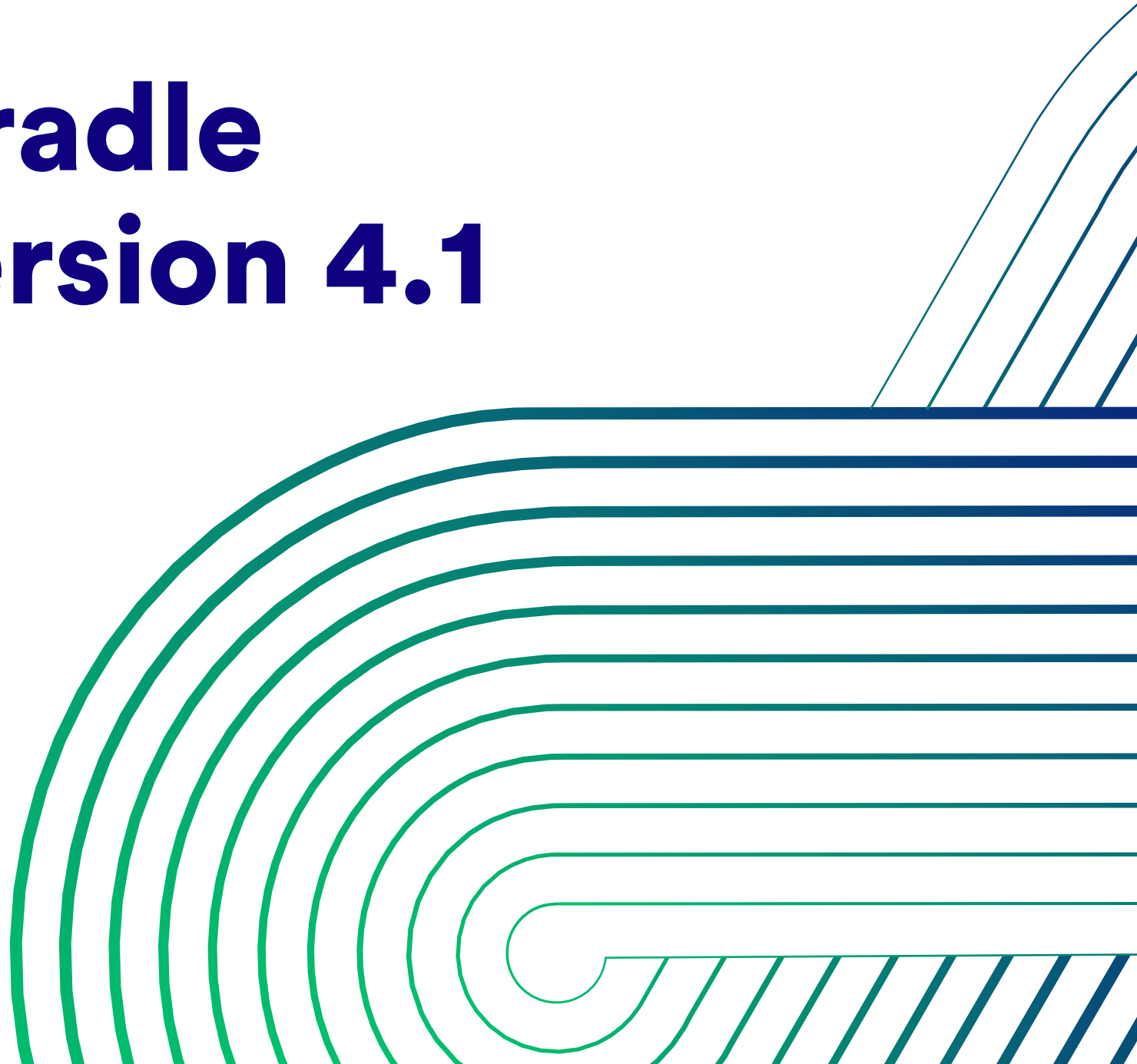


# Cradle to Cradle Certified Version 4.1

Overview for Assessors  
15 May 2024

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



# Agenda

- 1. Important dates and transition policies (Susan)**
- 2. Summary of changes, Version 4.0 to 4.1 (Esther)**
- 3. Updates on Material Health documents (Brandon)**
- 4. Q & A**

