



Revising the ResponsibleSteel International Production Standard

A summary of the changes proposed for Version 3.0 of the Production Standard

Public consultation | 60 days | September 2026

In brief

ResponsibleSteel is revising its International Production Standard from Version 2.1.1 to Version 3.0 and is inviting comment from anyone with an interest in how steel is produced.

This document summarises what is being proposed and why, so that you can decide which topics matter to you and where to focus your response. Each topic also has its own more detailed consultation paper.

The consultation is open for 60 days and your feedback will shape the drafting that follows.

The consultation language is English. If this hinders your ability to participate, please do reach out to ResponsibleSteel at standards@responsiblesteel.org and we will do our best to make it easier for you to participate.

Disclaimer: This document is a summary. To evaluate the changes fully you should read the specific chapters on each topic. Links are provided on [page 8](#).

How you can engage

Everything below is reached from a [dedicated landing page](#) on the ResponsibleSteel website, signposted from the front page.

How to take part	What it involves
The online survey	One survey carries the questions from every proposal, organised by topic, so you can answer the full survey or only the sections that matter to you.
A paper for each topic	Each proposal has its own self-contained paper which includes a short description of why changes are being proposed, what is proposed, the questions asked and any glossary changes. These papers vary in length depending on the complexity of the topic.
Recorded presentations	Five to twenty minutes per topic and introduced by ResponsibleSteel technical staff. This option provides a strong overview on the proposed changes and the rationale behind them.

How to take part	What it involves
Public webinar, 13 October 2026	Interactive session introducing all the topics at a high level.
Technical papers on request	Three detailed papers on Principle 10 for those with in-depth knowledge of greenhouse gas emissions accounting. These are available on-demand and aimed at stakeholders with a technical background in GHG emissions.
A conversation	You are welcome to register interest in more in-depth discussion on a particular topic. The format will vary depending on the topic area, level of interest, and team availability. You can request a focused discussion by completing this form

1. Why the Standard is being revised

The ResponsibleSteel International Production Standard is the global standard against which steelmaking sites are independently audited and certified. It covers thirteen Principles, spanning governance, social and environmental performance, from labour rights and community consultation to water, biodiversity and greenhouse gas emissions.

The current Version, 2.1.1, has been in use since 2024. A 60-day public consultation held between 1 October and 1 December 2024 confirmed that a revision was needed and helped set its scope. That consultation followed a systematic internal review of audit reports, stakeholder queries, requests for clarification, assurance panel feedback, sector developments and emerging legislation.

The [Terms of Reference](#) for the revision set four objectives, and every proposal in this consultation is intended to serve at least one of them.

Improve relevance

The revision has stayed within the priority areas identified when the scope was set. The climate proposals respond to implementation experience under Version 2.1.1 and to how far the Science Based Targets initiative, IFRS and the GHG Protocol have moved since 2022. On the social side, as producers move towards lower-emission production, it has become important to explore how ResponsibleSteel can support a just transition at certified sites. The annual leave proposal responds to a formal Standard Change Request and to input gathered through working groups.

Enhance accessibility and usability

In the proposed Version 3.0 there is a restructured introduction, a plain statement of what is binding and what is informative, a single four-part format for all thirteen Principle introductions, and a consistent drafting convention. Introducing an effective date six months after publication gives certification bodies and sites a defined period in which to prepare.

The claims proposals serve the same objective. At present, anyone trying to establish what may be claimed has to work across the Production Standard, the Assurance Manual, the draft Chain of Custody Standard and the Claims and Logo Use Guidelines. Consolidating those rules in one place gives buyers, sites and auditors a single authoritative answer, and allows the rules to be maintained on their own cycle rather than waiting for a revision of the Production Standard.

Increase alignment with legislation and ESG frameworks

The first step was to map Version 2.1.1 against seven frameworks — CSRD, CSDDD, CBAM, TNFD, SBTi, the GHG Protocol, and IFRS S1 and S2 — to show whether and how certification can support members in demonstrating compliance. In addition, substantial work has also been done to align the proposed Principle 10 requirements with IFRS S2 for climate-related risks and opportunities, and with the SBTi Corporate Net-Zero Standard v2.0 for near-term action. Definitions have been harmonised as far as possible with other instruments, including the Steel Standards Principles Transparency Criteria, the PACT Methodology for Product Carbon Footprints, the emerging GHG Protocol Scope 2 Guidance and Actions and Market Instruments Standard, and the Mission Possible Partnership guardrails for mass balance. Interoperability with other emissions-based schemes has also been considered, notably the China Iron and Steel Association's China to Future (C2F) Standard and the Low Emissions Steel Standard (LESS).

Strengthen credibility

Most of the proposals have been developed through structured processes: Member working groups and expert technical advisory groups for Principle 10, four working group meetings in 2024 followed by six technical advisory group meetings for annual leave, and five working group meetings for just transition.

Whether a proposed requirement can actually be audited has been treated as a first-order test rather than an afterthought, which is why several proposals put that question to you directly, and why feedback from certification bodies is sought as a distinct set of questions.

2. What is not changing

Version 3.0 keeps the shape of the Production Standard that sites and auditors already know.

