CRADLE TO CRADLE CERTIFIED™
PRODUCT STANDARD

VERSION 3.1 TO DRAFT VERSION 4
COMPARISON – SUMMARY OF MODIFICATIONS AND NEW REQUIREMENTS
Products Eligible for Certification

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. Following from these high level exceptions, the specific list of products that are not eligible for certification has been extended to include:

- Products that contain live organisms (e.g. plants and seeds)
- Cleaning products containing antimicrobials that contribute to antibiotic resistance, and
- Products that are designed/intended to be non-circular (e.g. non-composable single use plastic bags, plastics containing oxo-biodegradable additives, and products containing microbeads).

General Requirements

Nearly all of the General Requirements listed below are new to v4. 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.

<table>
<thead>
<tr>
<th>Level</th>
<th>Draft Version 4 Requirements and Explanation of Modifications Compared to v3.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic</td>
<td><strong>New:</strong> A certification compliance assurance system is in place.</td>
</tr>
<tr>
<td></td>
<td><strong>New:</strong> Environmental risks are assessed for the final manufacturing stage and for the product.</td>
</tr>
<tr>
<td></td>
<td><strong>New:</strong> An environmental policy based on the environmental risks associated with the final manufacturing stage and the product is in place.</td>
</tr>
<tr>
<td>Bronze</td>
<td><strong>New:</strong> A strategy is developed for implementing the environmental policy at all final manufacturing stage facilities.</td>
</tr>
<tr>
<td></td>
<td><strong>New:</strong> At least one measurable improvement has been made in at least one of the five program categories. (Required at Bronze and Silver level recertification.)</td>
</tr>
<tr>
<td>Silver</td>
<td><strong>New:</strong> Management systems are in place that support the implementation and oversight of the environmental policy at final manufacturing stage facilities.</td>
</tr>
<tr>
<td></td>
<td><strong>Modified:</strong> Environmental performance data are collected and analyzed to measure progress towards achieving the strategy. → This requirement builds on the v3.1 and related v4 requirements to collect data on energy, emissions, and water use. Additional data may have to be collected depending on the outcome of the Basic level environmental risk assessment. Data analysis is newly required under v4.</td>
</tr>
<tr>
<td>Gold</td>
<td><strong>New:</strong> Responsible sourcing management systems are in place that support the implementation and oversight of the environmental policy within the product’s supply chain.</td>
</tr>
<tr>
<td>Platinum</td>
<td><strong>New:</strong> 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.</td>
</tr>
</tbody>
</table>

Material Health

The general requirement framework in this category has been preserved. All v3.1 Material Health requirements have been incorporated into v4, many with at least some modification. Several new requirements have also been added. The most notable new and modified requirements in v4 are:

- The v4 Basic Level Restricted Substance List includes many more substances compared to the v3.1 Banned List, aligning with leading regulatory restrictions.
- All organohalogen substances are newly restricted at the Basic level. The restriction includes several substances that are on the v3.1 Banned List and all other organohalogen that are restricted at the v3.1 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, except for minor commodity type components such as fasteners.
- 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 along with the final v4 standard in 2020.

<table>
<thead>
<tr>
<th>Level</th>
<th>Draft Version 4 Requirements and Explanation of Modifications Compared to v3.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic</td>
<td><strong>Modified:</strong> Product is in compliance with the Basic Level Restricted Substances List (RSL). → The RSL, which is based on leading regulatory restrictions, replaces the v3.1 Banned List.</td>
</tr>
<tr>
<td></td>
<td><strong>Modified:</strong> Product is in compliance with requirements for the avoidance of organohalogens. → Organohalogens as a group are restricted. Under v3.1, a short list of organohalogens are restricted at Basic level and the rest are restricted at Gold level.</td>
</tr>
<tr>
<td></td>
<td><strong>No change:</strong> Product is 100% characterized by generic material.</td>
</tr>
<tr>
<td>Bronze</td>
<td><strong>Modified:</strong> Product is ≥ 75% assessed (complete formulation information collected for 100% of materials released directly into the biosphere). → New methods for calculating percentage assessed are introduced. However, for multi-material products, the v3.1 method may still be used.</td>
</tr>
<tr>
<td></td>
<td><strong>Modified:</strong> Strategy developed to phase-out or optimize all x-assessed or grey-rated chemicals. → Minor changes have been made to the required strategy elements.</td>
</tr>
<tr>
<td>Silver</td>
<td><strong>Modified:</strong> Product is ≥ 95% assessed (complete formulation information collected for 100% of materials released directly into the biosphere). → New methods for calculating percentage assessed are introduced (see comment at Bronze).</td>
</tr>
<tr>
<td></td>
<td><strong>Modified:</strong> Product does not contain recognized PBTs, vPvBs, or EU CLP Cat.1 &amp; 2 CMRs, or exposure is unlikely or expected to be negligible. → PBTs and vPvBs are restricted at the Silver level under v4 while only PBTs are restricted at Gold level under v3.1. CMRs listed as Cat. 1 &amp; 2 in EU CLP regulation are restricted at Silver level under v4 while CMRs as defined per the Cradle to Cradle Certified Material Health Assessment Methodology are restricted at Silver level under v3.1.</td>
</tr>
<tr>
<td></td>
<td><strong>Modified:</strong> Product has low VOC emissions (required for products permanently installed in buildings). → Testing to demonstrate low VOC emissions is required at the Silver level under v4. 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.</td>
</tr>
</tbody>
</table>
New: Product complies with VOC content limits (required for liquid and aerosol consumer and construction products).

