

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 1, 2020 at 1:21 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.

Please find a summary of your comments below:

Q. First Name
R. Todd

Q. Last Name
R. Jones

Q. Organization
R. Center for Resource Solutions (CRS)

Q. Title
R. Director, Policy

Q. Email Address
R. todd.jones@resource-solutions.org

Q. Country
R. United States

Q. Stakeholder Type
R. NGO/Nonprofit representative

Q. Industry
R. NGO / Nonprofit

Q. Does your company have a Cradle to Cradle or Material Health Certificate?
R. Not Applicable

Comment
Q. Document
R. Cradle to Cradle Certified™ Product Standard, Version 4

Q. Standard Section
R. 6 Clean Air & Climate Protection

Q. Sub-Section
R. 6.4 Quantifying Greenhouse Gas Emissions

Q. Comment
R. Regarding, "For Bronze level: 1. Report electricity in terms of kWh or equivalent and the resulting greenhouse gas emissions in terms of CO₂e using the location-based method" (pg. 49), please explain why only the location-based method is required. According to the GHG Protocol Scope 2 Guidance, "the presence of contractual information in any market where a company has operations triggers the requirement to report according to the market-based method" (Sec. 6.2 pg. 43 of the GHGP Scope 2 Guidance). In other words, the market-based method should be used where differentiated energy products in the form of contractual instruments (including direct contracts, certificates, or supplier-specific information) are available in a given market or where certificates or contractual instruments convey legally enforceable claims (See Sec. 9.3 pg. 76 and Sec. 6.4.1 pg. 45 of the GHGP Scope 2 Guidance).

Comment
Q. Document
R. Cradle to Cradle Certified™ Product Standard, Version 4

Q. Standard Section
R. 6 Clean Air & Climate Protection

Q. Sub-Section
R. 6.4 Quantifying Greenhouse Gas Emissions

Q. Comment
R. Regarding, "For the Silver level, if quantifying scope 1, 2, and 3 emissions at the company level, the product must be included in

11. Regarding, "For the Silver level, in quantifying scope 1, 2, and 3 emissions at the company level, the product must be included in scope. The methods employed must follow a recognized greenhouse gas accounting methodology (i.e. the Greenhouse Gas Protocol or others listed by CDP)" (pg. 50), does this mean that the product does not need to be included in the quantification at the bronze level? If so, please explain why. Does this mean that the methods employed do not need to follow a recognized greenhouse gas accounting methodology at the bronze level? If so, please explain why. We recommend that the certified product be included in GHG quantification and that the quantification methods employed follow a recognized GHG accounting methodology at all levels.

Comment

Q. Document

R. Cradle to Cradle Certified™ Product Standard, Version 4

Q. Standard Section

R. 6 Clean Air & Climate Protection

Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding, "Depending on achievement level and the methods used, applicants are: [...] Directly increasing the share of renewable electricity available on the local grid for all to use" (pg. 51-2), based on the way it is worded, this requires both a demonstration of causality—demonstration that companies caused an increase in RE generation from a baseline scenario—AND that this new incremental RE generation is NOT used by the company or certified product, but in fact by all grid customers. If this is the intent, project additionality testing should be included for the former, and a demonstration that associated RECs are retired on behalf of all grid customers or by the project itself should be required for the latter. If this is not the intent, we suggest revising the language to clarify the intent.

Comment

Q. Document

R. Cradle to Cradle Certified™ Product Standard, Version 4

Q. Standard Section

R. 6 Clean Air & Climate Protection

Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding, "Gold level: For the final manufacturing stage of the product, renewably source 50% of the electricity used, producing at least half of the 50% (i.e. 25% of the total electricity used) on-site and/or procuring half through long-term power purchase agreements supporting new renewable electricity installations" (pg. 52), limiting RE supply options to onsite or PPAs is not necessary and may not produce the desired outcome. If the intent is to ensure that purchases support new RE or even directly finance new construction, simply requiring that, rather than assuming that certain purchasing options automatically achieve that. This will provide flexibility to companies with operations where these purchasing options may be limited and also more directly achieve the desired impact.