- The thirteen Principles remain, with the same scope. The only exception is Principle 4, whose title and definition are clarified to make explicit that changes arising from climate change (i.e. Technology Route Conversions are within scope).
- The overall criteria structure is unchanged, as is the existence of Core and Progress criteria.
- The Decarbonisation Progress Level thresholds themselves are not being altered, and the 'cradle-to-crude steel' life cycle scope is unchanged.

3. What is being proposed, at a glance

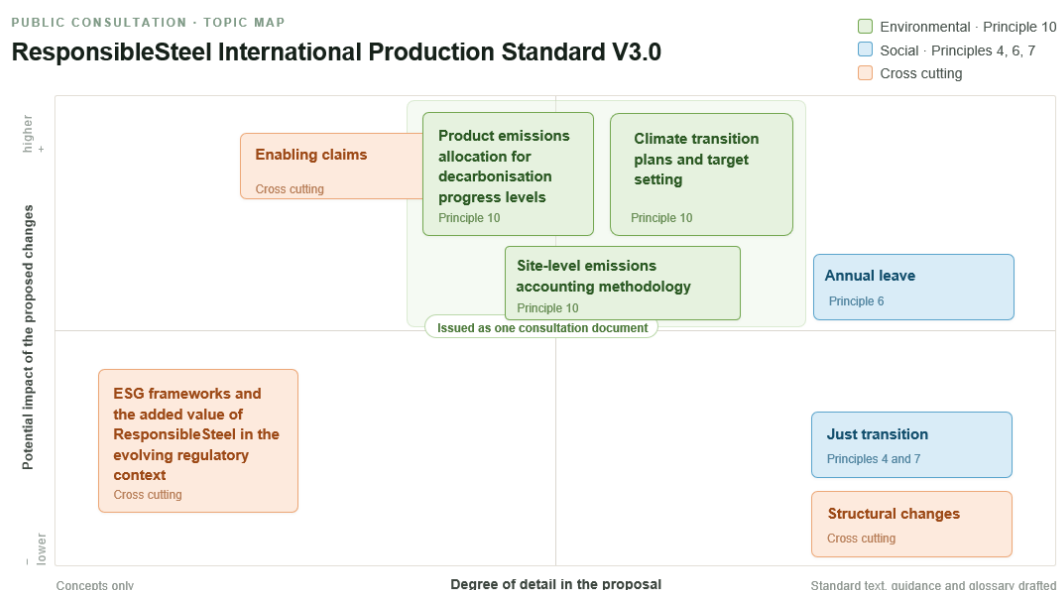
Rather than publishing a single marked-up draft of Version 3.0, we are consulting on a set of topic proposals. The topics are at different levels of maturity; many of the concepts are interrelated in ways that cannot be resolved until feedback is in; and we want you to be able to focus on the questions that matter most to you, rather than working through a long document to find them. The implications across the Production Standard as a whole, and any remaining issues, will be addressed at the next stage of the revision.

Six proposals are set out below. They are at different stages, which is shown in the "Stage" column and reflected in what each paper asks of you:

- **Conceptual** — we are asking what we should be trying to achieve.
- **Choosing options** — we are asking how we should achieve it.
- **Proposal** — draft text is put forward for comment.

The map below places each proposal by how detailed it already is, and by how much impact the change would have if adopted.

Figure 1. The consultation proposals mapped by degree of detail in the proposal and by the potential impact of the proposed changes. The three Principle 10 topics are issued as a single consultation document.



#	Proposal	Stage	What is being proposed	Impact of the changes
1.1	Climate transition plans and target setting Principle 10	Choosing options / Proposal	Describes what a credible climate transition plan must contain at corporate and site level, covering the net-zero ambition, corporate system boundary, target setting, strategy, governance and disclosure, with alignment to IFRS S2 and to the SBTi Corporate Net-Zero Standard v2.0. The requirement to ascribe to a sector-wide, temperature-aligned pathway is replaced by an explicit corporate commitment to net-zero by 2050 unless otherwise justified; climate-related risk and opportunity assessment is repositioned within the transition plan, and the review, update and disclosure cycle are given defined time limits.	Clarify the components of credible climate transition plans, ensuring alignment with global climate objectives and resilience to investment uncertainty. Relevance Addresses 1.5°C overshoot and reduced near-term corporate ambition. Usability More flexible framework to demonstrate progress towards near-term targets. Alignment Aligned to IFRS S2 and the SBTi Corporate Net-Zero Standard v2.0. Credibility Addresses criteria which have received multiple assurance questions.
1.2	Site-level emissions accounting methodology Principle 10	Conceptual / Choosing options	Harmonised site-level emissions accounting across the iron and steel supply chain including making the ResponsibleSteel methodology mandatory for steelmaking sites in determining crude steel GHG emissions intensity (P10.4); GHG data disclosure reviewed for comparability; proposed shift from absolute annual emissions to crude steel emissions intensity declarations. For primary data incentivisation, the existing 1.2/1.6 'burden of the doubt' multipliers applied to default values are proposed to be replaced by a mandatory Primary Data Share declaration. Product-level accounting examined to align product carbon footprint and EPD requirements across products entering and leaving a site.	Harmonise site-level emissions accounting for steelmakers, enabling comparable GHG data that is more decision-useful for steel buyers, investors and policymakers. Review approach to primary data incentivisation (i.e. removal of 1.2/1.6 multipliers to default upstream GHG values, replacing it with a primary data share declaration) to reduce barriers to DPL1 achievement. Relevance ResponsibleSteel methodology used more widely, reducing barriers to DPL disclosure and use. Usability DPL achievement more accessible, more useful GHG data published on the ResponsibleSteel website. Credibility Greater consistency in GHG accounting approaches.
1.3	Product emissions allocation for Decarbonisation Progress Levels Principle 10	Conceptual	The design of accounting rules for allocating emissions within the site boundary, so that decarbonisation progress can be recognised at production line and/or product level. Guided by transparency, additionality and credibility, and by an attributional approach in which attributes remain proportionate to physical flows.	Enable low-emissions steel to be recognised earlier, stimulating market demand for certified steel demonstrating DPL achievement. Relevance Brings DPL claims closer to sold products. Usability Enhanced usability of DPL claims, with higher ambition (i.e. low emissions / near-zero emissions).

