

Recycled Claim Standard Terms of Reference

The following Terms of Reference (ToR) will be used to guide the work that will be done on the Recycled Claim Standard. The Terms help to define the research to be done, the stakeholders to engage, and the requirements and certification practices of the standard. As we move forward with these steps, we expect to uncover more information about industry interests and practices that may cause us to revise these terms of reference.

All changes will be made with the approval of the Steering Committee and Technical Group, and the full IWG will have the chance to give input.

Purpose

The goal of the RCS is to increase the use of recycled materials.

The objectives of the RCS are to:

- Alignment of recycled definitions across multiple applications.
- Track and trace recycled input materials.
- Provide consumers (both brands and end consumers) with a tool to make informed decisions.
- Provide assurance that materials are actually recycled and in a final product.

Scope

The Recycled Claim Standard is intended for use with any product that contains at least 5% recycled material. Each stage of production is required to be certified, beginning at the recycling stage and ending at the last seller in the final business-to-business transaction. Material collection and material concentration sites are subject to self-declaration, document collection, and on-site visits.

Recycled input validation

- ISO 14021 definition of recycled materials
 - o Must list pre- and post-consumer volumes
 - o Does not include re-use, up-cycling, down-cycling
- Reclaimed Material Declaration Form
- Collection and concentration stages not subject to certification
- Recyclers required to be certified

Chain of Custody

- All RCS certified sites required to meet requirements of Content Claim Standard, “Claimed Material” is recycled material from an approved Reclaimed Material Declaration Form

It will not address:

- Social aspects of processing and manufacturing
- Environmental aspects of processing and manufacturing
- Quality
- Legal compliance

Needs Justification

1. There is no other globally applicable, third-party independent standard that validates recycled material content claims.

2. The RCS is the only standard that aligns verification among all the interested stakeholders.
3. Some companies are not able to meet all of the strict requirements of the GRS, but still need support in their use of recycled materials.

Risk Assessment/Risk Plan

1. Incorrect or inconsistent certification results.
 - *Strong guidance for certification bodies; training, tools*
 - *Key to be transparent and to have a process to capture lessons learned*
2. Deliberate misleading of auditors by sites being certified.
 - *Training of sites being certified, so that they understand the goals of the Standard and buy into the process*
 - *Strong accreditation requirements of CB's*
 - *Ensure that audit points are easily verifiable; give objective measures for auditors to apply*
3. Lack of understanding of standard's requirements by sites being certified.
 - *Training, tools*
4. Introducing increased costs and complication to the supply chain.
 - *Involvement of stakeholders in the development process so that the standard is practical in its application*
 - *Use of CCS to overlap with certification to other TE standards (OCS, GRS, RDS, RWS)*
 - *Encourage brands to push greater volume through narrower supply chains; to keep the cost per unit to a minimum*
 - *There is a lot of basic education to be done to explain the certification processes; give greater support to brands to reach and educate their supply chains*
 - *Use equivalency process to recognize standards that the supply chain is already using*
5. Conflicts with legislation or with other standards
 - *Include disclaimer that local legislation takes precedent*
 - *Research existing standards*
 - *Set up procedures to address any conflicts in the future*
 - *Address Labeling Legislations – for development of our own labeling requirements*
6. Corruption
 - *Sufficient checks and balances in the certification process*
 - *Use of local certifiers to know the underlying issues and behaviours, and to look out for potential problem areas*
7. Standard proliferation, audit fatigue, confusion
 - *Build in recognition of existing standards*
 - *Conduct gap analysis of close standards, including CB-owned standards and country standards for procurement*

- *Create a standard that is globally applicable, to drive the industry towards a single approach*
 - *Have a modular standard – create alignment with existing standards on the core module*
8. Limitations of what can be observed in one audit per year
- *Documentation checks*
 - *Additional unannounced audits*
 - *Random audits*
 - *Worker interviews*

There is some confusion between RCS and GRS, even among users of the standard.

- *Could combine the standards with separate labeling grades.*