



TextileExchange  
Creating Material Change

# Textile Exchange CCS Implementation Manual Version 1.3 - 2013

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## CCS Implementation Manual

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# CONTENTCLAIM STANDARD



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## Introduction

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The CCS Implementation Manual provides interpretations and clarifications for the Content Claim Standard (CCS) family of standards and their supporting documents. All guidance given in the manual is to be considered binding to Certification Bodies (CBs) working with, and Organizations certified to, the Content Claim Standard and any standards that make use of the CCS.

This manual will be updated regularly to address areas of uncertainty or to give further detail in the application of the standard. It is up to all users of the standard to regularly check for the most current version of the manual found at [www.TextileExchange.org/content/content-claim-standard](http://www.TextileExchange.org/content/content-claim-standard). The manual does not change or alter any of the criteria of the standard, but rather is intended to support correct and consistent application of the standard.

CBs are to use the guidance and assessment requirements found in the current version of the CCS Implementation Manual for their clients at the time of their certification. Whenever there is an update to the manual, TE will inform all CBs and Organizations will be assessed against the new version of the manual during their next annual certification. If it is a significant change, TE will communicate to CBs that they must communicate to all Certified Organizations that changes should be made as soon as possible, but will not require compliance with the newly added requirements until their next annual certification.

The Manual is divided into four sections; the first gives guidance on specific requirements of the CCS, and the second gives guidance on the Organic Content Standard (OCS), the third gives guidance on the TE Recycled Claim Standard (RCS), and the fourth addresses frequently asked questions (FAQ's).

# CCS Standard Interpretations

## A1 - Scope

### A1.2 Application

The CCS applies to organizations that wish to demonstrate the validity and legality of the material content claim of the products they buy, sell and/or produce. It provides third party verification of the amount of a given material being claimed in a final product. It addresses the flow of goods within and between companies, and covers manufacturing, storage, handling, and shipping.

**Guidance: CCS certification applies to the full supply chain, from the source of the input material to the last point of production or sale to the Organization (brand or retailer) that is selling to end consumers.**

**If a brand or retailer is receiving CCS goods and selling them on to other brands or retailers, the former will need to be certified.**

**When the CCS is being used for the chain of custody requirements for a standard, such as the Organic Content Standard or TE Recycled Claim Standard, the scope of the acceptable raw materials will be defined by that standard.**

**CBs must not certify another third party standard's product using the CCS without that standard owner's express written permission. (eg. A CB cannot use the CCS to certify that GOTS yarn is present in the final product without first getting permission from GOTS.)**

A1.3d The Standard does not address any processing inputs.

**Guidance: Processing inputs are those materials or substances that are used in the processing of products, and that do not become a significant part of the product being produced. For example: chemicals used in dyeing and finishing, or detergents used in scouring.**

## A4 - Definitions

The following additional terms have been defined:

**Accreditation: Accreditation is a procedure by which an authoritative body evaluates and gives formal recognition that a certification program is in accordance with the standards of the authoritative body.**

**Certification Body (CB): The organization responsible for the all aspects of assessment against the TE standard.**

**All CBs must be accredited to the TE standard by a TE-approved professional accreditation body.**

**Abbreviations:**

- CCS – Content Claim Standard
- OCS – Organic Content Standard
- RCS – TE Recycled Claim Standard
- CB – Certification Body
- TC – Transaction Certificate

## B1 - General requirements for Certification

### B1.2 Records

The Organization shall maintain complete and up-to-date records to demonstrate conformity with all requirements of the CCS.

**Guidance: These should include results from regular internal mass balance calculations, as well as a material flow diagram for all CCS products.**

The Organization shall keep complete and up-to-date records of the description, quantities, origins and/or destinations of all CCS products received and delivered.

**Guidance: These records must be matched up with supporting CCS transaction certificates.**

**In the situation that an input has been approved to a separate standard (for example, GOTS certified goods are accepted as inputs for OCS certified products), this inventory must be reported to that CB and confirmed that it has not been used for that other standard's production. The purpose of this requirement is to prevent certified goods being 'double counted', ie: claimed as inputs for two separate standards.**

## B2 - Auditing Requirements

### B2.1 Inspection Requirements

Organizations involved in the manufacturing and handling of CCS products, from the initial processing of the received Claimed Material to final packing, as well as traders of CCS products, must be inspected by a CB licensed by Textile Exchange, and must hold a valid Scope Certificate.

**Guidance: Licensing by TE involves accreditation by a third-party accreditation body.**

### B2.2 Frequency of Inspections

Inspections are to be carried out on an annual basis.

The CB has the right to carry out unannounced inspection visits. The visits shall cover in particular those units or situations where there may be specific risk of confusion or exchange of CCS products with other products.

**Guidance: Inspections are to occur at least annually, within the calendar year, and within the validity period of the scope certificate. Non-conformities must be corrected within two months of the inspection. Certification decisions may be made by the CB up to two weeks after receiving notification of the correction of non-conformities from the Certified Organization. In the case of no non-conformities, certification decisions must be made within two months of the inspection.**

**CBs that are certifying more than 50 sites to the CCS must perform a minimum of two percent unannounced inspections. No more than 48 hours notice can be given in advance on an unannounced inspection.**

Core production operations may not be exempt from inspection/certification.

**Guidance: Examples of core processing operations for textiles include ginning, spinning, knitting or**

**weaving, and all must be inspected and certified.**

### **B2.3 Inspection Coverage**

The CB shall make a full physical inspection of the records, production processes and storage units at each site. External storage units being used for CCS products must be declared and will be subject to inspection.

