



Content Claim Standard Certification Procedures 2.1

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The *Content Claim Standard Certification Procedures 2.1* replaces the *Content Claim Standard Certification Procedures 2.0* and is effective as of July 19, 2021. All audits and assessments conducted after November 1, 2021 shall be conducted using the *Content Claim Standard Certification Procedures 2.1*.

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English is the official language of the *Content Claim Standard Certification Procedures*. In any case of inconsistency between versions, reference shall be made to the English version.

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The *Content Claim Standard Certification Procedures 2.1* will undergo a revision process at least every five years. The next revision is tentatively scheduled to begin in 2021, for completion in 2021. You may submit feedback to the document at any time; send to Assurance@TextileExchange.org. Points of clarification may be incorporated into supplementary and guidance documents prior to 2021. More substantive feedback or suggested changes will be collected and reviewed as part of the next revision of the document.

Document Revision History

Content Claim Standard Certification Procedures 2.0, released June 2020

Note: V2.0 is the earliest version of this document in order to align with versions of the CCS.

Content Claim Standard Certification Procedures 2.1, released July 2021

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Section A - General Information

A1. About the Content Claim Standard

The Content Claim Standard (CCS) is an international, voluntary standard that sets criteria for third-party certification of chain of custody. The goal of the CCS is to ensure the accuracy of content claims.

This is a voluntary standard that is not intended to replace the legal or regulatory requirements of any country. It is the responsibility of each operation to demonstrate compliance with all applicable laws and regulations related to marketing, labor, and business practices. Sellers of CCS products are advised to reference labelling requirements in the countries of sale, to ensure that they are meeting all legal product claim requirements.

Individual sites are certified by independent third-party certification bodies using annual audits. Material is tracked from the origin to the final product, following the criteria of Textile Exchange's Content Claim Standard (CCS). For more information, please visit:

TextileExchange.org/Standards.

A2. About Textile Exchange



Textile Exchange is a global nonprofit that creates leaders in the sustainable fiber and materials industry. The organization develops, manages, and promotes a suite of leading industry standards as well as collects and publishes vital industry data and insights that enable brands and retailers to measure, manage, and track their use of preferred fiber and materials.

With a membership that represents leading brands, retailers, and suppliers, Textile Exchange has, for years, been positively impacting climate through accelerating the use of preferred fibers across the global textile industry and is now making it an imperative goal through its 2030 Strategy: Climate+. Under the Climate+ strategic direction, Textile Exchange will be the driving force for urgent climate action with a goal of 45% reduced CO2 emissions from textile fiber and material production by 2030.

A3. About the Certification Procedures

The CCS Certification Procedures presents normative criteria for *accreditation bodies* and *certification bodies* which are specific to the Content Claim Standard. These criteria are in

addition to the criteria for all Textile Exchange standards, which can be found in *ASR-101 Accreditation and Certification Procedures for Textile Exchange Standards*.

The CCS Certification Procedures V2.1 have been developed as a supplemental document to the existing Content Claim Standard V2.0. A full update will be published later in 2021 to align with the Content Claim Standard 3.0.

In an effort to minimize the disruption to certification bodies outside of a revision process, some criteria below are identified as recommended (use of the word 'should'). Textile Exchange intends to update these criteria to be requirements (use of the word 'shall') upon the revision to V3.0.

Section B - References

B1. Terms and Definitions

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

B2. Reference Documents

The following documents are key documents for conducting CCS certification. It is essential that they are used alongside this document.

- a. *CCS-101-V2.0 Content Claim Standard ("CCS")*
- b. *CCS-201 CCS Implementation Manual*
- c. *ASR-101 Accreditation and Certification Procedures for Textile Exchange Standards ("ACP")*
- d. *ASR-103 Policy for Scope Certificates*
- e. *ASR-104 Policy for Transaction Certificates*
- f. *TE-101 Terms and Definitions for Textile Exchange Standards*
- g. *TE-301 Standards Claims Policy*
- h. *ILO C182 – Worst Forms of Child Labour Convention, 1999 (No. 182)*
- i. *ILO C029 – Forced Labour Convention, 1930 (No. 29)*

Section C - Criteria for Accreditation Bodies

Additional criteria for accreditation bodies will be defined in V3.0 of this document.

