

Cradle to Cradle Certified® Product Standard

Version 3.1 to Version 4.0 Comparison:

Summary of Modifications and New Requirements

March 2021

This document contains a high level comparison of the requirements in Version 3.1 and Version 4.0 of the Cradle to Cradle Certified® Product Standard, highlighting new requirements and modifications made to Version 3.1 requirements.

Certification Levels

The Cradle to Cradle Certified® Products Program encourages continuous improvement via a series of increasingly challenging certification levels. Version 3.1 (V3.1) has five certification levels (Basic, Bronze, Silver, Gold, and Platinum), while Version 4.0 (V4.0) has four certification levels (Bronze, Silver, Gold, and Platinum). Under V3.1, a product may be certified at the Basic level for a maximum of two years (one certification cycle), while under V4.0 a product may be certified at the Bronze level for a maximum of four years (two certification cycles) with an allowance to extend this time period if technical, performance, and/or market barriers exist, these limitations are publicly disclosed, and the Silver level is achieved in at least one of the standard categories.

Also new to V4.0, children's products, cosmetics, and personal care products are ineligible for certification at the Bronze achievement level in Material Health (i.e., they must meet the Silver achievement level or higher in Material Health). In addition, eligible single-use plastic products and product packaging (when certified as a separate product) are ineligible for certification at the Bronze and Silver achievement levels in Product Circularity (i.e., they must meet the Gold achievement level or higher in Product Circularity).

Product Eligibility

The Cradle to Cradle Certified Products Program applies to products except for (1) products that are contrary to the intent of the Cradle to Cradle principles, (2) products that the program requirements were not written to address, and (3) products that are not in compliance with applicable laws and regulations. In addition to these high-level exceptions, the specific list of products that are not eligible for certification currently includes:

- Products that contain live multi-cellular organisms (e.g., plants and seeds),
- Fur, and products containing fur,
- Cleaning products containing antimicrobials that are not approved for use per leading regulations (i.e., the EU's Biocidal Products Directive), and
- Products that are designed/intended to be non-circular (e.g., select single-use plastic products, select single-use plastic packaging, plastics containing oxo-degradable additives, and products containing microbeads).

Note that the list of ineligible products will be included in the Version 4.0 User Guidance and is also available [here](#).

General Requirements

Nearly all of the General Requirements listed below are new to V4.0. Most notably, an environmental management system must be in place at all final manufacturing stage facilities at the Silver level. In addition, applicants must demonstrate that they have made at least one measurable improvement to recertify at the Bronze and Silver levels.

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	New: A certification compliance assurance system is in place.
	New: Environmental risks are assessed for the final manufacturing stage and for the product.
	New: An environmental policy based on the environmental risks associated with the final manufacturing stage and the product is in place.
	Modified: A strategy is developed for implementing the environmental policy at all final manufacturing stage facilities. At recertification, progress toward achieving the strategy is measured. → <i>This requirement builds on the V3.1 and related V4.0 requirements to collect data on energy, emissions, and water use. Additional data may have to be collected depending on the outcome of the environmental risk assessment. Data <u>analysis</u> is newly required under V4.0.</i>
	New: Company executives demonstrate commitment and support for establishing and maintaining a culture for achieving high levels of environmental performance.
	New: At least one <u>measurable</u> improvement has been made in at least one of the five standard categories. (Required at Bronze and Silver level recertification.)
Silver	New: Management systems are in place that support the implementation and oversight of the environmental policy at final manufacturing stage facilities.
Gold	New: Responsible sourcing management systems are in place that support the implementation and oversight of the environmental policy within the product's supply chain.
Platinum	New: Environmental objectives are incorporated into relevant employee performance evaluations, and incentives are provided to encourage top management and employees to actively participate in achieving the company's environmental goals.

Material Health

The general requirement framework in this category has been preserved. All V3.1 Material Health requirements have been incorporated into V4.0, many with at least some modification. Several new requirements have also been added. The most notable new and modified requirements in V4.0 are:

- The V4.0 Restricted Substances List includes many more substances compared to the V3.1 Banned List, aligning with leading regulatory restrictions.
- A tiered approach to restricting organohalogen substances and functionally related, non-halogenated classes of equivalent concern has been introduced. Substances of special concern (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) are now restricted at the Bronze level, while the product may not contain materials with > 1% carbon-bonded halogens by weight at the Silver level. The restrictions

include several substances that are on the V3.1 Banned List. Note that all organohalogens are still restricted at the Gold level.