**Guidance: The Organization must give the CB, both for announced and unannounced visits, access to all parts of the unit and all premises, as well as to the accounts and relevant supporting documents. The same level of access must be given by sub-contractors that will be inspected. It is up to the contracting organization to ensure this is given. Inspectors must be allowed to interview staff and workers without restriction.**

In advance of each inspection, the organization must ensure the CB has access to an updated and accurate document that contains:

a full description of the production units including:

- name of each unit
- name and location of the site
- activity being performed
- a list of all the practical measures taken at the level of the unit to ensure compliance with the CCS standard
- a declaration that the organization is performing its operations in accordance with the CCS standard

The description, practical measures list, and statement of compliance with the Standard must be signed by a representative of the Organization.

This document will be verified by the CB during the certification process. If deficiencies and non-compliances with the requirements of this Standard are found, the CB will issue an inspection report to the organization. The organization must countersign this report and take necessary corrective measures. Certification will be given only after deficiencies or non-compliance issues have been corrected by the applying organization and confirmed by the CB.

## C1 - Documenting the purchase and sale of CCS inputs and outputs

Records must be maintained to enable the Organization and the CB to track the Claimed Material as it moves through and between the different processing operations. Records must be current, complete, accurate, easily auditable and understood, and must be held for at least five years.

TCs (Appendix D2.3 of the CCS) must be used to capture the transfer of goods from one organization to another. TCs may only be issued by the CB that has issued the Scope Certificate for the Organization.

The information that certifiers will look for and verify includes:

- the identity of the Claimed Materials or CCS inputs being supplied, the quantities, and the supplier of the inputs
- the identity of the CCS products being produced, the quantities, and the consignees or buyers of the outputs
- the relationship between the amounts of CCS inputs and outputs

**Guidance: The CB must review the documents and amounts before issuing a TC, with all inputs accounted for through valid TCs. At a minimum the CB will check against the written requirements of the standard (C.1 of the CCS) as well as:**

- copies of invoices/shipping documents and TCs for inputs that will be used to produce CCS goods
- amounts of stock on hand for inputs that will be used to produce CCS goods
- expected gain or loss during the production process(es)
- amount of CCS product being shipped and amount being put into stock
- copies of invoices/shipping documents and TCs for CCS goods that are being sold

Before issuing a TC, the CB must perform a mass balance calculation (taking into account production loss) that reviews available inventory to ensure enough certified input was available.

Note that TCs:

- Can only be issued by the CB for the Certified Organization. The CB holds the ultimate authority on the issuance and withdrawal of the TC.
- Must be requested in a timely manner.
- Must be issued in a timely manner.
- Must not be issued if the client has major non-conformities.
- Input used from other approved standards (eg: GOTS) inventory must be reported to that standard body and confirmed that it has not been used for that standard's production.
- Must not be used in public communication.

If the Organization has issued 12 or less TCs, then all TCs must be inspected. For amounts over 144 TCs, the CB must inspect the square root of the total number of TCs issued over the year. If one TC is missing or is wrong, then there is cause for a non-conformity, and a root cause analysis must be done, including investigation into the extent of the problem, to see what the corrective action should be. If only a statistically minor number of mistakes are found, then a simple correction can be made, but if there is evidence of regular errors, then a full corrective action with follow up will be required. It will



be up to the discretion of the CB to review a greater number of TCs, and to determine what correction actions should be taken.

**C1.1a For Claimed Materials entering the supply chain from an outside source:**

For materials entering the supply chain, there must be a document giving the name and address of the supplier, the quantity and description of the goods, reference to claims being made about the material along with any corresponding verification or certification.

**Guidance: Shipping documents and invoices can be used to supply this information, or if a separate document is created, they must contain the same information about the identity and quantity of the claimed material.**

**Any claims being made about the attributes of the claimed material (eg: social, environmental, quality, performance) that may be carried through to final product claims should also be included.**

**C1.1b For products already certified to CCS:**

A TC confirming that CCS inputs have been produced by a supplier that has been certified to the CCS or an accepted equivalent standard. The Organization shall check the supplier invoice and supporting documents to confirm that the date, quantity, blend percentage and material description all conform to the TC.

**Guidance: The Certified Organization must have valid TCs confirming all CCS inputs. Where the CCS is used to support a product standard, the accepted equivalents will be defined in the specific standard.**

**C1.1c CCS products received from an internal source:**

For goods that are flowing from one production unit to another within the same Organization there must be corresponding documentation that references the initial Claimed Materials, the quantity, blend percentage, and description of the CCS products being received.

**Guidance: For example, a factory purchases fiber and receives a TC, then manufactures yarn and fabric internally. The factory will document the transactions from business unit to business unit, connecting the material with the original TC.**

**C1.3 Mass balance calculation**

For each production step, the records must demonstrate the balance between the CCS inputs and the outputs containing the declared final amount of Claimed Material. All calculations are done based on the weight of the materials.

In its simplest form, the equation is:

$$(A+B)*(1-C) = D \text{ containing } A/(A+B) \% \text{ of material A}$$

A = Amount of Claimed Material by weight

B = Amount of non-Claimed Material by weight

C = Percentage of loss during production

D = Amount of final product by weight

The calculation must also take into account stock levels and rejected goods. When the properties of the Claimed Material vary significantly from the other materials, and the variance could lead to significant differences in gain or loss in production between the different materials, the Organization must show that they are taking this into consideration in their own calculations, and the CB will check these.

The final percentage of gain or loss will be compared to the expected percentage and any differences will be investigated. Deviations of over 5% of the expected amounts will be investigated and may result in a non-conformity assessment.

**Guidance: Organizations will be required to submit their formulas and sample mass balance calculations to their CBs in advance of an inspection.**

## C2 - Managing CCS goods during production

### C2.3 Segregation

Claimed Materials must be kept separately from non-Claimed Materials and CCS products must be separated from other products of the same type. Extra precautions must be taken where Claimed Materials or CCS products are being shipped, stored or produced alongside non-Claimed Materials or products of the same type to ensure that no confusion or substitution occurs.