Section D - Criteria for Certification Bodies

D1. General Criteria

D1.1 Personnel Qualifications

Personnel qualifications will be included in V3.0 of this document.

D1.2 Data and Reporting

Data and reporting criteria will be included in V3.0 of this document.

D2. General Auditing Criteria

D2.1 Multiple Certification

D2.1.1 An organization or a site may be included in multiple scope certificates for claims based on different Standards.

D2.1.2 If an organization is certified to another standard (including both Textile Exchange and non-Textile Exchange standards) where there is a risk of double-claiming material, the certification body shall include all standards which recognize similar content in its review of the volume reconciliation, and shall evaluate the claims made regarding the other standard and any other necessary records to ensure that products are not being double claimed.

D2.1.3 A site shall not be included as a main or subsequent site in more than one scope certificate to the same Standard unless one of the following situations applies:

- a. The site has a *primary scope* and multiple certifications are permitted by the Standard or its Certification Procedures; or
- b. The site is a *trader* site which is included in multiple scope certificates for processing sites which are under common ownership with the trader.

NOTE: D2.1.3 refers to sites only. A single location or entity may be included as a subcontractor in multiple scope certificates.

- D2.1.4** The certification body may conduct the initial audit remotely if the organization holds certification to another Textile Exchange standard or to GOTS with the same certification body. This option does not apply to GRS.

D2.2 Management of Certified Subcontractors

- D2.2.1** If a subcontractor is independently certified to the Standard, no additional audit of the subcontractor (i.e. outside of the scope of the subcontractor's scope certificate) is required.
- D2.2.2** When a certified subcontractor is included in an organization's scope, the certification body should do one of the following:
- Issue a transaction certificate when materials are sent for outsourcing, as defined in *ASR-104 Policy for Transaction Certificates B5*;
 - If the organization and the subcontractor are certified with the same certification body, ensure that outsourcing from the organization is considered in the subcontractor's audit; or
 - If the organization and the subcontractor are certified with different certification bodies, notify the subcontractor's certification body of the outsourcing and provide information on the standard, number of transactions, and volume of materials sent for outsourcing to the subcontractor's certification body.

NOTE: Textile Exchange may update policies to require that transaction certificates be used when materials are outsourced to a certified subcontractor with the release of CCS V3.0.

- D2.2.3** If a certification body has concerns that a subcontractor which is certified by another certification body is not meeting the criteria of the Standard, the certification body should submit a complaint about the subcontractor to either the subcontractor's certification body or to Textile Exchange.
- D2.2.4** When auditing an organization which acts as a subcontractor for other organizations, the certification body shall include all products certified to the Standard in its evaluation.

D2.3 Auditing of Non-Certified Subcontractors

- D2.3.1** Prior to each audit or prior to adding a new subcontractor to the scope, the certification body shall conduct a risk assessment and assign a risk level for each subcontractor who is not certified to the Standard following the process in ACP Appendix C. The following risk table shall be used.

NOTE: All GRS subcontractors shall be assigned a high risk level. See *GRS-102 GRS Certification Procedures* for more details.