# Important Dates and Transition Policies

**Susan Klosterhaus**

# 2 May 2024 – V4.1 Release Date

## Documents now available on the C2CPH website

- Cradle to Cradle Certified Product Standard, Version 4.1 and reference documents
- C2C Certified Material Health Certificate Standard, Version 4.1
- ‘Redline’ versions of standard and reference documents with marked changes compared to Version 4.0
- Version 4.0 to 4.1 Comparison Summary
- Responses to public comments

# 1 July 2024 – V4.1 Effective Date

Documents that will be available on the C2CPH website

- Version 4.1 Assessment Summary Form
- CACP, WSS, SF Section 8.3 assessment forms
- Restricted substances declarations
- Revised Bill of Materials
- Cradle to Cradle Certified Product Standard, Version 4.1 User Guidance
- Recycled Content Materials Analyte List
- Certification claims guidance

# V4.1 Assessor Training

- Will be developed as quickly as possible after other V4.1 documents completed
- Online training modules, knowledge tests, practice assessment exercise will be required for all assessors by a deadline (TBD)

# Updated Version 4 Transition Policy

- Please see updated policy on V4.1 page of the C2CPH website
- Companies may apply for certification to Version 4.1 beginning 1 July 2024 (the Version 4.1 Effective Date).
- Applications and Assessment Summary Forms (ASFs) for certifications to Version 4.0 will be accepted until 31 December 2025. Applications and ASFs received after this date will be required to certify to Version 4.1.

# Options for V4.0 to V4.1 Transition

Companies wishing to recertify their product(s) to Version 4.1 prior to their current Version 4.0 certification expiration date may do so via one of two ways:

- (1) Interim Assessment Review – An assessor must provide all updates in the V4.1 ASF (information that needs to be provided will be highlighted; ASF to be completed soon). The certification will expire on the date of the original Version 4.0 certificate. The IAR fee applies.
- (2) Early recertification – An assessor must submit a Version 4.1 assessment summary form following the same procedure used for a typical recertification, with all recertification requirements met. The recertification fee applies.



# Summary of Changes

## Version 4.0 to Version 4.1

Esther Julier

## Version 4.1 Changes – Highlights

- **Material Health:** The Bronze-level chemical restrictions more closely align with leading chemical regulations, serving as the first step prior to the in-depth, full toxicity assessment of chemicals in the product.
- **Product Circularity:** Requirements better incentivize reuse, remanufacturing, and similar cycling pathways.
- **Clean Air & Climate Protection:** More options were introduced for achieving important targets to use renewable electricity and address greenhouse gas emissions in manufacturing and ensure alignment with industry best practice.
- **Water & Soil Stewardship:** Requirements for tier 1 suppliers and third-party water treatment facilities were shifted to higher achievement levels, to offer a more feasible approach.
- **Social Fairness:** A modification of Bronze level requirements was introduced to focus on manufacturing facilities while still ensuring the category is aligned with leading international guidelines (e.g., UN Guiding Principles and OECD Due Diligence Guidance for Responsible Business).
- **Environmental Policy & Management:** The requirements have been fully aligned with the due diligence requirements that already existed for human rights in the Social Fairness category. This provides a comprehensive and parallel set of environmental and human rights due diligence requirements aligned with the OECD Guidance and the upcoming EU Corporate Sustainability Due Diligence Directive.

# Environmental Policy & Management

- The scope of the Bronze level environmental policy, risk assessment, and strategy, and Silver and Gold level management system requirements has been increased. These requirements now apply to the applicant company rather than focusing primarily on final manufacturing stage facilities and the certified product.
- The following environmental topics must now be included in the Bronze level risk assessment in all cases:
  - Greenhouse gas emissions and contribution to climate change,
  - Environmental pollution (air, fresh and marine water, soil),
  - Resource use and circularity,
  - Biodiversity, and
  - Ecosystems
- For large companies ( $\geq 250,000$  employees), these same issues must always be addressed in the company's environmental policy. For other companies, these issues must be addressed in the policy if they are identified as high-risk per the risk assessment.
- The scope of the Silver level monitor and verify performance requirements, and the Silver and Gold level grievance mechanism, transparency, and stakeholder engagement requirements, has been increased. These requirements now apply to the environment and human rights. Under Version 4.0, these requirements exist in the Social Fairness category and apply to human rights alone.

