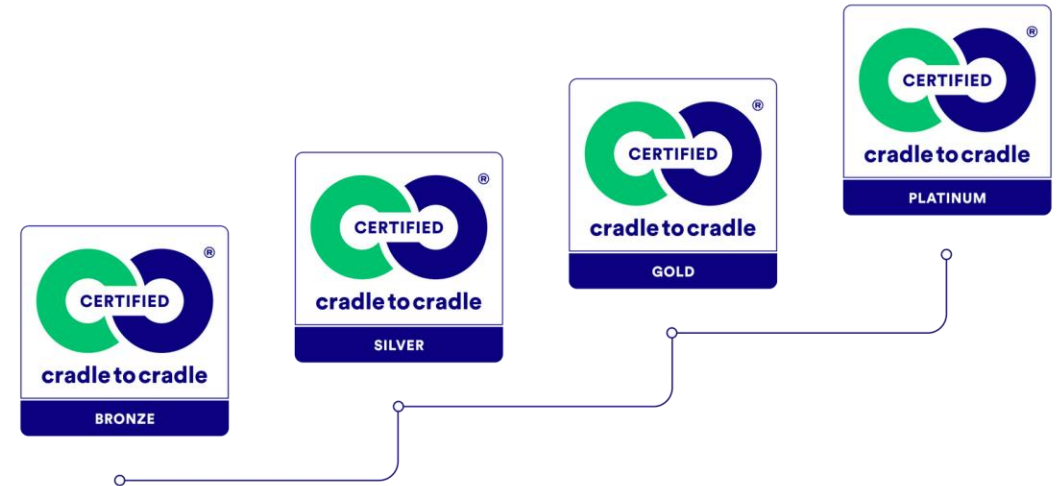
- To incentivize the supply and demand for environmentally sustainable products covered by ecodesign requirements
- Based on the two highest performance classes

Min performance requirements

**This document explains in detail how C2C Certified<sup>®</sup> goes beyond the ESPR requirements and is an ongoing incentive for companies to achieve excellence in the field of circularity.**

# C2C Certified<sup>®</sup> to demonstrate compliance and beyond

- ESPR requirements are the baseline of C2C Certified<sup>®</sup>.
- C2C Certified<sup>®</sup> goes further through developing continuous improvement strategies for their products or by setting clear thresholds.



- C2C Certified<sup>®</sup> is an **ongoing incentive for companies to achieve excellence in the field of circularity**. It helps to be future ESRP compliant when the sector-specific delegated acts will be published in the coming years.
- It considerably **reduces the burden of the compliance team**, while ensuring that the products designed remain innovative.



## Cradle to Cradle Certified® Circularity Data & Cycling Instructions

Product Name **Zody II and Zody LX Task Chairs**

Certification Level **Bronze**

Company Name **Haworth, Inc.**

Product Circularity Level **Bronze**

Certification Number **5644**

Expiration Date **03 November 2024**

Circular Sourcing	
1	Cycled content type:
2	Description of cycled content source:
3	Potential contaminants tested in recycled content:
4	Biomass source of renewable material in the product:
5	Description of renewable material source:
6	Potential contaminants tested in renewable content:
7	Source of virgin non-renewable material in the product:
8	Description of virgin non-renewable material source:
9	Potential contaminants tested in virgin non-renewable content:
Circular Design	
1	Product's intended cycle:
2	Design for maintenance, repair, or refurbishment:
3	Product defined functional use period:
4	Intended cycling pathway(s):
Circular Systems	
1	Circularity, material health, or other related certifications, standards, that have been obtained for the product, restricted substance/chemical lists and/or related or circularity regulations.
2	Intended disassembly and extraction scenarios:
3	Reverse logistics mechanism in place for extraction and reprocessing of the product:
4	Description of reverse logistics in place for extraction and reprocessing of the product:
Cycling Instructions	
1	Procedure for identification of homogeneous material in the product intended for cycling:
2	Instructions for the cleaning, maintenance, and repair of the product or a link to where these instructions may be found (if cleaning, maintenance, or repair is required during product use).
3	Instructions for the extraction, recovery, disassembly, and reprocessing of the product or a link to where these instructions may be found.