Gold

No change: 100% of homogeneous materials subject to review are assessed (i.e. none have a grey rating due to insufficient data).

No change: Product is optimized for material health (i.e., all x-assessed chemicals replaced or phased out).

Modified: Product has very low VOC emissions or is inherently non-emitting (required for products permanently installed in buildings). → More stringent emissions limits apply at the Gold level under v4 compared to v3.1.

Platinum

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.

New: ≥ 75% of the product by weight is assessed as A/a or B/b.

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. A strategy developed to increase percentages over time.

OR

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.

Product Circularity

The v3.1 Material Reutilization category has been renamed Product Circularity. All v3.1 Material Reutilization requirements have been incorporated into v4, but have been modified. The majority of the requirements in this category are newly introduced in v4. The most notable new and modified requirements are:

- Circularity metrics and information necessary for proper product handling at end-of-use must be made publicly available via the Materials Passport.
- The v3.1 Material Reutilization score has been decoupled into two sets of progressively more rigorous requirements to:
  - Use materials that are compatible with intended cycling scenarios (i.e. recyclable, compostable, biodegradable), and
  - Use cycled and/or renewable materials or communicate why this is not feasible.
- 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 Gold for short use phase products and at Platinum for long use phase products. The amount of cycling that must occur is newly defined based on the length of the use phase.

Basic

No change: Appropriate cycle(s) for all materials are defined (technical and/or biological). → This requirement was moved to the v4 Product Circularity category from the v3.1 Material Health category.
<table>
<thead>
<tr>
<th>CRADLE TO CRADLE CERTIFIED PRODUCT STANDARD // Version 3 – 4 Comparison</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New:</strong> Applicant is involved in a circularity initiative to gain an understanding of relevant cycling infrastructure availability.</td>
</tr>
<tr>
<td><strong>New:</strong> Materials Passport: Circularity metrics and key information necessary for proper product handling at end-of-use are publicly available. More information and increased transparency are required at higher certification levels.</td>
</tr>
<tr>
<td><strong>New:</strong> Intended cycling scenario(s) for the product and its materials are defined.</td>
</tr>
<tr>
<td><strong>New:</strong> A plan has been created to address challenges with the cycling infrastructure for the product at the end of its first use; potential cycling partners have been identified.</td>
</tr>
<tr>
<td><strong>Modified:</strong> ≥ 50% of materials by weight are compatible with the intended cycling scenario(s) (i.e. recyclable, compostable, or biodegradable). → <em>The use of recyclable, compostable, and biodegradable materials is given credit via the Material Reutilization (MR) score under v3.1.</em> The MR score considers recycled and/or renewable content plus recyclability and/or compostability. In v4, these topics are decoupled and addressed separately. In addition, in v4, materials in technical cycles must be compatible for recycling, rather than recyclable in theory.</td>
</tr>
<tr>
<td><strong>Modified:</strong> Select product and material types contain cycled and/or renewable content. Alternative: Limitations that prevent the applicant from meeting this requirement are publicly reported. → <em>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.</em></td>
</tr>
<tr>
<td><strong>New:</strong> 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.</td>
</tr>
<tr>
<td><strong>Modified:</strong> ≥ 70% of materials by weight are compatible with the intended cycling scenario(s) (i.e. recyclable, compostable, or biodegradable). → <em>See comment at Bronze level for similar requirement.</em></td>
</tr>
<tr>
<td><strong>Modified:</strong> Percentage of cycled and/or renewable content, by weight, is equal to or higher than industry averages. Alternative: Limitations that prevent the applicant from meeting this requirement are publicly reported. → <em>See comment at Bronze level for similar requirement.</em></td>
</tr>
<tr>
<td><strong>New:</strong> A strategy for improving product circularity is developed including plans for:</td>
</tr>
<tr>
<td>● Implementing a circular opportunity or innovation</td>
</tr>
<tr>
<td>● Improving the product’s design for disassembly (if relevant)</td>
</tr>
<tr>
<td>● Increasing the amount of post-consumer recycled content and/or responsibly sourced renewable material, as relevant to the product type.</td>
</tr>
<tr>
<td>≥ 90% of materials by weight:</td>
</tr>
<tr>
<td>● <strong>Modified:</strong> Are compatible with the intended cycling scenario(s) (i.e. recyclable, compostable, or biodegradable) → <em>See comment at Bronze level for similar requirement.</em></td>
</tr>
<tr>
<td>● <strong>New:</strong> Support high-value cycling. This means that the materials are of high quality and are likely to retain their value for subsequent use.</td>
</tr>
<tr>
<td><strong>Modified:</strong> 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.) → <em>Short use-phase products must be actively cycled at Gold under v4 while this is a Platinum level requirement under v3.1 (for all products).</em> The remainder of the requirements listed here are new.</td>
</tr>
</tbody>
</table>
**Modified:** Percentage of cycled and/or renewable content, by weight, is consistent with values achieved by industry leaders for the product type. Alternative: Limitations that prevent the applicant from meeting this requirement are publicly reported. → **See comment at Bronze level for similar requirement.**