- The 100 ppm threshold for materials being subject to review in a product no longer applies. All homogeneous materials within a product are subject to review in V4.0, except for minor commodity type components such as fasteners.
- PBTs, vPvBs, and substances of equivalent concern to CMRS, PBTs, and vPvBs are newly restricted at the Silver level.
- CMRs are still restricted at the Silver level, but are defined based on the EU's CLP regulations rather than on the C2CC Material Health Assessment Methodology.
- The V3.1 Gold level requirement to demonstrate low VOC emissions has been moved to the Silver level. More stringent limits on VOC emissions are newly introduced at the Gold level. In addition, VOC emissions tests and limits accepted by several green building standards will be recognized.
- VOC content limits are newly introduced at the Silver level.
- At the Platinum level, a percentage of the product must be A/a or B/b assessed, and requirements focusing on addressing the use of hazardous substances in the supply chain are newly introduced.
- Several updates have also been made to the Material Health Assessment Methodology, including new methods for assessing recycled content materials. These updates will be included in an updated version of the Material Health Assessment Methodology, which will be published by the effective date of the V4.0 standard.

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	Modified: Product is in compliance with the Restricted Substances List (RSL). → <i>The RSL, which is based on leading regulatory restrictions, replaces the V3.1 Banned List.</i>
	Modified: Product does not contain organohalogen substances of special concern or functionally-related, non-halogenated classes of equivalent concern above relevant thresholds. → <i>Halogenated substances of special concern, including per- or polyfluoroalkyl substances (PFASs), halogenated flame retardants and organophosphate ester flame retardants, and highly halogenated carbon-based materials are restricted at all levels. Under V3.1, a short list of organohalogens are restricted at all levels and the rest are restricted at the Gold level.</i>
	No change: Product is 100% characterized by generic material. → <i>Required at the V3.1 Basic level.</i>
	Modified: Product is ≥ 75% assessed (complete formulation information collected for 100% of materials released directly into the biosphere). → <i>New methods for calculating percentage assessed are introduced. However, for multi-material products, the V3.1 method may still be used.</i>
	Modified: Strategy developed to phase-out or optimize all x-assessed or grey-rated chemicals. → <i>Minor changes have been made to the required strategy elements.</i>
Silver	Modified: Product is ≥ 95% assessed (complete formulation information collected for 100% of materials released directly into the biosphere). → <i>New methods for calculating percentage assessed are introduced (see comment at Bronze).</i>
	Modified: Product does not contain materials with > 1% carbon-bonded halogens by weight, recognized PBTs, vPvBs, or EU CLP Cat.1 and 2 CMRs, or substances causing an equivalent level of

	<p>concern, or exposure is unlikely or expected to be negligible. → <i>As noted above, under V3.1, a short list of organohalogens are restricted at the Basic level and the rest are restricted at the Gold level. PBTs, vPvBs, and substances of equivalent concern are restricted at the Silver level under V4.0, while they are restricted at the Gold level under V3.1 (except for vPvBs which are not restricted under V3.1). CMRs listed as Cat. 1 & 2 in EU CLP regulation are restricted at the Silver level under V4.0, while CMRs as defined per the Cradle to Cradle Certified Material Health Assessment Methodology are restricted at the Silver level under V3.1.</i></p> <p>Modified: Product has low VOC emissions (required for products permanently installed in buildings). → <i>Testing to demonstrate low VOC emissions is required at the Silver level under V4.0. This is a Gold level requirement under V3.1. In addition, VOC emissions standards that are recognized by several leading green building programs are now recognized.</i></p> <p>New: Product complies with VOC content limits (required for liquid and aerosol consumer and construction products).</p>
Gold	<p>No change: 100% of homogeneous materials subject to review are assessed (i.e., none have a grey rating due to insufficient data).</p> <p>No change: Product is optimized for material health (i.e., all x-assessed chemicals replaced or phased out).</p> <p>New: Strategy developed to either increase the percentage of preferred (A/a and/or B/b assessed) materials and chemicals in the product or optimize the chemistry in the supply chain.</p> <p>Modified: Product has very low VOC emissions or is inherently non-emitting (required for products permanently installed in buildings). → <i>More stringent emissions limits apply at the Gold level under V4.0 compared to V3.1.</i></p>
Platinum	<p>No change: All product relevant process chemicals are assessed (i.e., none have a grey rating due to insufficient data) and no x-assessed chemicals are used.</p> <p>New: ≥ 50% of the product by weight is assessed as A/a or B/b.</p> <p>New: ≥ 75% of the product's input materials or chemicals have a C2CPII Material Health Certificate at the Gold or Platinum level or ≥ 50% of the product's input materials or chemicals are Cradle to Cradle Certified at the Gold or Platinum level or equivalent. A strategy is developed to increase percentages over time. OR</p> <p>New: Environmental health impact hotspot analysis based on life cycle assessment completed, emissions and resource use hotspots that impact human and environmental health are identified, and material health optimization strategy is developed based on the results.</p>

Product Circularity

The V3.1 Material Reutilization category has been renamed Product Circularity. All V3.1 Material Reutilization requirements have been incorporated into V4.0, but have been modified. The majority of the requirements in this category are newly introduced in V4.0. The most notable new and modified requirements are:

- Circularity data and information necessary for proper product handling at end-of-use must be made publicly available.

