Terms of Reference for the Working Group on Revision of ResponsibleSteel Chain of Custody Standard and Claims & Logo Use Guidelines

Version 1.0

30th October 2026

Overview

This document is the Terms of Reference (TOR) for the Working Group (WG) on the revision of the ResponsibleSteel Chain of Custody (CoC) Standard and the Claims and Logo Use Guidelines. It sets out the background to the revision; the purpose and scope of the revision; the guiding principles; the objectives and intended outcomes of the WG; the governance structure and proposed timeline; the formation of the WG and meeting commitment; and the WG discussion points. The references provide the link to the current requirements of the CoC Standard Draft v0.2 and the Claims and Logo Use Guidelines. This document will serve as a reference throughout the revision process.

Background

Under the International Production Standard (IPS) v2.1.1, a steelmaking site that holds the Core Certification and achieves progress levels one for both principle 3 and principle 10 can market and sell its steel as ResponsibleSteel certified. For a company further down the supply chain to make claims about that steel, an unbroken chain of custody is needed from the steelmaking site to the company making the claim. The CoC Standard sets the requirements for this chain.

The draft CoC Standard draft v0.1 went through a 60-day public consultation in 2024, and the feedback was used to develop draft v0.2. This new draft was intended to be piloted and then put to a 30-day second public consultation before finalisation. The pilot did not take place, and the work was paused. As a result, only one of the two rounds of public consultation required by ResponsibleSteel's standard-setting procedures has been completed. The CoC Standard has not been finalised and implemented.

The Claims and Logo Use Guidelines (Nov 2023) set the rules for claims about achievements against the IPS, and for the use of ResponsibleSteel marks.

Since a CoC certificate is needed to make product claims downstream, and the CoC Standard is not finalised, product claims on ResponsibleSteel certified steel are not yet available to the market.

Core design of CoC Standard Draft v0.2

Draft v0.2 offers two types of certifications: full CoC certification for product claims, and CoC input certification for procurement claims only. The full CoC certification requires an unbroken chain of custody, with one-up, one-down traceability, and applies to both steelmakers and downstream actors.

The proposed CoC model is physical segregation: a product batch must be made from 100% ResponsibleSteel certified inputs. The attributes passed downstream are certified status and the two progress levels: the Decarbonisation Progress Level (DPL) and the Material Sourcing Progress Level (MSPL). How progress levels are assigned to output steel products when inputs with different levels are mixed is still open, with four options (Section 11 of Draft v0.2).

CoC certificate holders must also meet qualifying requirements. All organisations and activities within the CoC boundary must either meet the core requirements for ResponsibleSteel site certification, or be certified by a third party for quality, environmental, and occupational health and safety management systems, such as ISO 9001, ISO 14001 and ISO 45001. They also need a responsible sourcing policy.

For full CoC certification, each certified product category also needs a product carbon footprint. Downstream traders seeking full CoC certification are exempt from the Section 5 qualifying requirements where applicable.

Claims related considerations

Several ResponsibleSteel projects will change which claims are possible, and therefore the changes are needed for the draft CoC Standard to be finalised, to accommodate those changes.

IPS v3.0, planned for June 2027, proposes the removal of the requirement to achieve Progress Level 1 on both Principle 3 and Principle 10 for making product claims, such as "certified steel" claims. It also proposes to develop a method to allocate site emissions to production lines or individual products. In addition, it proposes the ResponsibleSteel accounting method for calculating crude steel emissions intensity be mandatory for all Core Site certificate holders.

In parallel, ResponsibleSteel is developing the GHG Standalone Certification that will verify GHG-only aspects. The Interoperability Programme with CISA and LESS may also enable GHG-only claims, through an interoperability pathway. The timeline of the programme launch is Q2-Q3 2027.

As a result, certified steel will come from four certification pathways in two groups: the full-standard group (Core Site Certification v2.1.1 and v3.0) and the GHG-only group (GHG Standalone Certification and the Interoperability Pathway). Claim types carrying certification pathways, progress levels and GHG emissions value for production-line/product level can be possible.

