Recycled Material Standard (RMS) Interoperability Pilot for Post-Consumer Plastics

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Introduction

GreenBlue is conducting an interoperability pilot – allowing recycled plastic materials to enter the RMS chain of custody through recognition of other standards. Specifically, the pilot will allow manufacturers to use non-RMS certified post-consumer resin as an eligible input for the RMS chain of custody if it is certified to a standard approved by GreenBlue.

By recognizing inputs from other certification programs, RMS-certified manufacturers and their downstream customers will have access to more certified inputs without having to bear the burden of multiple chain of custody certification audits.

Background

There are multiple programs (scheme owners) that have developed standards and procedures for making claims related to recycled materials.[1] While there are similarities, each program has its own set of definitions, requirements, policies, procedures and guidance documents to support their respective programs.

Often scheme owners take different approaches to developing and maintaining standards and have varying degrees of transparency. Furthermore, the more rigorous chain of custody schemes generally are not interoperable. This complexity leads to confusion for supply chain members and has stifled adoption.

Key Objectives

As always, the primary objective of the Recycled Material Standard is to advance the use of recycled materials. For this pilot in particular, the key objectives are to:

1) test the feasibility of allowing manufacturers to use non-RMS certified inputs to support downstream claims of recycled content under the RMS chain of custody,
2) allow brands and retailers to meet goals and regulatory requirements that rely on chain of custody certification,
3) bring recycled materials to market more cost effectively, and

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[1] Eunomia Research & Consulting, *A Comparative Assessment of Standards and Certification Schemes for Verifying Recycled Content in Plastic Products*, October 19, 2021.

4) increase the availability of RMS-certified products.

Target Participant Group

Currently, the RMS Framework only allows uncertified reclaimed material as an eligible input to the RMS chain of custody before it has been processed into "recycled material" able to be used in a manufacturing process. For this pilot, the RMS team is extending the capability of using non-RMS certified material inputs to plastics manufacturers that purchase post-consumer resin; specifically, those organizations that purchase (or consume their own) recycled resin inputs (RMS Material ID code P3 level) and transform them into plastic articles (RMS Material ID code P4 level or greater).   Manufacturers may be integrated either upstream or downstream.

Pilot Timeline

The pilot is open to manufacturers achieving certification status in calendar years 2025 and 2026 (including new and existing RMS participants). The targeted completion date is December 2027.

Pilot Requirements

Approval Process for Participation

In order to participate in this trial, companies must notify both GreenBlue and their certification body and receive approval for participation.

Due Diligence Requirements

For the pilot, manufacturers that source non-RMS certified recycled resin materials (materials with a P3 classification) as an input to the RMS chain of custody must maintain a due diligence system meeting the criteria specified in RMS Framework section 6.3 with the following additional requirements for those materials:

1. Non-RMS certified post-consumer materials must be directly procured from a reclaimer. If brokers take legal ownership of materials, the materials are ineligible for this pilot and must be RMS-certified to maintain chain of custody.

2. Non-RMS certified post-consumer material shall have documentation from each supplier facility confirming its recycled status and % post-consumer content. This information shall be provided for each shipment.

3. Non-RMS certified material must be certified under another third-party certification scheme approved by GreenBlue and:

a. Shall employ only the controlled blending or segregation model as defined by ISO 22095:202 definitions (sections 5.41 and 5.32).

b. Shall be accompanied by the third-party certificate or specified claim documentation identifying the scheme employed, validity of the certification, and the source facility of the material.

c. Mass balance credit claims and rolling average content claims are not allowed.

4. Inputs brought into the RMS chain of custody shall be assigned a recycled status and material type in accordance with sections 5.1 and 5.2 of the RMS Framework at the time they are received.

Pilot Evaluation

GreenBlue seeks to get feedback based on at least six months of experience (preferably one year) from each pilot participant. As such, the evaluation period is intended to continue through 2027 unless sufficient information is gathered to adopt interoperability criteria in a standard revision before that time.

Participants must agree to complete a pilot assessment survey every six months. Continuing participation will be contingent on approval from GreenBlue. The survey will assess progress toward key objectives described above.

GreenBlue staff will evaluate results of participant surveys and auditor feedback and will make a recommendation to the RMS Advisory Committee. If recommended by GreenBlue and approved by the RMS Advisory Committee, the adaptation for interoperability will be included in future standard updates.

RMS-Approved Standards for Interoperability Pilot

The following standards have been pre-approved by GreenBlue:

- SCS Certification Standard for Recycled Content (SCS-103 V8.1), July 2025.

- Environmental Claim Validation Procedure for Defined Source Content (UL 2809-1, Nov 2023) & Recycled Content, (UL 2809-2 Ed. 2), June 2024.

- RecyClass Recycling Process Certification, Audit Scheme Version 1.2 revised December 17, 2024

- Textile Exchange RCS-101 Recycled Claim Standard (RCS), Document Code RCS-101-V2.0-2017.01.01, August 17, 2020

- Textile Exchange GRS-101 Global Recycled Standard (GRS), Document Code GRS-101-V4.0-2017.01.01, August 17, 2020

Certification program operators are welcome to contact GreenBlue if they would like their standard considered for approval in the future. GreenBlue reserves the right to hire an independent third party to evaluate additional standards and, if needed, the applicant will pay for the assessment.

Criteria for Standard Inclusion in RMS Interoperability Pilot

This section summarizes the criteria used to assess standards that are approved for the RMS Interoperability Pilot. In all cases, the assessment was done by GreenBlue staff using only publicly available information. GreenBlue reserves the right to end the pilot, or add or remove standards from this list.

If a scheme owner wishes to be considered for inclusion, they should contact GreenBlue staff at rms@greenblue.org.

Standards were evaluated against following criteria to assess whether the requirements are covered, partially covered, or not covered.

Technical Requirements

Definitions – The definitions for post-consumer and (if applicable) post-industrial material are consistent with ISO 14021 and the RMS Material Modules.

Calculation Methods – If blending occurs, there is a clear method for calculation of recycled content by material type and status. Methods include details on how to account for the mass of recycled material (numerator) and all of the mass in a product (the denominator).

Chain of Custody – The scheme includes clear requirements for chain of custody including documentation required to issue claims to downstream recipients of recycled material.

Standard Development and Maintenance

Development Process – The process is documented and made publicly available. Stakeholders have information needed to participate. There are clear requirements and timelines for reviewing standards.

Balanced Participation – The standard reflects a voluntary consensus-based approach to ensure openness, balance and fairness for all stakeholders.

Public Consultation – The development process includes public consultation on the standard and allows adequate time to submit comments. Efforts are made to reach a broad cross section of stakeholders.

Certification Body Requirements – Auditing is conducted by third-party. The certification body requirements are clear, robust and publicly available.

Complaints and Grievances – There is a mechanism to raise and resolve complaints and grievances with the scheme owner or certification body.   The dispute resolution system should be open and accessible to stakeholders.