Sufficient steps must be taken to ensure that no significant amount of non-Claimed Material is mixed in with the Claimed Materials during production, handling, shipping or storage.

**Guidance: In organizations that process CCS and non-CCS products at the same site, “sufficient steps” include cleaning out the machinery prior to processing CCS inputs. This same principle applies to other CCS materials in order to prevent contamination and commingling.**

### C2.4 Identification

Claimed Materials or CCS products must be clearly identified and tracked as they move through production. This may include, but is not limited to, direct labelling of Claimed Materials or CCS products, machines, storage vessels, or storage areas.

**Guidance: In some cases it may be necessary for the Claimed Materials or CCS products to be labelled directly, while in others, it will be sufficient for the machines, carrying vessels and storage containers or areas to be clearly signed. It may also be possible that no identification is needed, as in the example of a spinning mill that only processes 100% organic cotton.**

**Labels and signage must be visible and understandable by all workers operating in the area.**

**Final products that are to be sold to consumers may not have the CCS logo or name on them.**

## C3 - Packaging and Transporting CCS Products

The Organization shall ensure that the products containing Claimed Material must be transported to other units, including wholesalers and retailers, only in appropriate packaging, containers or vehicles that are closed in such a manner that substitution of the content cannot be achieved without manipulation or damage of the seal.

All shipments of CCS products must have a label stating:

- the name and address (city and country) of the producer or, where different, of the owner or seller of the product
- the name and address (city and country) of the consignee

- the name of the product, including a reference to the Claimed Material content (expressed as a percentage) of the product being shipped
- the name of the transporter
- reference to the Content Claim Standard, the name of the CB and the identification number (project number) of the CB
- the lot identification number
- quantity of products
- date of shipment

Alternatively, this information can be presented on an accompanying document, as long as such document can be undeniably linked with the packaging, container or vehicle of the product.

**Guidance: CCS and non-CCS products may be shipped or transported in the same container, as long as there is sufficient identification attached to the CCS products in a way that does not allow the identification to be easily moved to other products.**

## C5 - Labeling to the CCS

**Guidance: The CCS logo cannot be used for product-specific communication to consumers. Its primary use is for business-to-business communications. Certified Organizations may use the CCS name and/or logo in their written or electronic marketing or transaction documents to other organizations, as well as internally. For the purpose of maintaining the clear identity of CCS products, the CCS logo may also be used to identify certified products or their containers as they move through the supply chain.**

The CCS name may be used in off-product communication by Certified Organizations to refer to verification of product claims supported by the CCS. For example: a website or catalogue copy explaining the Organization's efforts to ensure accuracy of its product claims for a range of goods.

Retailers selling to end consumers only, and not to other retailers, are not required to be certified. If a brand/retailer sells to other retailers, they must be certified to the standard in order to maintain the integrity of the Claimed Material content in the final product.

## C6 - Products suspected of not satisfying the requirements of the CCS standard

When an Organization suspects that an input that they have purchased or a product that has been manufactured is not in compliance with this Standard, they shall withdraw references to the Claimed Material content of the related product until they can confirm the valid certification of the product, and shall inform the CB immediately.

**Guidance: The CB is responsible for responding to tips and complaints about fraudulent products or services with appropriate action and due diligence. If it is found that the Organization is knowingly and/or repeatedly operating with non-conformities or purposely violates the requirements of the standard, the CB must suspend the Organization's certification status and inform TE. The Organization will be allowed to re-apply for certification two years after the date of the suspension.**

If certification is terminated for any reason (voluntary or enforced), or if it is reduced in scope, the CB

shall collect all applicable certification documents, and ensure that any references to the standard are ceased for the affected goods. Any shipments with valid TCs (ie: issued before the termination of certification) may be sold as certified, at the discretion of the CB. The CB must inform Textile Exchange immediately of the termination.

## D1 - Tools and Resources

### D1.2 Questions and Additional Information

For questions or additional information about the CCS please contact: [integrity@TextileExchange.org](mailto:integrity@TextileExchange.org).

**Guidance: If you want to comment on TE standards or submit a complaint about a certified organization, a certification body, an accreditation body, or any related party, you may email [integrity@TextileExchange.org](mailto:integrity@TextileExchange.org) and TE will investigate with the appropriate parties.**

## D2 - Sample Documents

### D2.4 Transaction Certificate Policy Guidelines

This policy document has been updated with a revision to allow Multiple Shipments per TC, under the following guidelines.

Multiple Shipments on a TC: It is permitted to issue a single TC that covers the information of multiple shipments as long as the following conditions are met:

- a. The CB must give permission in writing to the seller to use a single TC for the agreed number and/or time period (either for the individual case or as a procedural rule).
- b. The seller must notify the buyer of the time period for which the TC will be open, giving the buyer sufficient time to respond if any change is required. At any time, the buyer has the right to require a shorter time period or a TC for each shipment and to receive written proof that the seller's CB has given permission for multiple shipments against their TCs.

**Guidance: The buyer should discuss with his own CB: for example, the buyer may purchase inputs (intermediates) from a company that is supplying on an open TC, use these inputs to produce their own goods, then sell them before the inputs' TC is closed. The CB may not be willing to issue the TC for the buyer's goods being sold without first having confirmation of the certification of the incoming goods. The CB may also require written confirmation that the multiple shipment practice was agreed to by the CB of the seller.**

- c. All shipments must be sent from the same seller at the same location (box 3) and must be produced by the same last processor of the products (box 5).
- d. All shipments must be sold to the same buyer (box 7) and sent to the same consignee at a single place of destination (box 8).
- e. The maximum number of shipments against a single TC is 100.
- f. The maximum time period that a single TC can cover is 3 months.

