

Procedure for the Development and Revision of ResponsibleSteel Standards

Version 4.0

Date: 30 September 2026

Version information

No.	Date	Description (N.B. numbering refers to the numbering of respective versions)
Version 1.0	December 2017	Initial endorsement of these procedures
Version 1.1	May 2018	Variations to paragraphs 2.1.1, 2.2.1c, and 2.3.3
Version 1.1	October 2019	Variations to paragraphs 2.2.1 and a new paragraph 2.5.2
Version 2.0	June 2020	Modification to paragraph 2.2.1.a and variations to sections 3.3 and 11.
Version 3.0	September 2023	Modifications to generalise the application of the procedures to multiple Standards. Addition of section 2 covering the decision to develop a new Standard. Addition of section 3.6 on feasibility testing of a draft Standard. Variations to paragraphs 3.7.4 to require 60-day first consultations for the revision of standards the public consultation period of draft Standards and to 11.1.1 regarding determining the need for a clarification or interpretation of a Standard. Modifications to section 12, including the addition of paragraphs 12.1.2, 12.1.3, 12.2.2 and 12.2.3 covering the review and revision of an existing Standard. Additions of sections 12.3 for the reaffirmation of a Standard and 12.4 for the withdrawal of a Standard. Some changes to reflect the further development of the ResponsibleSteel programme: • Renaming Executive Director to Chief Executive Officer. • Including the role of the Technical Advisory Panel in section 1.2. • Addition of reference to the ResponsibleSteel Exceptions Procedure in paragraph 12.1.2. Typographical changes and restructuring, including renumbering of some sections.
Version 4.0	September 2026	This version streamlines the standard revision procedure while aiming to remain compliant with the ISEAL Code of Good Practice v1.1. The new procedure includes four different paths: 1. A "Full" process, which applies to any new Standard and regular revision (every five years) of any existing Standard. 2. An "Intermediate" process, which applies to non-urgent yet substantive revisions triggered between the 5-year cycles. 3. A "Board Standard Directive" process, which applies to urgent and substantive revisions. 4. A "Simple" process, which applies to non-urgent and non-substantive revisions, as well as clarification and interpretation notes. This version also incorporates language and format improvements through the removal of redundancies and non-critical content by using a plain English approach.

Disclaimer

The official language of this document is English. The definitive version is held on the ResponsibleSteel website <https://www.responsiblesteel.org/>. Any discrepancy between copies, versions or translations shall be resolved by reference to the definitive English version.

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About this document

This document defines the processes to be followed for the review and revision of existing ResponsibleSteel Standards and the development of new ResponsibleSteel Standards. The procedures have been written using the ISEAL Code of Good Practice for Sustainability Systems v1.1 ('the ISEAL Code') as reference. The original version of this procedure was endorsed by the ResponsibleSteel Interim Council in December 2017. Updates to the procedure have since been approved by the ResponsibleSteel Board of Directors and are shown in the version history table above.

The procedure includes different processes to be used depending on the type, depth and urgency of a Standard development or revision. It provides details about:

- the steps for proposing a new Standard and the development of a Terms of Reference;
- the main steps of the standards-setting and revision processes including the timelines and opportunities for stakeholder participation;
- the decision-making procedures, including how decisions are made and who makes them.

1. Introduction

1.1. Background

- 1.1.1. This document specifies the processes to develop and/or revise ResponsibleSteel Standards.
- 1.1.2. These processes vary in depth, responsibilities, decision-making and duration, depending on the level of importance and urgency of the development or revision of a ResponsibleSteel Standard.
- 1.1.3. ResponsibleSteel Standards shall be developed in English. Translations in non-official languages are allowed, but in case of ambiguity, contradiction or any legal challenge, the English version shall always prevail.
- 1.1.4. This procedure shall be reviewed whenever deemed necessary by the Board, taking account of any stakeholder comments that have been received up to that time.
- 1.1.5. The current version of these procedures and associated annexes shall be published and be available for download from the ResponsibleSteel website. Comments or suggestions are welcome and should be addressed to the ResponsibleSteel Chief Executive Officer ('CEO').