For more information, visit [www.c2ccertified.org](http://www.c2ccertified.org)  
Cradle to Cradle Certified® is a trademark of the Cradle to Cradle Products Innovation Institute

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Circular Sourcing		
1	Cycled content type:	Pre-consumer recycled content (defined) (3% - 7%)
2	Description of cycled content source:	Aluminum ADCT2, Black Nylon 6 Glass-filled resin
3	Potential contaminants tested in recycled content:	Heavy metals, Halogenated organic compounds
4	Biomass source of renewable material in the product:	Not applicable to product
5	Description of renewable material source:	Not applicable to product
6	Potential contaminants tested in renewable content:	Not applicable to product
7	Source of virgin non-renewable material in the product:	Oil based (28% - 32%), Metallic (67% - 72%)
8	Description of virgin non-renewable material source:	steel, aluminum, plastic, fabric, foam
9	Potential contaminants tested in virgin non-renewable content:	Not applicable to product
Circular Design		
1	Product's intended cycle:	Designed for technical cycling
2	Design for maintenance, repair, or refurbishment:	Designed for maintenance, Designed for repair, Designed for refurbishment
3	Product defined functional use period:	12 years
4	Intended cycling pathway(s):	Reuse, Refurbishment, Repair, Recycling
Circular Systems		
1	Circularity, material health, or other related certifications or standards, that have been obtained for the product, restricted substance/chemical lists and/or related chemical or circularity regulations.	In addition to meeting the requirements of the 2021 Cradle to Cradle Certified Restricted Substances List (RSL), Zody LX complies with the Haworth banned list in addition to any regulatory hazard lists as well. It does not require Prop 65 labeling.
2	Intended disassembly and extraction scenarios:	Product is designed for clean disassembly (without components contaminating or damaging each other). Product is designed for ease of disassembly (see standard Section 5.8 for definition)
3	Reverse logistics mechanism in place for extraction and reprocessing of the product:	No reverse logistics in place
4	Description of reverse logistics in place for extraction and reprocessing of the product:	At this time, Haworth does not have dedicated reverse logistics in place. However, Haworth is able to provide customers with guidance for returning products for reprocessing.
Cycling Instructions		
1	Procedure for identification of homogeneous materials in the product intended for cycling:	The Zody II and LX are primarily sold B2B as office furniture. At product end of life or when the customer decides to decommission a Zody LX product, there is a label with instructions that customers can follow to return products to Haworth for processing. For more information, customers may contact Haworth directly for information on their Circular Services. Disassembly instructions will be made publicly available at product launch.
2	Instructions for the cleaning, maintenance, and repair of the product or a link to where these instructions may be found (if cleaning, maintenance, or repair is required during product use).	Cleaning instructions can be found in the Haworth Care and Maintenance Standards document.
3	Instructions for the extraction, recovery, disassembly, and reprocessing of the product or a link to where these instructions may be found.	Haworth products are primarily sold B2B as office furniture. At the end of life, there is a label with instructions that customers can follow to return products to Haworth for processing. This process is incentivized with discounts for future purchases. Customers are also provided with an info sheet on Circular Services. Once returned to Haworth, lightly used or damaged products can be repaired, cleaned and resold through the Haworth company store or donated depending on the current demand. Returned products that cannot be recommissioned or donated are typically processed through recycling partner Padnos. Padnos has the ability to process recycled relevant materials. An alternative pathway for product end of life management is available through Green Standards (GS), which handles office furniture decommissioning. GS manages the resale, recycling, and donation of used office furniture and equipment. GS is an international service provider. Disassembly instructions will be made publicly available at product launch.

For more information, visit [www.c2ccertified.org](http://www.c2ccertified.org)  
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# Circularity Data Report

Publicly available on the [Product Registry](#)  
Ahead of the Digital Product Passport

- ◀ Circularity attributes
- ◀ Cycling instructions

# Main divergences

## Cycling pathways

C2C Certified® allows for **different routes for circularity** (biological or technical cycle) while the ESPR is more prescriptive in pointing for a specific route for specific product categories.

## Disclosure of substances of concern

ESPR will require companies to **publicly disclose substances of concern** throughout a product's lifecycle while C2C Certified® requires companies to identify substances of concern but not to disclose them publicly. This point will be further detailed in the delegated acts and the substances of concern that need to be published indicated.

## Value chain

**The scope of C2C Certified® varies** according to the requirement and the level of achievement. For certain requirements at lower achievement levels, the scope of C2C Certified® includes the applicant company and final manufacturing stage, while at the Gold and Platinum levels it mainly covers the entire supply chain, such as the ESPR.

# Detailed comparison of C2C Certified® with ESPR requirements

- In the tables below, the left-hand column summarizes the C2C Certified® requirements, while the right-hand column explains what is required under the ESPR to implement.

