Materials Matter

MATERIALS MATTER
STANDARD

CLAIMS AND LABELING POLICY
FOR CONSULTATION

Document Information

Document Code

Document code   TE-MM-POL-301

Version

Publication date   **January 8th, 2024**
Effective date   **[Month DD, YYYY]**
Transition period   **[Month DD, YYYY] – [Month DD, YYYY]**
NOTE: See section A1.1 for more details.

Document Revision History

**[Month DD,   First Publication
YYYY]**

Document Revision and Interpretation

The *Materials Matter Claims and Labeling Policy* will undergo a review process at least every five years. Points of clarification may be incorporated into supplementary and guidance documents prior to the next review. More substantive feedback or suggested changes will be collected and considered as part of the next review of the document.

Any uncertainty regarding the correct interpretation of a criterion should be resolved by the "Notes and Examples" content, where possible. You may submit feedback to Textile Exchange's standards system at any time via this form or by sending an email to standards@textileexchange.org.

Copyright

Disclaimer

About Textile Exchange

Textile Exchange is a global non-profit aiming to drive beneficial outcomes for climate and nature across the fashion, textile, and apparel industry, right from the start of the supply system.

Our goal is to help the industry achieve a 45% reduction in the greenhouse gas emissions that come from producing fibers and raw materials by 2030 (from a 2019 baseline). To get there, we are keeping our focus holistic and interconnected, accelerating the adoption of practices that improve soil health, water, and biodiversity while respecting human livelihoods and animal welfare.

Over the last 20 years, our internationally recognized standards for the production of different fibers and raw materials have helped build integrity in the industry. As a member of ISEAL, we comply with three credibility Codes of Good Practice which underpin our policies and procedures for organizational functions like standard-setting, assurance, and monitoring, evaluation, and learning. These practices ensure we provide value, rigor, accessibility, and transparency in our standards.

All of our standards are anchored by an independent, third-party assurance model that supports organizations in consistently demonstrating and maintaining conformity while handling and trading their certified products, through an independently verifiable and impartial process.

About the Materials Matter Standard

The Materials Matter Standard is a voluntary sustainability standard for the production and initial processing of raw materials used in the fashion, textile, and apparel industry.

The standard sets out to incentivize a system in which the materials in our clothing and textiles support the climate, respect human rights and animal welfare, and drive beneficial outcomes for soil health, water, and biodiversity. It aligns the industry on a shared trajectory towards this vision by establishing what best practice looks like for different materials in various settings, from farms to recycling facilities.

By focusing specifically on the start of the supply chain, the Materials Matter Standard provides a global certification model that is connected to the unique contexts of producers and processors, as well as their local communities and landscapes. A blend of practice-based criteria and outcome-based indicators helps participating organizations get acknowledged for meeting core requirements and measuring results. At the same time, it gives brands and retailers that choose certified materials a way to speak confidently to customers about them.

In the long term, the Materials Matter Standard provides a foundation for producers and processors to map how their activities impact the people and ecosystems around them, track their progress based on different practices, and learn where to improve over time to drive beneficial outcomes on the ground. Beyond getting certified, optional leadership criteria invite participating organizations to raise the bar through areas like regeneration, renewable energy, and textile-to-textile recycling.

Over time, the Materials Matter Standard will be improved and adapted using insights from the auditing process and outcome measurements. This will help make sure it brings more meaningful benefits to those producing materials for the industry, as well as those directly impacted by the practices they use.

Please note that the Materials Matter Standard was known as "the unified standard" during its development. With the release of the Pilot V1.0, Textile Exchange is pleased to share its official name with stakeholders.

Contents

A. About the Document

Notes for consultation

This draft of *TE-MM-POL-301 Materials Matter Claims and Labeling Policy* (TE-MM-POL-301) is being released for public consultation and feedback.

Many references to Textile Exchange documents included in this draft are made as references to current Textile Exchange documents and will be updated for the final published policy.

NOTE: Any notes included in criteria within the "Consultation Notes" section are limited to this document and will not apply to the final publication of TE-MM-POL-301-V1.0.

There are several areas of work that are not yet fully addressed in this draft. Textile Exchange welcomes input on these topics, which include:

- Sourcing claims;
- Mass balance claims;
- Recognition claims;
- Commitment claims;
- Trademark and label use guidelines; and
- Claims and labeling examples

NOTE: All incomplete dates will be populated in the final version of this policy (e.g. "[Month DD, YYYY]" in A1.1.1).

A1. Implementation

The following implementation timelines apply:

A1.1.1   The *Materials Matter Claims and Labeling Policy V1.0* is effective [Month DD, YYYY], and may be used immediately. It replaces the following documents which shall not be used as of the mandatory date of *Materials Matter Claims and Labeling Policy V1.0* (see A1.1.2):

   a.   TE-301-V1.3 Standards Claims Policy; and

   b.   TE-302-V1.3 Standards Logo Use Specifications.

   _____

   CONSULTATION NOTE:

   1)   The *Organic Content Standard (OCS)* is planned to remain out of scope of the Materials Matter system. As such, our plan is to develop a separate, updated OCS claims and labeling policy to support on-going use of the OCS label and claims following the transition from the *TE-301 Standards Claims Policy* to the *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*.

A1.1.2   The mandatory implementation date for the *Materials Matter Claims and Labeling Policy V1.0* is [Month DD, YYYY]. All audits and assessments conducted on or after [**Month DD, YYYY**] shall be conducted using *Materials Matter Claims and Labeling Policy V1.0*.

