CCS 3.0: Summary of Key Changes

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Introduction

Textile Exchange is committed to building credible, internationally recognized standards that include assurance and monitoring and evaluations systems. As a member of ISEAL, Textile Exchange follows three Codes of Good Practice in addition to its own procedures for Standard Setting, Accreditation and Certification.

The Content Claim Standard (CCS) provides the chain of custody criteria for all Textile Exchange standards. The standard verifies the presence and amount of a given claimed material in a final product. It provides a strong chain of custody system from the source to the final product which is then certified by an accredited third-party certification body. It allows for transparent, consistent, and comprehensive independent evaluation and verification of material content claims on products. The CCS is the foundation of the Textile Exchange standards.
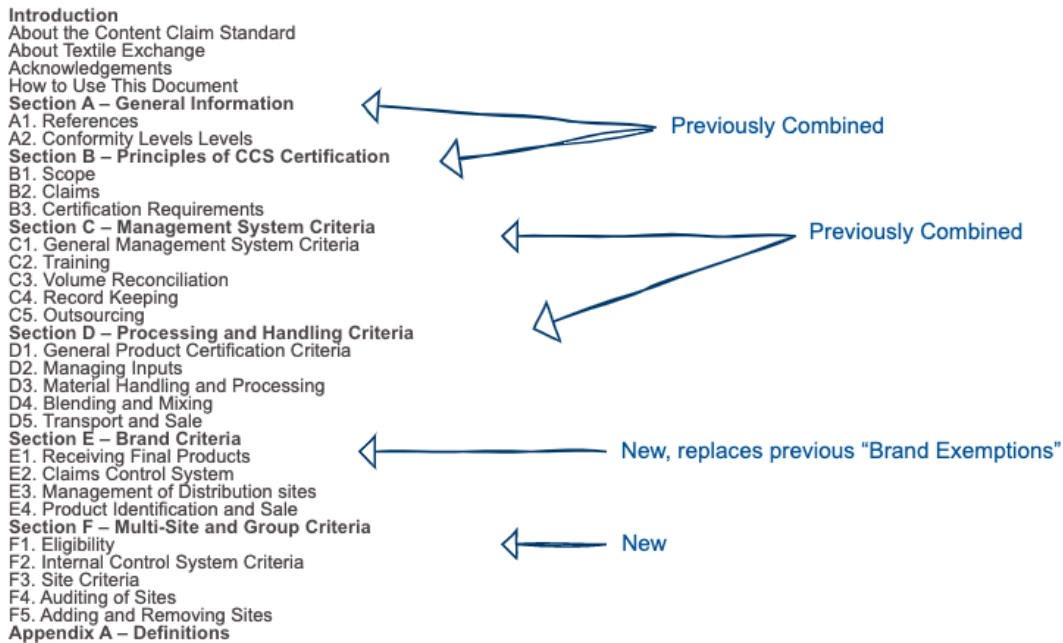
In April 2020, Textile Exchange launched a comprehensive revision of the Content Claim Standard 2.0.

- An initial 30-day open feedback period on CCS 2.0 was held in May 2020. Find a summary of the feedback received here.
- Following the work of the International Working Group, a two-month public comment period was held from March 1 to April 30, 2021 on Draft CCS 3.0. You can find a summary of the feedback received here.

This document provides a summary of key changes made between CCS 2.0 and CCS 3.0.

Structural Changes

We revised the document structure and format for easier comprehension and consistency with other standards. We also supplemented the CCS by separating content into two new additional documents: the CCS User Manual and the CCS Certification Procedures. All auditing criteria for certification bodies has been removed from the CCS and the User Manual.

Previously Combined

Previously Combined

New, replaces previous "Brand Exemptions"

New

Key Content Changes

General

We refined operational criteria, including having strong management systems in place, managing CCS input, and how to manage CCS product during production. Wording and objectives throughout the standard have been clarified in many instances. To further enhance comprehension, we also introduced new definitions where needed and revised or removed existing ones for clarity.

Chain of Custody

As part of the CCS 3.0 revision, Textile Exchange launched a site-level mass balance pilot earlier in 2021 and pilot audits were conducted with three participant organizations by two certification bodies. CCS 3.0 references a separate policy, CCS-105, which addresses an alternative volume reconciliation.

In response, Textile Exchange has partnered with Fashion for Good to work on an assessment framework for tracer technology, including DNA tracers, isotopes, and fluorescent applications. Following the assessment, we may update the CCS Certification Procedures to reflect any recognition of these tools by standards users. Textile Exchange is also exploring opportunities to offer electronic tracking opportunities in addition to the traditional transaction certificates. If

changes are made, these will be addressed through certification procedures and the TC Policy, rather than the CCS itself.

Brand Requirements

Rather than a set of brand exemptions, we drafted a set of criteria for brand certification in CCS 3.0 and also created a new definition of *brand*. CCS 3.0 now requires certification up to the brand, regardless of if the brand is the seller in the final business to business transaction or sells direct to consumers only. Brand network certification and 100% exemption known from CCS 2.0 have been dropped, whereas batch code labelling remains an option. Under CCS 3.0, no outgoing transaction certificates from the brand are required.

Trader Certification

CCS 3.0 introduced a new set of criteria for trader certification: traders without physical possession are no longer required to be certified and the audit frequency of traders corresponds to a risk assessment. In addition, the certification procedures allow for remote trader audits for sites without physical possession of claimed product.

Subcontractors

As part of the revision, risk assessment criteria for subcontractors were defined in *CCS-102-V2.0 CCS Certification Procedures*. A new outsourcing section (C5) has been drafted in CCS 3.0, which includes that contracts are required with all subcontractors and also contains new criteria for organizations acting as subcontractors.

Multi-Site and Group Certification

In CCS 3.0, we created a new section, section F, for multi-site and group certification to clarify requirements, adapting learnings from the Responsible Down Standard (RDS) and Responsible Animal Fiber (RAF) farm group requirements. In the spirit of continuous improvement, we will launch a pilot later in 2021 to further strengthen our approach to multi-site and group certification. Two separate policy documents will be published following the pilot projects:

- CCS-106 Policy for Supply Chain Group Certification
- CCS-107 Policy for Multi-Site Certification with Sampling of Sites