# Environmental Policy & Management

## 3.2.1 Environmental Policy - Bronze

- Scope increased to include the applicant company.
- Requirements may no longer be met by final manufacturing facilities alone
- **Public disclosure may be used to demonstrate formal approval**

## 3.2.2 Assessing Environmental Risks and Opportunities - Bronze

- Scope increased to apply to the applicant company and the broader value chain
- The following issues are now de facto high risk for all large companies and potentially high risk for other companies: Greenhouse gas emissions and contribution to climate change, environmental pollution (air, fresh and marine water, soil), resource use and circularity, biodiversity and ecosystems. Note: All high-risk issues must then be incorporated into the policy. Large is defined per the EU's CSDDD or as  $\geq 250,000$  employees.
- **Waste generation is now a de facto high-risk for facilities located in countries with inadequate waste management (i.e., countries with open dumps)**

## 3.2.3 Monitor & Verify Performance - Silver

- Scope of the Silver level performance measurement requirements increased to include environment. Environmental performance data must be requested from tier 1 suppliers identified as high-risk for environmental issues per the risk assessment.
- **Note: Measuring performance on environmental issues at facilities was deemed sufficiently covered by the other categories of the standard. Not required in Section 3.2.3.**

## 3.2.4 Strategy for Environmental Policy Implementation - Bronze

- Scope increased to include the applicant company. Requirement may no longer be met by final manufacturing facilities alone.

## 3.2.6 Environmental Management Systems – Silver and Gold

- The applicant is now required to have a corporate level environmental management system (this is in addition to the facility level environmental management system required under V4.0)
- Gold level responsible sourcing management system requirement may no longer be met by final manufacturing facilities

## 3.2.7 Grievance Mechanisms – Silver and Gold

- Scope increased to include environment. **Note: The same grievance mechanism as that receiving credit in Social Fairness may receive credit if it is able to accept both human rights and environmental related grievances.**

## 3.2.8 Transparency and Stakeholder Engagement – Silver and Gold

- Scope increased to include environment.

## 3.2.9 Environmental Protection Incentives - Platinum

- Scope applies only to applicant company. Requirements may not be met by final manufacturing facilities alone.

## Version 4.1 Environmental Policy & Management Requirements

### BRONZE

- Environmental policy ([applicant company](#))
- Environmental risks assessed ([applicant company](#))
- Strategy for policy implementation, including performance objectives ([applicant company](#))
- Executive commitment to achieving high levels of environmental performance
- Recertification: Performance data analyzed to measure progress on achieving strategy

### SILVER

- [Performance data requested from tier 1 suppliers associated with high risk, corrective actions planned and tracked](#)
- Management systems for implementation and oversight of policy ([applicant company](#) and final manufacturing facilities)
- [Grievance mechanism](#)
- [Open, transparent governance and reporting](#)

### GOLD

- Responsible sourcing management system for policy implementation in product's supply chain ([applicant company](#))
- [Stakeholder engagement and feedback informs strategy](#)

### PLAT

- Environmental objectives incorporated into relevant employee performance evaluations ([applicant company](#))
- Incentives provided to encourage top management and employees to actively participate in achieving the company's environmental goals ([applicant company](#))

# Material Health

## 4.1 Restricted Substances List Compliance / 4.1 Compliance with Leading Chemical Regulations

- The Restricted Substances List has been modified to more closely align with leading regulations.
- The reference document is now called the Restricted Substances reference document (rather than Restricted Substances List)
- For textile chemical formulations, conformance with the ZDHC MRSL is accepted as an alternative.

## 4.2 Avoidance of Organohalogens and Functionally Related Chemical Classes of Concern

- A list of restricted HFRs is now included in the Restricted Substances reference document. The listed substances are restricted in all cases, including when they are used for purposes other than flame retardancy. Any non-listed HFRs are also restricted if used for the purpose of increasing heat/fire resistance or decreasing flammability.
- A list of restricted OPFRs is now included in the Restricted Substances reference document. The listed substances are restricted in all cases, including when they are used for purposes other than flame retardancy. Any non-listed OPFRs are also restricted if used for the purpose of increasing heat/fire resistance or decreasing flammability –unless they have a material health assessment rating of a,b, or c when exposure is assumed.
- Organohalogen restriction exemption added: For any achievement level, an intermediate product (e.g., textile dyestuff) may be exempt from this requirement if it is specified for use at a concentration ensuring the organohalogen(s) remain below the subject to review limit in the final homogeneous material as present in the end product. Currently, this exemption applies to dyes only. NOTE: A disclaimer will be added to the certificate as follows: "The concentration of the certified [intermediate] product in final products sold to the general public must be at or below [X] for the assessment results to be valid. The requirements for certification have only been met under these conditions."