**Guidance:** The decision of a time period requires a balancing of costs and risks. While using a single TC for multiple shipments should reduce the yearly cost of TCs, it does mean that there will be periods of time during which goods being sold have not yet been verified by a CB. This will be of concern to the buyers of the product. While a time period of 3 months may be reasonable in some situations, it is assumed that a more realistic timeframe would be closer to 1 month in most cases.

- g. A TC may not be open past the end of the validity of the seller's actual certification (the validity of certification is mentioned on the Scope Certificate).

**Please visit the Textile Exchange website to find the most recent versions of the Harmonized Certificates and the policy documents with guidelines for use: <http://textileexchange.org/content/integrity-training-tools>.**

# OCS Standard Interpretations

## A2 - Compliance Requirements

The Organic Content Standard requires compliance with the requirements of the Content Claim Standard...

**Guidance:** Once a company has been certified to the CCS requirements for one standard (eg: OCS), then the CCS requirements will have essentially been met for other CCS-based standards (eg: RCS, GRS).

... whereby the Claimed Material is defined as:

**Organic material:** any output of organic farms that have been certified by an accredited certification body to comply with:

- government organic farming regulations that have been enacted, or
- private standards that have been assessed as compliant to the IFOAM Basic Standards in the context of the IFOAM Accreditation Program

**Guidance:**

- The OCS cannot be used to support claims on food products; food products are governed by national laws.
- Organic fiber certification according to the Japanese Agricultural Standard (JAS) is not possible (as per the JAS definition).
- Certification of fibers from the in-conversion period is possible if the applicable farming standard permits such certification.
- Any products being sold in the United States and making a reference to organic on the label must have the organic materials certified to the USDA NOP standard (as per USDA policy).

Traders with an annual turnover of less than \$10,000 of OCS goods, and retailers selling to end consumers only, are exempt from the certification obligation; provided that they do not (re-)pack or (re-)label OCS Goods. Exempted entities with less than \$10,000 annual turnover of OCS Goods must register with an Approved Certification Body and must inform the Certification Body immediately once their annual turnover exceeds \$10,000, or once they plan to (re-)pack or (re-)label OCS goods.

**A2.2** Buyers of the OCS product will be responsible to set any requirements on the specific organic standards that the input material must be certified to.

**Guidance:** For example, companies selling into the United States must ensure that the input materials have been certified to the United States Department of Agriculture's National Organic Program standard, while for companies selling into Europe, there are no legal requirements for non-food organic products.

## B1 - Labeling Language

Products certified to the OCS may use the terms “Made with X% Organically Grown Material” or “Contains X% Organically Grown Material”, and make reference to the OCS. ‘X’ must represent the final percentage of Organic Material by appropriate unit of measure in the finished product. ‘Material’ must be replaced by the Claimed Material (eg. cotton, coconut).

**Guidance:** In the United States, the USDA National Organic Program (NOP) controls the use of the word ‘organic’ on consumer products, and the terms “Organic Product” or “Made with Organic Material” must conform to the Global Organic Textile Standard. For this reason, the OCS specifies the use of “Made with” or “Contains Organically Grown Material.” Furthermore, the use of the term “Organically Grown” gives greater clarity to the consumer that it is the material itself that is organic, not the final product.

### B1.1 Labeling to the Organic Content Standard

If the company chooses to label the finished products as containing Organic Material, it may make reference to the OCS and use:

- “Made with/Contains 100% Organically Grown Material” only for products that contain 100% Organic Material. The OCS 100 logo may be used.
- “Made with/Contains Organically Grown Material” for products that contain 95% or more Organic Material, as long as the remaining content is not of the same type as the Organic Material. The OCS 100 logo may be used.
- “Made with/Contains X% Organically Grown Material” for products that contain 5-95% Organic Material. There are no restrictions on the remaining content. The OCS Blended logo may be used.

**Guidance:** For labeling with the OCS 100 logo, any combination of all organic materials can be used. For example, 50% organic wool and 50% organic cotton. This would be labeled as “Made with/Contains 50% Organically Grown Wool and 50% Organically Grown Cotton”.

For labeling with the OCS Blended logo, the remaining non-organic material can be of the same type. For example 50% organic cotton, 50% conventional cotton. This would be labeled as “Made with/contains 50% Organically Grown Cotton”. The conventional cotton may also be identified, but it must be clear that it is not organic.

The OCS can be used to certify organic-in-conversion materials and must be labeled as such at all times. It may be labeled as “Made with/Contains Organic In-Conversion Material” or “Made with/Contains Transitional Organic Material”. Those applying the labeling are responsible for checking the laws of the country of sale. For example, with products sold in the US, no reference may be made to “organic-in-conversion”.

## C1 - Use of OCS Logos

C1.1a Certification Bodies are responsible for issuing OCS logos for use on goods that have been certified up to the point where the logos are applied. Certification Bodies will be required to check for proper use of the OCS logos on goods during the certification process. They are not responsible for checking on logos in the marketplace.

**Guidance: CBs have the right and responsibility to take “suitable action,” such as withdrawing the logo use rights, if requirements are not met.**

C1.3 Brands and Retailers

**Guidance: Brands and retailers may use the OCS logo for marketing and publicity purposes after obtaining approval from the CB responsible for the certification of the last production step of their products. The CB has the ability to verify that the products are certified.**

C1.3a Brands and retailers may only have logos applied to goods that have been certified to the end of the supply chain (i.e.: the last step of ownership must have been certified). Use of the logo is not mandatory.

**Guidance: The seller in the last business-to-business transaction must be certified in order for products to be labeled with the OCS logos, assuming neither labeling nor packaging will occur after this transaction.**

For example,

- If Brand A buys its OCS products from Factory F, then sells directly to consumers, only Factory F must be certified to the OCS.
  - \* Note that only Certified Organizations can apply logos and the last Certified Organization’s reference number must accompany the logo.
- If Brand A buys OCS products from Factory F, then sells to retailers who then sell to consumers, then both Factory F and Brand A must be certified to the OCS.