1.2. Summary of responsibilities

- 1.2.1. Key responsibilities for the development and approval of a ResponsibleSteel Standard are summarised as follows:

a. ResponsibleSteel Board of Directors ('Board')

The Board:

- i. mandates the development of a ResponsibleSteel Standard;

- ii. approves the Procedure for Development and Revision of ResponsibleSteel Standards;
- iii. appoints the members and the Chair of the ResponsibleSteel Standards, Assurance and Claims Committee ('SACC');
- iv. depending on the relevant decision-making procedure for a ResponsibleSteel Standard, the Board either approves or ratifies a finalised ResponsibleSteel Standard (and subsequent substantive revisions) on the basis that the Procedure for Development and Revision of ResponsibleSteel Standards has been implemented to the Board's satisfaction and the resulting ResponsibleSteel Standard meets the specified Terms of Reference.

b. ResponsibleSteel Membership ('Membership')

The Membership reviews and approves draft Standards prior to their ratification by the Board when the "Full" process is followed for the development or revision of a ResponsibleSteel Standard (see 3.103.12).

c. ResponsibleSteel Board Standards, Assurance and Claims Committee ('SACC')

The SACC oversees the work of the Secretariat in developing ResponsibleSteel Standards in accordance with the Procedure for Development and Revision of ResponsibleSteel Standards. The SACC systematically reviews draft standards in the full and intermediate processes.

d. ResponsibleSteel Secretariat ('Secretariat')

The ResponsibleSteel Secretariat (the technical team) led by the CEO, drafts the ResponsibleSteel Standard in accordance with the Procedure for Development and Revision of ResponsibleSteel Standards. The Secretariat may convene thematic working groups and seek inputs from external stakeholders at its discretion. Inputs and stakeholder consultation results shall be shared with the relevant governance bodies within ResponsibleSteel.

e. ResponsibleSteel Technical Advisory Panel ('TAP')

The ResponsibleSteel Technical Advisory Panel advise the Secretariat on technical standards development issues at the request of the Secretariat at any time during the development and maintenance of ResponsibleSteel Standards, in accordance with the Procedure for Development and Revision of ResponsibleSteel Standards and the Terms of Reference of the ResponsibleSteel Technical Advisory Panel. The TAP may delegate this advice to a subsection of their membership, which are then called a Technical Advisory Group (TAG).

2. Overview of the processes for development and revision of ResponsibleSteel Standards

There are four options for processes to revise ResponsibleSteel Standards. Any new standard must follow the 'Full' process. The Secretariat will develop all drafts. The table below summarises the key differences between the different processes. For the purpose of this procedure, *substantive* is understood as a revision that modifies the level of performance required from an operator seeking compliance and *urgent* is understood as a revision determined to be urgent by the CEO following the conditions at 5.1.1. as guidance.

The ResponsibleSteel CEO is responsible for the correct implementation of the process adapted to each situation. In addition to the transparency requirements included in this procedure, the CEO shall inform the Board quarterly of any modification in the ResponsibleSteel documentation, which required implementing any element of this procedure.

The Board may object to the decision of the CEO regarding the process implemented in any given situation and require a new process to be implemented in replacement.

Should the Board be in agreement with the CEO's decision, the quarterly report shall be made public. Any external stakeholder may challenge revisions conducted using this procedure via ResponsibleSteel's "Issues Resolution System"¹.

¹ <https://www.responsiblesteel.org/issues-and-complaints>

Process				
Consideration	Full	Intermediate	Standards Directive	Simple
Description	<i>Used for the formal revisions occurring every 5 years. Any modification in standards can be considered.</i>	<i>Used for substantive and non-urgent revisions required before the 5-year revision round.</i>	<i>Used for substantive and urgent revisions required at any time.</i>	<i>Used for non-substantive and non-urgent revisions required at any time.</i>
Initiated by	<i>Board upon suggestion by the Secretariat/CEO.</i>	<i>CEO upon suggestion by the Secretariat or any third party.</i>	<i>CEO upon suggestion by the Secretariat or any third party.</i>	<i>Secretariat</i>
Final approval	<i>Board, and member vote</i>	<i>Board</i>	<i>Board</i>	<i>CEO</i>
Frequency	<i>For all new standards</i> <i>At minimum every five years</i>	<i>As needed</i>	<i>As needed</i>	<i>As needed</i>
Incorporate previous changes? (interpretations, clarifications, Directives)	<i>Y</i>	<i>Optional</i>	<i>Optional</i>	<i>N</i>
For new standards?	<i>Y</i>	<i>N</i>	<i>N</i>	<i>N</i>
Substantive changes?	<i>Y</i>	<i>Y</i>	<i>Y</i>	<i>N</i>
Public consultation	<i>Y – 1-2 rounds public</i>	<i>Optional</i>	<i>N</i>	<i>N</i>
SACC Consultation	<i>Y</i>	<i>Y</i>	<i>Optional</i>	<i>N</i>
TAP Consultation	<i>Y</i>	<i>Y</i>	<i>Optional</i>	<i>N</i>
Working groups required?	<i>Optional</i>	<i>Optional</i>	<i>N</i>	<i>N</i>
Documented risk assessment?	<i>Y</i>	<i>Y</i>	<i>Y</i>	<i>N</i>

