



ResponsibleSteel International Production Standard. From V2.1.1 to V3.0

Enabling Claims

Claims, Levels of Achievement and Traceability

Public Consultation Draft

Version 1.0

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Contents

1. Purpose and Scope	2
Executive summary	2
What is being proposed.....	3
What stakeholders are being asked	3
2. Consultation questions.....	4



1. Purpose and Scope

This document has been prepared for public consultation on the ResponsibleSteel International Production Standard V3.0 (hereafter, the Production Standard). It outlines the draft proposal for changes to the Production Standard V2.1.1 and the separate International Production Standard Guidance and Annexes document (Guidance and Annexes). This proposal focuses on the rules and processes associated with making claims about steel products that come from sites that have conformed with the ResponsibleSteel Production Standard. It aims to bring together a wide range of stakeholder input from the recent past, consolidating that feedback into a clear path forward that can be discussed, agreed and implemented.

The following documents should also be referred to when assessing this proposal: [Terms of Reference](#) for the revision of the Production Standard V3.0 and [consultation survey](#), which can be found on the [ResponsibleSteel website](#).

Executive summary

This work aims to realise two opportunities that have been raised by stakeholders:

(1) that for Core Site certified sites to see greater value added to their products and/or enjoy privileged market access, as other ISEAL certification schemes have enjoyed, greater demand for ResponsibleSteel 'Certified Steel' has to materialise. This involves unlocking downstream 'Certified Steel' value chains, such that they are developed and valued through greater accessibility. We believe that special effort is needed to ensure the value chain matures and the flow of certified products can begin, sparking demand as early adopters are seen to enjoy the benefits of the initial supply.

(2) that the rules for making claims are spread across multiple normative documents, making them difficult to understand and complex to revise.

Regarding the demand-side issue (1), our [Theory of Change](#) assumes that demonstrating conformity with the Production Standard will lead to downstream customers, investors and policymakers rewarding those achievements in their specific ways. Steelmakers have fed back that the costs incurred in demonstrating conformity with Progress Level 1 of both P3 Responsible Sourcing and P10 Climate Change and GHG Emissions are greater than the benefits received by their achievement, and that the expected demand has not materialised. These additional costs – in effect of being able to sell their products as 'Certified Steel' – are currently numerous: (a) consultancy and staff costs of bringing practices into conformity (i.e. improving performance); (b) an additional Progress Level audit to demonstrate conformity (auditor costs); (c) additional traceability compliance costs¹; and (d) additional audit costs of a traceability audit. Steelmakers are calling out for us to raise awareness and demand in the market and ease the audit burden. This project fits within the wider programme of activities that aims to address this and would be supported by systems for monitoring claims and having clear processes for receiving, processing and resolving complaints related to claims.

The structural issue (2) is complicated by a range of factors beyond those related to having the rules across multiple documents. These include: (a) conflating the rules on how claims work with the rule for meeting the different levels of achievement that a site can reach; (b) a lack of clarity on how sites should keep track of their products that were produced on site; (c) conflicting meanings of the word 'claim' being used interchangeably, as well as references to what can be claimed without using the word 'claim'; and (d) how to ensure that GHG

¹ Here traceability means 'Chain of custody' (CoC) which is a means by which inputs, outputs, and associated attributes are transferred, monitored and controlled as they move forward through each step in the supply chain (adapted from ISO 22095:2020) – ISEAL 2025



emissions claims work cohesively with claims related to products and product lines of 'Certified Steel'.

This project brings these interrelated issues together so they may be resolved holistically.

What is being proposed

There are a range of changes being considered that share the aim to catalyse faster uptake of steel from certified sites without weakening the credibility of the Production Standard or of the assurance system. These are given in Table 1.

Note that this work is happening alongside Principle 10 (Climate Change and GHG Emissions). Some of these changes aim for greater consistency and comparability in the allocation and tracking of the greenhouse gas emissions embedded within steel products. More information on those proposals can be found [here](#). The goal of the proposals here and there is that as more certified products enter value chains, ResponsibleSteel can help build both the market infrastructure and the transparent performance information needed to accelerate the transition towards responsible, near-zero steel production.

What stakeholders are being asked

Stakeholders are being asked for their feedback on the proposed changes, outlined in Table 1.

Table 1 Overarching changes proposed to resolve issues regarding claims and a lack of added value being realised in the downstream ResponsibleSteel value chain.