## 4.3 Material and Chemical Inventory

- A material subject to review limit of 100 ppm has been added for multi-material products. Exceptions: Finishes, coatings, and similar when on a part that is subject to review are also subject to review. Materials that come into routine direct human contact during normal use are always subject to review.

## 4.4 Assessing Chemicals and Materials

- The requirement to determine percentage assessed by number has been removed from the standard.

## Version 4.1. Material Health Requirements

### BRONZE

- Product is [in compliance with leading chemical regulations](#)
- Product does not contain organohalogen substances of special concern (PFAS, HFRs, highly halogenated) or functionally-related, non-halogenated classes of equivalent concern (OPFRs) above relevant thresholds
- Product is 75% assessed & 100% characterized by generic material
- Strategy developed to phase-out or assess/optimize all unassessed and problematic chemicals

### SILVER

- Product is 95% assessed
- Product does not contain materials with > 1% C-bonded halogen by weight, recognized PBTs, vPvBs, Cat.1 & 2 CMRs posing risk, or substances causing an equivalent level of concern
- Product has [low](#) VOC emissions (for products permanently installed in buildings)
- Product complies with VOC content limits (for liquid/aerosol consumer & construction products)

### GOLD

- All chemicals and materials subject to review in the product are assessed (100%)
- Product is optimized for material health (all chemicals are compatible with human & environmental health)
- Product has [very low](#) VOC emissions or is inherently non-emitting
- Strategy developed to increase the percentage of preferred materials and chemicals in the product [OR](#) optimize the chemistry in the supply chain

### PLATINUM

- All product-relevant process chemicals are assessed as compatible with human & environmental health
- ≥ 50% of the product by weight is assessed as preferable for human and environmental health
- Toxic emissions in the supply chain are addressed by:  
Inputs are ≥ 75% MHC or ≥ 50% C2C Certified w/Gold or Platinum level + strategy to increase percentages  
[OR](#)  
Environmental & human health impact hotspot LCA + strategy to address identified hotspots

# Product Circularity

## 5.1 Circularity Education

- Removed/ deleted

## 5.2 Preparing for Active Cycling

- Silver level: Reuse, repair, refurbish, remanufacture, or recycling accepted as the pathway for initiating partnerships at the Silver level. Partnerships for any additional intended pathways (including recycling for technical cycle) are required at at Gold. (Previously, recycling was a required pathway for all products and materials in technical cycles beginning at Silver level.)

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

Bronze through Platinum levels: Minimums, averages, rolling averages, and mass balance/credit method are all now accepted (previously, the product was required to contain a minimum amount of cycled or renewable content).

- The method used and percentage achieved must be reported via the Circularity Data Report.
- For chemical recycling, the technology pathway (e.g., depolymerization or pyrolysis followed by hydrocracking or solvent purification), available alternatives, rationale for selecting chemically recycled material over mechanically recycled, and a quantitative or qualitative description of the known and likely environmental and human health related impacts and trade-offs, must also be disclosed.
- If applying the credit method (i.e., mass balance) approach, the material must be certified to a C2CPH-recognized cycled content standard that does not count fuel as recycled.
- Recognized standards will include: Recycled Material Standard (RMS), ISCC Plus, Recyclclass, SCS Global Recycled Content Standard (SCS Global), Global Recycled Standard and Recycled Claim Standard (Textile Exchange), UL's Environmental Claims Validation Procedure (ECVP). Note: book and claim methods excluded. These have been added to the C2CPH-recognized program sheet on the assessor resources page as of 14-May. See the sheet for restriction conditions.