#	Proposal	Stage	What is being proposed	Impact of the changes
2	Enabling market claims Cross cutting	Conceptual	ResponsibleSteel are proposing that all products from certified sites may be sold as 'Certified Steel' and without requiring the sites to achieve Progress Level 1 for each of Principle 3 and Principle 10, with the intention of unlocking supply chains. This will require a functioning downstream Chain of Custody programme, which we are currently working on and the details of which are out of the scope of this consultation. We are also proposing to move all claims rules out of the Production Standard (mainly from the Introduction, P3 and P10 sections), and into the Claims and Logo Use Guidelines, leaving the Production Standard to describe measurement and Decarbonisation Progress Level classification only.	Certified sites able to sell product as certified after Core Site certification, realising more immediate value from certification, creating incentives for continued improvement. Relevance Stronger link to the value chain by allowing sourcing of products, rather than recognition of the site. Usability Drastically simplifies the system, increases accessibility to sites for product claims. Credibility Clearer claims, supported by credibility safeguards.
3	Annual leave Social • Principle 6	Proposal	Stakeholders asked to review a range of proposals, including: - allowing public holidays to count towards annual leave (but raising the total amount of annual leave); - allowing a site to demonstrate that its own arrangements meet the intent, and; - making publication of the policy conditional on whether the entitlement is already law in the jurisdictions where the site operates. The consultation questions are written in an open way that allows stakeholders to give nuanced feedback on what they like and what they don't.	Allowing sites to show how they meet the intent of the requirement, which: may make certification more achievable in some jurisdictions; makes the requirement more consistent globally; responds to certified site concerns regarding publication of policies already complied with by local law. Relevance Improves consistency across regions, focuses on intent of the requirement rather than specific criteria. Credibility Improves consistency across regions, focuses on intent, responds to market demand.
4	Just transition Social • Principles 4 and 7	Proposal	Principle 4 extended from Decommissioning and Closure to Decommissioning, Closure and Conversions; Criterion 4.1, the only one in that Principle, is expanded to require assessment of transition risks, impacts and opportunities and consultation in good faith; Principle 7 guidance is also strengthened to cover conversions without creating a second due diligence process.	Reputational gains by addressing the next frontier of sustainability topics being addressed, showing continual improvement by taking a phased approach. Relevance Addressing the evolving landscape on climate change and just transition. Usability Phased approach for an exploratory topic. Credibility Makes criteria more explicit, provides more detailed guidance on due diligence.

#	Proposal	Stage	What is being proposed	Impact of the changes
5	ESG frameworks and the added value of ResponsibleSteel in the evolving regulatory context Cross cutting	Proposal	A mapping of the degree of support the Production Standard V2.1.1 offers against seven frameworks — CSRD, CSDDD, CBAM, TNFD, SBTi, the GHG Protocol and IFRS S1 and S2, as a first step in showing whether and how certification can support members on their journey towards demonstrating compliance with ESG regulatory frameworks. Proposals for aligning Principle 10 of the Production Standard to IFRS S2 and to the SBTi Corporate Net-Zero Standard v2.0 are already being proposed as part of this consultation, presented in more detail in the P10 section.	Members will gain visibility on how ResponsibleSteel currently supports them with demonstrating conformity with various ESG frameworks, including regulations. Relevance Demonstrate comparable requirements. Alignment Incorporated for Principle 10.
6	Structural changes to the Introduction and the Principle introductions Cross cutting	Proposal	An effective date of six months after publication; the version history and amendment record presented as a table; the introduction restructured into numbered subsections; a new section on what is binding and what is informative; mark and claim rules delegated to the Claims and Logo Use Guidelines; a consistent drafting convention for shall, should, may and can is introduced. All thirteen Principle Introductions restructured into a common four-part format of objective, rationale, references and connections to other Principles. Four have been rewritten (Principles 3, 4, 6 and 10) without changing the intent of the Principle.	Certified sites, members and certification bodies will benefit from more structured and consistent Production Standard text, reducing ambiguity and gaining clarity on what is binding and not binding, with six months for implementation if desired. Usability Improved clarity by removing binding text from non-binding sections; removing claims from the Introduction to the Production Standard. Credibility Improved clarity by having alignment with ISO Standard language for (non) binding requirements and sections.

