

Recycled Claim Standard 2.0

Global Recycled Standard 4.0

Comments and Responses

The comments listed here were collected during the Public Stakeholder Review of the Standards, held during the month of April 28.

Under each comment, we have explained the result of the feedback and if accepted, where the changes in the standard may be found.

Reference	Paragraph	Commented text	Proposed change	Comment (justification for change)
1	A4 line 266	At least 10% (with a minimum of one) of all Collectors and /or Concentrators should be chosen for direct verification.	At least 30% (or 1/3) (with a minimum on one) of all Collectors and/or Concentrators should be chosen for direct verification.	More robust validation process
2	A4 line272	CBs should make an effort to avoid inspection of the same sites from one year to the next, if possible.	CBs should inspect the sites every 3 years to account for 100% of raw material providers sourced by year 3. Going forward newest suppliers should be audited as they enter the raw materials matrix. Facilities can be audited for multiple upstream uses; i.e. if bottle recycler A provides to spinning mill B and C, then bottle recycler A on needs to be audited once in that year.	More robust validation process

Response: *During our review of this criteria, Certification Bodies have noted the difficulty so far in meeting the 10% additional verification of Reclaimed Material providers. While documentation has been collected, it has been very difficult to contact them directly due to the fact that there is no contact between the Certification Body and the Material suppliers. The IWG has taken the decision to introduce a Reclaimed Material Supplier Agreement, in addition to the Reclaimed Material Declaration Form. This will include contact information between the Certification Body and the Material Supplier, to better enable the CBs to perform additional checks when needed. In future versions, this 33% every three years will be reviewed again.*

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3	A3 line 209	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.	The definition of pre-consumer waste is still not clear..." How is "process" defined in this context? Would yarn manufacturing be considered a process or operations such as combing, carding etc. would be considered process to determine at what point the waste generated can be used and captured as recycled content? It would be very beneficial if some examples are discussed in the standard.	More clear definition needed for better understanding and less confusion.

Response: *Additional examples have been added under the definition of Pre-Consumer Material. A3.1b also includes additional guidance about how Certification Bodies shall determine whether or not a Material may be claimed as Recycled Material.*

The term "process" has been further defined in the Guidance under the definition of Recycled Material. See page 16 in the GRS Implementation Manual.

4	B2.5b line518	Guidance: Appropriate protective equipment shall include adequate clothing, footwear and eyewear where necessary.	Add "hearing protection".	Should cover the full range of PPE
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Response: *This change has been included. See Guidance under B2.5b.*

5	General		Should there be a requirement for recycler to demonstrate that material recycling in their specific operation is better / more sustainable than using virgin material? GRS CB should be	
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			able accept LCA or other similar certificates.	

Response: *The intention of the standards is to provide verification that a material has been recycled. It is outside the scope of the standard to draw comparisons between processes. This has been outlined and approved in the Terms of Reference for the RCS and GRS.*

6	A5.2a	All materials entering the supply chain shall have a valid transaction certificate (TC) issued by an approved CB.	This may also include supporting documents, product authentication reports for molecular tagged recycled materials or products.	Molecular Tags or tracers are being used to tag recycled materials and can provide traceability in the supply chain as well as transparency. Product Authentication Reports relating to the use of tracers should be provided in addition to the TC as supporting documentation and should be recognized as part of any Quality Management System.
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Response: *The Transaction Certificate is an established and crucial component of the Content Claim Standard, upon which the RCS and GRS rely.*

Changes to the CCS were outside the scope of this review. Molecular tags and other forms of traceability are increasing in use, and may - in the future - be assessed as a complement or option for reliable assurance of material content. However, use of tracers is not currently a replacement or supplement for third-party certification to the chain of custody requirements of the Content Claim Standard. This comment has been marked to be added to the next review of the Content Claim Standard.

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Reference	Paragraph	Commented text	Proposed change	Comment (justification for change)
7	A5.2b	The amounts of pre-consumer and post-consumer material shall be recorded on the transaction certificate	This may also include supporting documents, product authentication reports for molecular tagged recycled materials or products	Molecular Tags or tracers are being used to tag recycled materials and can provide traceability in the supply chain as well as transparency. Product Authentication Reports relating to the use of tracers should be provided in addition to the TC as supporting documentation and should be recognized as part of any Quality Management System.

Response: *Any claim of assurance or verification of content, Recycled Material, Pre-Consumer or Post-Consumer Recycled Material provided by tracers, molecular tagging, or other alternative or supplement to the requirements of the CCS is not accepted in the standards.*

Changes to the CCS were outside the scope of this review. Molecular tags and other forms of traceability are increasing in use, and may - in the future - be assessed as a complement or option for reliable assurance of material content. However, use of tracers is not currently a replacement or supplement for third-party certification to the chain of custody requirements of the Content Claim Standard. This comment has been marked to be added to the next review of the Content Claim Standard.