C1.3b If products are being identified as certified to the OCS, then the logo must be used, and ‘Certified to OCS’ may also be added. The specifications set out in sections D1 and D2 must be followed.

**Guidance: This requirement only applies to consumer-facing labeling of products.**

## D1 - Identification of OCS goods

D1.1a When an OCS logo is used, there must be a reference to the CB that has certified the goods (e.g. CB’s name and/or logo) and a reference to the Certified Organization (e.g. Organizations’s name and/or certification number).

**Guidance: The text and logo example mentions “Certified by CB’s Reference Number”. This should be “Certified by Certification Body Name”. This is to ensure that consumers can easily identify who certified the product.**

D1.1b The OCS logo must not be permanently printed on or affixed to any reusable packaging.



**Guidance:** The purpose of this requirement is to ensure that non-certified products are not mistakenly or deliberately identified as being OCS certified. For example, boxes are being used to ship footwear, then are collected back at the store for re-use; these must not be identified in any way as OCS certified, as there is no way to control for the footwear that may be put into them after the original use.

# RCS Standard Interpretations

## A1 - References

A1.2b Material Concentration: Material concentration refers to the point in the recycling lifecycle when a reclaimed material receives primary handling. This may include, but is not limited to, sorting, screening, basic contaminant removal, or baling. Material is still unprocessed at this stage, meaning it has not been physically or chemically altered beyond basic handling, e.g. screening, crushing, or washing.

Entities involved in material concentration must have legal authorization to operate as a:

- Government organization (eg: municipality)
- Non-profit organization
- Business entity (eg: brokers)

**Guidance: “Legal authorization” would be a government-issued business license number or a non-profit registration document. The purpose of this requirement is to ensure that there is a valid organization that is standing behind the declaration form, and to give an added measure of protection against the possible trading of stolen goods.**

A1.2d Reclaimed Material: Material that would have otherwise been disposed of as waste or used for energy recovery, but has instead been collected and reclaimed as a material input, in lieu of new primary material, for a recycling process.<sup>1</sup>

**Guidance: The expressions “recovered material” and “reclaimed material” are treated as synonyms; however, it is recognized that, in some countries, one or other of these expressions may be preferred for this application. If your industry or your country uses different terminology, please contact [Integrity@TextileExchange.org](mailto:Integrity@TextileExchange.org) for further clarification.**

**We also recognize that it is difficult to substantiate that a material would have ‘otherwise been disposed of as waste or used for energy recovery’, as once a recycling process is established, the material is no longer being directed into a waste stream. It is important to keep in mind that the intent of recycling is to contribute to a ‘circular economy’; one where no waste is discarded or destroyed, but rather is re-used in a productive way.**

**UL has released a document titled: *Interpreting Pre-Consumer Recycled Content Claims* that provides helpful interpretation of pre-consumer recycled content.**

A1.2f Recycled Material: Material that has been reprocessed from reclaimed material by means of a manufacturing process and made into a final product or into a component for incorporation into a product.<sup>2</sup>

**Guidance: A recycled content claim may be made only for materials that have been recovered or otherwise diverted from the solid waste stream, either during the manufacturing process (pre-**

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2 This excerpt is taken from ISO 14021:1999, section 7.8.1.1, subsection b on page 14, with the permission of ANSI on behalf of ISO. © ISO 2013 – All rights reserved.

consumer), or after consumer use (post-consumer). To the extent the source of recycled content includes pre-consumer material, the manufacturer or advertiser must be able to justify that the pre-consumer material would otherwise have entered the solid waste stream.

According to the Federal Trade Commission, “Recycled content includes recycled raw material, as well as used, reconditioned, and re-manufactured components.” (FTC 2012 Green Guide, 260.13.a)

## A2 - Compliance Requirements - Recycled Materials

- A2.1b Entities involved in Material Collection (as defined in A1.2a), with the exception of individuals, are required to submit the Reclaimed Material Declaration Form (see Appendix A). The Reclaimed Material Declaration Form must be submitted to consignees on an annual basis for all reclaimed materials being supplied for use in RCS products. The Reclaimed Material Declaration Form declares that the facility will allow inspections with a minimum of 3 days notice by Certification Bodies accredited to the RCS.
- A2.2b Entities involved in Material Concentration (as defined in A1.2b) are required to submit the Reclaimed Material Declaration Form (see Appendix A). The Reclaimed Material Declaration Form must be submitted to consignees on an annual basis for all reclaimed materials being supplied for use in RCS products. The Reclaimed Material Declaration Form declares that the facility will allow inspections with a minimum of 3 days notice by Certification Bodies accredited to the RCS.

**Guidance: Physical inspections of Material Collectors and Material Concentrators will be conducted at the discretion of the CBs.**

**When more than 50 collectors and/or concentrators are supplying RCS or GRS input materials for the clients of one CB, that CB must conduct unannounced inspections of at least two percent of the collectors and/or concentrators.**

**The visits shall cover in particular those units or situations where there may be specific risk of confusion or exchange between virgin and recycled input materials.**

- A2.3b In addition, entities involved in Material Recycling must:
- i. Hold valid Reclaimed Material Declaration Forms for all RCS input materials, or proof of verification to an accepted standard (see *TE Accepted Equivalent Standards*).

**Guidance: If the reclaimed materials have been verified through an approved equivalent standard, then those reclaimed materials will be accepted for the RCS, as long as all related documentation is submitted to the Material Recycling facility and the Certification Body.**

**Accepted equivalent standards are those that have been approved by Textile Exchange and meet or exceed the requirements of the RCS for verification of reclaimed materials (i.e.: verification that they would have otherwise gone in to the waste stream). To be considered for equivalency, standards may be submitted to Textile Exchange by contacting [Integrity@TextileExchange.org](mailto:Integrity@TextileExchange.org).**

- ii. Verify that all sources of reclaimed material have legal authorization to operate for the relevant function, and hold copies of the relevant documents.