C2C Certified requirements GENERAL REQUIREMENTS	ESPR
<b>3.1 Certification Compliance Assurance</b> <b>Bronze</b> - A documented certification compliance assurance system is in place.	Partially aligned with the ESPR - the ESPR will require companies and manufacturers placing products on the EU market to keep the respective documentation for 10 years. The documentation (e.g., test results, certificates etc) do not need to be third-party verified, so C2C Certified® goes beyond what is expected by the legislation in so far.
<b>3.2.1 Environmental Policy</b> <b>Bronze</b> - Commit to protecting the environment through company policy.	Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level requirements are set. Additionally, the ESPR does not require any elements around continuous progress that companies need to make.
<b>3.2.2 Assessing Environmental Risks and Opportunities</b> <b>Bronze</b> - Identify environmental risks and opportunities for the applicant company, including all final manufacturing stage facilities and for the certified product.	This is not required by the ESPR directly. Potentially a maximum carbon footprint threshold could be set for products. The criteria outlined in the C2C Certified® standard could contribute to the assessment that companies will need to perform. This is however still very much to be confirmed, for textiles in 2025.
<b>3.2.3 Monitor &amp; Verify Performance</b> <b>Silver</b> - Request data measuring performance against the environmental policy from tier 1 suppliers associated with high-risk issues as identified per the risk assessment.	Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set.
<b>At recertification</b> , demonstrate continued efforts to obtain performance data and evidence of tracking corrective actions that may be necessary at tier 1 supplier locations.	Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set.

<b>C2C Certified requirements</b> <b>ENVIRONMENTAL POLICY &amp; MANAGEMENT</b>	<b>ESPR</b>
<p><b>3.1 Certification Compliance Assurance</b></p> <p><b>Bronze</b> - A documented certification compliance assurance system is in place.</p>	<p>Partially aligned with the ESPR - the ESPR will require companies and manufacturers placing products on the EU market to keep the respective documentation for 10 years. The documentation (e.g., test results, certificates etc) do not need to be third-party verified, so C2C Certified® goes beyond what is expected by the legislation in so far.</p>
<p><b>3.2.1 Environmental Policy</b></p> <p><b>Bronze</b> - Commit to protecting the environment through company policy.</p>	<p>This is not required by the ESPR directly. Potentially a maximum carbon footprint threshold could be set for products. The criteria outlined in the C2C Certified® standard could contribute to the assessment that companies will need to perform. This is however still very much to be confirmed, for textiles in 2025.</p>
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<p><b>3.2.3 Monitor &amp; Verify Performance</b></p> <p><b>Silver</b> - Request data measuring performance against the environmental policy from tier 1 suppliers associated with high-risk issues as identified per the risk assessment.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set.</p>
<p>At <b>recertification</b>, demonstrate continued efforts to obtain performance data and evidence of tracking corrective actions that may be necessary at tier 1 supplier locations.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set.</p>

<b>C2C Certified requirements</b> <b>ENVIRONMENTAL POLICY &amp; MANAGEMENT</b>	<b>ESPR</b>
<p><b>3.2.4 Strategy for Environmental Policy Implementation</b></p> <p><b>Bronze</b> - Develop a strategy for implementing the environmental policy and report on implementation progress at each recertification.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. Additionally, the ESPR does not require any elements around continuous improvement, meaning no corrective action plans need to be developed.</p>
<p>For <b>recertification</b>, environmental performance data must be collected and analyzed to measure progress toward achieving environmental targets and objectives, and areas for improvement must be identified. For any identified areas of poor performance, methods of improving outcomes must also be identified and evaluated and the strategy refined accordingly.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. Additionally, the ESPR does not require any elements around continuous improvement, meaning no corrective action plans need to be developed.</p>
<p><b>3.2.5 Demonstrating Commitment</b></p> <p><b>Bronze</b> - Demonstrate commitment and support for establishing and maintaining a culture whereby employees and business partners are able to achieve high levels of environmental performance.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. No commitments on the value chain/ business partner performance need to be made.</p>
<p><b>3.2.6 Environmental Management Systems</b></p> <p><b>Silver</b> - For the applicant company and for all final manufacturing stage facilities, implement management system(s) that support achievement of the environmental policy commitments within company and facility operations.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. No commitments on the value chain/ business partner performance or management systems need to be made.</p>
<p><b>Gold</b> - Implement a responsible sourcing management system that supports achievement of the environmental policy commitments within the product's supply chain.</p> <p>For <b>recertification</b> at the Silver or Gold level, the policy, procedures, practices and/or programs must be reviewed to identify deficiencies and implement changes (if needed) that will lead to improved performance.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. No commitments on the value chain/ business partner performance or management systems need to be made.</p>