**New:** The strategy has been implemented including:
- A circular opportunity or innovation,
- Product is designed for easy disassembly (if relevant), and
- 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.

**New:** At least two intended cycling scenarios are defined for the product and its materials.

**Modified:** ≥ 99% of materials by weight are compatible with the intended cycling scenario(s) (i.e. recyclable, compostable, or biodegradable). → **See comment at Bronze level for similar requirement.**

**Modified:** The product is actively cycled 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.) → **Active cycling must be demonstrated at Platinum in both v3.1 and v4. The requirement to implement a program to increase cycling rates or quality is newly introduced in v4.**

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

**New:** The product is actively cycled in an amount consistent with the product’s use-phase (the shorter the use phase, the higher the amount).

**Modified:** Percentage of cycled and/or renewable content, by weight, has reached the technically feasible maximum. Alternative: Limitations that prevent the applicant from meeting this requirement are publicly reported. → **See comment at Bronze level for similar requirement.**

### Renewable Energy & Climate

The v3.1 Renewable Energy & Carbon Management category has been renamed Renewable Energy & Climate. All v3.1 Renewable Energy & Carbon Management requirements have been incorporated into v4, the majority with at least some 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% have been moved to the Bronze level under v4, and the v4 Silver level targets have been increased to 20%.
- The v4 Bronze, Silver, and Gold level renewable and offset targets may be reduced through a credit for third-party verified performance improvement(s).
- 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 and Platinum levels, half of the renewable electricity target (half of 50% and half of > 100%, respectively) must be met through the use of either on-site produced renewable electricity or voluntary third-party certified or verified electricity sources.
- The v3.1 Platinum level requirement to quantify embodied emissions has been moved to the v4 Gold level and a third-party critical review is now required.
- The v3.1 Platinum level target of 5% for addressing embodied emissions has been moved to the v4 Gold level and the v4 Platinum level target has been increased to 100%.

<table>
<thead>
<tr>
<th>Level</th>
<th>Draft Version 4 Requirements and Explanation of Modifications Compared to v3.1</th>
</tr>
</thead>
</table>
| Basic | Modified: Manufacturing facilities comply with permitted air emissions limitations.  
  This is now explicitly noted in the REC category rather than being combined with the general v3.1 requirement to comply with all applicable regulations. |
| Bronze | No change: Annual electricity use and/or greenhouse gas emissions associated with the final manufacturing stage of the product have been quantified.  
New: The cost of moving to the next certification level in the Renewable Energy & Climate category has been estimated. The cost estimate requirement is part of the standard section on strategy and is meant to inform development of the full strategy at the Bronze level. |
| Silver | Modified: A strategy for increasing use of renewable electricity and reducing greenhouse gas emissions has been developed. The strategy includes near and mid-term targets. Minor changes have been made to the required strategy elements.  
New: The renewable electricity and GHG reduction strategy includes long-term target(s) in addition to the near and mid-term targets. |
| Gold  | No change: 50% of electricity is renewably sourced or offset with renewable electricity projects, and 50% of greenhouse gas emissions are offset.  
New: 50% of the renewable electricity (25% of total electricity used) is either voluntary third-party certified or produced on-site. Applicable to final manufacturing stage only.  
New: Alternative: The 50% renewable electricity and offset targets may be reduced by up to 12.5 percentage points (25% of the target) based on verified performance improvement.  
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. Blowing agents are addressed in the Material Health category under v3.1. This issue has been moved to the REC category under v4. In addition, the threshold for review has been increased to 1% compared to 0.01% under v3.1. |
Modified: The embodied emissions associated with the product from cradle to gate have been quantified. → This requirement has been moved from the v3.1 Platinum level to the v4 Gold level. Third-party critical review is newly required under v4.

