<table>
<thead>
<tr>
<th>Reference GRS 3.0</th>
<th>Requirement GRS 3.0</th>
<th>Reference GRS 4.0</th>
<th>Requirement GRS 4.0</th>
<th>Reason for Change</th>
</tr>
</thead>
</table>
| N/A              | "must"              | How to use this document | In the CCS, the following verbal forms are used to indicate requirements, recommendations, permissions, or capabilities:  
• “shall” indicates a requirement  
• “should” indicates a recommendation  
• “may” indicates a permission  
• “can” indicates a possibility or capability | Clearer and more consistent than other terms. In alignment with ISO 17065 |

**A1.2a**  
**Material Collection:**  
Material collection refers to the point in the recycling lifecycle when a material is reclaimed from the waste stream.  

**Entities involved in material collection could include, but are not limited to:**  
• Individuals who collect post-consumer materials for sale to brokers  
• Government organizations (e.g.: municipalities) that offer curbside recycling or operate transfer stations  
• Brokers that purchase pre/post-consumer waste from individuals, municipalities, or commercial operations for re-sale  
• Commercial operations that generate pre-consumer waste from manufacturing operations  
• Commercial operations that collect post-consumer waste (e.g: retail stores)  

**A1.2b**  
**Material Concentration**  
Material Concentration refers to the point in the recycling lifecycle when a waste material receives primary handling.  

**Entities involved in material concentration must have legal authorization to operate as one of the following:**  

---

_Recycled Claim Standard_  
_Summary of Changes from 1.0 to 2.0_  
_June 2017_
A1.2e 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.

A1 Definitions Recycled Content Proportion, by mass, of Recycled Material in products or packaging. Only Pre-Consumer and Post-Consumer Materials shall be considered as Recycled Content.

We use the term 'products' now instead of 'goods' as it is more precise.

A3 A3 - Principles of RCS Certification
A3.1 Scope
A3.1a The Standard applies to products that contain 5% or more Recycled Content. Some exceptions may apply, see TE Accreditation and Certification Procedures for the derogation process.
A3.1b The Standard applies to any verified Recycled Material and may apply to any supply chain.
A3.2 Scope
A3.2a The Standard provides verification of chain of custody for Recycled Material, in accordance with the Content Claim Standard.
A3.2b The Standard includes consumer-facing labeling; only products that have been certified up to the seller in the last business-to-business transaction are eligible. See RCS Logo Use and Claims Guide for labeling guidelines.

This section is new. In the previous version, these details were found in the Foreword and Introduction.

A2 Entities involved in Material Collection, Material Concentration, and Material Recycling of inputs to be used in RCS certified products must submit declarations for the materials they are supplying. Entities may handle one or multiple of these stages. Certification to the RCS is required for entities involved in Material Recycling.

This has been removed. This has been removed since the Material Recycler is responsible for the documentation provided by the Material Collectors or Material Concentrators.

A2 Material Collection: random inspections; self-declaration This has been removed. This has been removed since the Material Recycler is responsible for the documentation provided by the Material Collectors.

A2 Material Concentration: random inspections; self-declaration This has been removed. This has been removed since the Material Recycler is responsible for the documentation provided by the Material Concentrators.
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
</table>
| **A2.1** | **A2.1** Material Collection  
A2.1a Entities involved in Material Collection are not subject to RCS certification and materials from the collection stage may not claim to be certified to the RCS.  
A2.1b Entities involved in Material Collection (as defined in A1.2a), with the exception of individuals, are required to submit the Reclaimed Material Declaration Form (see Appendix A). The Reclaimed Material Declaration Form must be submitted to consignees on an annual basis for all reclaimed materials being supplied for use in RCS products. The Reclaimed Material Declaration Form declares that the facility will allow inspections with a minimum of 3 days notice by Certification Bodies accredited to the RCS. |
| **A2.2** | **A2.2** Material Concentration  
A2.2a Entities involved in Material Concentration are not subject to RCS certification and materials from the concentration stage may not claim to be certified to the RCS.  
A2.2b Entities involved in Material Concentration (as defined in A1.2b) are required to submit the Reclaimed Material Declaration Form (see Appendix A). The Reclaimed Material Declaration Form must be submitted to consignees on an annual basis for all reclaimed materials being supplied for use in RCS products. The Reclaimed Material Declaration Form declares that the facility will allow inspections with a minimum of 3 days notice by Certification Bodies accredited to the RCS. |
| **A2.3** | **A2.3a** Entities involved in Material Recycling (as defined in A1.2c) are subject to RCS certification. The RCS requires compliance with the requirements (sections A, B, C and D) of the Content Claim Standard, whereby the ‘Claimed Material’ is replaced with ‘Recycled Material’ as defined in section A1.2f.  
**A4.1a** Entities involved in Material Recycling (as defined in A1) are subject to RCS certification. The RCS requires compliance with the requirements of the Content Claim Standard, whereby the ‘Claimed Material’ is replaced with ‘Recycled Material’ as defined in section A1. |
| **A2.3** | **A2.3b** In addition, entities involved in Material Recycling shall:  
We have moved to using consistent terms for shall, should, may, and can. ‘Must’ is no longer used.  
In addition, entities involved in Material Recycling **shall**; |