<b>C2C Certified requirements</b> <b>ENVIRONMENTAL POLICY &amp; MANAGEMENT</b>	<b>ESPR</b>
<p><b>3.2.7 Grievance Mechanisms</b></p> <p><b>Silver</b> - Provide a grievance mechanism that permits stakeholders to obtain redress for negative environmental impacts. For any contract final manufacturing stage facilities, request that a grievance mechanism be made available.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. Any due diligence related requirements are out of the scope of the ESPR.</p>
<p><b>Gold</b> - For contract final manufacturing stage facilities, ensure that a grievance mechanism is available that permits stakeholders to obtain redress for negative environmental impacts.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. Any due diligence related requirements are out of the scope of the ESPR.</p>
<p><b>3.2.8 Transparency and Stakeholder Engagement</b></p> <p><b>Silver</b> - Use open and transparent governance and reporting, making information on how environmental risks are managed and adverse impacts are addressed publicly available.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. Any due diligence/general reporting related requirements are out of the scope of the ESPR.</p>
<p><b>3.2.8 Transparency and Stakeholder Engagement</b></p> <p><b>Gold</b> - Incorporate stakeholder engagement and feedback into environmental risk management, using it to shape company strategy and operations.</p>	<p>Going beyond what is expected as part of the ESPR, as the ESPR is purely taking the product lens, no company level or value chain requirements are set. Any due diligence/general reporting related requirements are out of the scope of the ESPR.</p>
<p><b>3.2.9 Environmental Protection Incentives</b></p> <p><b>Platinum</b> - Incorporate environmental performance results into relevant employee and executive performance evaluations and incentive structures.</p>	<p>Going beyond what is expected by the ESPR no company level requirements on the environmental performance/ due diligence practices are covered by the ESPR.</p>
<p><b>3.3 Measurable Improvement</b></p> <p>At <b>recertification</b> at the Bronze or Silver level, demonstrate that at least one measurable improvement has been made in at least one of the five program categories since the prior certification.</p>	<p>Going beyond as no improvement needs to be shown in order to be aligned with the ESPR. The ESPR only sets minimum requirements for products.</p>

<b>C2C Certified requirements</b> <b>MATERIAL HEALTH</b>	<b>ESPR</b>
<p><b>4.1 Compliance with Leading Chemical Regulations</b></p> <p><b>Bronze</b> - The product complies with leading chemical regulations.</p>	<p>This neither aligns nor misaligns with the ESPR. Meeting the requirements of existing chemical legislation (REACH, RoHs etc) is a given to place products on EU markets.</p>
<p><b>4.2 Avoidance of Organohalogens and Functionally Related Chemical Classes of Concern</b></p> <p><b>Bronze</b> - Homogeneous materials subject to review are not and do not contain organohalogen substances of special concern, or functionally related, non-halogenated substances of equivalent concern (i.e., per- and polyfluoroalkyl substances (PFASs), halogenated flame retardants (HFRs) and organophosphate ester flame retardants (OPFRs), halogenated polymers, halogenated organic solvents, and other highly halogenated, carbon-based materials) above relevant thresholds. Certain exemptions apply.</p>	<p>C2C Certified® restricts all REACH annex XVII and annex XIV listed substances and Persistent Organic Pollutants (POPs) already at the Bronze level. It also restricts PFASs, flame retardants and highly halogenated substances that are not regulated.</p> <p>This is going beyond what is required by the ESPR. If ESPR will include these substances under the specific product groups, there would be a requirement to disclose these substances (related to article 7 paragraph 5).</p>
<p><b>Silver</b> - Homogeneous materials subject to review do not contain organohalogen substances in exceedance of 1% by weight. Certain exemptions apply.</p> <p><b>Gold</b> - Homogeneous materials subject to review do not contain organohalogen substances above chemical subject to review limits (i.e., 100 ppm or lower if specific concentration limits are defined).</p>	<p>Category 1 and 2 Carcinogenic Mutagenic Reprotoxic (CMR) substances as defined per the CLP Regulation and substances of very high concern on the candidate list per REACH are restricted at the Silver level.</p> <p>This is going beyond what is required by the ESPR. All C2C Certified® Section 4.2 restrictions will also be restricted to the same extent per the ESPR (e.g., PVC and all other highly halogenated substances are highly restricted at Silver and fully restricted at Gold). However, if the ESPR will include these substances under the specific product groups, there would be a requirement to disclose these substances (related to article 7 paragraph 5). It is still unclear if thresholds (e.g., 1% by weight) will be set. Those should be defined per product group: e.g., textiles, toys, furniture etc.</p>