	Overarching change	Further detail
1	Moving the rules for making claims to one normative document	The Production Standard would no longer specify when products can be sold as certified or as coming from a certified site – that information would be moved to the Claims & Logo Use Guidelines.
2	Clarifying how levels of achievement unlock certain claims	The Production Standard would describe levels of achievement in terms that claims can then be built on. This would mean text that states verifiably what a site has achieved (i.e. Core Site Certification, and Progress Level 0–4 against P3 and P10) leaving the Claims and Logo Use Guidelines to set out what may be said about it.
3	Core Site Certification is all it takes to sell your products as 'Certified Steel'	Sites would be able to sell products as 'Certified Steel' when they have achieved Core Site Certification. This removes the requirement for Progress Level achievement before making 'Certified Steel' claims, and for the additional audit that would determine that. This is the change intended to have the most direct effect on uptake, and it is also the one that depends on the structural questions, since the Production Standard's traceability provisions are upstream only and the controls on the output side currently sit in the draft Chain of Custody (i.e. traceability) Standard, behind a second certificate and a second (and sometimes third) audit. Ultimately the site would be allowed to prepare visual and text-based on and/or off product claims that clearly convey these distinctions, e.g. by showing a progress bar on any logo.
4	Enabling traceability and preventing	We are also working on the design and definition of clear rules for the internal traceability systems of sites, and looking



Overarching change	Further detail
counterfeit claims of 'Certified Steel'	towards launching a credible downstream traceability programme, based heavily on the draft work already done. While this work is out of the scope of the consultation, we have included information here as it is clearly relevant to the aims of the <i>Enabling Claims</i> project. The role of an assured traceability system for unlocking added value for certification products has been repeatedly shown across a range of large-scale ISEAL code-compliant programmes (e.g. Marine Stewardship council, Textile Exchange and Forest Stewardship Council, on which our Theory of Change has been inspired). ResponsibleSteel will work to determine the most cost effective and efficient approach to this, in parallel to the formal consultation.

2. Proposed Questions for Consultation

Areas for public consultation

1. To what extent do you agree with the following statements?
Allowing products that have come from sites that have Core Site Certification to be sold with marketing claims, even if they have not reached Progress Level 1 for Principle 3 (Responsible Sourcing of Input Materials) or Principle 10 (Climate Change and GHG Emissions) is acceptable.

These products should be called 'Certified Steel' rather than 'steel from a certified site' as part of a unified, simplified system.
2. Please explain your answers.
3. Which of the following should be required to be in place before a site may sell their products as ResponsibleSteel certified? Select all that apply.
 - that the product has only been handled by supply chain actors whose processes for the traceability of their products have been verified.
 - that the individual products themselves can be traced back to the steel producer and its volume reconciled by an auditor, wherever it is in the value chain downstream from the steel producer
 - that an accurate declaration of the GHG emissions associated with those products is provided, based on a regionally or internationally-recognised product carbon footprint (PCF) methodology (in the form of a 3rd party verified PCF or Environmental Product Declaration)
4. Please explain your answer.
5. To what level of granularity should claims be allowed? Select all that apply.
 - Site-level: It is only if all of the products from a site are certified that any of the products can be claimed as certified.



Areas for public consultation

- Production line: Some product lines from a site could be claimed as certified, even if other production lines from the same site are not certified.
 - Product: Some products from a site could be claimed as certified, even if other products from the same site are not certified.
6. Please explain your answer.
 7. To enable claims to be made related to products leaving the site, we need to ensure internal traceability. In your opinion, what is the preferred method [select one option]:
 - include additional requirements for traceability into the Production Standard (e.g. P2);
 - require a separate traceability certification (but find ways to ensure the audits happen at the same time)?
 8. Please explain your answer.
 9. If ResponsibleSteel were to require that only products that have been handled by supply chain actors whose processes for traceability have been verified could be certified, how should these requirements be implemented for steel producers? Tick all options that are acceptable.
 - By requiring the site to be certified against the same ResponsibleSteel Chain of Custody Standard (details to be confirmed) as the downstream supply chain actors handling certified products.
 - As a principle of the ResponsibleSteel Production Standard that duplicates only those parts of the draft ResponsibleSteel Chain of Custody Standard (i.e. traceability) that are relevant to the steel producer.
 - N/A: Steel producers should not have to do this at all.
 10. Please explain your answer.
 11. What are the most important things that a site would have to show in order to demonstrate that the risk of counterfeit certified and/or low-emissions steel being sold through their site is low? Please explain your answer.
 12. Please add any further comments on this topic.
 13. To what extent do you agree with the following statement? References to what can be claimed about a site or product's achievement should be removed from the Production Standard and relocated to the Claims and Logo Use Guide.
 14. Please explain your answer.