Output	<i>New standard or revised standard with new full number</i>	<i>Revised standard with new full number OR</i>	<i>Standalone document that refers to relevant sections of the current Standard that it supersedes</i>	<i>Revised standard with new version number (full or sub-version, depending on the magnitude of the changes) or standalone document (clarification or interpretation note)</i>
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3. Full Standard development/revision process

3.1. Preparation

- 3.1.1. The Secretariat shall prepare for the development of the new ResponsibleSteel Standard or the 5-year revision of an existing ResponsibleSteel Standard as follows:
- The Secretariat shall assess the need and justification for the new standard, including alignment with ResponsibleSteel's intended impacts, consideration of the existence and design of comparable standards, and discussion with initiatives and organisations responsible for related programmes .
 - An assessment of risks (e.g. possible unintended negative social, environmental, or economic impacts, including impacts on developing country economies) in implementing the proposed Standard shall be carried out, and actions to mitigate these risks identified and documented.
 - A stakeholder analysis shall be carried out, including the identification of key stakeholder groups and representatives.

3.2. Development of a Terms of Reference for the new or revised ResponsibleSteel Standard

- 3.2.1. The Secretariat shall prepare draft Terms of Reference ('ToR') for the new or revised Standard for review by the Board. The Terms of Reference shall include at minimum:
- the proposed scope of the Standard;
 - the objective of the Standard development or revision process;
 - the intended sustainability outcomes of the Standard, if applicable;
 - how the outcomes are aligned to the vision and mission of ResponsibleSteel as described in the ResponsibleSteel Objects (see ResponsibleSteel Constitution, adopted 29th April 2021, paragraph);
 - the decision-making procedure, how decisions are made and who will make them;
 - a justification of the need for the Standard, including how the Standard complements existing standards or those with overlapping scopes;
 - the intended sustainability claims that the Standard will substantiate, if applicable.

The Board shall review and approve the justification for the new Standard and the proposed ToR. Upon implementing feedback from the Board, the Secretariat shall finalise and publish the ToR.

3.3. Publication of work programme

- 3.3.1. The decision to develop or revise (5-year revision only²) a ResponsibleSteel Standard shall be announced on the ResponsibleSteel website together with a summary of the standard development process that shall include:
 - a. the Terms of Reference for the Standard; and,
 - b. the main steps in the standard-setting process, including the timelines and clearly identified opportunities for stakeholder participation and comment; in the case of an updated version, an indication of the transition period that will apply before the updated version comes into effect.
- 3.3.2. The work programme and timetable for the development or 5-year revision of a ResponsibleSteel Standard shall be updated on an ongoing basis on the ResponsibleSteel website.

3.4. Establishing and maintaining a stakeholder contact list

- 3.4.1. The Secretariat shall identify and map key stakeholder groups, including stakeholders with experience or expertise in steelmaking in both developed and developing countries, and experience of the direct as well as indirect social and environmental impacts of steelmaking with the aim of achieving inputs covering the range of interests in the subject matter and in the geographic scope to which the Standard applies.
- 3.4.2. The ResponsibleSteel Secretariat shall be responsible for maintaining a stakeholder contact list for each ResponsibleSteel Standard being developed/revised.

Note: Stakeholder contact lists are updated regularly. The Secretariat shall use the latest stakeholder contact lists.

3.5. Drafting of a ResponsibleSteel Standard

- 3.5.1. The Secretariat shall be responsible for the drafting of a preliminary draft Standard at the start of the standard development or revision process, in line with the Terms of Reference.
- 3.5.2. In preparing the preliminary draft the Secretariat shall ensure that ResponsibleSteel members have been consulted on the proposed content of the draft and that feedback collected previously among certified companies, auditors and other third parties are taken into consideration.
- 3.5.3. At its discretion, the Secretariat may convene stakeholder working groups, invite additional experts to provide advice on particular issues, conduct further feasibility testing, request support from the ResponsibleSteel Technical Advisory Panel, and/or seek other support to develop a revised draft.

² Other revision processes (intermediary, simple and urgent) do not require such announcement.