<b>C2C Certified requirements</b> <b>MATERIAL HEALTH</b>	<b>ESPR</b>
<p><b>4.3 Material and Chemical Inventory</b></p> <p><b>Bronze</b> - Characterize all homogeneous materials in the product by concentration and generic material type or category/name. In addition, fully define the chemical composition of products that are released directly into the biosphere as part of their intended use (e.g., soaps, paints). For other product types, collect the chemical composition information necessary to assess at least 75% of the product.</p>	<p>Directionally aligned with the ESPR, but going a step further as C2C Certified® requires to fully define the chemical composition of a product (or at least 75%), while the ESPR will likely be limited to substances of concern.</p>
<p><b>Silver</b> - Fully define the chemical composition of products released directly into the biosphere as part of their intended use (e.g., soaps, paints). For other product types, collect the chemical composition information necessary to assess at least 95% of the product.</p>	<p>Directionally aligned with the ESPR, but going a step further as C2C Certified® requires to fully define the chemical composition of a product (or at least 95%), while the ESPR will likely be limited to substances of concern.</p>
<p><b>Gold</b> - Fully define the chemical composition of all homogeneous materials subject to review within the product.</p>	<p>Directionally aligned with the ESPR, but going a step further as C2C Certified® requires to fully define the chemical composition of a product, while the ESPR will likely be limited to substances of concern.</p>
<p><b>Platinum</b> - Fully define the chemical composition of all process chemistry that comes into contact with the product or its material constituents during the final manufacturing stage.</p>	<p>Directionally aligned with the ESPR, but going a step further as C2C Certified® requires to fully define the chemical composition of a product, while the ESPR will likely be limited to substances of concern.</p>



<b>C2C Certified requirements</b> <b>MATERIAL HEALTH</b>	<b>ESPR</b>
<p><b>4.4 Assessing Chemicals and Materials</b></p> <p><b>Bronze</b> - Assess at least 75% of the product</p>	<p>While the ESPR does not require an assessment of all substances/chemicals used in a product, the biggest difference is the notion of "throughout the lifecycle of the product", as defined in the ESPR (art 5). Meaning if in the 25% unassessed chemicals and materials of the product such a substance would be found, the product would be found "non-compliant".</p> <p>However, note that the entire product, including the portion that is not assessed, must comply with leading regulations (e.g., REACH, RoHS, POPs directives) and with additional restrictions on PFASs, HFRs, OPFRs, and highly halogenated substances at the Bronze level.</p>
<p><b>Silver</b> - Assess at least 95% of the product</p>	<p>While the ESPR does not require an assessment of all substances/chemicals used in a product, the biggest difference is the notion of "throughout the lifecycle of the product", as defined in the ESPR (art 5). Meaning if in the 5% unassessed chemicals and materials of the product such a substance would be found, the product would be found "non-compliant".</p> <p>However, note that Category 1 and 2 CMRs and all substances on the SVHC candidate list are restricted at Silver (in addition to bronze restrictions noted above), including in portions of the product that are not assessed.</p>
<p><b>Gold</b> - Assess 100% of the product</p>	<p>The ESPR does not require an assessment of all substances/chemicals used in a product. This goes well beyond the requirements of the ESPR or regulations in general and will include obtaining an understanding of hazard and risks associated with all chemicals in the product.</p>
<p><b>Platinum</b> - Assess 100% of the product AND all process chemistry that comes into contact with the product or its material constituents during the final manufacturing stage.</p>	<p>This is aligned and going beyond the ESPR requirement as it not only covers substances of concern but other substances as well and addresses the noting of throughout the lifecycle of the product in covering process chemistry.</p>