- The V3.1 Material Reutilization score has been decoupled into two sets of progressively more rigorous requirements to:
 - Use cycled and/or renewable materials or communicate why this is not feasible, and
 - Use materials that are compatible with intended cycling pathways (i.e., recyclable, compostable, biodegradable).
- At the Gold level, materials must be likely to retain their value for subsequent use, and renewable materials must be responsibly sourced either at Bronze or at Gold or Platinum depending on the degree of sourcing concerns.
- The V3.1 Nutrient Management Strategy requirement has been replaced with requirements to obtain an understanding of the challenges limiting cycling of the product, create a plan for addressing those challenges, and initiate the necessary partnerships to facilitate implementation of the plan.
- Design for disassembly requirements are newly introduced at the Gold level.
- The product must be actively cycled at the Gold level for short-use phase products and at the Platinum level for long-use phase products. The amount of cycling that must occur is newly defined based on the length of the use phase.

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	New: Applicant is involved in a circularity education initiative to gain an understanding of relevant cycling infrastructure development.
	New: Intended cycling pathway(s) for the product and its materials are defined.
	New: A plan has been created to address challenges with the cycling infrastructure at the end of the product's first use; potential cycling partners have been identified.
	Modified: Select product and material types contain cycled and/or renewable content. Alternative: Limitations that prevent achievement of this requirement are publicly reported. → <i>The use of cycled and/or renewable content is given credit via the Material Reutilization score (described above) and is optional until the Platinum level under V3.1.</i>
	Modified: ≥ 50% of materials by weight are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable). → <i>The use of recyclable, compostable, and biodegradable materials is given credit via the Material Reutilization (MR) score under V3.1. The MR score considers recycled and/or renewable content <u>plus</u> recyclability and/or compostability. In V4.0, these topics are decoupled and addressed separately. In addition, in V4.0, materials in technical cycles must be compatible with the specific intended cycling pathway rather than recyclable at the pilot scale only.</i>
Silver	New: Circularity data and cycling instructions are publicly available.
	New: Partnerships for cycling (recovery and processing) of the product have been initiated. If the product is intended for cycling via municipal systems, materials are compatible with those systems.
	Modified: Percentage of cycled and/or renewable content, by weight, is equal to or higher than industry averages and/or is consistent with common practice. Alternative: Limitations that prevent achievement of this requirement are publicly reported. → <i>See comment at Bronze level for similar requirement.</i>

	<p>Modified: ≥ 70% of materials by weight are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable). → <i>See comment at Bronze level for similar requirement.</i></p> <p>New: A strategy for improving product circularity is developed including plans for:</p> <ul style="list-style-type: none"> • Increasing the amount of post-consumer recycled content and/or responsibly sourced renewable material, as relevant to the product type, • Implementing a circular opportunity or innovation, and • Improving the product’s design for disassembly (if relevant).
Gold	<p>Modified: Percentage of cycled and/or renewable content, by weight, is equal to or higher than industry averages and/or is consistent with common practice. Alternative: Limitations that prevent achievement of this requirement are publicly reported. → <i>See comment at Bronze level for similar requirement.</i></p> <p>≥ 90% of materials by weight:</p> <ul style="list-style-type: none"> • Modified: Are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable) → <i>See comment at Bronze level for similar requirement.</i> • New: Support high-value cycling. This means that the materials are of high quality and are likely to retain their value for subsequent use. • New: If relevant, parts containing these materials are designed for easy disassembly. <p>New: The strategy has been implemented including:</p> <ul style="list-style-type: none"> • Increased use of post-consumer and/or responsibly sourced renewable material as relevant to the product type. Alternative: Limitations that prevent increased use are publicly reported, and • A circular opportunity or innovation. <p>Modified: The product is actively cycled (recovered and processed) and/or a program is implemented to increase the cycling rate or quality of the product’s materials after use. (Both are required for short-use phase products; one is required for long-use phase products.) For select single-use plastic products, a minimum cycling rate of 50% is achieved. → <i>Short-use phase products must be actively cycled at Gold under V4.0 while this is a Platinum level requirement under V3.1 (for all products). The remainder of the requirements listed here are new.</i></p>
Platinum	<p>New: At least two intended cycling pathways are defined for the product and its materials.</p> <p>Modified: Percentage of cycled and/or renewable content, by weight, has reached the technically feasible maximum. → <i>See comment at Bronze level for similar requirement.</i></p> <p>Modified: ≥ 99% of materials by weight are compatible with the intended cycling pathway(s) (i.e., recyclable, compostable, or biodegradable). If relevant, parts containing these materials are designed for easy disassembly. → <i>See comment at Bronze level for similar requirement.</i></p> <p>Modified: The product is actively cycled in an amount consistent with the product’s use phase (the shorter the use phase, the higher the minimum percentage required) and a program is implemented to increase the cycling rate or quality of the product’s materials after use. (Not required for long-use phase products that have been on the market for a time period that is less than the product’s average use phase.) → <i>Active cycling must be demonstrated at the Platinum level in both V3.1 and V4.0. The requirement to implement a program to increase cycling rates or quality is newly introduced in V4.0.</i></p>