3.6. Content of ResponsibleSteel Standards

- 3.6.1. The Standard shall specify the date on which it was formally adopted and the planned year for its next revision. The Standard shall specify any transition period that may apply between the date of formal adoption and the date of full enforcement.
- 3.6.2. The Standard shall include introductory sections describing its objectives and its scope of application.
- 3.6.3. The Standard may include sections that are applicable to specific categories of users if this is necessary to ensure that the Standard can be applied to all categories of users within its scope of application.
- 3.6.4. The requirements of the Standard:
 - a. Shall be drafted so that conformity can be assessed for any applicant within the scope of the ResponsibleSteel Standard without the need for subsequent modification or adaptation;
 - b. Shall be drafted to minimise ambiguity in interpretation;
 - c. May be expressed in terms of process, management, or performance requirements;

3.7. Glossary of terms

- 3.7.1. A ResponsibleSteel Standard shall reference the ResponsibleSteel Glossary to guide its consistent interpretation and implementation.

3.8. Risk assessment

- 3.8.1 The Secretariat shall undertake a risk assessment to evaluate whether the content of the new or revised Standard may be detrimental to ResponsibleSteel, its members, partners, certified operators and auditors in terms of:
 - a. Rigour and robustness in achieving the expected impact;
 - b. Practicality;
 - c. Affordability and inclusiveness;
 - d. Legal compliance;
 - e. Transparency;
 - f. Reputation.

3.9. Board validation

- 3.9.1 When the CEO considers that a draft is ready to be made available for formal public consultation, the CEO shall submit the draft to the Board for its review.
- 3.9.2 The Board shall review the draft Standard and risk assessment to consider whether it meets the requirements of the Terms of Reference and/or if any outstanding risk requires being addressed.
- 3.9.3 If the Board determines that the draft Standard does not meet the requirements of the Terms of Reference or if identified risks outweigh the benefits of the new/revised Standard, the Board shall consult with the CEO to determine what further actions are needed to address its concerns. The Board shall document its concerns and the agreed actions to be taken and shall record this as a formal decision of the Board in accordance with its usual decision-making procedures. The CEO shall document whatever actions are then taken, together with any changes to the draft Standard that have been made as a result, and then repeat step [3.9.1], above.
- 3.9.4 If the Board determines that the draft Standard meets the requirements of the Terms of Reference for its development this shall be recorded as a formal decision of the Board in accordance with its usual decision-making procedures.

3.10 Public consultation and revision of the draft

- 3.10.1 If 3.9.4 is met, the draft Standard shall then be published on the ResponsibleSteel website together with:
 - a. Any guidance or comment the Board deems useful for stakeholders to understand the proposed changes and/or the context in which modifications were made;
 - b. A collated, anonymised record of any stakeholder comments submitted on the previous draft (if applicable), together with the Secretariat's response to those comments;
 - c. instructions for the submission of comments on the draft.

- 3.10.2 Following the publication of the new/revised draft Standard, the Secretariat shall contact all stakeholders on its defined contact list inviting comments on the draft.
- 3.10.3 For new standards, at least two rounds of public consultation shall be organised. For standard revisions, at least one round of public consultation shall be organised. Extra rounds of consultation may be organised if deemed necessary by the SACC (See 3.10.9).
- 3.10.4 The first round of public consultation shall be a minimum of 60 days. For second and extra rounds, the consultation period may be reduced to 30 days.
- 3.10.5 The Secretariat shall publish a synopsis describing whether/how comments received during the public consultation are proposed to be addressed, along with its rationale. This synopsis shall be shared with every stakeholder who formally contributed to the consultation during the official period, with the possibility to challenge the Secretariat's position while providing their rationale and any additional element of understanding. The Secretariat shall consider any new element and may amend the synopsis and proposed revisions accordingly. Should any point remain unsettled, contributors may use the Issues Resolution System to further appeal the modifications suggested by the Secretariat.
- 3.10.6 At the end of the specified consultation period the Secretariat shall collate all the comments received and prepare a revised draft taking account of those comments.
- 3.10.7 When the Secretariat has completed a revised draft to its satisfaction the Secretariat shall submit the draft to the SACC together with:
- A copy of the synopsis published after the public consultation;
 - A report of any working groups, feasibility testing, additional information or other considerations that have been taken into account in developing the revised draft.
- 3.10.8 For revised Standards, the SACC shall review the draft and the accompanying records and reports and determine, in consultation with the Secretariat whether:
- the draft should be submitted for a further round of public consultation before submission to the Board and Membership if unresolved issues remain, which require inputs from a broader range of stakeholders than ResponsibleSteel constituencies; or
 - the draft should be submitted to the Board and Membership for approval, or
 - some other course of action.
- If the SACC determines that the draft Standard should be submitted for a further period of public consultation, the Secretariat shall initiate the consultation process as described in paragraph [3.10.1] The decision shall be documented by the Secretariat and made available to any stakeholder upon request.
- 3.10.9 3.10.1 If the SACC determines that the draft Standard is ready to be submitted for approval, it shall request the CEO to submit the Standard to the Board for final review as described in section [3.11], below;
- 3.10.10 If the SACC determines that some other course of action is required this shall be documented together with any resulting changes to the draft Standard, and the Standard shall be resubmitted to the SACC as described in paragraph [3.10.7], above.