**Guidance: The reference to “all sources of reclaimed material” does not include Material Collection from individuals.**

- iii. Inspect all incoming shipments of reclaimed material to confirm that they are not virgin material. In the case that virgin material is identified, the supplier of the material and the certified shall be notified, and there shall be increased control established over incoming goods from the supplier involved.

**Guidance: Staff receiving reclaimed materials must be trained and directed to identify any material that is or could be virgin material. If virgin material is suspected or identified, it must be immediately removed from the reclaimed materials stock until further investigation confirms its identity.**

**In all cases of virgin material, the certification body must be informed, and it will be at their discretion to conduct further investigation with the supplier.**

### A3 - Compliance Requirements - Production

- A3.2b The amounts of pre-consumer and post-consumer waste must be recorded separately at all steps of production.

**Guidance: While the labelling requirements of the RCS do not call for the pre- and post-consumer amounts to be identified separately (in accordance with the FTC Green Guides) it is often not possible for the companies involved in the production of RCS goods to know how the final product will be labelled, or if they will want the information for their own use. For this reason, and for the future ability to track aggregate amounts of pre- and post-consumer amounts, the percentages of pre- and post-consumer recycled material must be recorded at each production stage and on transaction certificates.**

- A3.2c Traders with an annual turnover of less than \$10,000 of RCS goods, and retailers selling to end consumers only, are exempt from the certification obligation; provided that they do not (re-)pack or (re-)label RCS Goods. Exempted traders with less than \$10,000 annual turnover of RCS Goods must register with an Approved Certification Body and must inform the Certification Body immediately once their annual turnover exceeds \$10,000, or once they plan to (re-)pack or (re-)label RCS goods.

**Guidance: A trader is any entity that takes ownership of the certified goods, regardless of whether they take physical possession of the goods. Certification Bodies may require a trader with an annual turnover of less than \$10,000 of RCS goods to become certified or require physical inspection and/or document audit if deemed necessary due to high risk.**

- A3.2d In cases where there is the possibility of differential rates of production loss between recycled and virgin inputs, organizations must address this through their mass balance formula.

**Guidance: In most cases the percentage loss of recycled and virgin inputs will be very close, and no adjustments to the mass balance formula are needed. However, in some cases the loss rates are different enough to impact the final content claims, for example:**

- **If recycled cotton is being used as an input, and the staple length is shorter than the virgin fiber, then during the combing process it is likely that most of the shorter fibers that are combed out will be the recycled cotton. This would mean that the percentage of recycled fiber in the output is less than the amount used in the input, and for low ratio claims, this can lead to inaccurate product claims. To address this, companies shall:**
  - **Add more recycled fiber to their inputs, to account for the expected loss (eg: use 55kg of recycled cotton fiber and 45 kg of virgin cotton fiber to create a 50% recycled yarn).**

or

- **Adjust the final amount being claimed to reflect the actual amount of recycled material in the output.**

A3.6 Buyers of the RCS product will be responsible to set any further requirements on the specific standards or requirements to which the input material must be certified. These additional requirements are separate from the RCS and its certification process.

**Guidance: Any additional requirements set by a buyer do not fall under the RCS certification. However, it may be advantageous to have the additional requirements checked during the RCS inspection process. All such arrangements will be strictly between the buyer and the certification body.**

**Some brands may wish to identify the original source material prior to recycling. This is outside the scope of certification to the RCS, but may be added to the Transaction Certificates if requested by the brand. The arrangements should be made through the Certification Body.**

## B1 - Labeling Language

The RCS standard applies to products that are composed of 5 -100% Recycled *Material*.

*Material* refers to the raw material created as the output of the recycling process. The RCS can be applied to individual components of a product, as long as they are each certified to the standard.

**Guidance: Examples of Recycled Materials are:**

**Input: plastic bottles**

**Output: PET chips**

**Recycled Claim: Recycled Polyester**

**Input: wool clothing**

**Output: wool fiber**

**Recycled Claim: Recycled Wool**

**An example of an individual component being claimed would be a jacket that is made with virgin nylon shell and a recycled polyester lining. In this case the RCS would apply to the lining only, and any product claims would have to clearly reflect this.**

### B1.1 Labeling to the TE Recycled Claim Standard

In all cases, 'X%' represents the minimum final percentage of Recycled Material by appropriate unit of measure in the finished product. Percentage must be calculated exclusive of trims.

**Guidance: In most cases the unit of measure will be weight, but in some cases (such as paint recycling), volume will be more appropriate. Percentage must be calculated exclusive of trims.**

Pre- and post-consumer content amounts may be called out separately.

**An example of a pre- and post-consumer labelling claim would be:**

**"Contains 50% pre-consumer and 50% post-consumer polyester." Equivalent terms may also be used, such as Post-consumer Recycled (PCR) or Post-industrial Recycled (PIR).**

## D1 - Identification of RCS Goods

### D1.1 Products

All logos must follow the design specifications set out in section D2.

Logos may also be accompanied by text saying 'Certified to TE RCS 100' or 'Certified to TE RCS Blended'.

**Guidance: RCS product claims may be translated into other languages, as long as the meaning does not change.**

D1.1a When an RCS logo is used, there must be a reference to the Certification Body that has certified the goods (e.g. certifier's name and/or logo) and a reference to the Certified Organization (e.g. Certified Organization's name and/or license number).

**Guidance: The Certified Organization's reference number is given by the CB so that the Certified Organization that produced the product can be tracked by the CB.**

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## Appendix - Definitions of Recycled Content

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The following standards have been listed as further reference for companies looking to understand interpretations of recycling in different regions.