New: Cycling rates and quality are monitored over time, and an increase in cumulative cycling rate or quality is demonstrated.

Clean Air & Climate Protection

The V3.1 Renewable Energy & Carbon Management category has been renamed Clean Air & Climate Protection. All V3.1 Renewable Energy & Carbon Management requirements have been incorporated into V4.0 with modification. Several new requirements and options have also been added. The most notable new and modified requirements are:

- The V3.1 Silver level renewable electricity and offset targets of 5% (applicable to the final manufacturing stage) have been moved to the Bronze level under V4.0 and the V4.0 Silver level targets have been increased to 20%. Note that the offset targets in V3.1 have been incorporated into the greenhouse gas emissions targets under V4.0.
- The V4.0 Bronze, Silver, and Gold level renewable electricity and greenhouse gas emissions targets (applicable to the final manufacturing stage) may be reduced through a credit for third-party verified performance improvement(s).
- The V4.0 Bronze, Silver, and Gold level targets may alternatively be met via financial support of a climate-relevant public policy initiative and/or investments in emissions reduction projects on-site.
- A new method for giving credit for the use of bioenergy produced from fuels that would otherwise be categorized as waste has been introduced. The credit reduces the amount of offsets that would otherwise have to be purchased to meet the targets (see the standard for further information).
- At the Gold level and Platinum levels respectively, 25% and >100% of total electricity used in the final manufacturing stage must be on-site renewable electricity or procured via long term power purchase agreements (PPAs) supporting new renewable electricity installations. An alternative for the Gold level only is to procure 100% renewable electricity for all final manufacturing stage facilities.
- At the V4.0 Platinum level, carbon offsets are primarily accepted to compensate for non-energy related greenhouse gas emissions.
- The V3.1 Platinum level requirement to quantify embodied emissions has been moved to the V4.0 Silver or Gold level depending on product type, and a third-party critical review is now required either at Gold or Platinum (also depending on product type).
- Transparency requirements applicable to the final manufacturing stage and embodied greenhouse gas emissions have been added at the Bronze and Gold levels, respectively.
- The V3.1 Platinum level target of 5% for addressing embodied emissions has been increased to 25% and moved to the V4.0 Gold level, while the V4.0 Platinum level target has been increased to 100%.

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	Modified: Final manufacturing facilities comply with air emissions regulations or guidelines - i.e., permits, international guidelines, or industry best practice. → <i>This is now explicitly noted in the CA&CP category rather than being combined with the general V3.1 Basic level requirement to comply with all applicable regulations.</i>
	No change: Annual electricity use and greenhouse gas emissions associated with the final manufacturing stage of the product have been quantified. → <i>Required at the V3.1 Basic level.</i>