3.11 Board review

- 3.11.1. When the SACC has determined that the ResponsibleSteel Standard is ready to be submitted to the Membership for approval, the Secretariat shall share the latest version of the Standard with the Board, along with a report summarising the development/revision process, main issues, concerns and risks raised during the process and how these were addressed and any departure from this procedure together with the justification of any such departure.
- 3.11.2. If the Board determines that the Procedure for Development and Revision of ResponsibleSteel Standards has not been followed, or that the ResponsibleSteel Standard does not meet the requirements of the defined Terms of Reference, the Board shall identify its specific concerns, and in consultation with the CEO determine what further actions it considers are needed to address these.
- 3.11.3. If any revisions to the Standard are made, then such revisions shall be approved by the SACC before being presented to the Board for subsequent approval. When the necessary actions have been completed, the CEO shall prepare an addendum to the report described in 3.11.1, describing the actions that have taken place and identifying any changes to the Standard that have resulted from these. Steps [3.11.2] shall be repeated until the Board is satisfied. When the Board determines that this is the case, the CEO shall finalise the report described in [3.11.1], and submit it alongside the final draft Standard to the Membership.

3.12. Membership approval and Board ratification

- 3.12.1. The CEO shall submit the report described in 3.11.1 and the final draft Standard to the Membership for ballot.
- 3.12.2. Each ResponsibleSteel member shall submit their decision to approve, reject or abstain from approving the final draft ResponsibleSteel Standard, in accordance with the most recent version of the ResponsibleSteel ballot procedure that is in place at the time of the ballot. In the case of a rejection or an abstention, the member shall specify the reasons for the rejection or abstention and specify what actions the member considers would be needed in order for the member to approve the ResponsibleSteel Standard.
- 3.12.3. If the Membership approves the draft Standard:
 - a. The Membership's decision will be conveyed to the Board;
 - b. The Board will ratify the Membership's decision at its next Board meeting and formally adopt the Standard in accordance with its usual decision-making procedures.
- 3.12.4. If the Membership rejects the draft Standard:
 - a. The CEO shall collate the reasons given by the members for their abstentions or rejections, and the actions that they have proposed would be needed to gain their approval;
 - b. The CEO shall review the members' reasons in consultation with the Chair of the SACC and propose a plan of action;
 - c. The plan of action shall be presented to the Board, which shall determine what further steps should be taken, at its discretion.

3.13. Publication of the new/revised Standard

- 3.13.1. Any new or revised ResponsibleSteel Standard shall be published on the ResponsibleSteel website within four weeks of its formal adoption by the Board, and all stakeholders that provided input to the Standard, as well as current ResponsibleSteel certificate holders and certification bodies, shall be informed of such.
- 3.13.2. Any associated guidance or explanations relating to the new or revised ResponsibleSteel Standard shall be published on the ResponsibleSteel website.
- 3.13.3. ResponsibleSteel Standards and any associated documentation shall be available for download from the ResponsibleSteel website free of charge.

3.14. Regular revision of an existing ResponsibleSteel Standard

- 3.14.1. Within a maximum of five years of the date of formal adoption of a ResponsibleSteel Standard the Secretariat shall carry out a formal consultation with ResponsibleSteel members, approved certification bodies and ResponsibleSteel certificate holders to determine whether the ResponsibleSteel Standard needs to be reaffirmed, revised, or withdrawn.
- 3.14.2. The Secretariat shall consider relevant data and information to determine whether the Standard needs to be revised, which may include:
 - a. monitoring of ResponsibleSteel's performance and effectiveness;
 - b. assessment of client's conformity or performance against the Standard;
 - c. analysis of feedback received from certificate holders, members, auditors, certification bodies, and other stakeholders, particularly with respect to Standard effectiveness, implementation, and scope;
 - d. any other revisions implemented since the last revision of the Standard;
 - e. external research and industry best practices.
- 3.14.3. The Secretariat shall report its findings to the SACC for review and the SACC shall make a recommendation for the Board's approval to revise, reaffirm or withdraw the Standard.
- 3.14.4. The Secretariat shall report its findings and the SACC recommendation to the Board for decision. The Board may decide to revise, reaffirm, or withdraw the Standard.
- 3.14.5. If the Board determines that a revision is desirable, the full process described in Section 3 shall be followed.
- 3.14.6. If the Board determines that the Standard should be reaffirmed, the Board shall state the rationale given, reaffirm the Standard, and specify the year for the next review of the Standard. The decision, rationale, and year for the next review of the Standard shall be published on the ResponsibleSteel website promptly, and the Secretariat shall announce the decision in the ResponsibleSteel newsletter or similar.
- 3.14.7. If the Board determines that the Standard should be withdrawn, then the CEO shall develop a proposal for the withdrawal of the Standard including the rationale for withdrawal and the implementation steps in line with this procedure:
 - a. It is at the discretion of the Board to determine if a consultation should be conducted for the proposal to withdraw a Standard.
 - b. A consultation may include ResponsibleSteel members, certification applicants, certificate holders, certification bodies, the ResponsibleSteel