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8	A5.2e	<p>Buyers of the GRS product will be responsible to set any further requirements on the specific standards or requirements to which the input material shall be certified. These additional requirements are separate from the GRS and its certification process.</p> <p>Some brands may wish to identify the original source material prior to recycling. This is outside the scope of the certification of GRS, but may be added to the TC if requested by the brand. This arrangement should be made through the Certification Body.</p>	This may also include supporting documents, product authentication reports for molecular tagged recycled materials or products	Molecular Tags or tracers are being used to tag recycled materials and can provide traceability in the supply chain as well as transparency. Product Authentication Reports relating to the use of tracers should be provided in addition to the TC as supporting documentation and should be recognized as part of any Quality Management System.

Response: *Tracers, molecular tagging, or other alternative or supplement to the requirements of the CCS may be used at the discretion of the Organizations undergoing certification. These have not been reviewed or assessed as part of the CCS, RCS, or GRS. They do not replace or supplement the requirements of the standard.*

9	A5.2a	All materials entering the supply chain shall have a valid transaction certificate (TC) issued by an approved CB.	This may also include supporting documents, product authentication test reports for molecular tagged recycled materials or products	Molecular Tags or tracers are being used to tag recycled materials and can provide traceability in the supply chain as well as transparency. Product Authentication Reports relating to the use of tracers should be provided in addition to the TC
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				as supporting documentation and should be recognized as part of any Quality Management System.

Response: *See response to comment number 6, regarding the use of Transaction Certificates.*

10	Lines 209-212	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.		The Higg MSI utilizes the recycling cut-off approach. For recycled products, the transportation of the waste product to the recycling facility, and burdens of the recycling process, must be provided. No other upstream inputs are included. The chart below demonstrates this cut-off procedure.
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Response: *This comment has been reviewed by the International Working Group, and an addition to the guidance has been accepted. The changes provide guidance for Certification Bodies, specifically targeted for the determination of whether a Claimed Material is Pre-Consumer Recycled Material, or simply resource efficiency.*

You can see the changes to the Standards under line A3.1b.

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Reference	Paragraph	Commented text	Proposed change	Comment (justification for change)
11.	Lines 209-212	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.	As a solution, I would suggest that an additional criteria for pre-consumer waste should also be applied: "Does the process accept pre-consumer waste from multiple sources or only their own operations?" If yes, then it can be considered recycled content. If no, then the impact burden is not able to have the cut-off method applied and it is a manufacturing efficiency not recycling.	There are many instances where re-use of "waste" streams should be considered as manufacturing efficiency and not recycled content. In these instances, diverting it through an additional process to feedback into the original process should not be considered "recycled".

Response: *This comment has been reviewed by the International Working Group, and an addition to the guidance has been accepted. The suggested proposal has not been accepted out of concern that it may create incentive to trade materials between manufacturers as a loop hole to the requirement.*

The changes provide guidance for Certification Bodies, specifically targeted for the determination of whether a Claimed Material is Pre-Consumer Recycled Material, or simply resource efficiency.

You can see the changes to the Standards under line A3.1b.

12	Sections B, C, and D		To help address this I would encourage the release of the certification results, especially around emissions targets that get set.	I have always had some concerns over the social and environment claims within the GRS - there is a lot going on in this standard and the degree to which these practices occur are not the primary
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				consideration of the standard.

Response: *The Scope of both standards has been reviewed and approved by the International Working Group. Since the certification results of specific sites is confidential, this information will not be disclosed, unless it is done directly by the Certified Organization.*

As part of our Monitoring and Evaluation of the effectiveness of the standard, Textile Exchange will begin collecting aggregated performance information from the Certification Bodies. This may include the Targets for Emissions and other environmental processing targets and performance measurements.

	B2.2a iv. Line 447	and shall not employ any person under the age of 15, whichever of these is higher. If, however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.	I will add to ask the factories to keep a special records for young under 16 years old. each company will keep a record of the reason they have chosen or not to join. they will be called the "coming generation" (this might help in the future to put actions in place for those kids)	
	B2.2a iv. Line 544	Work performed shall be on the basis of a recognized employment relationship established in compliance with national legislation and practice and international labor standards; whichever affords the greater protection.	the "coming generation" will be paid decently and cannot be less than the minimum wages in the country.	

Response: *The Social Requirements included within the Standard reference other existing Social Responsibility criteria used in manufacturing. Standards and certification always carry the risk of*

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increasing the burden of audits on the Certified Organization without additional returns. By including criteria that align with other standards, and by recognizing existing audits in the standard, the Standard can provide a strong assurance of performance in key areas, without increasing the audit pressure.

For this reason, changes to the Social Criteria were not made, except which provided clarity or guidance to existing criteria.