These proposals are set out across nine documents: six issued for public consultation, and three supporting technical papers on Principle 10 available to interested stakeholders on request.

#	Document	Audience
1	<u>Climate Change and GHG Emissions — Summary of Proposed Changes and Open Consultation Questions (Principle 10)</u>	Public consultation
1.1	Climate Transition Plans and Target Setting (Principle 10)	Technical paper — available on request
1.2	Site-Level Emissions Accounting Methodology (Principle 10)	Technical paper — available on request
1.3	Product Emissions Allocation for Decarbonisation Progress Levels (Principle 10)	Technical paper — available on request
2	<u>Enabling Market Claims — Cross Cutting</u>	Public consultation
3	<u>Annual Leave — Principle 6, Labour Rights</u>	Public consultation
4	<u>Just Transition — Principles 4 and 7</u>	Public consultation
5	<u>ESG Frameworks and the Added Value of ResponsibleSteel in the Evolving Regulatory Context — Cross Cutting</u>	Public consultation
6	Structural Changes — About this Document, Introduction and Principle Introductions	Shared for information

4. The proposals in more detail

4.1 [Climate Change and GHG emissions \(Principle 10\)](#)

The why

The climate requirements introduced in Version 2.0 were a significant step forward, but they have proved difficult to implement in places, and the external landscape has moved a long way since 2022. IFRS S2 has set expectations for how climate-related risks and opportunities are assessed, the SBTi Corporate Net-Zero Standard v2.0 has changed expectations of corporate ambition and near-term action, and the GHG Protocol is under revision.

At the same time, site-level emissions data reported under the Production Standard is not consistently comparable across the iron and steel supply chain, which limits its usefulness to the buyers, investors and civil society organisations who are meant to be able to rely on it.

The proposals are grouped into three workstreams. Alongside them, Principle 10 is restructured, with revised criterion titles, so that requirements are grouped more logically and are easier to audit.

Climate transition planning (Workstream 1)

This workstream affects Criteria 10.1, 10.2, 10.5 and part of 10.7.1, and addresses what a credible climate transition plan must contain at both corporate and site level.

The headline proposal is that **the requirement for a corporate to align with a sector-wide, temperature-aligned pathway is replaced by an explicit commitment to reach net-zero emissions by 2050**. A later target year may be justified where it reflects the national context — for example where the jurisdiction has set a net-zero target beyond 2050, or where the organisation operates in a developing-country context. This addresses the ambiguity and weakening scientific basis of current '1.5°C' and 'well-below 2°C' alignment claims, and gives auditors a tangible benchmark.

Alongside that:

- Corporate targets are to be **quantitative and time-bound**, to cover **Scope 1 and 2 as well as material Scope 3** emissions, and to use a specified **corporate emissions accounting framework** so that base year and target year are assessed consistently.
- The plan must show the **specific actions being taken to deliver** the targets — supply chain collaboration, policy engagement, research and development, business model change, financing — and distinguish between what the corporate **controls directly and what it can only influence**.
- **Time limits are set for the review and update cycle**: progress reviewed at least annually, the strategy updated within twenty-four months where a review identifies a material deviation, and the revised strategy published within twelve months of that update.
- **Climate-related risk and opportunity assessment is folded into the same criterion as corporate transition planning**, rather than sitting in a separate and weakly connected criterion, in line with IFRS S2 and the recommendations of the TCFD.
- **Site-level planning mirrors the corporate plan**, with a proposed minimum ambition of Decarbonisation Progress Level 1 by 2030 for steelmaking sites under Steel Certification. Where a certificate covers more than one site, a weighted average across that portfolio would have to meet the floor.

This work was supported by six member working group meetings, repeated across two time zones, with parallel expert technical advisory group sessions between September and December 2025, convening seventeen organisations across steelmakers, non-steelmaker business members, civil society organisations and a certification body. It also draws on a 2025 member survey, in which 92 per cent of respondents said they already use emissions intensity metrics in their transition plans and 54 per cent also report absolute emissions.

Where the working group did not reach consensus, the question is put openly. **Open questions include which net-zero pathways should be eligible for near-term target setting, whether upstream Scope 3 emissions should be included alongside Scope 1 and 2 in the corporate boundary, whether corporates should keep the flexibility to choose between intensity and absolute targets, and whether the Decarbonisation Progress Level 1 by 2030 floor should be introduced at all.**

GHG emissions accounting methodologies (Workstream 2)

This workstream affects Criteria 10.3, 10.4, 10.6.4 and 10.7.1, together with Annexes 4 and 5, and addresses how emissions are measured, verified and disclosed so that the resulting data can be compared.