## 5.8 Active Cycling

- Gold level: Active cycling is now required for products for which cycling is required per leading regulations (e.g., apparel, electronics, carpet, mattresses, batteries, tires) and for any product where the use phase is less than four years (rather than one year)



## Version 4 .1 Product Circularity Requirements

### BRONZE

- Intended cycling pathway(s) for the product and its materials are defined
- Plan for improving cycling infrastructure; cycling partnerships identified
- Meets level-specific product/material targets for % cycled or renewable content (targets increase through Platinum) Alternative: limitations are publicly reported. [Allowable methods: minimum content, average, rolling average, mass balance/ credit method.](#)
- $\geq 50\%$  materials by weight are compatible with intended cycling pathway(s)
- Circularity data and cycling instructions are publicly available

### SILVER

- Cycling partnership(s) initiated [for at least one intended pathway](#)
- $\geq 70\%$  materials by weight are compatible with intended cycling pathway(s)
- Strategy for improving product circularity is developed

### GOLD

- [Cycling partnerships\(s\) initiated for all intended pathways](#)
- $\geq 90\%$  materials by weight are compatible with intended cycling pathway(s)
- Materials compatible for high value cycling
- Circular design opportunity implemented
- Product designed for disassembly (if relevant)
- The product is actively cycled and/or a program is implemented to increase the cycling rate or quality of the product's materials after use (also applies at Platinum). [Active cycling required at Gold for products with use phase of 4 years or less and for products required to be cycled per leading regs.](#)

### PLATINUM

- At least two intended cycling pathways are defined for the product and its materials
- $\geq 99\%$  materials by weight are compatible with intended cycling pathway(s)
- A minimum amount of product is actively cycled
- Monitoring program to track cycling rates/quality and an increase in cumulative rate/quality is demonstrated

# Clean Air & Climate Protection

## 6.2 Quantifying Electricity Use and Greenhouse Gas Emissions & 6.6 Transparency

- Silver level: Environmental Product Declarations (EPDs) required at Silver level instead of Gold level for construction products and building materials used to construct the primary building elements.
- Silver level: Reporting on how the CA&CP targets have been achieved is now required.

## 6.3 Clean Air & Climate Protection Strategy

- Bronze level: The requirements for a cost estimate for moving to the next level and to explain how the targets are “sufficiently ambitious” have been removed

## 6.4 Using Renewable Electricity and Addressing GHG Emissions

- Bronze thru Platinum levels: The  $\leq 15$  year generator age limit no longer applies to renewable electricity procured via a utility green power purchasing arrangement (i.e. the attributes and electricity are purchased on the same contract).
- Bronze and Silver levels: Carbon offsets are no longer accepted to address emissions from purchased electricity where the nuclear power share is  $> 10\%$  and there is an established renewable electricity market and related attribute tracking system. In other words, offsets may now be used if there isn't a renewable electricity tracking system even if nuclear power share is  $\geq 10\%$  at Bronze and Silver.
- Gold level: Carbon offsets are no longer accepted to address emissions from purchased electricity in any location with an established renewable electricity market and related attribute tracking system.
- Bronze thru Gold levels: Contaminated waste wood may count as renewable if strict emissions limits are met and incinerator waste is properly managed.
- Bronze and Silver levels: ENERGY STAR building and plant certification or equivalent is a new method of achieving the required targets.
- Gold level: Power purchase agreements of any term length receive credit if the contract is signed pre-financing. In addition, a 'long-term' PPA is now defined as 10 years or more (rather than 15). Further, the requirement to support new generators ( $\leq 15$  years) does not apply to contracts signed prior to validity of V4.0 (1 July 2021), direct grid connections, and if the applicant is the/an original off-taker/buyer.
- Gold level: A new option has been added for achieving the gold target applicable to all scope 1/direct and other scope 2/ indirect emissions: Invest in on-site emissions reductions projects, for example, purchase more energy efficient equipment (must be of an equivalent value to carbon offsets compensating for 50% of emissions).
- Platinum level: Carbon offsets are no longer accepted for achieving the final manufacturing stage targets. This also means that bioenergy receiving partial credit may not be used at Platinum (e.g., woody waste)

## Version 4.1 Clean Air & Climate Protection Requirements

### BRONZE

- Air emissions compliance
- Electricity use & greenhouse gas emissions quantified (final manufacturing stage)
- Strategy
- 5% renewable electricity and/or greenhouse gas emissions targets achieved (final manufacturing stage)
- Energy efficiency certification or label for select product types (e.g., for appliances and windows)
- Transparency - greenhouse gas emissions [and method of achieving targets](#) disclosed (final manufacturing stage)

### SILVER

- [Environmental Product Declaration \(EPD\) available \(construction products and building materials\)](#)
- 20% renewable electricity and/or greenhouse gas emissions targets achieved (final manufacturing stage). Alternative: The Gold level embodied emissions target (25%) has been met.