	<p>Modified: A strategy for increasing use and/or procurement of renewable electricity and addressing greenhouse gas emissions has been developed. The strategy includes near and mid-term targets. → <i>Minor changes have been made to the required strategy elements.</i></p>
	<p>Modified: 5% target(s)* for procuring or producing renewable electricity and/or addressing greenhouse gas emissions have been achieved. Applicable to final manufacturing stage electricity and emissions only. → <i>The 5% targets have been moved to the Bronze level (this is a Silver level requirement under V3.1). Alternative methods of achieving the targets have been introduced.</i></p>
	<p>New: Products that use energy during the use phase (e.g., appliances) or that greatly impact the energy efficiency of buildings (e.g., windows, insulation) are certified using a C2CPII-recognized energy efficiency standard or similar, if available.</p>
	<p>New: Greenhouse gas emissions data for the applicant company, all final manufacturing stage facilities, or the final manufacturing stage of the product are made available to stakeholders.</p>
Silver	<p>Modified: For construction products and building materials used to construct primary building elements, the embodied emissions associated with the product from cradle to gate or through end of use have been quantified. → <i>This requirement has been moved from the V3.1 Platinum level to the V4.0 Silver level.</i></p>
	<p>New: The renewable electricity and GHG reduction strategy includes long-term target(s) in addition to the near and mid-term targets.</p>
	<p>Modified: 20% target(s)* for procuring or producing renewable electricity and/or addressing greenhouse gas emissions have been achieved. Applicable to final manufacturing stage electricity and emissions only. Alternative: 25% of the embodied emissions associated with the product from cradle to gate or through end of use are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). Note: This is required at the Gold level in all cases. → <i>The Silver level targets applicable to the final manufacturing stage have been increased from 5% to 20%. Alternative methods of achieving the targets have been introduced.</i></p>
Gold	<p>Modified: For all product types, the embodied emissions associated with the product from cradle to gate or through end of use have been quantified. → <i>This requirement has been moved from the V3.1 Platinum level to the V4.0 Gold level.</i></p>
	<p>New: For construction products and building materials used to construct the primary building elements, a third-party critical review of the quantification of embodied greenhouse gas emissions is conducted, and an Environmental Product Declaration produced. For other product types, third-party verification or an internal review is conducted.</p>
	<p>Modified: 50% target(s)* for procuring or producing renewable electricity and/or addressing greenhouse gas emissions have been achieved. Applicable to final manufacturing stage electricity and emissions only. → <i>Alternative methods of achieving the targets have been introduced.</i></p> <p>New: 50% of the renewable electricity (25% of total electricity used) is either produced on-site or procured through long-term power purchase agreements supporting new renewable electricity installations. Alternative: Renewable electricity procurement matches 100% of electricity used at final manufacturing facilities.</p>

	<p>New: Embodied greenhouse gas emissions data are made available to stakeholders.</p> <p>Modified: Blowing agents used in the manufacture of the product’s foam materials (any foam > 1% of product by weight) have low to no global warming potential and no ozone depletion potential. → <i>Blowing agents are addressed in the Material Health category under V3.1. This issue has been moved to the CA&CP category under V4.0. In addition, the threshold for review has been increased to 1% compared to 0.01% under V3.1.</i></p> <p>Modified: 25% of the embodied emissions associated with the product from cradle to gate or through end of use are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). → <i>This requirement has been moved from the V3.1 Platinum level to the V4.0 Gold level and the target has been increased from to 25% in V4.0 from 5% under V3.1.</i></p>
Platinum	<p>New: For all product types, a third-party critical review of the quantification of embodied greenhouse gas emissions associated with the product from resource extraction through end of use is conducted, and an Environmental Product Declaration is produced.</p> <p>Modified: > 100% of electricity is renewably sourced. The electricity is produced on site or procured through long-term power purchase agreements supporting new renewable electricity installations. For other on-site energy demands (if any), eligible sources of bioenergy are used. > 100% of any remaining greenhouse gas emissions are offset. Applicable to the final manufacturing stage electricity and emissions only. → <i>Carbon offsets are accepted only in certain scenarios, and unbundled renewable energy attribute certificates that are not associated with long term procurement agreements are no longer accepted at the Platinum level under V4.0 as a means of encouraging more direct action to use renewable energy and reduce emissions. Under V3.1, the Platinum level targets could be met via carbon offsets, on site renewables, and/or bundled or unbundled renewable energy attribute certificate procurement.</i></p> <p>Modified: 100% of the embodied emissions associated with the product from cradle to gate or through end of use are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). → <i>The percentage has been increased to 100% in V4.0 from 5% under V3.1.</i></p>

*Depending on the achievement level, the “targets” may apply to renewable electricity procurement or on-site production and use, performance improvements (emissions intensity reductions), absolute emissions reductions, use of eligible bioenergy sources, purchase of carbon offsets, and/or financial donations or investments.