Modified: 5% of the embodied emissions associated with the product from cradle to gate are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). → This requirement has been moved from the v3.1 Platinum level to the v4 Gold level.

Platinum

No change: > 100% of electricity is renewably sourced or offset with renewable electricity projects, and > 100% of greenhouse gas emissions are offset.

New: 50% of the renewable electricity (50% of total electricity used) is either voluntary third-party certified or produced on-site. Applicable to final manufacturing stage only.

Modified: 100% of the embodied emissions associated with the product from cradle to gate are offset or otherwise addressed (e.g., through projects with suppliers, product redesign, savings during the use phase). → The percentage has been increased to 100% in v4 from 5% under v3.1.

Water Stewardship

All v3.1 Water Stewardship requirements have been incorporated into v4 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.
- Several requirements, including the Basic level permit compliance requirements, apply not only to the final manufacturing stage but also to suppliers of key materials that make up ≥ 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 water conservation best practices and technologies at final manufacturing stage facilities expected to have the greatest water-related impacts are newly introduced at the v4 Silver and Gold levels. These requirements also apply to key materials at the v4 Gold level.
- The v3.1 Silver level requirement to assess product relevant chemicals in effluent has been moved to the v4 Bronze level.
- Aligning with the v4 Material Health category, product relevant chemicals in effluent must be assessed at the Bronze level and may not include CMRs, PBTs, or vPvBs 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 Gold level.
- The Platinum facility level requirements have been altered. A comprehensive effluent quality management system and effluent optimization are required.

<table>
<thead>
<tr>
<th>Level</th>
<th>Draft Version 4 Requirements and Explanation of Modifications Compared to v3.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic</td>
<td>Modified: Local and product-relevant water issues are characterized. → 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)</td>
</tr>
</tbody>
</table>
| Modified: Manufacturing facilities comply with water quality standards or guidelines - i.e. compliance with permits, international guidelines, or industry best practice. (Required for final manufacturing facilities and tier 1 suppliers of key materials associated with pollutant intense processes.) → 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 as well as select tier 1 supplier facilities.  

Modified: Water use is quantified at the facility level. → This requirement has been moved from the v3.1 Bronze level to the v4 Basic level and slight changes have been made to the data that must be collected.  

New: Adequate drinking water, sanitation, and hygiene are provided at final manufacturing stage facilities. |
|---|
| **Bronze**  

**New:** A water stewardship strategy has been developed. The strategy includes:  
- Plans for implementing water conservation best practices and technologies at facilities expected to have the greatest water-related impacts.  
- Water use reduction targets; progress on meeting targets reported at renewal. (Required for facilities using high volumes of water in stressed locations.)  
- Plans for conserving water in the supply chain. (Required for key materials associated with high volume or pollutant intense processes.)  
- Plans for implementing a project that will positively impact local and/or supply chain water issues.  

**Modified:** Product-relevant chemicals in effluent are assessed. A strategy is developed to phase-out or optimize all x-assessed and grey-rated chemicals. (Required for final manufacturing stage.) → This requirement has been moved from the v3.1 Silver level to the v4 Bronze level. |
| **Silver**  

**New:** Progress has been made on implementing the water stewardship strategy.  

**New:** Water use data are made available to stakeholders.  

**New:** Product-relevant effluent does not contain recognized PBTs, vPvBs, or EU CLP Cat.1 & 2 CMRs, or exposure via effluent is unlikely or expected to be negligible. (Required for final manufacturing stage.) |
| **Gold**  

**New:** The water stewardship strategy has been implemented including:  
- Water conservation best practices and technologies at facilities expected to have the greatest water-related impacts.  
- Actions to conserve water 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 stewardship requirements and address the processes of concern. (Required for key materials.)  
- A project that positively impacts local and/or supply chain water issues.  