Risk Factor		Level
Subcontractor Certification History	Subcontractor has been banned from certification to one or more Textile Exchange Standards, or to GOTS	Critical
Product Handling	Subcontractor is a <i>processor</i> or applies labels	High
	Subcontractor is not a processor but handles product where there is a high risk of comingling or substitution (e.g. bulk raw material, when other similar material may be present on-site)	High
	Subcontractor handles materials where there is not a high risk of comingling or substitution (non-certified materials may be present on-site)	Medium
	Subcontractor handles finished, labelled materials only	Low
	Subcontractor exclusively handles certified materials	Low
Return of Product (processing subcontractors only)	Processing subcontractor ships product directly to the organization's customers and the organization does not see the product following processing	High
	Processing subcontractor ships product directly to the organization's customers, but the organization is able to see the product following processing (e.g. on-site inspection)	Medium
	Processing subcontractor returns product to the organization	Low
Location of Outsourcing	Subcontractor is <u>outside</u> of the organization's country/region in a country with a Corruption Perception Index (CPI) <u>below</u> 50	High
	Subcontractor is <u>outside</u> of the organization's country/region in a country with a <i>CPI</i> <u>above</u> 50	Medium
	Subcontractor is <u>within</u> the organization's country/region in a country with a <i>CPI</i> <u>below</u> 50	Medium
	Subcontractor is <u>within</u> the organization's country/region in a country with a <i>CPI</i> <u>above</u> 50	Low

NOTE: If a subcontractor is certified to another Textile Exchange standard for similar processes and activities, the subcontractor may be considered low risk provided that the audit is not for GRS, regardless of other risk factors.

D2.3.2 Subcontractors shall be audited as follows:

- a. **High risk subcontractors:** All subcontractors shall be audited on-site annually.
- b. **Medium risk subcontractors:** All subcontractors shall be audited on-site at least once during every three years.
- c. **Low risk subcontractors:** All subcontractors shall be audited once during every three years. A minimum of \sqrt{n} subcontractors shall be audited on-site during this time, where n is the total number of subcontractors. The remaining subcontractors may be audited remotely.

D2.3.3 When a subcontractor is added to the scope certificate outside of an initial or recertification audit, the subcontractor shall be audited as follows:

- a. **High risk subcontractors:** The subcontractor shall be audited on-site prior to being added to the scope.
- b. **Medium risk subcontractors:** The subcontractor shall be audited prior to being added to the scope. A remote audit is permitted. However, only an on-site audit may be counted towards the on-site auditing criterion in D2.3.2b.
- c. **Low risk subcontractors:** No audit of the subcontractor is required.

D2.4 Auditing of Brand Networks

D2.4.1 When assessing risk based on CCS D3.3c, the certification body shall use the following risk table:

Risk Factor		Level
National Governance	More than 50% of the distribution network is located in a country with a Corruption Perception Index (CPI) below 50	High
	25-50% of the distribution network is located in a country with a CPI below 50	Medium
	Less than 25% of the distribution network is located in a country with a CPI below 50	Low

Risk Factor		Level
Logo Use	Standard's logo appears on packaging only	High
	Standard's logo appears on a hang tag only	Medium
	Standard's logo is applied permanently to the product	Low
Application of Labels	Manufacturer sources or prints labels without any controls of numbers	High
	Manufacturer buys controlled quantities of labels from a brand-approved supplier only	Medium
	Brand buys labels and sends controlled amounts to the manufacturer	Low
Brand Identification	Brand identifier or authentication does not appear on product	High
	Brand appears clearly and permanently on product	Medium
	Brand appears clearly and permanently on product with a lot number or batch code reference	Low
Counterfeit Measures	No anti-counterfeit measures are used	High
	An anti-counterfeit internal tracking system is in place	Medium
	Internal tracking systems and genetic or technological (e.g. RFID) tracers are in place	Low
Physical Product Movement	Product is shipped to two or more intermediate sites before being shipped to retailer (e.g. manufacturer to brand DC to wholesaler to retailer)	High
	Product is shipped to one intermediate site before being shipped to retailer (e.g. manufacturer to DC to retailer)	Medium
	Product is shipped directly from manufacturer to retailer	Low
Information Sharing	Brand has regular and open access to the distributor's purchase and sales information	Low