Comment

Q. Document

R. Cradle to Cradle Certified™ Product Standard, Version 4

Q. Standard Section

R. 6 Clean Air & Climate Protection

Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding, "Platinum level: For the final manufacturing stage of the product, renewably source > 100% of the electricity used. Produce the electricity on-site and/or procure through long-term power purchase agreements supporting new renewable electricity installations" (pg. 52), limiting RE supply options to onsite or PPAs is not necessary and may not produce the desired outcome. If the intent is to ensure that purchases support new RE or even directly finance new construction, simply requiring that, rather than assuming that certain purchasing options automatically achieve that. This will provide flexibility to companies with operations where these purchasing options may be limited and also more directly achieve the desired impact.

Comment

Q. Document

R. Cradle to Cradle Certified™ Product Standard, Version 4

Q. Standard Section

R. 6 Clean Air & Climate Protection

Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding the numbered requirements under "Meeting the Renewable Electricity Targets" (pg. 53), the desired outcome of these requirements, plus additional benefits, impact, and third-party verification, can be achieved by simply requiring that RE purchases be Green-e® certified in the U.S. and Canada and in all other markets where a Green-e® Standard for RE exists. This would also simplify requirements for users. As it stands now, the combination of these requirements is not equivalent to Green-e® certification.

Comment

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R. 6 Clean Air & Climate Protection

Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding, "3. Renewable electricity that is part of a utility's default offer (i.e. renewable electricity that is part of the standard grid mix) may receive credit towards achieving the renewable electricity targets only if there is no voluntary renewable electricity market in the applicable market region" (pg. 53), we request clarification of "standard grid mix." Where possible, we suggest using terms that are used in guidance documents like the GHG Protocol's Scope 2 Guidance. RE in a utility's default product offer (i.e. a utility-specific resource mix and emissions factor) may be different from RE that is part of the standard grid mix (i.e. a regional grid average mix and emissions factor). RE in the regional grid average should not be counted by individual consumers since it simply represents RE generated in the region and may have already been transacted. In contrast, RE in a utility-specific resource mix MAY represent unique RE that has not been transacted and may be claimed by customers but ONLY IF there are unique RECs retired to substantiate delivery of this RE to customers, either through a state RPS program or outside of it. C2C should require some demonstration that this is the case in order to recognize use of this RE toward RE usage requirements at different levels. Number 4 below appropriately requires that "renewable energy attribute certificates must be retained by the applicant or canceled on the applicant's behalf in all cases." However, it is not sufficiently clear that this also applies to the RE delivered by default per number 3. This should be clarified and C2C should specify what kind of documentation or demonstration is required in this case.

Comment

Q. Document

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Q. Standard Section

R. 6 Clean Air & Climate Protection

Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding, "The generation or consumption of the renewable electricity may not be used to meet any regulatory requirements" (pg. 54), additional clarification, explanation, and perhaps requirements are needed. For example, if the RE generation occurs in a capped region/sector, like California or the EU, does this requirement mean that allowances must be retired on behalf of the generation in order to ensure that the generation is surplus to GHG regulations and there are net avoided emissions associated with the generation? This would not be achieved by unique REC or GO retirements alone. In other words, does this requirement mean that the generation AND ALL OF IT'S ATTRIBUTES must be surplus to regulation? If so, additional requirements that are specific to the market and location of the generation should be added to specify how to achieve this requirement.

Comment

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Q. Standard Section

R. 6 Clean Air & Climate Protection

Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding the numbered requirements under "For the remaining half (i.e. 50%) of the Gold target and for the Platinum level target" (pg. 54), limiting RE supply options to onsite or PPAs is not necessary and may not produce the desired outcome. If the intent is to ensure that purchases support new RE or even directly finance new construction, simply requiring that, rather than assuming that

certain purchasing options automatically achieve that. This will provide flexibility to companies with operations where these purchasing options may be limited and also more directly achieve the desired impact.

Comment

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Q. Sub-Section

R. 6.6 Using Renewable Electricity and Addressing Greenhouse Gas Emissions in Final Manufacturing

Q. Comment

R. Regarding the numbered requirements under “Meeting the Carbon Offset Targets” (pg. 54-5), the desired outcome of these requirements (except for number 3), plus additional benefits, consumer protections, and retail-level verification, can be achieved by requiring that RE offset purchases be Green-e® Climate certified. This would also simplify requirements for users. As it stands now, the combination of these requirements for offsets is not equivalent to Green-e® Climate certification.