- **Use of the ResponsibleSteel methodology would become mandatory** for steelmaking sites in determining crude steel emissions intensity, rather than optional as it is today for sites not pursuing a Decarbonisation Progress Level. The methodology is closely aligned with the worldsteel CO₂/GHG data collection methodology, and it now includes an approach for stainless steels and high alloy steels. A ResponsibleSteel emissions calculation tool, currently in testing, will be made available to support sites.
- **The current 'burden of the doubt' multipliers** — 1.2, or 1.6 for methane-intensive materials, applied to default upstream values where primary data is not used — **would be removed and replaced by a mandatory Primary Data Share declaration**, reported alongside the **emissions intensity**, together with a requirement to **use primary data where it is available** even if it is higher than the default. Those multipliers are estimated to have inflated crude steel emissions intensities by between 2 and 12 per cent.
- **The default embodied emissions values in Annex 5 would be updated and expanded**, a minimum 95 per cent emissions coverage threshold introduced, and **new guidance provided on supplier-specific life cycle assessment data** for materials such as nickel and hydrogen.
- **Product carbon footprint and Environmental Product Declaration requirements** would be tightened through mandatory third-party verification, the **exclusion of carbon offsets** and a **narrower shared list of accepted standards**, bringing the requirements for steel products into closer alignment with those for products used in steelmaking.
- Public disclosure on the ResponsibleSteel website would shift from an annual absolute emissions figure to crude steel emissions intensity, with the Primary Data Share, the scrap share of metallic inputs and the steel product category added so that published data can be interpreted and compared.

This work was supported by four working group meetings, repeated across two time zones, with parallel technical advisory group sessions between February and March 2026, convening seventeen organisations. **The main open question is how, or whether, the harmonised methodology should extend to non-steelmaking sites such as pellet producers, ironmakers and downstream processors, and whether those sites should continue to disclose annual emissions or move to an intensity metric.** Four options are set out in the consultation paper.

Product emissions allocation for Decarbonisation Progress Levels (Workstream 3)

Decarbonisation Progress Level classification currently rests on a site-level annual average emissions intensity and scrap share, measured from cradle to crude steel. That boundary lets sites be compared regardless of what they go on to make, and it works well for that purpose. It works less well during a transition in which a site converts only part of its operations, because a site-wide average does not recognise a lower-emission production line or product. Meanwhile, mass balance and attribute allocation approaches are proliferating across the sector, and some have met significant civil society opposition, and refusal from steel buyers, where allocation is not physically grounded or transparent.

This proposal does not set out a methodology. It presents the design features that would shape the methodology and asks for views before drafting begins. No working group has yet been convened for this workstream; engagement so far has been through targeted interviews. **The direction of travel is:**

- **A more flexible system boundary:** Claims could be made at a finer level of physical granularity — individual products, product groups, product categories, process routes, production lines, or sites grouped within the same operating segment — and potentially over a shorter or variable reporting period.
- **Controlled mass balance:** Environmental attributes may be assigned to products only in proportion to the relevant physical inputs and outputs, either through site-level proportional attribution or through a physically constrained approach based on the site's actual input mix. Non-proportional allocation would not be permitted.
- **A clear and limited role for market instruments:** Energy instruments such as renewable energy certificates, guarantees of origin and power purchase agreements could contribute, as could emerging commodity certificates such as green iron traded through a book and claim registry, where they meet defined requirements for eligibility, credibility and traceability. GHG reduction certificates would not be eligible, and clear matching, tracking and cancellation rules would apply to prevent double counting.
- **Minimum safeguards against over-allocation:** The whole site must be certified; the site must have reached at least Decarbonisation Progress Level 1 on its site-wide average before any product-level claim is made; the approach carries an expiry date, for example 2035, as a bridge for the transition period rather than a permanent feature; and a product cannot be credited with lower emissions than the site's best available technology could physically achieve.
- **Traceability, physical or digital:** Demonstrably linking allocated attributes to the product, and disclosure that makes clear what a product-level claim represents and how it differs from a conventional product carbon footprint.

A 2025 member survey found 68 per cent of respondents are in favour of enabling this kind of differentiated, production line or product-level claim, alongside strong support for robust safeguards. The methodology is being developed with an eye to interoperability with schemes that already permit production-line or product-level certification.

Proposed revised structure of Principle 10

Criterion	Proposed title	What changes
10.1 (Core)	Corporate climate transition planning	Previously 10.1 and 10.2. Sets out the climate transition plan in full — targets, strategy, implementation and financial aspects

Criterion	Proposed title	What changes
		— and absorbs the criterion on climate-related financial risks and opportunities.
10.2 (Core)	Site climate transition planning	Previously 10.5. Sets out a site-level climate transition plan and links it to the corporate plan.
10.3 (Core)	Site GHG emissions determination — general	Previously 10.3. Absorbs the methodology requirements for steelmaking sites, making use of the ResponsibleSteel methodology mandatory rather than a choice between several recognised standards. Largely unchanged for non-steelmaking sites.
10.4 (Core)	Site GHG emissions intensity determination — steelmakers	Previously 10.4 and parts of 10.6. Requirements specific to sites producing crude steel, including steelmaker-specific data points such as scrap share.
10.5 (Progress)	Decarbonisation Progress Level classification	Previously parts of 10.6. Claims-related language is removed and the product carbon footprint requirements are clarified.
10.6 (Core / Progress)	GHG emissions disclosure	Previously 10.7. Updated disclosure points for better comparability, including a shift to emissions intensity metrics where applicable.