A2. Document References

All *organizations* are subject to the criteria of the following documents, and it is essential that they are used alongside this document. All can be found at TextileExchange.org/knowledge-center. Where a specific version of a document is referenced, this is to ensure clarity in referencing specific criteria and does not supersede mandatory implementation dates for future versions of the document. The latest version of referenced documents, including any amendments (e.g. calibrations), applies for those without a version number.

The following documents are relevant to the *Materials Matter Claims and Labeling Policy* and its implementation. Please note that Textile Exchange will be releasing updated versions of these documents to align with the Materials Matter Standard in 2024/2025.

A2.1.1   *TE-MM-STN-101 Materials Matter Standard Pilot Version* – The *Materials Matter Standard (MMS)* provides the requirements for the production and initial processing of raw materials used in the fashion, textile, and apparel industry.

A2.1.2   *CCS-101 Content Claim Standard* – The *Content Claim Standard (CCS)* is a chain of custody standard that provides *organizations* with a tool to verify a specific input material, track this material during individual *site* processing and handling on its journey to a *final product*, and provide *volume reconciliation*. It requires that each organization along the *supply chain* takes sufficient steps to ensure that the integrity and identity of the input and output materials are preserved.

A2.1.3   *ASR-101 Accreditation and Certification Procedures for Textile Exchange Standards* – This document contains the requirements for *accreditation bodies* and *certification bodies* conducting different forms of evaluation in the Materials Matter standards system, including requirements for issuing and managing *non-conformities* by the *accredited* certification bodies.

B. Document Scope and Certification

The *Materials Matter Claims and Labeling Policy* provides clear requirements and guidelines for entities looking to communicate about Materials Matter certification and/or Materials Matter Certified products, which includes *claims* about *certification* to the raw material standard and/or the *Content Claim Standard (CCS)* to track Materials Matter Certified materials. Communication about the Materials Matter Standard is voluntary within our system. Entities that wish to communicate about Materials Matter follow the requirements in this document to ensure all claims being made protect the credibility of the claim and the *Materials Matter system.*

B1. Claim Types

The type of claims allowed under the *Materials Matter Claims and Labeling Policy* includes the following:

B1.1.1   **Product Claim** – A claim made about the certified material in a product; usually takes the form of labeling which can be done on or off-product.

B1.1.2   **Certified Organization Claim** – A claim made about the certification status of an organization.

B1.1.3   **Sourcing Claim** – A claim made about the certified material which is sourced by an organization.

B1.1.4   **Mass Balance Claim** – A claim made about material certified under the mass balance system.

B1.1.5   **Recognition Claim** – A claim made about certified material that will enter the system through the *Materials Matter Standard Recognition Framework* for recognizing existing standards.

B1.1.6   **Commitment Claim** - A claim made about an organization's commitment to source certified material.

Consultation Note: Materials Matter claims allowed for certification bodies are not currently in scope of the *Materials Matter Claims and Labeling Policy*. We intend to develop a supplemental guidance document for certification bodies and accreditation bodies to communicate about their work with Textile Exchange and our standards.

Claim Scopes

The *Materials Matter Claims and Labeling Policy* applies to claims about the materials that have criteria in the scope of the *Materials Matter Standard*, including:

- Single material claim scopes:
    o Recycled [material]
    o Wool
    o Mohair
    o Alpaca
    o Down
- Blended claim scopes:
    o Recycled Materials
    o Animal Materials
    o Blended Materials

Consultation Note: Materials that will enter the system through the *Materials Matter Standard Recognition Framework* will be added once the framework is finalized and as materials are recognized.

The claim scopes differ depending on whether the product contains a single *certified material*, blends of multiple certified materials within a similar category ("Animal Materials" and "Recycled Materials"), or blends of multiple certified materials from different categories (e.g. certified down and certified recycled polyester would fall into the "Blended Materials" scope).

Consultation Note: We are considering an additional claim scope for a product that contains a minimum of 95% certified *content* and meets optional supply chain criteria. This is being considered alongside a parallel workstream to identify supply chain certifications that may bring value or have added impacts, and develop mechanisms through our systems to collect and share relevant data.

Materials Matter Certified		
Single Material	**Blended**	**Full Product (single or blended)**
Recycled [material type]	Recycled Materials	Product
Wool	Animal Materials	
Mohair	Blended Materials	
Alpaca		
Down		

B2. Our Trademarks

The Materials Matter trademarks are proprietary and for authorized use and/or display only; all trademark use must conform with this policy.

The Materials Matter trademarks are the intellectual property of Textile Exchange, which reserves all rights in relation thereto. Unauthorized display, copy, and/or use of the Materials Matter trademarks without prior authorization is strictly prohibited.

Any organization that uses the Materials Matter trademarks is required to do so in agreement with trademark use terms and conditions through Textile Exchange, a licensing agreement with a certification body, or an authorization agreement with an accreditation body as applicable.

Certification bodies with a valid licensing contract with Textile Exchange may sublicense the right to use the Materials Matter trademarks upon request and approve use for all claims about certification in conformity with the requirements in this policy.

Textile Exchange reserves the right to take legal action against any party that uses, displays, and/or copies the Materials Matter trademarks without prior authorization. Incidents of unlicensed or improper use of the Materials Matter trademarks will be handled in accordance with _ASR-110 Complaints and Feedback Policy_ and the terms outlined in this policy.