Water & Soil Stewardship

The V3.1 Water Stewardship category has been renamed and refocused on Water and Soil Stewardship. The focus on both water and soil has been accomplished throughout the category via requirements to assess and optimize both effluent and sludge (both of which have high potential to impact soil quality) and implement best practices and technologies to conserve both water and soil (quantity and quality) at final manufacturing facilities and in the supply chain. All V3.1 Water Stewardship requirements have been incorporated into V4.0 in modified form. Many of the requirements in this category are either modified or newly introduced. The most notable new and modified requirements are:

- The V3.1 Basic level permit compliance requirement has been extended to include independently operated effluent treatment facilities at the Bronze level, and certain tier one suppliers at the Silver level.
- Several requirements, including the permit compliance requirements, apply not only to the final manufacturing stage but also to suppliers of key materials that make up $\geq 25\%$ of the product by weight or by cost. Key materials are defined as materials that are typically produced using pollutant intense or high volume water use processes.
- A requirement to provide adequate drinking water, sanitation, and hygiene (WASH) at all final manufacturing stage facilities is newly introduced.
- Requirements to implement conservation best practices and technologies at final manufacturing stage facilities expected to have the greatest water-related impacts are newly introduced at the V4.0 Silver and Gold levels. These requirements also apply to key materials at the V4.0 Gold level.
- Product relevant chemicals entering effluent and sludge must now comply with the Core Restricted Substances List at the Bronze level.
- Aligning with the V4.0 Material Health category, product relevant chemicals entering effluent may not include CMRs, PBTs, or vPvBs or substances of equivalent concern at the Silver level (under V3.1 CMRs and PBTs in effluent are addressed at the Gold level).
- Transparency requirements are newly introduced at the Gold and Platinum levels.
- A water stewardship positive impact project has been added to the V4.0 Gold level.
- The Platinum facility level requirements have been altered. A comprehensive effluent quality management system and effluent optimization are required.

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	<p>Modified: Local and product relevant water and soil issues are characterized (Required for final manufacturing stage facilities and select tier 1 suppliers of key materials). → <i>Changes and additions have been made to the issues that must be characterized for this requirement (note: this requirement is referred to as “Local and Business-specific Issues” in V3.1 and is required at the Basic level.)</i></p>
	<p>Modified: Final manufacturing facilities comply with water quality regulations or guidelines – (i.e., permits, international guidelines, or industry best practice). → <i>This requirement is similar to the V3.1 Basic level regulatory compliance requirements. However, it has been extended to include externally owned and operated effluent treatment plants.</i></p>
	<p>New: Product relevant chemicals entering effluent or sludge comply with the relevant restrictions on the Core Restricted Substances List (RSL). (Required for final manufacturing stage.)</p>
	<p>Modified: Water use at final manufacturing stage facilities is quantified. → <i>This requirement is nearly identical to the V3.1 Bronze level requirements. Slight changes have been made to the data that must be collected.</i></p>
	<p>New: Adequate drinking water, sanitation, and hygiene are provided at final manufacturing stage facilities.</p>
	<p>New: A strategy for achieving the Silver level water and soil conservation requirements has been developed. For facilities using high volumes of water in stressed locations, the strategy includes water use reduction targets. Progress is reported at recertification.</p>

Silver	<p>New: Manufacturing facilities of tier 1 suppliers comply with water quality regulations or guidelines (i.e., permits, international guidelines, or industry best practice). (Required for tier 1 suppliers of key materials associated with pollutant intense processes.)</p>
	<p>New: The Bronze level water and soil conservation strategy has been implemented including:</p> <ul style="list-style-type: none"> • At least one conservation technology or best practice at facilities expected to have the greatest water- or soil-related impacts. (Required for final manufacturing facilities with high volume processes in stressed locations and facilities with pollutant intense processes.) • One additional action to conserve water and/or soil either at final manufacturing facilities or in the supply chain. (Required when there are any facilities with high volume or pollutant intense processes and/or in stressed locations, or key materials in scope.)
	<p>Modified: Product relevant process chemicals entering effluent and sludge are defined and assessed. (Required for final manufacturing stage.) → <i>This requirement is similar to the V3.1 Silver level requirement to assess all product relevant chemicals entering effluent. Under V4.0 the scope is reduced to include only product relevant process chemicals because intentional product inputs that enter effluent and sludge are already required to be assessed per the Material Health category at the Silver and Gold levels.</i></p>
	<p>New: Product relevant effluent and sludge does not contain recognized PBTs, vPvBs, or EU CLP Cat.1 and 2 CMRs, or substances causing an equivalent level of concern, or exposure via effluent and sludge is unlikely or expected to be negligible. (Required for final manufacturing stage.)</p>
	<p>New: Water use data are made available to stakeholders.</p>
	<p>New: A strategy for achieving the Gold level water and soil conservation requirements has been developed. Progress is reported at recertification.</p>
Gold	<p>New: The Silver level water and soil conservation strategy has been implemented including:</p> <ul style="list-style-type: none"> • Conservation technologies and best practices at facilities expected to have the greatest water- and/or soil-related impacts. (Required for all final manufacturing facilities with high volume or pollutant intense processes and/or in stressed locations.) • Actions to conserve water and/or soil in the supply chain, including the use of certified materials, working as part of multi-stakeholder group(s), and/or working directly with suppliers to implement water and soil stewardship requirements and address the processes of concern. (Required for key materials in scope.)
	<p>Modified: Product relevant chemicals in effluent are assessed and optimized (i.e., none are x-assessed or grey-rated). (Required for the final manufacturing stage and for key materials where pollutant intense processes occur at tier 1, or at any tier for leather, metal finishing, pulp/paper and textiles.) → <i>This is required for the final manufacturing stage in both V3.1 and V4.0. Under V4.0 the requirement also applies to key materials obtained from select tier 1 suppliers or any tier for the list of specific materials above.</i></p>
	<p>New: A positive impact project that addresses local and/or product relevant water and/or soil issues has been implemented.</p>
Platinum	<p>New: Water quality data are made available to stakeholders.</p>