**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 & textiles.) → This is required for the final manufacturing stage in both v3.1 and v4. Under v4 the requirement also applies to key materials obtained from select tier 1 suppliers or any tier for the list of specific materials above. |
| **Platinum**  

**New:** Water quality data are made available to stakeholders.  

**New:** Impact of positive impact project demonstrated.  

**New:** For final manufacturing stage facilities:  
- 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. |
Social Fairness

All v3.1 Social Fairness requirements have been incorporated into v4 with modification. The majority of the requirements in this category are either modified or newly introduced in v4. The requirements are now prescriptive (rather than providing options for achievement as is done in v3.1 for the Silver through Platinum levels), and are 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 Basic 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.
- 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.
- Transparency requirements are newly introduced 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.)

<table>
<thead>
<tr>
<th>Level</th>
<th>Draft Version 4 Requirements and Explanation of Modifications Compared to v3.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic</td>
<td><strong>Modified:</strong> Human rights risks are assessed for the company, final manufacturing stage, and tier 1 suppliers. At recertification, progress is made on identifying risks from initial resource extraction to tier 1. <strong>A requirement to identify risks at the company level 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.</strong></td>
</tr>
<tr>
<td></td>
<td><strong>New:</strong> A human rights policy based on international human rights standards and an understanding of the company’s risk areas is in place.</td>
</tr>
<tr>
<td></td>
<td><strong>New:</strong> Performance against the human rights policy is measured. Select corrective actions are complete (e.g. addressing cases of child labor or forced labor). Progress on other corrective actions are demonstrated at recertification.</td>
</tr>
<tr>
<td>Bronze</td>
<td><strong>New:</strong> Company executives demonstrate commitment and support for establishing, promoting, maintaining, and improving a culture of social fairness.</td>
</tr>
<tr>
<td></td>
<td><strong>Modified:</strong> A strategy is developed for implementing the human rights policy. <strong>Under v4 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.</strong></td>
</tr>
</tbody>
</table>
**Silver**

*Modified*: Management systems support the implementation and oversight of the human rights policy within company operations. → *v4 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.*

*New*: A grievance mechanism permits company employees and other stakeholders to obtain redress for negative human rights impacts.

*New*: Performance data are analyzed to measure progress towards achieving the strategy.

*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. → *v4 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.*

**Gold**

*New*: Responsible sourcing management systems support the implementation and oversight of the policy within the product’s supply chain.

*New*: A grievance mechanism permits contract manufacturer employees and other stakeholders to obtain redress for negative human rights impacts.

*New*: Materials associated with high-risk of child or forced labor or support of conflict are certified to a C2CPII recognized certification program or an equivalent alternative is in place. If a certification program is not available, a traceability exercise is conducted upon recertification. → *Certifications of this type can receive credit under the v3.1 “Material or issue-specific audit” requirement but are not mandatory.*

*New*: The company uses open and transparent governance and reporting that incorporates stakeholder engagement. Stakeholder feedback informs strategy and operations.

*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. Positive impact is demonstrated at recertification. → *This requirement is very similar to the v3.1 Innovative Social Project requirement which is optional at Silver and Gold, and required at Platinum. A requirement to measure and demonstrate impact upon recertification has been introduced in v4.*

**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.

---

**Product and Material Type-specific Requirements**

New requirements are introduced at the v4 Basic level for single-use plastic products and for the packaging of formulated consumer products. New requirements for animal materials have been added at the Silver level.

<table>
<thead>
<tr>
<th>Level</th>
<th>Draft Version 4 Requirements and Explanation of Modifications Compared to v3.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basic</td>
<td><em>New</em>: Single-use plastic products: The product is designed for cycling, is recyclable/compostable in municipal cycling systems in 20% of regions where the product is sold, and the product contains post-consumer cycled or renewable content. (All other program requirements also apply at the relevant level)</td>
</tr>
<tr>
<td></td>
<td><em>New</em>: Primary packaging of formulated consumer products:</td>
</tr>
</tbody>
</table>
- The packaging is designed for cycling, is recyclable/compostable in municipal cycling systems in 20% of regions where the product is sold, and the packaging contains post-consumer cycled or renewable content.
- The packaging meets Basic Level RSL requirements.

**Animal materials:**
- **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.
- **No change:** A strategy for implementing a mechanism to ensure adherence to the policy is developed.

<table>
<thead>
<tr>
<th>Bronze</th>
<th>Animal materials:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>No change:</strong> Progress on implementing the policy and mechanism are demonstrated.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Silver</th>
<th>Animal materials:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>New:</strong> Material is certified to a C2CPII approved animal welfare certification or equivalent.</td>
</tr>
</tbody>
</table>

**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.