Technical Advisory Panel, and other stakeholders. The time period to submit comments on the proposal for the withdrawal is determined by the Board. The Secretariat shall conduct the consultation.

- c. The Secretariat shall submit the final proposal for withdrawal and, if applicable, a summary of comments received, to the Board for a decision. The decision shall be recorded following the Board's usual decision-making procedures.
- d. If the withdrawal of a Standard is approved by the Board, then the Standard will be moved to the archive section of the ResponsibleSteel website, and certification bodies will be instructed that no further certificates of conformity shall be issued. Valid certificates that have been issued prior to the withdrawal shall remain valid until their date of expiry.
- e. The Secretariat shall announce the withdrawal of the Standard to certification applicants, certificate holders, certification bodies and in the ResponsibleSteel newsletter or similar.

4. Intermediate Standard revision process

The intermediate Standard revision process is intended to be used for substantive revisions, which are not deemed urgent, but need implementation prior to the next 5-year formal revision round. The decision to trigger an intermediate revision process may be taken by the CEO upon suggestion by the Secretariat or any third party.

4.1. Preparation

- 4.1.1. The Secretariat shall prepare for the revision of an existing ResponsibleSteel Standard as follows:
 - a. The Secretariat shall assess and document the need and justification for a Standard revision once a year or earlier, based on feedback, complaints or suggestions from ResponsibleSteel certified companies, auditors, members or external stakeholders;
 - b. An assessment of risks (e.g. possible unintended negative social, environmental, or economic impacts, including impacts on developing country economies) in implementing the proposed Standard shall be carried out, and actions to mitigate these risks identified and documented.
 - c. A stakeholder analysis shall be carried out, including the identification of key stakeholder groups and representatives.
- 4.1.2. The CEO shall review the justification for the Standard revision and inform the Board of the revision process.

4.2. Drafting of a revised ResponsibleSteel Standard

- 4.2.1. The Secretariat shall be responsible for the drafting of a preliminary draft Standard at the start of the revision process, which addresses the identified needs.
- 4.2.2. In preparing the preliminary draft the Secretariat may consult ResponsibleSteel members and experts (including TAP if appropriate) on the proposed content of the draft and shall ensure that feedback collected previously among certified companies, auditors and other third parties are taken into consideration.

4.3. Risk assessment

- 4.3.1. The Secretariat shall undertake a risk assessment to evaluate whether the content of the revised Standard may be detrimental to ResponsibleSteel, its members, partners, certified operators and auditors in terms of:
 - a. Rigour and robustness in achieving the expected impact;
 - b. Practicality;
 - c. Affordability and inclusiveness;
 - d. Legal compliance;
 - e. Transparency;
 - f. Reputation.
- 4.3.2. The CEO shall review the draft Standard and risk assessment to consider whether any outstanding risk requires to be addressed.
 - a. If the CEO determines that identified risks outweigh the benefits of the new/revised Standard, the CEO shall consult with the Secretariat to determine what, if any, further actions are needed to address its concerns. The Secretariat shall document whatever actions are then taken, together with any changes to the draft Standard that have been made as a result, and then repeat step 4.2 above.
 - b. If the CEO determines that the draft Standard addresses the needs that initially justified the revision and that no outstanding risk remains unmanaged, this shall be recorded as a formal decision of the CEO.

4.4. SACC Consultation

- 4.4.1. When the Secretariat has completed a revised draft to its satisfaction the Secretariat shall submit the draft to the SACC together with the rationale for the revision, including comments received from any third party and advice from experts consulted by the Secretariat.
- 4.4.2. The SACC shall review the draft and the accompanying rationale and determine, in consultation with the Secretariat whether:
 - a. the draft should be further modified, with the possibility to consult additional experts or the Technical Advisory Panel, or
 - b. the draft should be submitted to the Board for approval.