### GOLD

- Embodied emissions quantified and disclosed (all products). Internal review or third-party verification.
- 50% renewable electricity and/or greenhouse gas emissions targets achieved (final manufacturing stage).
- 50% of renewable electricity used to meet the target (i.e., 25% of total) produced on-site or procured via long term PPAs. Alternative: 100% renewable electricity procured (final manufacturing stage facility)
- Foam blowing agents – low GWP and ODP
- 25% of embodied emissions addressed (cradle to gate at minimum)

### PLAT

- Environmental Product Declaration (EPD) available (all products).
- > 100% renewable electricity produced on-site or procured via long term PPAs. [No carbon offsets.](#)
- 100% of embodied emissions addressed (cradle to gate at minimum)

# Water & Soil Stewardship

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

- Requirement to identify risks at tier 1 has been moved from Bronze to Silver level.

## 7.2 Effluent Quality Compliance

- The requirement to fully address compliance of third-party treatment facilities has been moved from Bronze to Gold level recertification. If a third-party treatment facility is found to be out of compliance, applicant have until Gold level recertification to address the issue. Work to obtain compliance information from third-parties still begins at the Bronze level.
- The Silver level requirement to demonstrate effluent quality compliance of tier 1 suppliers has been removed from the standard.

## 7.5 Strategy and 7.6 Water & Soil Conservation

- If final manufacturing facilities are not in scope for the Silver or Gold requirements in Section 7.6, a strategy at the Bronze level and action at Silver level are not required. (In this case, taking action to address issues in the supply chain is an alternative/option for achieving the Silver level only).

## 7.7 Assessing and Optimizing Product Relevant Chemicals in Effluent and Sludge

- For textile chemical formulations, ZDHC MRSL conformance is an accepted alternative to demonstrating compliance with the Section 4.1 restrictions. Subject to review limits have also been clarified.
- The requirements to assess product relevant chemistry at tier 1 (and any tier for pulp & paper, leather, metal plating and textiles) has been moved from Gold to Platinum level

## Version 4.1 Water & Soil Stewardship Requirements

### BRONZE

- Water and soil issues characterized ([final manufacturing](#))
- Effluent quality compliance ([final manufacturing](#))
- Product-relevant chemicals in effluent/sludge – comply with leading chemical regulations (final manufacturing)
- Water use quantified
- Drinking water, sanitation, and hygiene provided
- Strategy to achieve Silver level water and soil conservation requirements including water use reduction targets for final manufacturing facilities using high volumes in high stress locations.

### SILVER

- [Water and soil issues characterized \(tier 1\)](#)
- Strategy implemented + new strategy to achieve Gold level water and soil conservation requirements
- Product-relevant process chemicals in effluent/sludge – defined and assessed (final manufacturing)
- Product-relevant chemicals in effluent/sludge – no CMRs, PBTs, vPvBs, or equivalent concern (final manufacturing)
- Transparency: Water use data

### GOLD

- Recertification: Effluent quality compliance (third party treatment facilities)
- Silver level water and soil conservation strategy implemented, including actions to conserve water and/or soil where the highest impacts were expected (applies to final manufacturing and supply chain)
- Product relevant chemicals in effluent/sludge – optimized ([final manufacturing](#))
- Water and/or soil stewardship positive impact project

### PLAT

- Transparency: Water quality data
- Impact of positive impact project demonstrated
- [Product relevant chemicals in effluent/sludge – assessed and optimized \(key materials associated with pollutant intense processes\)](#)
- All effluent/sludge: Quality management & optimization (or closed loop at facility)

# Social Fairness

## 8.2 Human Rights Policy

- Applicants now have until recertification at the Bronze level to fully implement all elements of the human rights policy. Any element(s) that were not included at the initial Bronze certification must be disclosed/posted via an expanded scorecard or certification report or directly on C2CPH's public registry. Incomplete policies are not accepted at the Silver level.
- Public disclosure of the policy is accepted as an alternative to a signature to demonstrate formal approval. (Note: Applicable to Section 3.2 also)

## 8.3 Monitor & Verify Performance

- The Bronze level requirement to measure performance on achieving all elements of the human rights policy for the applicant company has been removed from the standard. Performance must still be measured for all final manufacturing stage facilities.