4.2 [Enabling market claims](#)

The why

Demand for ResponsibleSteel 'Certified Steel' has not yet materialised to the extent expected. Sites with Core Site certification are not seeing value added in their sale price of their products or gaining privileged market access, so the downstream value chain for certified steel remains underdeveloped. Steelmakers report that the cost of demonstrating conformity with Progress Level 1 of both Principle 3 and Principle 10 (i.e. the work needed on site to meet the requirement, the additional audits, demonstrating compliance with the chain of custody requirements) exceeds the benefit they receive. This has also resulted in limited supply, which then becomes a vicious circle of no supply no demand, no demand no supply.

Separately, the rules for making claims are spread across several normative documents, which makes them hard to understand and complex to revise. The word 'claim' is also used with different meanings in different places.

Four related changes are proposed, with the aim of speeding up uptake of steel from certified sites without weakening the credibility of the Production Standard or of the assurance system.

- **One home for the claims rules.** The Production Standard would no longer specify when products can be sold as certified or as coming from a certified site; that would move to the Claims and Logo Use Guidelines.
- **Clearer levels of achievement.** The Production Standard would describe what a site has verifiably achieved — Core Site certification, and Progress Levels 0 to 4 against Principles 3 and 10 — leaving the Claims and Logo Use Guidelines to set out what may be said about it. At Progress Level 0 the certificate would show 'disclosure', so that progress is visible even below Progress Level 1.
- **Core Site certification would be enough to sell products as 'Certified Steel'.** This removes the requirement for Progress Level achievement, and the additional audit that goes with it. It is the change most likely to affect uptake directly.
- **Traceability and protection against counterfeit claims.** Work is under way on clear rules for sites' internal traceability systems and on a credible downstream chain of custody programme. That work sits outside this consultation, but it is what makes the change above workable.

4.3 [Annual leave \(Principle 6, Labour Rights\)](#)

The why

Requirement 6.9.1.d requires a certified site to provide all workers with paid annual leave of at least three working weeks after one year of service, based on ILO Convention C132, which excludes public holidays from that total. The site's policy for achieving this must be made public.

Four concerns have been raised:

- In some jurisdictions the entitlement is already mandated by law, so publishing the policy adds nothing.
- Excluding public holidays is arguably unfair where public holidays vary greatly between countries and plainly contribute to rest and recovery.
- The requirement is inflexible where other arrangements could meet the same intent, which may be stifling culturally relevant alternatives.
- There is genuine confusion about how many days a 'working week' contains.

Four options are put forward, and you are invited to say which elements should and should not be implemented.

Option A: No change we leave the requirement as it is currently.

Option B: Implement the following:

- Allowing public holidays to count towards annual leave, but raising the total number of days of annual leave required to 25.
- Making the policy public is made conditional based on whether requirements go beyond local labour law.
- Clarification that it is not enough to have these policies, but that they shall also be implemented.
- Clarification of the definition of a working week.

Option C (Recommended by the ResponsibleSteel Technical Advisory Group): Implements the changes in Option B and allows sites to demonstrate and justify to their certification body that their company policies, whatever they are, 'ensure sufficient rest and recovery periods for workers, to safeguard their health, safety and wellbeing, and to enable them to meet their family responsibilities.'

Respondents are also given the opportunity to suggest some combination of Options A, B and C.

The single most important thing we need to learn from this consultation is whether you consider the options equivalent in outcome for workers' wellbeing.

How we got here

Requests for interpretation were received in 2022 and 2023, followed by a formal Standard Change Request in August 2024. Four working group meetings were held between October and December 2024, and a Technical Advisory Group of four experts — spanning industry and operations, certification and assurance, academia and independent labour rights expertise — took the work forward across six meetings between September 2025 and March 2026.

The group agreed to maintain the intent of the existing entitlement rather than align it to national legal minimums, which differ widely; that additional flexibility is needed where cultural holiday norms or the absence of legal frameworks make the current requirement hard to meet, provided the intent of sufficient rest and recovery is still met; that mandatory guidance embedded in the Production Standard is the right mechanism for introducing that flexibility; and that credible alternatives, including a collective bargaining agreement, are appropriate ways of demonstrating that the intent is met.

4.4 Just Transition (Principles 4 and 7)

The why

Decarbonising the steel sector is essential to meeting global climate goals, and as producers move to lower-emission production routes, employment patterns and local economies across the steel value chain will be reshaped. The industry directly employs around six million people and supports many more indirectly. Without deliberate planning, the workers and communities most affected risk being left behind.

Version 2.1.1 already addresses much of this, through stakeholder engagement, labour rights, and decommissioning and closure planning, but it does not say so explicitly meaning that the provisions that would matter may or not be triggered when a site closes, not when it converts a production route while continuing to operate.