B3. Chain of Custody

Chain of custody refers to the system that tracks and verifies the movement of materials from their origin through each stage of production, processing, and distribution. It ensures that certified materials are properly documented and accounted for at every step of the supply chain.

The _Content Claim Standard (CCS),_ Textile Exchange's chain of custody standard, provides a rigorous framework for verifying the presence and accurate tracking of eligible materials through the supply chain. The CCS requires each organization in the supply chain to maintain robust record-keeping, participate in traceability systems, and have independent third-party audits to ensure integrity.

In the CCS, mass balance is an alternative chain of custody model available for use by _certified organizations_ for eligible and approved processes. Mass balance allows for the _mixing_ of certified and non-certified materials, provided the overall input and output volumes of the certified materials are accounted for. This system enables scalability and accessibility, particularly in industries where full physical segregation is not feasible. While the certified content may not be physically present in each product, the mass balance approach ensures that the equivalent amount of certified material is sourced and processed for an eligible product, supporting valid claims about responsible sourcing.

By implementing the CCS, and incorporating mass balance systems where applicable, organizations can support their allowable claims with documented proof, ensure the credibility of their processes, and encourage the broader adoption of more sustainable practices in the textile industry.

B4. Guiding Claims Principles

When making a claim about _Materials Matter_, it is crucial that the claim is truthful and conveys what is being achieved. Textile Exchange follows ISEAL's guidelines to ensure that claims and labeling about _Materials Matter_ certification are communicated transparently—with clarity, accuracy, and relevance—and are supported by reliable and transparent systems.

What is ISEAL?
ISEAL is an organization that supports ambitious sustainability systems and their partners to tackle the world's most pressing issues that focus on credible practices, to advance scalable and effective solutions that make a lasting impact.

Textile Exchange encourages *claim makers* to follow these guiding principles and best practices when making claims:

- **Clear:** The claim is easily understood and free from misleading information.
- **Accurate:** The claim is truthful, based on substantiated evidence, and an accurate interpretation of that evidence.
- **Relevant:** The claim is about an issue that is significant to the product or business and not a distraction from more important issues.
- **Transparent:** Information about the claim and claim system is easily accessible and publicly available, including the scope, verification, and supporting evidence.
- **Robust:** There is a robust system in place that controls when claims can be used and by whom, and clear criteria is met before any claims are made.

B5. Legal Compliance

The claim maker, whose name is associated with any claim, is solely responsible and liable for product labeling, packaging, and other information thereon. It is the claim maker's responsibility to ensure that packaging, labeling, and other claims comply with all relevant legislation, regulations, and standards. All Materials Matter claims should conform with this policy and are expected to be accurate, up to date at the time of printing or publication, and can be substantiated if required.

This policy is not intended as legal guidance and claims and labels made based on Textile Exchange's certification system are not intended to be legal guarantees. Textile Exchange shall not be held liable or responsible for the legal implications arising from the use of our standards certification system nor the use of any related claims. It is recommended best practice to seek legal counsel to understand the consumer protection laws and labeling requirements in each country of sale, which falls outside the scope of certification to our standards and this policy.

Relevant legislation, standards, and other guidance includes (but is not limited to):

European Union (EU):

- Directive on empowering consumers for the green transition and annex, 2024
- Proposal for a Directive on Green Claims, 2023

International:

- ISO 14020, ISO 14021, ISO 14024, ISO 14025

United Kingdom (UK):

- DEFRA Green Claims Guide, 2011 | CMA Green Claims Code, 2021

United States (USA):

- Federal Trade Commission's, 16CFR Part 260, Guides for the Use of Environmental Marketing Claims (Green Guides), 2012
- Federal Trade Commission, 16CFR Part 255, Guides Concerning the Use of Endorsements and Testimonials in Advertising, 2009 (In review, 2020)

Section 1 – Materials Matter Claims

This section outlines the overarching criteria that apply to all *Materials Matter claims* allowed within the Materials Matter system. These general criteria ensure consistency, credibility, and transparency in how claims are made. Adhering to these criteria is essential for all organizations seeking to make Materials Matter claims, regardless of specific *claim type*.

1.1. General Requirements

1.1.1   The *claim maker* and their claims meet all the criteria in this section as well as the criteria under the applicable *claim type* section(s) of this policy. *Materials Matter claim* types include:

   a. *Product claims*;
   b. *Certified organization claims*;
   c. Sourcing claims; and
   d. Mass balance claims

   _____

   NOTE:

   1) Per Appendix A - Definitions of this policy, the term "claim maker" encompasses all entities that wish to make a claim. The term "*organization*" is limited to entities that are certified to or in the process of becoming certified under the Materials Matter system.

   CONSULTATION NOTE:

   2)   The names and/or inclusion of all claim types listed here are subject to change.

1.1.2   Use of the Materials Matter trademarks meet the criteria in Section 8 – Trademark and Label Use Guidelines.

1.1.3   Materials Matter claims are clearly distinct and separate from any non-Materials Matter claims or labels, to ensure there is no confusion or perceived association.

   _____

   NOTES:

   1) Examples of how to make claims clearly distinct and separate include:
      • Displaying the logos for each standard in different sections of a webpage, label, etc.
      • Using clear headings and adequate spacing between sections describing each standard, especially on webpages.
      • Not combining references to multiple standards in a single sentence, especially for sustainability reports.
   2) Claims based on the *Materials Matter Standard Recognition Framework* follow the guidance in the recognition claims document.