Market needs and regulation are also changing which claims are needed. For example, many downstream companies need to report Scope 3 emissions in corporate reporting; whereas CBAM requires importers to report the embedded emissions of steel. Substantiated environmental claims are becoming part of the regulatory requirements.

Purpose

The programme of work aims to enable product claims on ResponsibleSteel certified steel for the market in a way that is credible and practical. It will:

- revise the CoC Standard so that verified attributes can pass downstream to support the intended claim types;
- revise the Claims and Logo Use Guidelines to cover the new claim types, in line with the CoC model and current claims regulations;
- align both documents with IPS v3.0 and pave the way for alignment with GHG standalone certification and interoperability programme;
- complete the pilot and second round of public consultation required by ResponsibleSteel's standard-setting procedures.

The first phase of the revised documents is planned for publication together with IPS v3.0 in June 2027.

Scope of work

a. Chain of Custody Standard (Draft v0.2)

Determine:

- The attributes to be passed and traced downstream to enable the intended types of claims
- How certification pathways are distinguished in claims
- The CoC model for each attribute, and the attribution method used to assign value attributes to steel outputs within each organisation's CoC boundary
- The qualifying requirements for downstream organisations (if any): environmental and occupational health and safety management systems, ISO 9001, product carbon footprint and responsible sourcing
- The traceability requirements: the core data passed downstream, and internal traceability within each organisation
- Oversight of traced attributes and volumes

- Audit arrangements for steelmakers and downstream organisations
- Product scope, including co-products, by-products and composite products
- Phasing of the revision and the corresponding claim modules

b. Claims and Logo Use Guidelines

- Permitted and forbidden wording and logo use for each type of claim, in line with the CoC model
- Alignment with regulatory requirements on environmental claims
- The approach to monitoring claims and acting on misuse

c. Editorial improvements

A general review of the structure and wording, tables and illustrations in the CoC Standard and Claims and Logo Use Guidelines to improve readability and clarity, including updates to definitions in the Glossary to avoid ambiguity.

d. Enabling systems

- Consideration of online traceability system and register requirements.

Out of Scope

The following are delivered by other ResponsibleSteel projects or teams. The WG will consider them only where they affect the CoC Standard or the Claims and Logo Use Guidelines:

- IPS v3.0, including the emissions accounting and allocation method
- The GHG Standalone Certification standard, and the interoperability programme with CISA and LESS
- The CoC Assurance Manual

Guiding Principles

The revision process will be guided by the following key principles:

Rigour and robustness	○ Prevent double counting and double selling of certified volumes and attributes
Credibility	○ Ensure credible, substantiated and third-party verified claims ○ Matching claim wording to the CoC model and to the traced evidence ○ Keep claims from different pathways, levels and scopes clearly distinct to avoid misleading claims ○ Monitor claims and act on misuse, to protect trust in ResponsibleSteel and in certified steel ○ Ensure the allowed claims is legally compliant with relevant regulations
Practicality	○ Set requirements that are practical and feasible for the value chain ○ Keep rules easy to understand and audit
Affordability and inclusiveness	○ Keep certification and audit burden affordable, so that small and medium-sized companies and companies across the globe can take part
Consistency and alignment	○ Align with International Production Standard v3.0
Value Activation	○ Design claims that reward certified steelmaking sites for their different achievements ○ Ensure the CoC Standard adds value for buyers and users of steel, so that demand for certified steel grows ○ Phase the revision so that value is delivered early, agree the plan to continue development over time.
Transparency	○ Ensure transparent disclosure of the claims e.g. the reporting period and the attribution /allocation method for GHG attributes