The proposal is deliberately stepwise and does not create a new Principle. **Its scope is limited to transitions related to climate change conversions**, on the reasoning that just transition is a still-emerging concept whose delivery is shared with governments and others, and that a wider scope would place obligations on companies that they cannot discharge alone. Within that scope, **the focus is on making existing requirements explicit and supporting them with guidance.**

- The title and **scope of Principle 4 would be extended from 'Decommissioning and Closure' to 'Decommissioning, Closure and Conversions'**, so that what a site already does when a facility closes applies equally when a production route is converted. A Technology Route Conversion (conversion) is defined as retiring a carbon-intensive process or asset and replacing it with a lower-emission alternative — for example replacing a blast furnace and basic oxygen furnace route with an electric arc furnace route.
- **Criterion 4.1, the only criterion in Principle 4, is clarified, such that what is required is more explicit.** When decommissioning, closure or a conversion is announced, the site would assess the associated transition risks, adverse impacts and opportunities. Existing references to consulting workers, their representatives including trade unions, affected communities and local authorities are retained, and the term 'good faith' is introduced to qualify the type of consultation rather than its outcome. **Mitigation plans would have to include the identified impacts, and the obligation to act is made more explicit, with 'appropriate measures' replacing 'steps', and specific mention of worker retention and reskilling where appropriate.** For conversions, the criterion now includes a cross reference to the climate transition plan requirements in Principle 10 (rather than duplicating them) such that the aims of Principle 10 are complemented by Principle 4 now adding an associated social and economic dimension.
- Principle 7 is strengthened, mainly in its **mandatory guidance, to make explicit that human rights risk and impact assessment is conducted when a decommissioning, closure or conversion is identified.** This contains a cross reference to Principle 4 rather than creating a second due diligence process.

How we got here

The work draws on the Just Transition Framework developed jointly by ResponsibleSteel and the Initiative for Responsible Mining Assurance and published in March 2026, which mapped sixteen existing frameworks, tested a draft through workshops in Johannesburg and Brussels, and set out nine principles, fifty core elements and five recommendations for voluntary sustainability standards. Five working group meetings were held between September 2025 and March 2026, bringing together steelmakers, mining assurance, certification and assurance bodies, an industry association and labour representation.

4.5 ESG frameworks and the added value of ResponsibleSteel

The why

ESG disclosure and due diligence rules are multiplying, and the reporting burden on steelmakers is rising with them. It is not easy for members to see whether, or how far, ResponsibleSteel certification helps them meet those obligations. This risks certification being seen as an irrelevant additional cost to compliance, rather than the opposite: which is that compliance is and can be a credible, trusted and transparent means of demonstrating some of a steelmaker's regulatory compliance obligations. This work compares and contrasts the ResponsibleSteel Production Standard against a suite of frameworks that were selected by our members as relevant in terms of **global applicability, their compliance needs and stability of their design and implementation** (i.e. any frameworks expected to be revised imminently were excluded).

Seven frameworks were selected: two EU laws in the CSRD and the CSDDD, one EU regulation whose obligation falls on importers in CBAM, and four voluntary or investor-facing instruments in TNFD, SBTi, the GHG Protocol, and IFRS S1 and S2.

Each framework was assessed topic by topic against the normative text of Version 2.1.1, with guidance and annexes treated as informative. Each rating uses a three-point scale — **anticipates, supports, informs** — with a blank where the framework does not cover the topic at all. Every rating had to be citable on both sides, naming a ResponsibleSteel criterion and a framework article or disclosure requirement; any rating that could not was reduced or left blank. Ratings were first drafted with AI assistance and then sense-checked by ResponsibleSteel.

The broad finding is that much of what these frameworks ask for is already required by ResponsibleSteel and has been independently verified as being in place at certified sites. However, differences in language and approach often mask that this is the case. For example, ResponsibleSteel certifies a 'site' while most of these frameworks report on a whole company, and it tests performance where several of them ask for disclosure in a prescribed format.

This work will identify specific examples of these issues and suggest solutions for overcoming them, which may need to be considered for future iterations of the ResponsibleSteel International Production Standard. This review has already identified a range of changes relevant to Principle 10 with proposals for aligning the language of ResponsibleSteel with that used in IFRS S2 and the SBTi Corporate Net-Zero Standard v2.0. This is preliminary work on which feedback is being sought.

PLEASE NOTE that certification to the ResponsibleSteel International Production Standard does not constitute legal advice as to whether a company does or does not meet any given legal obligation. Compliance, and whether ResponsibleSteel certification contributes to compliance, is a matter for the authorities within those jurisdictions. The legal duty to report, to disclose and to conduct due diligence stays with the company in all cases. Please also note that the initial draft is just that, a draft, and more detailed review and preparation will be conducted based on the outcome of the consultation.

4.6 Structural changes to the introduction and the Principle introductions

The why

The opening sections of the Production Standard, together with the introduction to each of the thirteen Principles, are meant to hold information that is not itself a requirement. Over successive versions they have accumulated a mix of organisational narrative, scope rules, entitlement statements and rules about marks and claims, which sites, auditors and even ResponsibleSteel staff find hard to navigate and which occasionally read as normative when they are not. The Production Standard has also lacked a clear effective date, so the publication date has had to serve as one, leaving certification bodies and sites without a defined period in which to prepare.

These changes provide structure and clarity rather than changing the level of ambition.