	<p>New: Impact of positive impact project demonstrated.</p>
	<p>New: For final manufacturing stage facilities:</p> <ul style="list-style-type: none"> ● A comprehensive effluent quality management system has been established, and ● Effluent and sludge produced as a result of all manufacturing processes used at the facility are optimized. <p>→ Replaces the V3.1 Platinum facility-level requirement that effluent meet drinking water quality standards.</p>

Social Fairness

All V3.1 Social Fairness requirements have been incorporated into V4.0 with modification. The majority of the requirements in this category are either modified or newly introduced in V4.0. The requirements are now prescriptive (rather than providing options for achievement as is done in V3.1 for the Silver through Platinum levels) and based on a management systems approach. The lower achievement levels aim to ensure that basic human rights are upheld while Gold and Platinum represent best in class performance on social fairness. The most notable new and modified requirements are:

- The V3.1 Basic level risk assessment that considers the final manufacturing stage and its direct (tier 1) suppliers has been extended to include risk assessment for the applicant company.
- A company policy, based on international human rights standards, is newly required at the V4.0 Bronze level and performance on key policy elements must be measured.
- A strategy to fully implement the policy is required at the Bronze level, and management systems that facilitate policy implementation must be in place at the Silver level.
- Requirements for grievance mechanism(s) to be made available to company and final manufacturing stage facility employees and other relevant stakeholders are newly introduced.
- Transparency and stakeholder engagement requirements are newly introduced at the Silver and Gold levels respectively.
- A responsible sourcing management system requirement is newly introduced at the Gold level.
- Materials associated with high risk of child labor or forced labor must be certified to a standard addressing these concerns or an equivalent alternative must be in place at the Gold level.
- The V3.1 Platinum level requirement to have a third-party facility level social audit has been replaced with a set of requirements that aim to recognize above and beyond achievement on social fairness. (Note that third-party social audits will still receive credit as a method of demonstrating that certain requirements have been fulfilled across the category. The credit received will vary depending on the social audit, program, or certification under consideration.)

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	<p>Modified: Human rights risks are assessed for the company, final manufacturing stage, and direct suppliers to the final manufacturing stage (tier 1). Progress is made on assessing risks beyond tier 1 (i.e., tier 2 and beyond). → A requirement to identify risks at the <u>company level</u> has been added to the V3.1 Basic requirements to identify risks relevant to the final manufacturing stage facilities and certified product's supply chain. Progress on identifying risks after tier 1 is now required.</p>