Risk Factor		Level
	Brand receives regular reports on purchase and sales information	Medium
	No information sharing is in place	High
Monitoring and Penalty System	Brand has a regular monitoring system in place, with strong penalties for any violations of the contract	Low
	Brand has an unstructured monitoring system in place, with penalties for any violations of the contract	Medium
	There is no monitoring or penalties	High
Fraud Prevention	Brand has clearly defined requirements to prevent any selling of counterfeit goods. Any instances will lead to the end of the business relationship	Low
	Brand has requirements to prevent any selling of counterfeit goods. Any instances will lead to penalties	Medium
	No requirements against counterfeiting are in place	High
Brand Auditing System	Third party audits	Low
	Self-assessment reports	Medium
	No audits	High
Brand Auditing Frequency	Once a year	Low
	Random frequency	Medium
	No audits	High

D2.4.2

When assessing the risk of an Independent BNC Participant according to CCS D3.4b, the following risk table shall be used:

Risk Factor		Level
National Governance	Site is located in a country with a Corruption Perception Index (CPI) above 50	Low
	Site is located in a country with a CPI of 25-49	Medium
	Site is located in a country with a CPI below 25	High
Nature of Services	Distribution of sealed cartons or consolidation centers	Low
	Pick and pack services	Medium
	Repackaging of product	High
Quality Control System	Third party management system certification (e.g. ISO 9001)	Low
	Second party certification (e.g. brand audit)	Medium
	Internal system only, or no system	High
Certification History	Currently certified to a Textile Exchange standard or GOTS	Low
	Previously certified to a Textile Exchange standard or GOTS, or certified to another chain of custody standard	Medium
	No certification	High
Customs Bonding	Site is customs bonded	Low
	Site is not customs bonded	Medium
Previous Contract Violations	Brand has not identified contract violations for the site	Low
	Brand has identified one or two contract violations for the site	Medium
	Brand has identified three or more contract violations for the site	High

D2.4.3 When auditing Independent BNC Participants according to CCS D3.4b, the certification body shall consider low risk equivalent to Level 1, medium risk equivalent to Level 2, and high risk equivalent to Level 3.

D2.5 Audit Conduct and Duration

- D2.5.1** The following minimum time shall be spent on-site to conduct each audit. This does not include auditor travel or reporting time and is specified per site.
- a. Farms, slaughter sites, material recyclers, collectors/concentrators, OCS first processors, and all GRS sites except traders: See the applicable certification procedures
 - b. Trader (no physical possession): 1 hour
 - c. Distributor (physical possession with no processing): 2 hours
 - d. Processor: 3 hours
 - e. Subcontractor: One hour less than the time specified above for the site type
- D2.5.2** For a scope certificate which is limited to one trader site, the minimum audit duration shall be two hours. This is an exception to ACP D.4.4.5.
- D2.5.3** If two or more standards are being evaluated during a joint audit, the minimum audit time shall be the longest applicable time for one standard plus one hour per additional standard.
- D2.5.4** If a site fits into multiple categories under D2.5.1, the minimum audit time shall be the longest specified time in D2.5.1.

NOTE: Times listed in D2.5.1-4 are presented as a minimum. Many audits will require a longer duration than the minimum, and certification bodies should allow for more time in planning.

- D2.5.5** Audits of sites without physical possession of claimed materials may be conducted remotely. If the site is not the main location, evaluation may be limited to tasks directly performed by the site. This supersedes CCS C2.2a.
- D2.5.6** The certification body should maintain a system to ensure that the auditor was present at the site for each on-site audit for at least the minimum required audit time (e.g. photos with time and GPS location recorded) and to maintain records that this was done.

D3. Avoidance of Unacceptable Practices

D3.1 Avoidance of Unacceptable Practices

D3.1.1 The certification body should issue a critical non-conformity to any organization or site where evidence suggests that any of the following practices (collectively, the *unacceptable practices*) are occurring:

- a. The worst forms of child labor, as defined by ILO C182 – Worst Forms of Child Labour Convention, 1999 (No. 182); or
- b. Forced labor, as defined by ILO C029 – Forced Labour Convention, 1930 (No. 29).