- **We define the date by which all new certifications must be conducted against the new version of the Production Standard (i.e. the effective date) as six months past the publication date.** In practice this means that up until that date sites may seek certification against Version 2.1.1., though they may choose to use Version 3.0 from the day it is published (as soon as they have a certification body ready to do so). Where a site's certificate continues past the effective date they remain certified against the older version of the Production Standard until their current certificate expires.
- The version history and amendment record are presented as a table rather than as narrative.
- The introduction is restructured into numbered subsections, moving from what ResponsibleSteel is, to what the Production Standard is, to who it applies to, to what types of certification exist. **A new section states plainly what is binding** — the criteria and their requirements, the mandatory guidance, Annexes 1 to 5 and the Glossary — and what is informative.
- **All rules on marks and claims are delegated to the Claims and Logo Use Guidelines through a single reference, and the images of the three marks are proposed for removal.**
- **The scope of application is consolidated** into one subsection covering what the Production Standard applies to, what counts as a site, the area of influence and group-level policies. The thirteen Principles are grouped into governance, social and environmental.
- **All thirteen Principle introductions follow the same four-part structure:** objective, rationale, references, and connections to other Principles. Only four have been significantly rewritten — Principles 3, 4, 6 and 10 — and in none of these has the intent of the Principle changed.
- **A drafting convention is applied throughout:** 'shall' denotes a requirement, 'should' a recommendation, 'may' a permitted course of action and 'can' a possible course of action.

These changes are being shared for information. They have not been prioritised for consultation, and a draft is not being shared at this time, but comments are welcome.

5. Definitions

New and updated definitions are proposed alongside each topic, so that sites, auditors and stakeholders apply the requirements consistently. They include 'working week', 'good faith', 'just transition', 'climate transition plan' and 'Technology Route Conversion', together with a substantial set under Principle 10 covering 'climate transition planning', 'emissions accounting' and 'market instruments'. Each consultation paper lists the entries arising from its own topic, marked as new or updated. These are working descriptions offered for comment; the ResponsibleSteel glossary will be updated once this round of consultation has closed.

The full consultation package is listed in section 3.

6. How stakeholders have been involved so far

Open and transparent consultation is a guiding principle of this revision, and engagement has been calibrated according to how far each group is affected by, and can influence, the Production Standard.

- **Climate change and GHG emissions (Principle 10).** A working group was convened in September 2025 and has met alongside an expert Technical Advisory Group. Workstream 1 involved six working group meetings, repeated across two time zones, with parallel Technical Advisory Group sessions between September and December 2025. Workstream 2 involved four working group meetings, again repeated across time zones, with parallel sessions between February and March 2026. Both convened seventeen organisations across steelmakers, non-steelmaker business members, civil society organisations and a certification body. For Workstream 3, engagement so far has been through targeted interviews; a working group and Technical Advisory Group will be convened later in 2026. A member survey on GHG claims was conducted in 2025.
- **Just transition (Principles 4 and 7).** Five working group meetings between September 2025 and March 2026, with written feedback and analysis between sessions. The underlying research project with the Initiative for Responsible Mining Assurance, funded by the ISEAL Innovations Fund and SECO, included workshops in Johannesburg and Brussels with workers, unions, supply chain actors, companies, governments, civil society, communities and Indigenous groups.
- **Annual leave (Principle 6.9.1).** Four working group meetings between October and December 2024 following a Standard Change Request, and a Technical Advisory Group of four experts meeting six times between September 2025 and March 2026.
- **Regulation and ESG frameworks.** Members were consulted over the past year to identify which regulations, voluntary standards and reporting frameworks matter most to them, and the Principle 10 working group has worked with ResponsibleSteel on ensuring the climate proposals help members meet their obligations.
- **Structural changes.** These draw on clarification requests, interpretation queries and drafting issues accumulated since Version 2.1, together with audit experience highlighting inconsistency and ambiguity.

During this consultation, members, certificate holders and certification bodies will be engaged most intensively, through the topic webinars and direct communication. Other standard-setting schemes, civil society organisations and industry players will be reached through the public consultation, the webinars and website updates. Governments and academic experts will be engaged through targeted outreach, and communities can engage through the public consultation itself.

7. What happens next

We seek inclusiveness and fairness through extensive stakeholder consultation. Our goal is for stakeholders to provide feedback and be heard. In this we aim to secure strategic insights for the Production Standard, build consensus and earn credibility.

To this end stakeholders will have until 0800 (UTC) Monday 23 November 2026 to [participate in this consultation](#).

Following the close of the consultation all feedback will be consolidated and analysed by ResponsibleSteel. Where views are divergent or contradictory these may be reviewed with our various working groups and governance committees. Once any persistent disagreements are resolved a draft revised standard will be developed and made available for public consultation in early to mid-2027. As part of this we will seek input from certification bodies to ensure that the standard remains auditable and credible.

Our aim is to publish a revised draft of the Production Standard as early as possible in the second half of 2027. This will be supported by a report summarizing the changes, with reference to what the consultation found and how it was or was not taken into account and why. Supporting guidance, training materials, templates and translations will follow.

As the owner of the Production Standard ResponsibleSteel reserves the right to make all final decisions regarding the any changes to the content of the Standard as per [our Standard Setting Procedure](#). Final approval of the new version of the Production Standard will be subject to a vote by ResponsibleSteel members, in accordance with the Standard Setting Procedure.

Thank you for taking the time to engage with this revision. Your feedback directly shapes what Version 3.0 becomes.