	<p>New: A human rights policy based on international human rights standards and an understanding of the company’s risk areas is in place.</p> <p>Modified: A strategy for implementing the human rights policy is developed. At recertification, progress toward achieving the strategy is measured. → <i>Under V4.0 the focus of the strategy is on policy implementation in general while under V3.1 the focus is on addressing high-risk issues (if any) that were identified per the Basic level risk-assessment.</i></p> <p>New: For the applicant company and final manufacturing stage facilities, performance against the human rights policy is measured and corrective actions for select issues (e.g., child labor, forced labor) are complete. Corrective actions are planned for any other poor performance issues and, at recertification, progress is demonstrated.</p> <p>New: Company executives demonstrate commitment and support for establishing, promoting, maintaining, and improving a culture of social fairness.</p>
Silver	<p>Modified: Social audit performance data are requested from tier 1 suppliers in high-risk locations. At recertification, progress is made on supply chain data collection and corrective actions if needed. Corrective actions for select issues (e.g., child labor, forced labor) are complete. → <i>V4.0 requires all applicants to request performance data from tier 1 suppliers at the Silver level. Under V3.1 this is optional until the Platinum level and risk level is not considered.</i></p> <p>Modified: Management systems support the implementation and oversight of the human rights policy within company operations. → <i>V4.0 requires that all applicants have a comprehensive management system in place to ensure implementation of the human rights policy. Under V3.1, management procedures for addressing high-risk issues (if any) must be provided.</i></p> <p>New: A grievance mechanism permits company employees and other stakeholders to obtain redress for negative human rights impacts.</p> <p>Modified: The company has implemented a positive social impact project that measurably improves the lives of employees, the local community, or a social aspect of the value chain. → <i>This requirement is very similar to the V3.1 Innovative Social Project requirement which is optional at Silver and Gold, and required at Platinum.</i></p> <p>New: The company uses open and transparent governance and reporting, making information on how human rights risks are managed and adverse impacts are addressed publicly available.</p>
Gold	<p>New: Human rights risks are assessed for the product’s components and raw materials (regardless of tier).</p> <p>New: Materials associated with high risk of child or forced labor or support of conflict are certified to a C2CPH-recognized certification program or an equivalent alternative is in place. If a certification program is not available, a traceability exercise is conducted upon recertification. → <i>Certifications of this type can receive credit under the V3.1 “Material or issue-specific audit” requirement but are not mandatory.</i></p> <p>New: Responsible sourcing management systems support the implementation and oversight of the policy within the product’s supply chain.</p>

	New: A grievance mechanism permits contract manufacturer employees and other stakeholders to obtain redress for negative human rights impacts.
	New: An assessment has been conducted to determine the impact of the positive impact project using quantitative metric(s). Measurable progress is demonstrated at recertification.
	New: The company incorporates stakeholder engagement and feedback into human rights risk management. Stakeholder feedback informs strategy and operations.
Platinum	New: The company is collaborating to develop and scale solutions to an intractable social issue within the value chain of the product.
	New: The company fosters a diverse, inclusive, and engaged work environment in which social fairness operates as a core part of recruitment, training, remuneration, performance evaluation, and incentive structures.

Packaging for Certified Products

New Material Health and Product Circularity requirements are introduced at the V4.0 Bronze level for the packaging of certified products. The new requirements incorporate the V3.1 requirements for the packaging of formulated consumer products to comply with the V3.1 banned list. The requirements apply to all product packaging with the exceptions of (1) materials used exclusively for shipping the product and (2) packaging of products sold exclusively as inputs for other products.

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	<p>New: Primary packaging materials for fast-moving, formulated consumer goods (e.g., cosmetics, household cleaners), and for any product, packaging materials that are intended to be used with the product or for the application or dispensing of the product (e.g., mascara brush, lipstick tube, or other types of applicators, paper towel paper cores, tape dispenser), must comply with:</p> <ul style="list-style-type: none"> • The Restricted Substances List and organohalogen restriction (per the Material Health category), and <u>two</u> of the following requirements (see standard section 9 for further detail): • The sum of post-consumer cycled and renewable content is $\geq 20\%$ or equal to the percentage of cycled and renewable content required for the Silver level in Product Circularity. • Materials are compatible with municipal cycling systems; materials intended for composting are compostable. • The packaging is reusable/refillable, is part of a refill system, and/or has a product-specific take-back program. • The applicant has demonstrated efforts to reduce the amount or weight of packaging materials for the certified product.
	<p>New: Any other packaging materials contained in one sales unit as it is offered to the end user or consumer (e.g. toothpaste box, outer box containing individually wrapped product units) must comply with the organohalogen restriction (per the Material Health category), and one of the four circularity requirements listed above.</p>

Animal Welfare Requirements

New requirements for animal materials have been added at the Silver level.

Level	Version 4.0 Requirements and Explanation of Modifications Compared to Version 3.1
Bronze	No change: Company policy forbids animal abuse including practices of high concern relevant to the species (e.g., mulesing, live plucking), requires provision of the five freedoms, and includes provisions for immediately addressing cases where it becomes known that abuse is occurring. → <i>Required at the V3.1 Basic level.</i>
	No change: A strategy for implementing a mechanism to ensure adherence to the policy is developed. → <i>Required at the V3.1 Basic level.</i>
	No change: Progress on implementing the policy and mechanism are demonstrated.
Silver	New: Material is certified to a C2CPH-recognized animal welfare certification or equivalent.

Private Label Product Requirements

New requirements have been introduced for Private Label products. Most notably, applicants may select to either disclose that the product is certified as a private label (via the Cradle to Cradle Certified Product Registry and certificate), or meet all company-level program requirements. *Note: A private label product is a product that is identical in every way to another product that is currently Cradle to Cradle Certified (i.e., the parent product), except for brand name and packaging.*