This has been removed.  
This has been removed since the Material Recycler is responsible for the documentation provided by the Material Collectors or Material Concentrators.  
This has been edited for clarity and updated Definitions reference.
<p>| Section | A4.1b ii | Hold valid Reclaimed Material Supplier Agreements (see Appendix B) for all suppliers of Reclaimed Material (entities involved in Material Collection and/or Material Concentration). | This is a new requirement. |
| A2.3b i. | A4.1b i | Collect and retain completed Reclaimed Material Declaration Forms (see Appendix C) from their suppliers for all Reclaimed Material inputs. The Reclaimed Material Declaration Forms shall be collected at least annually or if the Reclaimed Material source changes. | This has been reworded for clarity. |
| A4.1b iii | A4.1b iv. | Inspect all incoming shipments of Reclaimed Material to confirm that they are not virgin material; confirm the correct identification as Pre- or Post-Consumer. Retain records of inspections. | The records of inspections is a new requirement. The guidance for inspecting incoming material has been moved to the Implementation Manual. |
| A2.3b iv | A4.1b v. | Request Transaction Certificates for all outgoing GRS certified products. | We use the term 'products' now instead of 'goods' as it is more precise. |
| n/a | A4.1c | A4.1c Material Recyclers who collect Reclaimed Material from their own processing shall retain the following records to verify their volume of recycling: i. Records of all materials entering the recycling process. ii. Description of Reclaimed Material and the stage where the waste was collected. iii. Any other relevant transfer notes. iv. Reclaimed Material Declaration Forms may be used in lieu of the records listed above (see Appendix C). | This section is a new requirement to ensure that companies collecting and recycling material from their own manufacturing may be effectively audited. |
| A3.1 | A5.1 | Organizations involved in production and trade of RCS products are subject to RCS certification. The Recycled Claim Standard requires compliance with the requirements (sections A, B, C and D) of the Content Claim Standard, whereby the ‘Claimed Material’ is replaced with ‘RCS Material’. | This has been edited for clarity and precision. |
| A3.2 | A5.2 | Production and Trade | This has been edited for precision. |
| A5.2 | In addition to the requirements of the CCS, all organizations involved in the production of RCS products shall meet the following requirements: | | All instances of ‘must’ have been replaced with ‘shall.’ |</p>
<table>
<thead>
<tr>
<th>A5.2a</th>
<th>All recycled materials entering the supply chain must have a valid Transaction Certificate (TC) issued by an approved CB.</th>
<th>A5.2a</th>
<th>All Recycled materials entering the supply chain shall have a valid Transaction Certificate (TC) issued by an approved CB.</th>
<th>All instances of ‘must’ have been replaced with ‘shall.’</th>
</tr>
</thead>
<tbody>
<tr>
<td>A5.2b</td>
<td>The amounts of pre-consumer and post-consumer material must be recorded separately at all steps of production.</td>
<td>A5.2b</td>
<td>Pre-Consumer and Post-Consumer Recycled Material Content percentage shall be recorded separately for each batch at every certified site and recorded on the transaction certificate.</td>
<td>All instances of ‘must’ have been replaced with ‘shall.’ Additional edits for precision.</td>
</tr>
<tr>
<td>A3.2c</td>
<td>Traders with an annual turnover of less than $10,000 of RCS goods, and retailers selling to end consumers only, are exempt from the certification obligation; provided that they do not (re-)pack or (re-)label RCS Goods. Exempted traders with less than $10,000 annual turnover of RCS Goods must register with an Approved Certification Body and must inform the Certification Body immediately once their annual turnover exceeds $10,000, or once they plan to (re-)pack or (re-)label RCS goods.</td>
<td>A3.2c</td>
<td>Traders with an annual turnover of less than $10,000 of RCS products, and retailers selling to end consumers only, are exempt from the certification obligation; provided that they do not (re-)pack or (re-)label RCS products. Exempted traders with less than $10,000 annual turnover of RCS products shall register with an approved Certification Body and shall inform the Certification Body immediately once their annual turnover exceeds $10,000, or once they plan to (re-)pack or (re-)label RCS products.</td>
<td>All instances of ‘must’ have been replaced with ‘shall.’ We use the term ‘products’ now instead of ‘goods’ as it is more precise.</td>
</tr>
<tr>
<td>A3.2d</td>
<td>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.</td>
<td>A3.2d</td>
<td>In cases where there is the possibility of differential rates of production loss between Recycled and virgin inputs, Certified Organizations shall address this through their mass balance formula for each material to show that calculations were done to account for the differences.</td>
<td>All instances of ‘must’ have been replaced with ‘shall.’ Additional edits for clarity.</td>
</tr>
<tr>
<td>A5.2e</td>
<td>Buyers of the RCS product will be responsible to set any further requirements on the specific standards or requirements to which the input material must be certified. These additional requirements are separate from the RCS and its certification process.</td>
<td>A5.2e</td>
<td>Buyers of the RCS 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 RCS and its certification process.</td>
<td>All instances of ‘must’ have been replaced with ‘shall.’</td>
</tr>
</tbody>
</table>