4.5. Board approval

- 4.5.1. The CEO shall submit the final draft Standard to the Board for approval, along with the necessary rationale and documentation.
- 4.5.2. Formal adoption of a ResponsibleSteel Standard shall rest with the Board. The Board will record its decision in line with its usual decision-making procedures.
- 4.5.3. If the Board approves the draft Standard, it will formally adopt the Standard in accordance with its usual decision-making procedures.
- 4.5.4. If the Board rejects the draft Standard:
 - a. The CEO shall collate the reasons given by the Board, and the actions that they have proposed would be needed to gain their approval;
 - b. The CEO shall review the Board's reasons in consultation with the Chair of the SACC, and propose a plan of action.

4.6. Publication of the revised Standard

- 4.6.1. Any revised ResponsibleSteel Standard shall be published on the ResponsibleSteel website within four weeks of its formal adoption by the Board, and all stakeholders that provided input to the Standard, as well as current ResponsibleSteel certificate holders and certification bodies, shall be informed of such.
- 4.6.2. Any associated guidance or explanations relating to the ResponsibleSteel Standard shall be published on the ResponsibleSteel website.
- 4.6.3. ResponsibleSteel Standards and any associated documentation shall be available for download from the ResponsibleSteel website free of charge.

5. Standards Directive

5.1. Conditions

- 5.1.1. Conditions under which an urgent revision can be triggered may include, but are not limited to:
 - a. Formal complaints raised by stakeholders that are deemed to have merit as per the ResponsibleSteel Issues Resolution System;
 - b. Problems of implementation which affect multiple organisations;
 - c. Perceived threats to ResponsibleSteel's credibility; or
 - d. Changes in legislation or international obligations that affect the implementation of the ResponsibleSteel Standard.

5.2. Drafting and risk assessment

- 5.2.1. If the CEO believes that there is a need for an urgent and substantive revision of a ResponsibleSteel Standard they shall direct the Secretariat to draft a Standards Directive amending the parts of the ResponsibleSteel Standards requiring modifications.
- 5.2.2. Upon completing the first draft Directive, the Secretariat shall undertake a risk assessment to evaluate whether the proposed modifications may be detrimental to ResponsibleSteel, its members, partners, certified operators and auditors in terms of:
 - a. Rigour and robustness;
 - b. Practicality;
 - c. Affordability and inclusiveness;
 - d. Legal compliance;
 - e. Transparency.
- 5.2.3. Based on the results of the risk assessment, the CEO may decide to:
 - a. Discontinue the process if identified risks are significant and outweigh the benefits of the revisions;
 - b. Share the draft Directive with the SACC for review and endorsement, followed by the Board for review and approval, if identified risks are significant but do not outweigh the benefits of the revisions;
 - c. Share the draft Directive with the SACC for review and approval if identified risks are limited.

5.3. SACC/Board Approval

- 5.3.1. Upon reviewing the draft Directive, the SACC and/or the Board may require the Secretariat to further revise it until it is deemed satisfactory and receives approval by the SACC or the Board.
- 5.3.2. Urgent revisions shall not be required to undergo a public consultation process nor feasibility testing. However:
 - a. the Secretariat may choose to consult working groups or experts, and
 - b. any approved urgent revisions shall be included in the subsequent regular revision of the ResponsibleSteel Standard, procedure, guidance or any other relevant document.
- 5.3.3. Upon SACC or Board approval of the Directive, the ResponsibleSteel Scheme Documents Register shall be updated to flag the existence of the directive with reference to the standards it impacts and supersedes.
- 5.3.4. The Directive shall be published on the ResponsibleSteel website and announced to ResponsibleSteel certification applicants, certificate holders, certification bodies and stakeholders. A clear feedback mechanism shall be included on the website, whereby any third party may submit comments and suggestions, which shall be taken into account by the Secretariat during the subsequent regular 5-year revision of the document.

6. Simple Standard revision process

6.1. Drafting

- 6.1.1 The Secretariat, in consultation with the CEO, may trigger non-substantive and non-urgent revisions, as well as clarification and interpretations of existing Standards at its own discretion.
- 6.1.2 A clarification is an explanation of the correct meaning of a requirement of the relevant ResponsibleSteel Standard, where the correct meaning is clear from existing guidance, context, or other sources of information. Clarifications may be provided without the need for stakeholder consultation.
- 6.1.3 An interpretation provides guidance on the application of a requirement where the correct meaning is not clear from existing guidance, context, or other sources of information. Interpretations may be provided without the need for stakeholder consultation, though the process may benefit from selected outreach.
- 6.1.4 The Secretariat shall be responsible for the drafting of a preliminary draft Standard or clarification/interpretation note at the start of the revision process, which addresses the identified needs.