   CONSULTATION NOTE:

   1) The *Materials Matter Standard Recognition Framework* and associated claims guidelines are currently under development.

1.2. Translations

1.2.1   Translation of Materials Matter claims is allowed and requires approval to ensure accuracy.

   _____

   CONSULTATION NOTE:

   1)   More criteria and guidance around translations will be provided. It is also our intention, where possible, to provide approved translations and will likely take the form of a supplemental document that can be updated regularly.

1.3. Approvals

1.3.1   Prior to their use, all Materials Matter claims are submitted to and approved following the formal *claim approval* process in the Textile Exchange *claims management system*.

NOTE:

1) Any approval criteria specific to each claim type can be found under the applicable claim type section.

CONSULTATION NOTE:

1) The Textile Exchange claims management system is currently under development and will be integrated into the stakeholder and certification body portals (also currently under development). The intention is to have a single place to log-in to and manage all claims.

Section 2 – Product Claims

This section outlines the criteria for making claims about *products* or *components* of products, at any stage of the *supply chain,* based on the *certified materials* they contain.

2.1. General Requirements

2.1.1   Product claims are allowed to be made for a *product* or a claimed *component*(s) of a product that meet all the applicable claim requirements.

_____

EXAMPLE:

1)   A component claim can be made about the outer shell, lining, and/or fill of a jacket.

2.1.2   Product claims are allowed to be made on-product and/or off-product.

_____

NOTES:

1)   All product claims criteria in this policy apply to uses both on and off-product.

2)   Examples of where claims can be made on-product include hangtags and care labels.

3)   Examples of where claims can be made off-product include e-commerce product pages, social media posts, and sales flyers.

2.1.3   Product claims are allowed to be made in both business-to-business and business-to-consumer contexts.

_____

NOTES:

1)   Business-to-business claims are generally made by supply chain members.

2)   Business-to-consumer claims are generally made by *brands* or *retailers*.

2.1.4   Only the *certified organization* is allowed to apply or attach product claims to a product.
   a.   If a direct certified supplier physically attaches a product claim to a product on behalf of a certified brand, the TE-ID of the certified brand is used.

_____

NOTE:

1)   Examples of how claims can be attached include printing, heat transferring, and affixing.

2.2. Eligibility

2.2.1   Product claims are only made when appropriate chain of custody is in place and by:
   a.   Organizations certified under the Materials Matter system that hold a valid *scope certificate*, or
   b.   Non-certified *retailers* who have been issued a TE-ID.

_____

NOTE:

1)   See *CCS-101 Content Claim Standard* for further details on chain of custody requirements.

2.2.2 Product claims are allowed to be made for products or claimed components that meet a minimum certified *content* threshold of:

   a. 30% for Materials Matter Certified single material claims (e.g. wool, recycled polyester, down); and

   b. 50% for Materials Matter Certified blended claims (containing more than one certified material)

_____

NOTES:

1) Product claims are allowed to be made for products that contain any blend of certified materials at any percentage, provided they all add up to 50% of the total product weight. See examples in the table below.

2) See the Section 8 – Trademark and Label Use Guidelines for instruction on which *Materials Matter Certified label* to use for products made of multiple components containing certified materials.

CATEGORY	MINIMUM THRESHOLD	EXAMPLES
Single Certified Material	30%	1) Product contains 30% Materials Matter Certified recycled cotton 2) Fill made of 100% Materials Matter Certified down
Blended Materials (more than one certified material)	50%	3) Product contains 25% Materials Matter Certified wool and 25% Materials Matter Certified recycled polyester 4) Product contains 40% Materials Matter Certified wool, 5% Materials Matter Certified alpaca, and 5% Materials Matter Certified recycled cotton

CONSULTATION NOTE:

1) This criterion attempts to streamline minimum certified content percentages (thresholds) across all materials and blends in scope of the *Materials Matter Standard*. Some thresholds have increased from the current standards with the intention to increase certified content over time as well as to bring all certified materials up to a basis that represents a minimum bar for using the Materials Matter mark. Please note the shift from the current requirements in *TE-301-V1.3 Standards Claims Policy*, which are:

- OCS 100 and RCS 100 – minimum 95%
- OCS Blended and RCS Blended – minimum 5%
- GRS – min. 50%
- RDS and RAF (RWS, RAS, and RMS) – minimum 5%

2.2.3 Product claims are allowed for final products or claimed components containing Materials Matter Certified material blended with any material(s) of another type (certified or non-certified).

_____

EXAMPLES:

1) Materials Matter Certified wool (e.g. 50%) may be blended with cotton (e.g. 50%).

2) Materials Matter Certified recycled polyester (e.g. 30%) may be blended with elastane (e.g. 2%) and cotton (e.g. 68%).

2.2.4 Product claims are not allowed for final products containing a mix of any Materials Matter Certified animal material in scope with non-certified animal material of the same type.

_____

EXAMPLES:

1) Materials Matter Certified wool may not be mixed with non-certified virgin wool and use a Materials Matter product claim.

2) Materials Matter Certified mohair may be mixed with Materials Matter Certified recycled mohair and use a Materials Matter product claim.

NOTE:

1) This does not apply to Materials Matter Certified recycled materials – these may be mixed with non-certified material of the same type.

