



TextileExchange
Creating Material Change

Textile Exchange Global Recycled Standard, version 3.0 Implementation Manual

2014

©2014 Textile Exchange

Global Recycled Standard, v3 Implementation Manual

The *Global Recycled Standard (GRS)* is a product standard for tracking and verifying the content of recycled materials in a final product, while ensuring strict production requirements.

English is the official language of the Global Recycled Standard. In any case of inconsistency between versions, reference shall be made to the English version.

Copyright: © 2014 Textile Exchange



Table of Contents

Introduction	3
Global Recycled Standard Interpretations	4
A3 Definitions	4
A4 Recycled Material Requirements	5
A5 Production Requirements	7
B1 Social Policy	8
B2 Social Requirements	8
B3 Verification of Social Compliance	8
C1 Environmental Management System	9
C2 Environmental Requirements	9
C3 Verification of Environmental Compliance	10
Section D: Chemical Requirements	10
D1 Chemical Management System	10
D2 Chemicals used in GRS products	10
D3 Verification of Chemicals	11
GRS Logo Use and Labeling Guide Interpretations	13
B1.2 Requirements for all GRS Labeled Products	13
B1.3 Optional Additional Language for Labeling GRS Products	13
GRS Frequently Asked Questions	15

Introduction

The *GRS Implementation Manual* provides interpretations and clarifications for the Global Recycled Standard (GRS) and its supporting documents. All guidance given in this manual is to be considered binding to Certification Bodies (CB) working with, and Organizations certified to, the Global Recycled Standard v3.

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 <http://globalrecycled.org>. 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 *GRS 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 Content Claim Standard (CCS) is an integral part of the GRS; therefore the *CCS Implementation Manual* is to be followed as well where references to CCS are considered to be referencing the GRS.

Global Recycled Standard Interpretations

A3 - Definitions

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 (e.g.: municipality)
- Non-profit organization
- Business entity (e.g.: brokers)

Guidance: Proof of “legal authorization to operate” is for example, a government-issued business license number or non-profit registration document. This ensures that there is a valid organization behind the declaration form, and to give an added measure of protection against the possible trading of stolen goods. Where legal authorization is required to process waste, there must be proof that this is in place.

Pre-Consumer Material: Material diverted from the waste stream during the manufacturing process. Excluded is the reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.¹

By-products may be considered pre-consumer material when the following criteria are met:

- a) the manufacturer has not deliberately chosen to produce it;
- b) the material cannot be used again without any further processing;
- c) and the material is not made ready for a further use as an integral part of the continuing process of production.

Guidance: UL has released a document titled: **Interpreting Pre-Consumer Recycled Content Claims that provides helpful interpretation of pre-consumer recycled content. The FTC Green Guides² also includes helpful guidelines for understanding claims.**

Pre-consumer may sometimes be referred to as “post-industrial”.

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.³

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 for further clarification.

We also recognize that it is difficult to substantiate that a material would have ‘otherwise been disposed of as

1 This excerpt is taken from ISO 14021:1999, section 7.8.1.1, subsection a.1 on page 14, with the permission of ANSI on behalf of ISO. © ISO 2013 – All rights reserved.

2 Guides for the Use of Environmental Marketing Claims (“Green Guides”); Federal Trade Commission; October 12, 2012. <http://www.ftc.gov>.

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

waste or used for energy recovery', as once a recycling process is established, the material is no longer being directed into a waste stream. See "Pre-Consumer Material" for further clarification.

Recycled content: Proportion, by mass, of recycled material in goods or packaging. Only pre-consumer and post-consumer materials shall be considered as recycled content.

Guidance: Packaging is exempted from the requirements of the standard, unless the recycled material being claimed is part of the packaging.

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.¹

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-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 and/or meets the qualification for by-products listed in the definition for "pre-consumer material".

In the US, 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) While materials that meet this definition may be considered as recycled in the US, the narrower definition of "recycled material" listed above is used for the Global Recycled Standard.