## Version 4.1 Social Fairness Requirements

### BRONZE

- Human rights policy based on international standards
- Human rights risk assessment (applicant company)
- Strategy for policy implementation, including performance objectives
- Performance measured, corrective actions planned, and progress at renewal ([final manufacturing](#))
- Select corrective actions complete, e.g., child or forced labor, structural safety
- Executive commitment to achieving high levels of performance
- Recertification (Bronze and above): Performance data analyzed to measure progress on achieving strategy

### SILVER

- Performance data requested from tier 1 suppliers in high-risk locations, corrective actions planned and tracked
- Management systems for implementation and oversight of policy (applicant company)
- Grievance mechanism
- Positive social impact project
- Open, transparent governance and reporting

### GOLD

- Human rights risks assessed for product components and raw materials
- Certified materials to address risk of child labor, forced labor, or conflict
- Responsible sourcing management system
- Positive social impact project – impact assessment
- Stakeholder engagement and feedback informs strategy

### PLAT

- Collaboration to solve an intractable social issue
- Diverse, inclusive, engaged work environment and living wage

# Packaging

- The two types of packaging have been consolidated into one type. Packaging requirement now pertain to all packaging materials contained in one sales unit as it is offered to the end user or consumer at the point of purchase.
- Compliance with leading chemical regulations and the organohalogens and functionally related chemical classes of concern restrictions (per Material Health Sections 4.1 and 4.2 respectively) is now required for all packaging types in scope. This means that certain types of packaging (e.g., the outer sales unit packaging such as a toothpaste box) are newly required to comply with leading chemical regulations under Version 4.1.
- One of the circularity requirements must be met at the Bronze and Silver levels, and two of the circularity requirements must be met at the Gold level for all packaging types described above. (Under Version 4.0, two of the circularity requirements must be met for type 1 packaging and one for type 2 packaging at the Bronze level. There are no Silver or Gold level circularity requirements under Version 4.0.)
- To receive credit for reducing packaging weight under Version 4.1, compatibility for cycling must not be reduced.



# Animal Welfare

- The requirement to use 100% certified material has been moved from the Silver to the Gold level.
- For the Silver level, it is now required to use  $\geq 50\%$  materials and substances certified to a C2CPH-recognized animal welfare certification program, or equivalent alternative. Alternatively, if it is not possible to achieve the 50%, a feasibility analysis and public disclosure of the limitations of using the required percentage of certified material are required. A strategy for increasing the percentage and progress at recertification is also required

# Private Labels

- Private label companies are no longer required to directly state that their product is a private label.
- Rather, it is required that a statement be placed on the registry noting that the requirements pertaining to the applicant company were met by 'the manufacturer'.
- The other option (same as in V4.0) is for the private label company to meet the company level requirements.

# Update on Material Health Documents

Brandon Reid

# Version 4.1 Restricted Substances Reference Document

- With the release of V4.1, the C2CC Restricted Substances List (RSL) Reference Document has been expanded and re-branded as the Restricted Substances Reference Document.
- The 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

# Version 4.1 Restricted Substances Reference Document

- 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.

# Version 4.1 Restricted Substances Reference Document

- Walkthrough

# Version 4.1 Restricted Substances Declarations

- To align with the changes to Section 4.1, the previous RSL declaration will now be split into two declarations:
  - Section 4.1
    - Suppliers may declare compliance with the Section 4.1 lists in the RS Reference Document (previous pathway), OR declare compliance with applicable regulations (new pathway).
  - Section 4.2
    - Suppliers declare compliance with the Bronze-level requirements in Section 4.2 (unless compliant via organohalogen screen).
    - Previously, Bronze-level Section 4.2 requirements were included in the RSL.

# V4.1 Restricted Substances Declarations

- Section 4.1
  - New regulatory compliance pathway.
  - Previous pathway (declare compliance with RSRD) still an option
  - Checklist for supplier-formatted declarations updated to reflect pathway 3b

## 3b. Declaration of Compliance with Leading Chemical Regulations

Products and materials that comply with the specified regulations and directives, including those that contain restricted substances according to allowable exemptions, derogations, or applicable scopes as defined by these regulations, meet the requirements set forth by the Cradle to Cradle Certified Product Standard Version 4.1, Section 4.1: Compliance with Leading Chemical Regulations.

