

From: Cradle to Cradle Products Innovation Institute info@c2ccertified.org
Subject: Thank you for your comments on the Cradle to Cradle Certified V4 Draft Standard
Date: September 20, 2019 at 2:24 PM
To: todd.jones@resource-solutions.org



Thank you for participating in the Cradle to Cradle Certified™ Version 4 draft standard. All feedback received during the public comment period will be reviewed by the Institute's Certification Standards Board and considered in the development of the final Cradle to Cradle Certified Version 4 standard, to be released in 2020.

Please find a summary of your comments below:

First Name

Todd

Last Name

Jones

Organization

Center for Resource Solutions (CRS)

Title

Director, Policy

Email Address

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Country

United States

Stakeholder Type

NGO/Nonprofit representative

Industry

NGO / Nonprofit

Does your company have a Cradle to Cradle or Material Health Certificate?

Not Applicable

Comment

Document

Cradle to Cradle Certified™ Product Standard, Version 4

Standard Section

6 Renewable Energy and Climate Requirements

Sub-Section

6.2 Requirements Summary

Comment

"Renewably sourced or offset with renewable electricity projects," used throughout Sec. 6, requires additional clarity. First, use of "offset" as a verb in the context of renewable energy use and procurement could be confusing and is not recommended. Second, this suggests that there is a distinction between "renewably sourced" and "offset with renewable electricity projects." Please explain the distinction given that use of specified renewable generation can only be determined contractually and there is no physical delivery of renewable energy on the shared grid.

Comment

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Cradle to Cradle Certified™ Product Standard, Version 4

Standard Section

6 Renewable Energy and Climate Requirements

Sub-Section

6.2 Requirements Summary

Comment

It was not immediately clear to us that renewable energy used to meet requirements at different levels can include RPS and default offer renewable energy, and that in fact no voluntary renewable purchasing is required until the Gold level. First, we recommended clarifying how much: 1) Total renewable energy, 2) Required, default or standard offer renewable energy, and 3) Voluntary renewable energy, as a percent of use, is required for each level. Second, we recommend that

some voluntary action be required at the Bronze and Silver levels. Third, we recommend that all voluntary renewable energy be third-party certified.

Comment

Document

Cradle to Cradle Certified™ Product Standard, Version 4

Standard Section

6 Renewable Energy and Climate Requirements

Sub-Section

6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions

Comment

On pg. 40 (Sec. 6.6, under Renewable Electricity and Offset Targets for the Gold level), “use 50% third-party certified renewable sources” has a different meaning than, “50% of the renewable electricity is third-party certified,” from the Requirements Summary. Certifying the electricity (i.e. the sale, product, or purchase) is different than certifying the source or generator. Please clarify what you mean. We suggest requiring certification of the electricity product and using the language from the Requirements Summary. Green-e®, for example, certified the renewable energy product, not the generator.

Comment

Document

Cradle to Cradle Certified™ Product Standard, Version 4

Standard Section

6 Renewable Energy and Climate Requirements

Sub-Section

6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions

Comment

On pg. 41 (Sec. 6.6, under Applying Voluntary Third-Party Certified Renewable Electricity to Targets): 1) please add the registered trademark symbol (®) to Green-e®; 2) in no. 1, please provide clarification and additional information around what “or equivalent” means, how it will be verified, and this is different in practice from no. 2; 3) in no. 2, please provide clarification and additional information around what a “qualified” third-party is in this context and how qualifications are demonstrated; and 4) provide clarification and additional information around what “new” renewable electricity projects are in this context. Finally, no. 2 seems to undercut no. 1 and may not be necessary. Please clarify how no. 2 is to be demonstrated and how it is different from demonstrating “equivalency.” We suggest that third-party certification, e.g. Green-e® certification, be required anywhere where it is available.

Comment

Document

Cradle to Cradle Certified™ Product Standard, Version 4

Standard Section

6 Renewable Energy and Climate Requirements

Sub-Section

6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions

Comment

On pg. 42 (Sec. 6.6 under Applying Voluntary Carbon Offsets to the Targets), first, please add the registered trademark symbol (®) to Green-e®. Second, we suggest strengthening condition no. 1, which only requires that offsets meet the criteria in the Green-e® Climate Standard, not that they are Green-e® Climate Certified. In this case, there are no assurances from certification or verification through Green-e® Climate. We suggest simply requiring Green-e® Climate Certified offsets.