<b>C2C Certified requirements</b> <b>MATERIAL HEALTH</b>	<b>ESPR</b>
<p><b>4.5 Material Health Optimization Strategy</b></p> <p><b>Bronze</b> - Develop a Material Health optimization strategy</p>	<p>This is going beyond the ESPR, as the ESPR does not require any improvement strategies, given that it is a market entry legislation (baseline requirements for companies to place a product on the market).</p>
<p><b>Recertification:</b> Demonstrate progress toward achieving the Material Health optimization strategy at each recertification.</p>	<p>This is going beyond the ESPR, as the ESPR does not require any improvement strategies, given that it is a market entry legislation (baseline requirements for companies to place a product on the market).</p>
<p><b>4.6 Using Optimized Materials</b></p> <p><b>Silver</b> - Use materials in the product that do not contain substances that are:</p> <ul style="list-style-type: none"> <li>● Classified or listed as known or suspected to cause cancer, birth defects, genetic damage, reproductive harm (CMRs), or cause an equivalent level of concern, unless exposure to these substances during the product’s final manufacturing, use, and end-of-use is unlikely or expected to be negligible, or</li> <li>● Listed as persistent, bioaccumulative, and toxic (PBTs) or very persistent and very bioaccumulative (vPvBs).</li> </ul>	<p>This is going beyond the ESPR requirements. Testing of recycled content will be likely a key topic of further discussion under the development of the Sector specific requirements.</p>
<p><b>Gold</b> - Use materials that are assessed as compatible with human and environmental health according to the Cradle to Cradle Certified Material Health Assessment Methodology, including only A/a, B/b, and C/c assessed materials and chemicals in the product.</p> <p><b>Platinum</b> - Use materials and process chemicals that are assessed as preferable for human and environmental health according to the Cradle to Cradle Certified Material Health Assessment Methodology, including &gt; 50% A/a and B/b assessed materials and chemicals in the product (see “Determining Percentage Assessed” in Section 4.4), and only A/a, B/b, and C/c assessed process chemistry.</p>	<p>The Assessment Methodology covers the same list of substances that are classified under the harmonized classification of the Classification, Labelling and Packaging (CLP) Regulation and refers to the same designations, so this requirement is directionally aligned and goes beyond this. The reasoning for including substances of concern is to cover not only substances that impact human health (falling under REACH) but also those that have environmental concerns (e.g., in impacting recyclability of products).</p>

<b>C2C Certified requirements</b> <b>MATERIAL HEALTH</b>	<b>ESPR</b>
<p><b>4.7 Volatile Organic Compound (VOC) Emissions</b></p> <p><b>Silver</b> - Products designed for permanent indoor use comply with leading standards that demonstrate low VOC emissions.</p> <p><b>Gold</b> - Products designed for permanent indoor use comply with leading standards that demonstrate very low to no VOC emissions.</p>	<p>This is likely going beyond what will be required by the ESPR. Substances that have environmental concerns and have a negative impact on outdoor air quality might be covered by the ESPR in the future sector-specific delegated acts.</p>
<p><b>4.8 VOC Content</b></p> <p><b>Silver</b> - For liquid, viscous, or aerosol consumer or construction products, limit volatile organic compound (VOC) content to low levels as established by leading standards.</p>	<p>This is likely going beyond what will be required by the ESPR. Substances that have environmental concerns and have a negative impact on outdoor air quality might be covered by the ESPR in the future sector-specific delegated acts.</p>
<p><b>4.9 Optimizing Chemistry in the Supply Chain</b></p> <p><b>Platinum</b> - Address hazardous chemicals in the product supply chain</p>	<p>This is aligned with the ESPR, however the ESPR will only restrict the use of those hazardous substances that are found on the final product.</p>
<p><b>Platinum</b> - Develop a strategy to further reduce hazardous chemical use and/or emissions in the supply chain.</p>	<p>This is going beyond what will be required by the ESPR as there is no notion of continuous improvement.</p>
<p><b>Platinum</b> - Demonstrate progress toward achieving reductions at each recertification.</p>	<p>This is going beyond what will be required by the ESPR as there is no notion of continuous improvement.</p>

<b>C2C Certified requirements</b> <b>PRODUCT CIRCULARITY</b>	<b>ESPR</b>
<p><b>5.1 Defining the Product’s Technical and/or Biological Cycles</b></p> <p><b>Bronze</b> - Designate all homogeneous materials subject to review in the product as being intended for technical and/or biological cycles and define the intended cycling pathway(s) for each material. For materials designated for technical cycles, recycling must be one intended cycling pathway.</p> <p><b>Platinum</b> - Define at least two intended cycling pathway(s) for each homogeneous material subject to review in the product.</p>	<p>Aligned</p> <p>1) ESPR could in the future limit the number of materials used in products.                  2) ESPR is likely to require instructions on how to treat the product at the end of its life, that could be communicated through the DPP specifically.</p> <p>However, in term of approach the ESPR does not differentiate between cycling pathways.</p>
<p><b>5.2 Preparing for Active Cycling</b></p> <p><b>Bronze</b> - Develop a cycling plan to address challenge(s) inhibiting development of the cycling infrastructure for the product at the end of its first use, and identify potential partners that are capable of recovering and processing the product.</p>	<p>Neither aligned or not aligned: the ESPR does not require businesses to set up recycling strategies etc, this is addressed separately through the Waste Framework Directive. However, it is relevant to note, that this is different for certain product groups depending on the applicable legislation (e.g., electronics or batteries which are outside of the ESPR but have separate product legislation).</p>
<p><b>Silver</b> - Initiate partnerships for recovery and processing of the product according to its intended cycling pathway(s). If there is more than one intended pathway for individual materials, partnerships may focus on one of those pathways (e.g., reuse, repair, refurbish, remanufacture, or recycling for the technical cycle). If the product is intended for cycling via municipal systems, use materials that are compatible with those systems.</p>	<p>See previous note, waste management strategies are typically dealt with under waste legislation (Waste Framework Directive). However, the ESPR might set requirements to improve the recyclability of products. It is still to be defined how these requirements will look like.</p>
<p><b>Gold</b> - Initiate partnership(s) for recovery and processing of the product according to all intended cycling pathway(s).</p> <p>For the Gold level, the Silver level requirements must be applied to all additional intended pathways (if any).</p>	<p>See previous note, waste management strategies are typically dealt with under waste legislation (Waste Framework Directive). However, the ESPR might set requirements to improve the recyclability of products. It is still to be defined how these requirements will look like.</p>