Although the specified regulations and directives cited in this section only apply to products sold in the EU, the requirements in Section 4.1 apply to all Version 4.1 Cradle to Cradle Certified products and their homogeneous materials. Therefore, materials not sold in the EU but that are in scope according to these regulations are still required to be in compliance with the restrictions on this list.

For the product or material under consideration, please identify all applicable chemical restriction regulations from the list below with which the supplied product or material complies:

- ☐ REACH – Regulation (EC) No 1907/2006
  - ☐ Annex XIV - Authorisation List - ECHA
  - ☐ Annex XVII - Substances restricted under REACH - ECHA
- ☐ POPs – Regulation (EU) 2019/1021
- ☐ RoHS – Directive 2001/65/EU
- ☐ Toy Directive – Directive 2009/48/EC
- ☐ Cosmetics Regulation – (EC) No 1223/2009

***\*draft text***



# V4.1 Restricted Substances Declarations

- Section 4.2
  - New standalone declaration
  - Similar format to Section 4.1
  - Includes language to declare Silver- and Gold-level compliance
  - Includes checklist for supplier-formatted declarations

3. Declaration of Compliance with the [insert publish date] Cradle to Cradle Certified Version 4.1 Restricted Substances Reference Document, Section 4.2	
<p>Complete this section to declare compliance of the supplied material(s) with the Cradle to Cradle Certified Version 4.1 Restricted Substances Reference Document, Section 4.2.</p> <p>Section 4.2 restricts the use of per- or polyfluoroalkyl substances (PFASs), halogenated flame retardants (HFRs), and organophosphate ester flame retardants (OPFRs) in materials. Halogenated polymers, halogenated solvents, and other highly halogenated carbon-based materials (containing 10% or more of total carbon-bonded chlorine, fluorine, and/or bromine*) are also not permitted for use. See the <a href="#">Cradle to Cradle Certified Product Standard Version 4.1, Section 4.2</a> for more information.</p> <p>Please view the following spreadsheet tabs in the <a href="#">Cradle to Cradle Certified Version 4.1 Restricted Substances Reference Document</a> to determine whether PFASs, HFRs, or OPFRs are present in the material**, including as intentionally added ingredients and nonfunctional constituents, and to determine whether the supplied material is considered highly halogenated:</p> <ul style="list-style-type: none"><li>• 4.2 PFASs</li><li>• 4.2 HFRs</li><li>• 4.2 OPFRs</li><li>• 4.2 Highly Halogenated</li></ul> <p>Use the checkboxes below to indicate the compliance of the supplied material.</p>	
<input type="checkbox"/>	Check this box if NONE of the chemicals described or listed in the above sections of the <a href="#">Cradle to Cradle Certified Version 4.1 Restricted Substances Reference Document</a> are present in the material**, <b>and</b> the material is not highly halogenated, as defined above.
<input type="checkbox"/>	<p>Check this box if ANY of the chemicals described or listed in the above sections of the <a href="#">Cradle to Cradle Certified Version 4.1 Restricted Substances Reference Document</a> are present in the material**, <b>or</b> if the material is a highly halogenated, as defined above.</p> <p>If selecting this option, please indicate the name, CASRN, and concentration of all PFASs, HFRs, and OPFRs contained in the homogeneous material in the space provided on the next page.</p>

***\*draft text***

# V4.1 Applicant Bill of Materials (BoM) Form

- Updates include
  - Re-organization for ease of use
  - Linked cells throughout form
  - Separate versions for single and multi-material products
  - Removed % assessed by number calculations

# V4.1 Recycled Content (RC) Testing Requirements

- Updates in progress to reflect revised Section 4.1 requirements.
  - Align with leading chemical regulations (REACH, POPs, RoHS, Toys Directive, Cosmetics Regulation)
- C2CPH also investigating options with labs to ensure that RC testing requirements align with lab capabilities, and to reduce overall cost of RC testing.

# Timeline

- Currently available
  - V4.1 Restricted Substances Reference Document
- July 1, 2024 Release
  - V4.1 Restricted Substances Declarations (Sections 4.1 and 4.2)
  - V4.1 Applicant Bill of Materials
  - V4.1 Recycled Content Materials Analyte List

# Q & A