MATERIALS MATTER CERTIFIED	MIXING ALLOWED?	EXAMPLES
Animal Materials	No	1) <u>Product claim not allowed:</u> Materials Matter Certified wool mixed with non-certified virgin wool 2) <u>Product claim allowed:</u> Materials Matter Certified down mixed with Materials Matter Certified recycled down
Recycled Materials	Yes	3) <u>Product claim allowed:</u> Materials Matter Certified recycled polyester mixed with virgin polyester

CONSULTATION NOTES:

1) No change from current *TE-301-V1.3 Standards Claims Policy* requirements for RDS and RAF standards.

2) We are considering expanding this *mixing* restriction across all materials in scope of the Materials Matter Standard, which means recycled materials would not be allowed to be mixed with non-certified material of the same type (e.g. Materials Matter Certified recycled polyester cannot be mixed with virgin polyester). Stakeholder feedback on this suggestion is highly desired.

2.2.5 Product claims sold in a business-to-business context not intended for sale to consumers do not have to meet the threshold and *mixing* criteria in 2.2.2 and 2.2.4 above.

   a. Product claims made in business-to-business contexts on final products which are intended for sale to consumers meet the threshold and mixing criteria in 2.2.2 and 2.2.4 above.

_____

EXAMPLES:

1) Yarns that are labeled and sold only in a business-to-business context do not have to meet the threshold and mixing criteria.

2) *Blank products* that are labeled and sold in a business-to-business context are intended for sale to consumer and must meet the threshold and mixing criteria

2.3. Labeling Criteria

2.3.1 Product claims include the following required elements:

   a. The applicable Materials Matter Certified label;

   b. The claim maker's TE-ID;

   c. A breakdown of the certified material(s) in the product and their percentages;

   d. One or more of the Allowed Language options from subsection 2.6; and

   e. A URL or QR code leading to more information about Materials Matter.

_____

NOTE:

1) See examples of product claims in application in Section 9 – Claims and Labeling Examples.

2.3.2 Product claims sold in a business-to-business context not intended for sale to consumers are allowed to omit the following required claim elements from 2.3.1:

   a. The certified material percentages; and

   b. One or more of the Allowed Language options from subsection 2.6.

_____

NOTE:

1) Product claims made in business-to-business contexts on final products which are intended for sale to consumers include all the required elements from 2.3.1.

Materials Matter

2.3.3 The organization is allowed to separate the *Materials Matter Certification mark* from the other required claim elements if a statement is included to direct the consumer where to find the additional information.

  a. For on-product claims, the other required claim elements appear elsewhere on the product or other medium where the claim appears.

  b. For online claims, a hyperlink from the statement to another webpage with the other required claim elements is allowed to be used.

2.3.4 In place of an on-product product claim, the organization is allowed to use a URL or QR code on a hangtag that links to an online product page where a product claim with all required elements are found.

2.3.5 The organization is allowed to reference a minimum percentage of certified content for that material type in the product claim.

_____

EXAMPLE:

1) "Contains at least 20% Materials Matter Certified recycled polyester"

2.3.6 The organization is allowed to include a lower percentage of certified content than what is listed on the *transaction certificate* for the claimed product.

_____

NOTE:

1) The claim maker is responsible for ensuring that this does not contradict any labeling regulations in the country of sale.

2.3.7 Product claims list the generic name of the certified material type(s).

_____

NOTE:

1) This does not include tradenames, names of other standards, programs, and initiatives, or names of breeds, varieties, and species.

2.3.8 The organization is allowed to include the terms "pre-consumer" and/or "post-consumer" for products containing Materials Matter Certified recycled content, as shown on the transaction certificate.

2.3.9 The organization is allowed to place a product claim on the certified product's packaging if a statement is included that states the product inside the packaging is certified.

_____

EXAMPLE:

1) "The product inside this package is certified to the Materials Matter Standard."

2.3.10 In-store promotional materials or displays advertising certified products are placed directly above or within visible distance to certified products and include a statement that indicates only products with the Materials Matter certification mark are certified.

_____

EXAMPLE:
1) "Only the products with the Materials Matter Certified mark are certified" or "Look for Materials Matter Certified products".

2.4. Special Cases

2.4.1   The organization is allowed to make a product claim on a packaged set of certified products as long as all products in the set are certified to the Materials Matter Standard and the Materials Matter Certification mark includes the product-specific certification information.

_____

EXAMPLE:

1)   A certified pajama top and bottom is an example of a packaged set of certified products.

2.4.2   The organization is allowed to make product claims about certified packaging, hangtags, or labels if they are kept clearly distinct and separate from any non-Materials Matter claims or labels, logos, or brand names to ensure there is no confusion or perceived association with other brand or product.

_____

NOTE:

1)   Under 1.1.3, see Note 1 for additional guidance on keeping information clearly distinct and separate.

2.4.3   If an on-product or printed claim contains incorrect information, the claim is not required to be removed however it is recommended that the claim be corrected as soon as possible (e.g. by placing a sticker over the incorrect claim).

2.5. Retailer Claims

2.5.1   Non-certified retailers complete relevant training from Textile Exchange on the requirements within the *TE-MM-POL-301 Materials Matter Claims and Labeling Policy* before making any product claims.

_____

NOTE:

1)   The relevant training may be in the form of an e-learning module and exam, 1:1 company training webinar, or another format determined by Textile Exchange.

2.5.2   Non-certified retailers submit a declaration form before making any product claims.

_____

NOTE:

1)   The declaration form is a legal agreement between the retailer and Textile Exchange that states the retailer has read and understands the requirements for making claims according to this policy. It only needs to be signed and submitted once before beginning to make Materials Matter claims.

CONSULTATION NOTE:

1)   The declaration form will likely be downloadable and submitted directly through the claims management system. Technology capabilities are still under consideration.