A4 - Recycled Material Requirements

- A4.1b Entities involved in Material Collection (as defined in A3), with the exception of individuals, are required to submit the Reclaimed Material Declaration Form (see Appendix 1). The Reclaimed Material Declaration Form must be submitted to consignees on an annual basis for all reclaimed materials being supplied for use in GRS products. The Reclaimed Material Declaration Form declares that the facility will allow inspections with a minimum of a 3 day notice by Certification Bodies accredited to the GRS.
- A4.2b Entities involved in Material Concentration (as defined in A3) are required to submit the Reclaimed Material Declaration Form (see Appendix 1). The Reclaimed Material Declaration Form must be submitted to consignees on an annual basis for all reclaimed materials being supplied for use in GRS products. The Reclaimed Material Declaration Form declares that the facility will allow inspections with a minimum of a 3 day notice by Certification Bodies accredited to the GRS.

Guidance: The requirements of A4.1 and A4.2 only apply to the direct suppliers of Material Recyclers, which are subject to certification.

A risk assessment of all the Material Collectors and/or Concentrators of a Material Recycling facility should be conducted. At least ten percent (with a minimum of one) of all Collectors and/or Concentrators should be chosen for direct verification, with two percent (with a minimum of one) chosen for physical inspection. These facilities may be chosen randomly or as a result of the risk assessment. Risk factors should include, but are not limited to, use of Pre-Consumer Material as input, facilities with high volumes of input material into GRS Material Recycling facilities, and inconsistencies

¹ 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.

in documentation. CBs should make an effort to avoid inspection of the same sites from one year to the next, if possible.

Direct verification of Material Collectors and Material Concentrators should seek to verify the authenticity of the Reclaimed Material Declaration Form as well as the following information:

1. That all claimed material meets the definition of Reclaimed Material (A3).
2. That all claimed material is properly identified as Pre-Consumer or Post-Consumer Material (A3).
3. That the source of all claimed material is reviewed.

Textile Exchange will not collect fees from inspections of Material Collectors or Material Concentrators.

A4.3b In addition, entities involved in Material Recycling must:

- i. Hold valid Reclaimed Material Declaration Forms for all GRS input materials, or proof of verification to an accepted standard (see TE Accepted Equivalent Standards), available online (<http://globalrecycled.org>).

Guidance: If the reclaimed materials have been verified through an approved equivalent standard, then those reclaimed materials will be accepted for the GRS, 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 GRS 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.

- 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: Prior to the initial inspection, the Material Recycled should submit a list of all sources of reclaimed material to their CB. This allows the CBs time to verify legal authorization of the entities involved in Material Collection and Concentration to operate (A4.1 and A4.2) as well as to assess any areas of risk.

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: Virgin material shall be defined as any material that does not meet the definition of “recycled material” given in A4. 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. It is understood that it will not be possible in every case to confirm whether input materials are reclaimed or virgin.

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.

A5 - Supply Chain Requirements

- A5.2b The amounts of pre-consumer and post-consumer material must be recorded separately for each batch at all steps of production and recorded on the transaction certificate.

Guidance: While the labelling requirements of the GRS 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 GRS goods to know how the final product will be labelled, or if they will want the information for their own use.

- A5.2c Traders with an annual turnover of less than \$5,000 of GRS goods, and retailers selling to end consumers only, are exempt from the certification obligation; provided that they do not (re-) pack or (re-) label GRS Goods. Exempted traders with less than \$5,000 annual turnover of GRS Goods must register with an Approved Certification Body and must inform the Certification Body immediately once their annual turnover exceeds \$5,000, or once they plan to (re-)pack or (re-) label GRS goods.

Guidance: A trader is any entity that takes ownership of the certified goods, regardless of whether they take physical possession of the goods.

- A5.2d 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 for each material to show that calculations were done to account for the differences.