### **ISO 14021**

[http://www.iso.org/iso/home/store/catalogue\\_tc/catalogue\\_detail.htm?csnumber=23146](http://www.iso.org/iso/home/store/catalogue_tc/catalogue_detail.htm?csnumber=23146)

### **European Standard EN 15343**

<http://www.en-standard.eu/csn-en-15343-plastics-recycled-plastics-plastics-recycling-traceability-and-assessment-of-conformity-and-recycled-content/>

### **FTC Green Guides**

<http://www.en-standard.eu/csn-en-15343-plastics-recycled-plastics-plastics-recycling-traceability-and-assessment-of-conformity-and-recycled-content/>

### **European Union: DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:312:0003:0030:en:PDF>

### **Japan: Law for the Promotion of Sorted Collection and Recycling of Containers and Packaging**

<http://www.meti.go.jp/policy/recycle/main/data/pamphlet/pdf/handbook2010-eng.pdf> - page 51

### **Australia: The Australian Recycling Sector Report**

<http://www.environment.gov.au/wastepolicy/publications/pubs/australian-recycling-sector.pdf>

## Appendix - FAQ's

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### Content Claim Standard FAQ's

#### List of Questions

1. How can the CCS name and logo be used?
2. Do retailers that import goods (certified products) need to be certified? What about brands/retailers?
3. Do importers dealing with certified products need to be certified and pay a fee?
4. Can a core operation that is sub-contracted be inspected as part of the contracting unit's certification?
5. Can sewing be a subcontracted operation, and therefore exempt from inspection?
6. Can dyeing be a subcontracted operation, and therefore exempt from inspection?
7. Do sites certified to the OCS/RCS have to be separately be certified to the CCS?
8. If a site is certified to the OCS/RCS and wishes to use the CCS separately, does it need to be certified to the CCS?
9. Why do I need to get my sites certified?

1. How can the CCS name and logo be used?

**The CCS logo cannot be used for product-specific communication to consumers. Its primary use is for business-to-business communications. Certified Organizations may use the CCS name and/or logo in their written or electronic marketing or transaction documents to other organizations, as well as internally. For the purpose of maintaining the clear identity of CCS products, the CCS logo may also be used to identify certified products or their containers as they move through the supply chain.**

**The CCS name may be used in off-product communication by Certified Organizations to refer to verification of product claims supported by the CCS. For example: a website or catalogue copy explaining the Organization's efforts to ensure accuracy of its product claims for a range of goods.**

2. Do retailers that import goods (certified products) need to be certified? What about brands/retailers?

**Retailers selling to end consumers only, and not to other retailers, are not required to be certified. If a brand/retailer sells to other retailers, they must be certified to the standard in order to maintain the integrity of the Claimed Material content in the final product.**

3. Do importers dealing with certified products need to be certified and pay a fee?

**Importers are not required to pay a fee unless they become certified. Importers are only required to be certified if the importer re-packages the goods in any way, applies the standard logo, or sells the products to companies other than their own.**

4. Can a core operation that is sub-contracted be inspected as part of the contracting unit's certification?

**Examples of core sub-contracted processing operations for textiles include ginning, spinning, knitting or weaving and all must be inspected and certified. The sub-contracted unit can be inspected and certified independently from the contracting unit, or it can be inspected and certified as a part of**



the contracting operation's certification. If the sub-contractor is certified as part of the contracting operation's certification, the subcontractor cannot advertise itself as certified, and they would be certified for only those products which are for that contracting unit and not work done for other clients.

5. Can sewing be a subcontracted operation, and therefore exempt from inspection?

As long as the sewing factory does not take ownership of the goods, and the goods can be tracked through the mandatory documentation, then it is not a requirement to have the sub-contracted sewing factory certified. However, the CB will check that the cutting records are available through the owner of the goods and that the product flow is fully traceable there. The CB still has the right to require an inspection if they feel it is needed to fully verify all parts of the chain.

6. Can dyeing be a subcontracted operation, and therefore exempt from inspection?

For chain of custody standards, although a product sent to a dye house under a sub-contracting arrangement falls under the same guidelines as all other sub-contracted processes, it is strongly recommended that CBs do at least one initial inspection of a sub-contracted dye house to fully understand the processes used, and the way documentation of product flow is handled. This is especially relevant for organic cotton certification.

The reason for this is the potential for issues down the line: if any contaminants were found in the final product, it would be very difficult to determine the source of any cheating or inadvertent contamination.

7. Do sites certified to the OCS/RCS have to be separately be certified to the CCS?

**No. If the site is only wanting certification to the OCS and/or RCS, the requirements of the CCS are already met as part of the OCS/RCS.**

8. If a site is certified to the OCS/RCS and wishes to use the CCS separately, does it need to be certified to the CCS?

**Yes. If a claim is to be made using the CCS, then the site must be separately certified to the CCS for that product claim verification. CBs will pay a separate \$100 fee for this certification per year just as it does for OCS and RCS.**

9. Why do I need to get my sites certified?

Certification is a means to confirm that the levels of social and/or environmental performance claimed for a product are correct and verified by an external party. Third-party certification is considered one of the strongest ways to ensure the integrity of sustainability claims. In this system, an independent third party gives assurance that a company, process, or product is in compliance with requirements in a particular standard. Certification provides legal and brand protection, purchase assurance, and greater credibility to the claims being made. Above all, certification is a means for ensuring that environmental and/or social improvements lead to meaningful and positive change.