D3.1.2 The certification body is not required to actively evaluate the organization against the criteria identified in D3.1.1 unless otherwise required by the Standard, but should take action if any evidence of the unacceptable practices occurring is identified.

Section E - Criteria for Scope and Transaction Certificates

This section includes criteria for the issuing of scope and transaction certificates, and is supplemental to *ASR-103 Policy for Scope Certificates* and *ASR-104 Policy for Transaction Certificates*.

E1. Scope Certificates

E1.1 Issuing Scope Certificates

- E1.1.1** The certification body shall ensure that all information included on the scope certificate is consistent with evidence reviewed during the audit, including the following:
- a. All process categories are possible for the site based on the setup and machinery which has been observed;
 - b. All listed raw materials are currently or could reasonably be processed by the site; and
 - c. The site is capable of producing the specified products, based on input materials and process categories.

E2. Transaction Certificates

E2.1 Issuing Transaction Certificates

This section supersedes the guidance provided in *CCS-201-V2.0 CCS Implementation Manual C4.1a Manual Guidance*.

E2.1.1 The certification body shall review documents and quantities before issuing a transaction certificate, with all claimed material inputs accounted for through valid incoming transaction certificates (except where otherwise allowed by a primary standard). At a minimum, the certification body shall check against the written criteria of the CCS as well as the following:

- a. Copies of invoices, shipping documents, and transaction certificates for the inputs to the claimed material;
- b. Quantities of stock on hand for inputs intended for the claimed material;
- c. Expected loss factor in the production per process, facility, and scope certificate;
- d. Quantities of claimed material shipped and in stock; and
- e. Copies of invoices and shipping documents for outgoing claimed material.

E2.1.2 Additionally, the certification body should check the following documents where applicable and relevant:

- a. Government issued sales or value added tax receipt for the claimed material (e.g. Eway Bills (India) and Fapiao (China));
- b. Third party product quality test reports for inputs and outputs;
- c. Financial records to document the purchase and sale of the claimed materials;
- d. Documentation to validate the identity of the claimed materials, quality, and quantities;
- e. Blending and/or mixing calculations;
- f. The identity of any subcontractors who handled the material while it was owned by the organization.

E2.1.3 Before issuing a transaction certificate, the certification body shall perform a volume reconciliation (taking into account production loss) that reviews available inventory to ensure that enough certified input was available.

E2.2 Amendment and Invalidation of Transaction Certificates

- E2.2.1** After it is issued, the transaction certificate may be amended in the following ways:
- a. To downgrade the claim from GRS to RCS;
 - b. To reduce the quantity of claimed material included on the transaction certificate, if further evidence shows that it was inaccurate;
 - c. To correct typographical errors (including increasing the quantity of claimed materials), within seven calendar days of issuance only; or
 - d. To invalidate the transaction certificate.
- E2.2.2** The certification body shall invalidate a transaction certificate if the certification body learns that any of the following apply:
- a. The organization presented falsified or fraudulent documents to obtain the transaction certificate;
 - b. The certification body identifies that they issued the transaction certificate in error;
 - c. The applicable input transaction certificate is invalidated; or
 - d. The claimed materials/products are otherwise shown to be ineligible for the claim being made.

NOTE: In the case that a claimed material is shown not to be eligible for a GRS transaction certificate due to not meeting the criteria of the social, chemical, or environmental modules of the GRS, the transaction certificate may be downgraded to RCS.