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:**
 - o **Add more recycled fiber to their inputs, to account for the expected loss (e.g.: use 55kg of recycled cotton fiber and 45 kg of virgin cotton fiber to create a 50% recycled yarn)**
 - or
 - o **Adjust the final amount being claimed to reflect the actual amount of recycled material in the output.**
- A5.2e Buyers of the GRS 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 GRS and its certification process.

Guidance: Any additional requirements set by a buyer do not fall under the GRS certification. However, it may be advantageous to have the additional requirements checked during the GRS 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 GRS, but may be added to the Transaction Certificates if requested by the brand. The arrangements should be made through the Certification Body.

B1 - Social Policy

B1.1b Worker awareness of policies regarding the social principles listed in Section B2.

Guidance: Worker awareness may be demonstrated through training records or procedures around worker access to updated social policies.

B2 - Social Requirements

B2.5a Certified Organizations shall provide safe and clean conditions in all work and residential facilities and shall establish and follow a clear set of procedures regulating occupational health and safety.

Emergency procedures must be clearly displayed and understandable to all workers, and hazards must be clearly marked.

Guidance: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

B2.5b Certified Organizations must take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Appropriate and effective personal protective equipment shall be provided as needed.

Guidance: Appropriate protective equipment shall include adequate clothing, footwear, and eyewear where necessary.

B3 - Verification of Social Compliance

B3.2a Certified Organizations may submit an equivalent third-party audit report that meets the following requirements:

- i. The audit must have been conducted against GRS recognized social principles, see TE Accepted Equivalent Standards, (<http://globalrecycled.org>).
- ii. The full audit report must be made available to the GRS inspector.
- iii. The audit must have been conducted by a qualified auditor.
- iv. The audit must not be older than 12 months at the time of the GRS audit.
- v. The audit report must be accompanied by proof that any identified corrective actions have been implemented as indicated in the corrective action plan.

Implementation of identified corrective actions will be confirmed during the GRS audit, and random checks will be made on the information in the audit reports.

Guidance: The auditing body must be a third party (i.e.: not the Certified Organization, one of its customers or suppliers) and be authorized by the standard owner of the equivalency standard to conduct the inspection and issue the report.

Other detailed Social Audit reports may be assessed by the GRS certification body to verify that the GRS Social Principles (Section B2) have been covered, and that the applied audit methodology is equivalent to the methodology outlined in Appendix 3. These criteria for the audits must be submitted to Textile Exchange for approval at least 3 months prior to any GRS audits or certification.

C1 - Environmental Management System

C1.1 Certified Organizations must have an environmental management system (EMS) in place. The environmental management system must include the following:

Guidance: See Global Social Compliance Program Environmental Implementation Guidelines, for further guidance in meeting the environmental requirements of the GRS.¹

C2 - Environmental Requirements

C2.1d The Certified Organization must set and meet targets for meaningful improvements in energy use and review progress annually.

Guidance: When assessing whether the targets set for improvements are meaningful, Certification Bodies shall consider how advanced the Certified Organization's current energy usage is and how much improvement is adequate and/or realistic.

For example, new machines to reduce water used per kg of fabric dyed and processed, an energy reduction plan to turn machines off when not in use. The Natural Resources Defense Council (NRDC)'s Clean by Design initiative has helpful guides for this approach.²

C2.2d The Certified Organization must set and meet targets for meaningful improvements in water use and review progress annually.

Guidance: When assessing whether the targets set for improvements are meaningful, Certification Bodies shall consider how advanced the Certified Organization's current water usage is and how much improvement is adequate and/or realistic.

C2.3e There must be a system in place to ensure that wastewater receives proper treatment, either on or off-site, to meet minimum requirements before entering the water stream, see Appendix 4. Where national and local requirements are more stringent, these limit values supersede the requirements listed in Appendix 4. This system shall also ensure that sludge receives proper treatment and disposal. Test reports must be made available for the certification body and meet the requirements below.

- i. The report must cover no more than 6 months
- ii. Must be conducted by trained personnel using equipment as directed by the test guidelines.
- iii. The reports must cover all legal requirements and those set out in Appendix 4.