## Organic Content Standard FAQ's

### List of Questions

1. Will there be any limitations on what fibers the organic material can be blended with like in the OE standards?
2. If we choose not to label our garments with OCS label but with our own labeling system. Is it enough to have the CCS certification?
3. Is it enough to use only CCS for both organic and recycled and save our suppliers cost if we do not want to label with OCS or RCS standard label?
4. Regarding cost for OCS, RSC and GRS as they all have the CCS as a foundation will it be cheaper to add one more of them if you already are certified to one of the others?
5. Can the OCS be used for organic cosmetics?
6. Which organic raw material standards can be used for cosmetics?
7. Does OCS certification require that I disclose my suppliers?

1. Will there be any limitations on what materials the organic material can be blended with like in the OE standards?

**The only limitation will be for products labeled as “Made with Organically Grown”:**

**“Made with/Contains Organically Grown Material” for products that contain 95% or more Organic Material, as long as the remaining content is not of the same type as the Organic Material.**

**For “Made with X% Organically Grown” (on claims for blends of 5-95%) there will be no restrictions on what the other fibers can be.**

2. If we choose not to label our garments with the OCS label but with our own labeling system. Is it enough to have the CCS certification?

**It would be advisable to use the OCS, as it clearly defines the need for proper verification of the material source (ie: certified to a valid organic standard) - everything else is identical to the CCS in terms of certification requirements. OCS also sets labeling language and logo use rules, but if you are using your own system and not using the OCS label, then you do not have to comply with these rules.**

3. Is it enough to use only CCS for both organic and recycled and save our suppliers cost if we do not want to label with OCS or RCS standard label?

**The standards are structured to simply refer to ‘certification to the requirements of the CCS,’ then add in the requirements for the organic or recycled material. Effectively, once a factory is certified to one CCS-based standard, they are qualified for the CCS component of the other, so the additional cost for the second standard should be minimal.**

4. Regarding cost for OCS, RSC and GRS as they all have the CCS as a foundation; will it be cheaper to add one more of them if you already are certified to one of the others?

**Ultimately it will be up to the CBs to set pricing for their services, but given that the standards are sharing the same chain-of-custody requirements, certification costs should be less than having the standards used separately.**

5. Can the OCS be used for organic cosmetics?

**The OCS is designed for use within any industry; it can be used for cosmetics, personal care products, textile and more.**

6. Which organic raw material standards can be used for cosmetics?

**The standard may be used for any non-food raw material grown to the standards referenced in the OCS:**

**Organic material: any output of organic farms that have been certified by an accredited CB to comply with:**

- **government organic farming regulations that have been enacted, or**
- **private standards that have been assessed as compliant to the IFOAM Basic Standards in the context of the IFOAM Accreditation Program.**

7. Does OCS certification require that I disclose my suppliers?

**Certification verifies the entire supply chain to the same requirements, without requiring that the suppliers are disclosed to the brand and/or retailer. When a product is labeled with reference to the OCS, the certification number of the last certified organization that owned the product must also be listed. If the brand/retailer does not wish to disclose the identity of that supplier, they themselves should become certified, so that they can list their own certification number.**

## Recycled Claim Standard FAQ's

### List of Questions

1. Are items that are re-used to make a new product considered recycled?
2. Why would I use the RCS logo instead of the normal "Mobius" symbol of three arrows in a triangle?
3. Why are recyclers required to be certified?
4. What should Collectors and Concentrators expect in case of an inspection?
5. Why is "pre-industrial" not allowed to be used as recycled inputs?
6. Can the RCS logo be used in off-product communications?
7. Does RCS certification require that I disclose my suppliers?

1. Are items that are re-used to make a new product considered recycled?

**No, because re-use does not require additional processing to make a new product. For example, when a used box is used to package a new product, this is considered re-use. If the cardboard box was shredded and the resulting material used as backing for a new notebook, this is considered recycling.**

2. Why would I use the RCS logo instead of the normal "Mobius" symbol of three arrows in a triangle?

**When used on products or packaging, the Mobius symbol indicates the product can be recycled and the number indicates what type of material it is. The Mobius symbol does not indicate the product was made with recycled content. The RCS logo is assurance that the product contains recycled material, and that it has been verified by a third party.**

3. Why are recyclers required to be certified?

Recyclers are required to be certified to ensure that the raw material that is being recycled has met the standard's definition of reclaimed material, i.e. material that has been diverted from a waste stream. The certification also ensures that pre- and post-consumer recycled material has been accurately identified. The stages prior to recycling, Material Concentrators and Material Collectors are not required to be certified, but are required to submit the Reclaimed Material Declaration Form along with their material, to provide source information for the Recycler.

4. What should Collectors and Concentrators expect in case of an inspection?

An inspection will consist of a physical audit of the facility and the materials being reclaimed, interviews with management and/or staff, as well as a review of the documentation (Reclaimed Material Declaration Forms, shipping documents, invoices). The inspected organization must make all areas, documents and employees (for interviewing) available to the inspector.

5. Why is "pre-industrial" not allowed to be used as recycled inputs?

Pre-industrial waste refers to waste that is generated by the same process in which it is re-used; this does not qualify as recycling as it is generally either common practice or just resource efficiency. An example of a common industry practice is taking the short fiber fallout from the spinning process and putting it back into the spinning of yarns in the next batch. This is a good practice, but is not considered recycling because no processing is needed to make the fibers usable, and the fibers would have not otherwise gone into the waste stream.

6. Can the RCS logo be used in off-product communications?

The RCS logo may also be used in off-product communication (web, print, signage), as long as all of the guidelines in Section D of the standard are followed, and there is no chance that non-certified products may be confused with the certified products.

7. Does the RCS require that I disclose my suppliers?

Certification verifies the entire supply chain to the same requirements, without requiring that the suppliers are disclosed to the brand and/or retailer. When a product is labeled with reference to the RCS, the certification number of the last certified organization that owned the product must also be listed. If the brand/retailer does not wish to disclose the identity of that supplier, they themselves should become certified, so that they can list their own certification number.