2.5.3   Product claims made by non-certified retailers appear off-product only (e.g. on e-commerce product pages) and include the retailer's own TE-ID.
   a.   The brand's TE-ID may be used if the brand has provided marketing or claim-related materials for the retailer to use.

_____

NOTES:

1)   An example of a non-certified retailer making off-product claims includes an e-commerce product page or in-store displays.

2) Retailers are allowed to sell products that have on-product claims if the certified brand has already attached them. Only certified organizations are permitted to physically attach claims to a product and retailers may not become certified to do this unless the product is owned and developed by them (in which case they are the certified brand).

2.5.4   Product claims made by non-certified retailers are submitted for approval through the Textile Exchange Claims Management System.

_____

CONSULTATION NOTES:

1) We aim to streamline and simplify the approval process for retailer claims.

2) Detailed information about Textile Exchange's claims management system will be further developed and presented in a supplemental document as we continue to build out the system.

2.6. Allowed Language

2.6.1   Product claims made for products containing only Materials Matter Certified wool include at least one of the following language options:

   a. The wool in this product comes from certified farms that meet detailed requirements for animal welfare, human rights, soil health, water, and biodiversity.
   b. The wool in this product comes from farms that have been certified to meet detailed requirements for animal welfare and human rights, as well as implementing practices that support soil health, water, and biodiversity.
   c. This product contains wool from farms that adhere to set requirements for nature, people, and animals. It has been processed by facilities that effectively manage their energy, water, and waste.

_____

NOTES:

1) All allowed language options may be preceded by the optional hero statement: "Wool that matters"

2) See examples of allowed language in application in Section 9 – Claims and Labeling Examples.

CONSULTATION NOTE:

1) Allowed language for all material types and scopes is still under development; above language for wool has been included as an example for criteria formatting and may not include exact final language allowed.

2.6.2   The product claim language options are allowed to be minimally adjusted, shortened, or expanded as long as the meaning is consistent.

_____

NOTE:

1) The following are examples of terms to avoid when adjusting language. This is not a comprehensive list, and some terms may have legal or regulatory restrictions to be aware of.
   - The terms "ensure" or "guarantee" are not used. There may be legal implications around making any guarantees.
   - The term "traceability" is not used unless eTrackit™ is being used. The Content Claim Standard alone does not trace materials directly back to consumers.
   - The terms "sustainable", "responsible", "green", and "environmentally friendly" are not used. These are generic terms that can be interpreted in many ways and may have legislative restrictions in certain regions and/or contexts.
   - The phrase "better than" is not used. The Materials Matter system does not support comparative claims.

2.7. Approvals

2.7.1   All product claims are submitted through the Textile Exchange claims management system and approved by the applicable certification body.

_____

CONSULTATION NOTE:

1) Detailed information about Textile Exchange's claims management system will be further developed and presented in a supplemental document as we continue to build out the system.

2.7.2 The organization is allowed to submit a controlled template for approval by their certification body to make product claims without seeking approval for each use.

a. The following pieces of information are allowed to be blank in artwork for controlled templates:

i. Claim scope;

ii. Percentage of certified content; and

iii. Allowed language.

_____

CONSULTATION NOTE:

1) The detailed information around controlled templates may change as we continue to develop the claims management system.

2.7.3 Approved controlled templates are re-submitted through the claims management system in the following situations:

a. When relevant artwork or allowed language has changed;

b. During annual re-certification audits; and

c. Upon request from the certification body.

_____

EXAMPLE:

1) An example of when the certification body may request the controlled template to be submitted is any calibrations or updates made to _TE-MM-POL-301 Materials Matter Claims and Labeling Policy_.

2.7.4 Claim approval requests for product claims are allowed to be submitted by a delegated entity on behalf of the claim maker.

_____

NOTE:

1) Examples of entities who can submit products claims on behalf of a claim maker include direct suppliers and design agencies.

CONSULTATION NOTE:

1) Further requirements or guidance around delegation may change as we continue to develop the claims management system.

2.7.5 Product claims are allowed to be pre-approved when an organization is in process of becoming certified.

a. Product claims cannot be made publicly until the organization receives their scope certificate and the claim has received final approval.

_____

NOTE:

1) The intention of pre-approval of a claim is to enable the organization to prepare for when they receive their scope certification.

Section 3 – Certified Organization Claims

This section outlines the criteria for making claims about an organization's certification to the Materials Matter Standard.

3.1. General Requirements

3.1.1   Certified organization claims are only made by organizations certified under Materials Matter system that hold a valid scope certificate.

NOTE:

2)   Brands or supply chain members certified to the Content Claim Standard (CCS) are considered "Materials Matter Certified".

3.1.2   Certified organization claims are allowed to be made on their own or in combination with product claims.

NOTE:

1)   If certified organization claims are used in combination with product claims, the requirements for product claims are also met.

EXAMPLE:

1)   Certified organization claims can be made on online product pages, email signatures, social media posts, hangtags, and informational webpages.

3.1.3   Certified organization claims are allowed to be made near the point of sale of labeled Materials Matter Certified products.

3.1.4   Certified organization claims made near Materials Matter Certified products in a business-to-business context include a statement to make it clear that only products covered by a valid Materials Matter Standard transaction certificate are certified.

EXAMPLES:

1)   Certified organizational claims can be used near product claims in a business-to-business context including on invoices, webpages, and advertisements.