Guidance: If there is doubt, the CB may take samples and carry out tests.

C3 - Verification of Environmental Compliance

C3.2a Certified Organizations may submit an equivalent third-party audit report that meets the

¹ To download a copy, visit <http://gscpnet.com>.

² Visit the Clean by Design webpage: <http://www.nrdc.org/international/cleanbydesign/>.

following requirements:

- i. The audit must have been conducted against GRS recognized environmental principles, see TE Accepted Equivalent Standards, (<http://globalrecycled.org>).
- ii. The full audit report must be made available to the GRS inspector
- iii. The audit must have been conducted by a qualified auditor
- iv. The audit must not be older than 12 months at the time of the GRS audit
- v. The audit report must be accompanied by proof that any identified corrective actions have been implemented as indicated in the corrective action plan

Implementation of identified corrective actions will be confirmed during the GRS audit, and random checks will be made on the information in the audit reports.

Guidance: Other detailed Environmental Audit reports may be assessed by the GRS certification body to verify that the GRS Environmental Principles (Section B2) have been covered. These criteria for the audits must be submitted to Textile Exchange for approval at least 3 months prior to any GRS audits or certification.

Section D: Chemical Requirements

The GRS addresses only the use and management of chemicals in the manufacturing of GRS goods. The standard does not apply to the facility as a whole, but only to the production of GRS products. The GRS does not address the chemicals that are present in the final product, as it does not control for any chemicals that may be present in the reclaimed goods that are used as initial inputs in the GRS production chain. The GRS Prohibited Substance List (D2.3) was developed with the textile industry in mind. As such, it does not apply to the production of non-textile products. Future versions of the standard will include similar lists for other classes of products.

It is the responsibility of the final sellers of GRS products to ensure that the products meet their own or nominated Restricted Substances Lists (RSL's) or any legal requirements in the country of sale.

Guidance: If a company wants to enforce an RSL on final products, it is necessary to set testing requirements of input materials against that RSL.

If a company wishes to use the GRS for non-textile products, please contact integrity@TextileExchange.org about an appropriate list of restricted chemicals.

D1 - Chemical Management System

Guidance: See [Global Social Compliance Program Environmental Implementation Guidelines](#) for further guidance on meeting the requirements of the chemical management requirements of the GRS.¹

D2 - Chemicals used in GRS Products

D2.1 Inherently problematic substances

Any chemicals used in processing of GRS Products shall not contain:

Substances of Very High Concern (SVHC)² as referred to in Article 57 of European Regulation (EC) No

¹ To download a copy, visit <http://gscpnet.com>.

² Directive 67/548/EEC with adjustment to REACH according to Directive 2006/121/EC and Directive 1999/45/EC as amended. <http://www.reach-compliance.eu/english/legislation/docs/launchers/launch-annex-1-67-548-EEC.html>.

1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)¹, and included in Annex XIV of the Regulation.

Guidance: Substances still under review by REACH, and not yet listed on the SVHC list may be used in GRS products. These substances must meet the requirements of D2.2 and D2.3a if applicable.

D2.2 Exclusion of substances and mixtures classified with particular hazard codes or risk phrases

No use is allowed of substances and mixture that are assigned (or may be assigned by the time of the application) any of the hazard statement codes and/or risk phrases (or a combination of them) listed in Table A.

Guidance: The GRS does not apply the complete list of Hazard codes or Risk phrases; it includes those that represent the highest risk of environmental and human health hazards.

D2.3a Chemical groups identified in the GRS Prohibited Substance List (available online) must not be used and must not be part of any preparations or formulations used in manufacturing GRS certified textile products.

Guidance: Chemical groups listed in the GRS Prohibited Substance List have been identified as chemicals of concern due to known and potential environmental and human health hazards.