- E2.2.3** If a transaction certificate is amended or invalidated after it is issued, the certification body shall ensure that an updated transaction certificate is provided to the buyer's certification body (if applicable) and to the buyer. The organization may take responsibility to notify the buyer provided that documentation of this is provided to the certification body.
- E2.2.4** The certification body shall provide a report to Textile Exchange no later than the 15th of the following month after any transaction certificates are altered or invalidated. The report may be provided using *ASR-505 Altered and Invalid Transaction Certificate Reporting Template* or directly into Textile Exchange's database (when available), and shall include the following information:
- a. Certification body name;

- b. Standard;
- c. Transaction certificate number, excluding the supplier's license number;
- d. The seller's name and license number;
- e. The buyer's name, certification body (if applicable), and license number;
- f. The claimed material and certified weight in kg;
- g. The dates the transaction certificate was issued, altered, and declared invalid (as applicable); and
- h. The certification body, transaction certificate number, standard, and certified weight from the incoming transaction certificate.

NOTE: Textile Exchange will publish a public list of invalid transaction certificates showing the certification body name, the standard, and the transaction certificate number only. Textile Exchange may also share details of an invalid transaction certificate excluding details of the input transaction certificate with the buyer's certification body.

Section F - Claims

This section shall be used for all claim approvals issued under *TE-301 Standards Claims Policy*, which has a mandatory implementation date of November 1, 2021.

Where a scope certificate is issued using the CCS for a claim related to a standard not owned by Textile Exchange, the claims requirements for the other standard shall apply in place of TE-301 and this section.

F1.1 Claims Approvers

- F1.1.1** The certification body shall designate one or more personnel as claims approvers, and shall provide training sufficient to ensure that claim approvals are only issued when all applicable criteria are met.

NOTE: Textile Exchange may provide and require specific training for claims approvers in the future.

F1.2 Issuing Claim Approvals for Assured Claims

- F1.2.1** The certification body shall only issue claim approvals to an organization which holds a valid scope certificate with the same certification body, or to a non-certified brand whose certified supplier (responsible for the application of labels) holds a valid scope certificate with the same certification body.

- F1.2.2** The certification body shall provide a claim approval application form to their certified clients on request. The form shall include all elements specified in *TE-303 Claim Approval Application Form*, though the certification body may specify an alternative format for submissions. The certification body may pre-fill information about the organization on the form (e.g. via a database).
- F1.2.3** Upon receipt of a complete claim approval application, a claims approver shall review the proposed claims and artwork to ensure that the criteria of *TE-301 Standards Claims Policy* and *TE-302 Standards Logo Use Specifications* are met.
- F1.2.4** The certification body should provide a response to each new and updated claim approval application within seven calendar days.
- F1.2.5** Once a claim approval application is determined to be correct and complete by a claims approver, the certification body shall provide a formal approval to the organization.
- F1.2.6** A copy of each claim approval shall be emailed to Textile Exchange at Approvals@TextileExchange.org, or shall be submitted to Textile Exchange through alternative formats which may be made available by Textile Exchange.

F1.3 Pre-Approval of Claims

- F1.3.1** The certification body may review claim approval applications from brands prior to the initial certification, and may issue a pre-approval. A final approval shall not be issued prior to certification.
- F1.3.2** When issuing pre-approvals, the certification body shall ensure that the brand does not make any public facing claims based on the pre-approval prior to receiving a final approval.

F2. Review of Existing Claims

F2.1 Auditing of Claims

- F2.1.1** During each audit, the certification body shall review all claims being made by the organization to ensure that:
- A valid claim approval issued within the last year is in place from the certification body for all assured claims;
 - Only eligible products are labeled, and each label corresponds with the product in terms of label grade and material composition; and

- c. If general marketing claims or informational statements are made about the Standard by the organization or by the organization's non-certified parent organization, that the organization's commitments to the Standard are registered with Textile Exchange and that the claims are accurate.

NOTE: A claims approver may assist the auditor with this review, and should be involved in case there is any question on whether a claim meets all applicable criteria.

F2.2 Reporting of Disallowed Claims

- F2.2.1** If the certification body identifies any disallowed claims by an organization who is not currently certified or in the application process with the same certification body, the certification body should report these claims to Textile Exchange as a formal complaint.