2)   "Our company is certified to the Materials Matter Standard. Only the products covered by a valid transaction certificate are certified."

3.2. Applicability

3.2.1   Organization claims include the following required elements:
   a. The organization's TE-ID;
   b. The Materials Matter certification mark; and
   c. One or more of the Allowed Claims from 3.3. Allowed Language below.

3.2.2   The organization is allowed to separate the Materials Matter Certification mark from the other required elements if a statement is included to direct the consumer where to find the additional information.
   a. For online claims, a hyperlink from the statement to another webpage with the other required claim elements is allowed to be used.

3.3. Allowed Language

3.3.1   Certified *producers* and *first processors* of animal materials in scope of the Materials Matter Standard use one or more of the following allowed language options:

    a. [Under Development]
    b. [Under Development]

_____

CONSULTATION NOTE:

   1)   Allowed language is currently under development.

3.3.2   Certified recyclers use one or more of the following allowed language options:

    a. [Under Development]
    b. [Under Development]

_____

CONSULTATION NOTE:

   1)   Allowed language is currently under development.

3.3.3   Certified supply chain members use one or more of the following allowed language options:

    a. [Under Development]
    b. [Under Development]

_____

CONSULTATION NOTE:

   1)   Allowed language is currently under development.

3.3.4   Certified brands use one or more of the following allowed language options:

    a. [Under Development]
    b. [Under Development]

_____

CONSULTATION NOTE:

   1)   Allowed language is currently under development.

3.4. Approvals

3.4.1   All certified organization claims are submitted through the Textile Exchange claims management system and approved by a certification body.

3.4.2   Certified organization claims are allowed to be pre-approved when an organization is in process of becoming certified.

    a. Certified organization claims cannot be made publicly until the organization receives their scope certificate and the claim has received final approval.

_____

NOTE:

   1)   The intention of pre-approval of a claim is to enable the organization to prepare for when they receive their scope certification.

Section 4 – Sourcing Claims

Consultation Note: Sourcing claims will replace what was previously referred to as "progress claims" in *TE-301 Standards Claims Policy*. The intent is to allow organizations to make claims about sourcing Materials Matter Certified materials in relation to goals set, either through a Textile Exchange commitment or a separate corporate ambition. The difference intended with sourcing claims in the *TE-MM-POL-301 Materials Matter Claims and Labeling Policy* is to build more rigor and accountability in the documentation, verification, approval, and reporting processes. The aim is to set organizations up for success with reporting requirements, ensure they are actively working towards these goals, and be empowered to communicate about them accurately and credibly. As such, we are working internally to define what added assurance mechanisms need to be put in place as well as looking at opportunities to make use of annual reporting through our Materials Benchmark.

Section 5 – Mass Balance Claims

Consultation Note: Changes to Textile Exchange's mass balance system (VR2) will be considered during the 2025 revision of the *CCS-101 Content Claim Standards (CCS)*, in which *CCS-105 Policy for Alternative Volume Reconciliation (VR2)* will be integrated. We acknowledge that claims about materials and products coming from VR2/mass balance systems to date have been limited and we are currently considering what product-related claims may be allowed in the Materials Matter system in the future. We are also considering expanded certified organization claims, as well as sourcing claims about products coming from mass balance systems for inclusion in the *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*. We welcome and encourage stakeholder input on certified product claims that originated from mass balance systems. This includes stakeholders that have an interest in this topic, companies that are implementing mass balance, and brands that may source products from mass balance systems.

Section 6 – Recognition Claims

Consultation Note: The Materials Matter Standard Recognition Framework is being developed to recognize certified raw material inputs from other verification systems in the *TE-MM-STN-101 Materials Matter Standard*. The framework is on a longer development track than the *Materials Matter Standard* and therefore we will not have criteria for claims based on the recognition framework in the first version of *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*. Instead, we intend to publish a supplemental recognition claims document along with the recognition framework. The document will contain both core criteria for all claims based on recognition and criteria relevant to specific recognized systems.

Section 7 – Commitment Claims

Consultation Note: Commitments to the *TE-MM-STN-101 Materials Matter Standard* are currently being developed through a broader organizational initiative to align multiple Textile Exchange material challenges, resources, and more. This reinforces the idea that commitments should not be made in isolation without related activities for taking action and reporting on progress. We do not intend to have criteria for commitment claims directly in the *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*.

Section 8 – Trademark and Label Use Guidelines

Consultation Note: Guidelines for the proper use of the Materials Matter certification mark will be available in the final version of *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*. We are currently in the process of finalizing the Materials Matter certification mark design, labels, and guidelines.

The different types of trademarks and labels used for the Materials Matter system include the following:

Marks	Description	Use Cases
Materials Matter name	Name of the certification system and standard, which includes the *Materials Matter Standard* for raw materials and the *Content Claim Standard (CCS)* for the Materials Matter scope.	Any
Materials Matter logo	Visual logo comprised of the interwoven "M" icon and the Materials Matter name used to represent the Materials Matter system.	Used by Textile Exchange and other authorized entities such as certification bodies and accreditation bodies.
Materials Matter certification mark	Visual mark that combines the interwoven "M" icon from Materials Matter logo and "Materials Matter Certified" text, used to represent Materials Matter certification.	Certified organization claims and sourcing claims
Materials Matter Certified label lock-up	Visual label composed of the Materials Matter certification mark and relevant claim scope used at the product level, used alongside or in association with other required elements for product claims.	Product claims

Section 9 – Claims and Labeling Examples

Consultation Note: Examples of claim applications for all types of claims and labeling will be available in the final version of *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*. We are currently in the process of finalizing the Materials Matter certification mark design, labels, and guidelines.