<b>C2C Certified requirements</b> <b>PRODUCT CIRCULARITY</b>	<b>ESPR</b>
<p><b>5.3 Increasing Demand: Incorporating Cycled and/or Renewable Content</b></p> <p><b>Bronze</b> - For select commonly cycled product and material types, incorporate the required percentage of cycled and/or renewable content into the product using an approved method.</p>	<p>Likely a future requirement of the ESPR, to include recycled and/or renewable content in products. Specific thresholds have to be identified. The European Commission is eager to require post-consumer recycled content for textile products. Chain of Custody (CoC) systems will be required to ensure the materials comply with the requirements.</p>
<p><b>Silver</b> - Incorporate a percentage of cycled and/or renewable content into the product equal to or greater than industry averages and/or consistent with common practice.</p>	<p>Going beyond the legislation, the legislation as a "market entry" legislation only sets a minimum requirement, progress plans and achieving "better than industry average" is not required.</p>
<p><b>Silver</b> - Develop a plan for increasing the use of post-consumer recycled and/or responsibly sourced renewable content.</p>	<p>Going beyond the legislation, the legislation as a "market entry" legislation only sets a minimum requirement, progress plans and achieving "better than industry average" is not required.</p>
<p>Demonstrate progress toward increasing the use of post-consumer recycled and/or responsibly sourced renewable content at <b>recertification</b>.</p>	<p>Going beyond the legislation, the legislation as a "market entry" legislation only sets a minimum requirement, progress plans and achieving "better than industry average" is not required.</p>
<p><b>Gold</b> - Incorporate a percentage of cycled and/or renewable content into the product that is consistent with industry leaders for the product type. Depending on material type, incorporate either post-consumer recycled or responsibly sourced renewable content.</p>	<p>Going beyond the legislation, the legislation as a "market entry" legislation only sets a minimum requirement, progress plans and being "consistent with industry leaders" is not required.</p>
<p><b>Bronze</b> - Alternatively, publicly disclose an explanation of the limitation(s) preventing achievement of the required minimums.</p>	<p>The ESPR might require the disclosure of recycled content as an information requirement under the DPP.</p>

<b>C2C Certified requirements</b> <b>PRODUCT CIRCULARITY</b>	<b>ESPR</b>
<p><b>5.3 Increasing Demand: Incorporating Cycled and/or Renewable Content</b></p> <p><b>For the Bronze, Silver and Gold levels:</b> A feasibility analysis may be applied as an alternative to meeting required percentages of cycled and/or renewable content in any case where an applicant is unable to meet the required percentages, including post-consumer recycled and responsibly sourced content as relevant. This alternative may be used for one or more materials in a product and at any achievement level except for Platinum.</p> <p><b>Platinum</b> - Incorporate the maximal technically feasible percentage of cycled and/or renewable content into the product.</p>	<p>Going beyond the legislation, the ESPR will consider trade-off (e.g., decreased durability of the product due to higher recycled content) as well as availability of recycled materials. However, the ESPR will not require individual companies to perform a feasibility analysis.</p>
<p><b>5.4 Material Compatibility for Technical and/or Biological Cycles</b></p> <p><b>Bronze, Silver, Gold, Platinum</b> - For 50%/70%/90%/99% of the product by weight, incorporate materials that are compatible with the intended cycling pathway(s).</p>	<p>This requirement is going beyond legislation.</p> <p>It is important to note that the legislation does not differentiate between cycling paths, but overall requirement goes beyond what is required under the EU legislation.</p>
<p><b>5.5 Circularity Data and Cycling Instructions</b></p> <p><b>Bronze</b> - Make data to support cycling of the product in its intended pathway(s) and instructions for how to cycle the product publicly available.</p>	<p>This is aligned with the DPP expectations, again those will be defined per product group as part of the delegated acts (to be defined for textiles in 2025).</p>