ZDHC (Zero Discharge of Hazardous Chemicals) has released a MRSL, intended to “assist brands, their supply chains and the broader industry to adopt a harmonized approach to the control of hazardous substances used to process textile and trim materials in apparel and footwear.” It is intended that when producing GRS certified products, the products will also meet the ZDHC MRSL requirements.²

D3 - Verification of Chemicals

D3.1d Further information and testing may be required by the Certification Body to further verify that chemicals or substances used in GRS products are not prohibited by Section D2.

Guidance: Based on risk assessment, the Certification Body may request additional testing or document requests. Random testing of chemicals used may also be conducted by the Certification Body.

Additional documents that may be requested by a CB include, but are not limited to: analytical test reports (from chemical suppliers), invoices (to verify the dye stuff has been bought from an approved supplier), and the recipes used in GRS products.

D3.2a Chemicals or additives which have met the criteria set out in Section D2 may be added to the GRS Allowed Substance List, to be maintained by Textile Exchange and available online (<http://globalrecycled.org/>). Any chemicals on this list may be used in the processing of GRS certified products. This is not a comprehensive list and only represents chemicals which have been screened.

Guidance: Certification Bodies are required to submit substances (basic chemicals or complex mixtures) found to comply with all GRS Chemical Requirements to Textile Exchange. The list of

1 Regulation (EC) No 1907/2006 of the European Parliament and of the Council. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:396:0001:0849:EN:PDF>.

2 You can find the ZDHC MRSL online: <http://www.roadmaptozero.com/>.

substances approved for use in GRS products will be maintained by Textile Exchange.

Chemical suppliers may also request that a chemical be added to the list of approved substances. To request a chemical or additive be added to the TE GRS Allowed Substance List, please send an email to Integrity@TextileExchange.org.

GRS Logo Use and Labeling Guide Interpretations

B1.2 Requirements for all GRS Labeled Products

- B1.2a The labeling must include the GRS logo, the phrase: “made with (or contains) X% Recycled Material”.

X% shall represent the final percentage of Recycled Material by appropriate unit of measure in the finished product.

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.

The minimum percentage of recycled content has been set at 20% for GRS v3. As increased technology and innovation allows for higher percentages of recycled content in products, the minimum required recycled content percentage will also likely increase in future versions of the GRS.

Material refers to the raw material created as the output of the recycling process. In the case of products with multiple Recycled Material types, each material must be separately listed with each percentage:

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

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

- B1.2b The labeling must reference the Certification Body (e.g.: Certification Body’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.

B1.3 Optional Additional Language for GRS Labeled Products

- B1.3a “Pre-consumer” or “post-industrial” (PIR) and “post-consumer” (PCR) may also be used to describe the recycled material; any percentage amounts must be accurate. Separate materials must be identified with accurate percentages.

Examples:

- “contains 80% recycled polyester”
- “contains 80% post-consumer recycled polyester”

- “contains 80% post-consumer and pre-consumer recycled polyester”
- “contains 40% post-consumer and 40% pre-consumer recycled polyester”
- “contains 60% recycled polyester and 20% recycled nylon”

Guidance: Equivalent terms may also be used, such as “post-consumer” recycled (PCR) or “post-industrial” recycled (PIR).

B1.3b Companies may use the language below for on- or off-product communication, at the discretion of the brand.

“Factories involved in the production of GRS certified products meet the fair labor and environmental impact requirements of the GRS.”

or

“Virtually all products impact the environment. For details on the issues covered by the GRS, go to <http://globalrecycled.org>.”

Guidance: Companies may reference the GRS website which will provide the consumer with additional information about the requirements of the standard.

GRS Frequently Asked Questions

1. **Why are recyclers required to be certified?**
2. **What should Collectors and Concentrators expect in case of an inspection?**
3. **Can the GRS logo be used in off-product communications?**
4. **Does GRS certification require that I disclose my suppliers?**

1. 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.

2. 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.

3. Can the GRS logo be used in off-product communications?

The GRS logo may also be used in off-product communication (web, print, signage), as long as all of the guidelines in the *GRS Logo Use and Labeling Guide* are followed, and there is no chance that non-certified products may be confused with the certified products.

4. Does GRS 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 GRS, 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.