6.2. SACC Consultation

- 6.2.1. When the Secretariat has completed a revised draft to its satisfaction the Secretariat may decide to submit the draft to the SACC together with the rationale for the revision, including comments received from any third party and advice from experts consulted by the Secretariat.
- 6.2.2. If consulted, the SACC shall review the draft and the accompanying rationale and determine, in consultation with the Secretariat whether:
 - a. the draft should be further modified, with the possibility to consult additional experts or the Technical Advisory Panel, or
 - b. the draft should be submitted to the CEO for approval.

6.3. CEO approval

- 6.3.1. The Secretariat shall submit the proposed revisions and/or the clarification/interpretation notes for approval, along with the necessary rationale and documentation.
- 6.3.2. The CEO may approve the proposed revisions, if these are deemed to address the issue initially identified while remaining non-substantive, or request the Secretariat to further modify the draft until it is deemed satisfactory.

6.4. Publication of the revised Standard or clarification/interpretation notes

- 6.4.1. Any revised ResponsibleSteel Standard shall be notified to the Board, SACC and Membership, be published in a list of changes on the ResponsibleSteel website and noted in subsequent revision processes. Administrative and non-substantive changes do not affect the regular review and revision cycle but shall require a new sub-version number (e.g. from 1.0 to 1.1) of the relevant ResponsibleSteel Standard, to be issued and published on the ResponsibleSteel website.
- 6.4.2. Any associated guidance or explanations relating to the new or revised ResponsibleSteel Standard shall be published on the ResponsibleSteel website.
- 6.4.3. ResponsibleSteel Standards and any associated documentation shall be available for download from the ResponsibleSteel website free of charge.

7. Record keeping

7.1. The CEO shall ensure that the following records are kept and are accessible for review on request for each ResponsibleSteel Standard:

- a. The Procedure for Development and Revision of ResponsibleSteel Standards (this document);
- b. Copies of the results of the need assessment and justification for a Standard including the names of standards, initiatives and/or organisations that were reviewed.
- c. The approved Terms of Reference for the development or review of the Standard;
- d. Copies of drafts of the ResponsibleSteel Standard circulated for formal review;
- e. The ResponsibleSteel Standards formally adopted by the Board;
- f. Names and affiliations of organisations, groups and/ or individuals invited to comment on the ResponsibleSteel Standard during each stage of its development or revision;
- g. Names and affiliations of the members of the SACC and invited experts who participated in the review and revision of each draft of the Standard including members of the Technical Advisory Panel;
- h. Copies of all comments received on drafts of the ResponsibleSteel Standard circulated for formal review;
- i. A synopsis of the comments received in response to each draft of the ResponsibleSteel Standard circulated for formal review, together with an explanation of how the comments were subsequently taken into account;
- j. A description of and an explanation for any departures from the Procedure for Development and Revision of ResponsibleSteel Standards;
- k. The final report on the implementation of the Procedure for the Development and Revision of ResponsibleSteel Standards considered by the decision-making body showing how the procedure was implemented;
- l. All formal decisions of the SACC, the Membership, and the Board in relation to the development and approval of the ResponsibleSteel Standard.

8. Concerns and complaints

- 8.1.1. Any stakeholder has the right to raise their concerns or submit a complaint about the implementation of the Procedure for Development and Revision of ResponsibleSteel Standards or about the content of ResponsibleSteel Standards.
- 8.1.2. Concerns or complaints should be submitted in writing to the Secretariat who shall follow the [ResponsibleSteel Issues Resolution System](#) and ensure that the complaint is conveyed to the appropriate body or individual for response.

9. Comments after approval

- 9.1.1. The Secretariat shall keep an Issues Log of all comments that are received on the content of a ResponsibleSteel Standard after its formal adoption/revision.
- 9.1.2. The Secretariat shall review all received comments on an ongoing basis with a view to providing guidance on interpretation of a ResponsibleSteel Standard by certification applicants, certificate holders, certification bodies and other stakeholders, and/or proposals for revisions in accordance with Sections 9 – 12 below, as required.
- 9.1.3. Any intermediate or urgent revision shall be presented to stakeholders for permanent inclusion (with/without modifications) or rejection at the next regular 5-year revision process, following the steps described in Section 3.



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