<b>C2C Certified requirements</b> <b>PRODUCT CIRCULARITY</b>	<b>ESPR</b>
<p><b>5.6 Circular Design Opportunities and Innovation</b></p> <p><b>Silver</b> - Develop a plan for implementing a circular design opportunity or innovation that increases product circularity.</p> <p>Demonstrate progress toward achieving the plan for implementing a circular design opportunity or innovation at <b>recertification</b>.</p> <p><b>Gold</b> - Implement a circular design opportunity or innovation.</p>	<p>Going beyond the ESPR. As a "market entry legislation" the ESPR does not require companies to develop plans to continuously improve. Products that enter EU markets "simply" need to meet the requirements of the legislation (yes/no), companies are not required to go further than that or to continuously improve.</p> <p>Going beyond the ESPR. As a "market entry legislation" the ESPR does not require companies to develop plans to continuously improve. Products that enter EU markets "simply" need to meet the requirements of the legislation (yes/no), companies are not required to go further than that or to continuously improve.</p> <p>The ESPR is more descriptive in terms of what is expected from products: e.g., minimal durability will be mandatorily set for some products. This requirement could be updated once there are more details on the ESPR when we have more details in the thresholds that will be set (for textiles in 2025).</p>
<p><b>5.7 Product Designed for Disassembly</b></p> <p><b>Silver</b> - For products with multiple materials requiring separation for cycling in the intended pathway, develop a plan for increasing the ease of product disassembly into discrete materials for intended cycling pathway(s).</p> <p><b>Gold</b> - For products with multiple materials requiring separation for cycling in the intended pathway, and for 90% of materials by weight, intentionally design the product for ease of disassembly.</p> <p><b>Platinum</b> - For products with multiple materials requiring separation for cycling in the intended pathway, and for 99% of materials by weight, intentionally design the product for ease of disassembly.</p>	<p>As recyclability might be one of the potential performance requirements of the ESPR (art 6) this point of C2C Certified® might increase in relevance in this context. However, we will have to see for what product groups this will become essential (through the development of the Delegated Acts).</p>

<b>C2C Certified requirements</b> <b>PRODUCT CIRCULARITY</b>	<b>ESPR</b>
<p><b>5.8 Active Cycling</b></p> <p><b>Gold</b> - For select single-use plastic products and single-use plastic packaging (when certified as a separate product), actively cycle <math>\geq 50\%</math> of the product's materials and implement a program to increase the cycling rate or quality of the product for its next use.</p>	<p>Packaging is not covered under the ESPR but is covered through the Packaging and Packaging Waste Regulation (PPWR).</p>
<p><b>Gold</b> - For other short-use phase products, and for any product that is required to be cycled per leading regulations (e.g., electronics, apparel), actively cycle at least some (<math>&gt; 0\%</math>) of the product's materials and implement a program to increase the cycling rate or quality of the product for its next use.</p>	<p>Follows the logic of the ESPR with identifying trade-offs. It would be important to check the outcome of the ESPR Delegated Act for textiles end 2025.</p>
<p><b>Gold</b> - For long-use phase products, actively cycle at least some (<math>&gt; 0\%</math>) of the product's materials or implement a program to increase the cycling rate or quality of the product for its next use.</p>	<p>Follows the logic of the ESPR with identifying trade-offs. The legal framework of the ESPR does not yet specify the nature of the trade-offs: e.g., as in this case durability vs recyclability, but further down the line and per product group the idea would be to further define those trade-offs and how those can be tackled.</p>
<p><b>Platinum</b> - For long-use phase products, actively cycle the product's materials and implement a program to increase the cycling rate or quality of the product for its next use.</p>	<p>Neither aligned nor misaligned with the ESPR. The ESPR would likely not to go into this level of detail.</p>
<p><b>Platinum</b> - Monitor cycling rates and quality over time, and demonstrate an increase in either cumulative cycling rate or quality.</p>	<p>Neither aligned nor misaligned with the ESPR. The ESPR would likely not to go into this level of detail.</p>
<p><b>Platinum</b> - Actively cycle a minimum percentage of the product's materials based on the duration of the product's use phase.</p>	<p>Follows the logic of the ESPR with identifying trade-offs. It would be important to check the outcome of the ESPR Delegated Act for textiles end 2025.</p>



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