Section 10 – Monitoring

Textile Exchange monitors the use of claims and its trademarks by relevant parties to ensure compliance with the *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*. To support oversight activities implemented by certification bodies, Textile Exchange utilizes a claims management system to maintain *records* of all approved claims and trademark use. Additionally, monitoring methods may include product tracebacks, routine or risk-based evaluations, product testing, product tagging, and web-based tools to identify misuse of claims or trademarks.

Concerns regarding potential improper or unlicensed use of Textile Exchange claims or trademarks may be reported through the online complaint form or via email at assurance@textileexchange.org.

If a claim is found to be non-conforming with the *TE-MM-POL-301 Materials Matter Claims and Labeling Policy*, Textile Exchange may classify it as a "misuse." Upon becoming aware of such misuse, Textile Exchange will contact the claim maker to address and resolve the issue.

If the misuse is not remedied or if repeated instances of misuse occur, Textile Exchange reserves the right to take appropriate actions in accordance with any active licensing agreements. Additional actions may include legal proceedings or engaging with the certification body, which could result in the *withdrawal* of certification.

Appendix A – Definitions

Refer to *TE-101 Terms and Definitions for Textile Exchange Standards and Related Documents* for definitions of terms used in this policy. Key definitions are included below. Defined terms are shown in italics in the first usage in this document, and in some other uses for clarity.

Term	Definition
Blending	The process of combining different raw material or fiber types into a single product or component (e.g. cotton blended with elastane).
Brand	An organization that controls the design, development, and purchase of final products for sale under their own name or private label. Brands may sell to wholesalers, retailers, or directly to consumers. This does not include organizations who sell a branded intermediate product for use in further processing steps.
Blank product	Any product that is sold business-to-business (B2B) with an intention or reasonable expectation that it will be further minimally processed, usually with decorative elements (e.g. printing, embroidery). Also commonly referred to as an "imprintable".
Certified material	Any material produced by a certified organization and sold with a product claim. (Formerly "claimed material").
Certified organization	An organization which holds a valid scope certificate to the Materials Matter Standard.
Certified organization claim	A claim made about the certification status of an organization.
Claim	An oral, written, implied representation, statement, advertising, or other form of communication that is presented to the public or buyer that relates to the presence of a certified material in the content of a product.
Claim approval	Required authorization for use of a claim as granted by a certification body upon submission of a formal request. Prior to the approval being granted, a review of the text claim and associated artwork is done.
Claim maker	Any party that wishes to make a claim about a Standards system. Normally this is a business in the supply chain but also includes other parties that wish to make a claim about a Standard.
Claim type	A classification of potential claims, including general messaging claims, product claims, and organization claims.
Claims management system	On online system owned by Textile Exchange where claims are submitted for approval by certification bodies and/or textile exchange. The system can also be used to submit claims that do not require approval for record keeping purposes or to request a review voluntarily.
Component	An easily identifiable and describable piece or part of a product.
Content	The material composition of a product.
Final product	A product that will be sold to a consumer in its current state and without further processing. Final products may be sold business to business (e.g. from the final processor in the supply chain to the brand).
Materials Matter certification mark	Visual mark used to represent certification to the Materials Matter Standard.
Materials Matter Certified label	Visual label composed of the Materials Matter Certification Mark and relevant claim scope.
Materials Matter claim	Any claim made about or in reference to any aspect of the Materials Matter system. See definition of 'claim'.
Materials Matter logo	Visual logo used to represent the Materials Matter standard system. Primarily used by Textile Exchange.

Term	Definition
Materials Matter system	Certification and standard system that includes the Materials Matter Standard for raw materials and the Content Claim Standard (CCS) for the Materials Matter scope.
Mixed product	A product where the content includes raw materials of the same type but with different attributes (e.g. certified wool and non-certified wool).
Mixing	The process of combining raw materials of the same type but with different attributes into a single product (e.g. certified wool and non-certified wool).
Organization	A legal entity which is certified to or in the process of becoming certified to a Standard. A scope certificate is held by an organization, and an organization has one or more sites.
Product claim	A claim made about the certified material in a product.
Products	The physical goods that result from each stage of production. These may include finished or unfinished goods.
Records	The information in written, visual, or electronic form that documents the activities undertaken by a user to demonstrate accordance with requirements.
Retailer	An organization which sells products to individual consumers. Includes both physical stores and online sales, and may or may not also be the brand. The definition of retailer includes distribution centers which are controlled by the retailer.
Scope certificate (SC)	A document issued by the certification body which verifies that an organization is competent to produce and sell specified claimed materials in conformity with a Standard.
Site	Any geographically distinct unit within a certificate scope. Locations which are geographically distinct or have different civic addresses are considered to be separate sites (see exception for farms). Subcontractors are not considered to be sites. The word facility is used in some documents and has the same meaning as site. Includes: farms, processors, offices.
Supply chain	The progression of business entities involved in the supply and purchase of materials, goods, or services from raw materials to the final product.
Transaction certificate (TC)	A document issued by a certification body which verifies that materials being sold or shipped from one organization to another conform to the Standard and may be treated as certified materials by the receiver.
Withdrawal	The revocation of a scope certificate due to a specific non-conformity or issue, or at the request of the certified party. Following a withdrawal of certification, a new audit is required for certification to return to an active status.