Objectives and Intended Outcomes

Objectives	Intended Outcomes
1. Guide the revision of the CoC Standard so that it enables credible, substantiated and third-party verified claims on steel from ResponsibleSteel certified sites, adds value across the steel value chain, and grows the market for certified steel.	• Agreed types of downstream claims, and the attributes passed on to support them • Agreed CoC model for each attribute, and the attribution method for GHG values • Agreed core traceability data, and an oversight approach
2. Guide the revision of the Claims and Logo Use Guidelines, including the claim rules and governance needed to keep product claims credible and legally compliant.	• Agreed principles for permitted and forbidden claim wording and logo use, matched to each CoC model • Agreed approach to monitoring claims and acting on misuse • Claim rules checked against legal requirements
3. Keep the requirements practical and proportionate for steelmakers and downstream actors to encourage uptake	• Agreed qualifying requirements for each type of actor • Agreed ways to minimise the audit burden • Agreed product scope

Governance Structure

- The ResponsibleSteel Standard Development Procedure, developed to be consistent with the ISEAL Code of Good Practice, must be followed. This includes a public consultation period and a member voting period, with ultimate approval by the Board.
- The **Standards, Assurance and Claims Committee (SACC)** of the ResponsibleSteel Board will be responsible for oversight of the standard development processes.
- The **ResponsibleSteel Secretariat** will convene and manage the project.
- A **Working Group** (WG) (the subject of this ToR) of ResponsibleSteel members with interest and relevant expertise will be established to support this work, inclusive of business members, civil society organisations and trade associations.
- A **Technical Advisory Group (TAG),** drawn from ResponsibleSteel's Technical Advisory Panel (TAP) of experts with relevant expertise may also be established to provide project guidance.

For more information on the standard revision process, refer to the ResponsibleSteel Standard Development Procedures which can be downloaded from this webpage.

Proposed Timeline

- October – November 2026: **60-day public consultation** of IPS v3.0
- November 2026 —January 2027: updating of the revised draft of CoC Standard and Claims and Logo Use Guidelines based on feedback collection in the consultation and in the working group
- Q1 2027: **public consultation and pilot testing** (exact timing tbc)
- Q1-Q2 2027: finalisation of the revised CoC Standard and Claims and Logo Use Guidelines based on the consultation feedback
- Q2 2027: Member vote and Board approval of final documents
- June 2027: publication of the updated ResponsibleSteel International Production Standard v3.0, CoC Standard, Claims and Logo Use Guidelines

Note: this timeline is subject to change, depending on the final revision scope, and level and consistency of feedback following the consultation.

Working Group Formation and Meeting Commitment

- Eight Working Group meetings are planned between late November 2026 and Q1/Q2 2027. The first six meetings will be held weekly or every two weeks, subject to members' availability. Additional meetings may be held if needed.
- Working Group members are expected to:
    - attend most of the meetings;
    - reserve 75 minutes for each meeting; and
    - allow enough time to review the documents shared before each meeting.
- The agenda and discussion points for each planned meeting are set out in the next section.
- ResponsibleSteel aims to form a balanced Working Group, with members from different segments of the steel value chain, civil society and other relevant stakeholder groups.
- To register to participate in the working group, **please fill in this form by 13 November 2026**. If you have questions or wish to discuss before registering, please email Margaret Ho, Claims and Traceability Specialist, at mho@responsiblesteel.org

Working Group Discussion Points

Mtg #	Date	Content & Intended Outcomes

1	End of November 2026	**Role and Added Value of the ResponsibleSteel CoC Standard**
		• Review the objectives of the ResponsibleSteel CoC Standard and the added value it can provide across the steel value chain. Examine the drivers below:
		  ○ Customer requirements and downstream demand for Scope 3 carbon accounting data
		  ○ Public procurement requirements for low-carbon steel
		  ○ Regulatory requirements for data evidence (e.g. CBAM, Digital Product Passport, melt-and-pour origin rules)
		  ○ Rules on environmental claims which require credible, third-party verified claims
		  ○ Whether certification can support a price premium for low-carbon steel
		  ○ Expectations on traceability of upstream raw materials
		Types of Claims and Attributes in the Claims
		• Review the types of claims ResponsibleSteel will offer downstream: procurement claims, certified steel claims, and certified steel claims with attributes
		• Review which data, and at which level, downstream users need in the claims:
		  ○ Certified status (always passed on)
		  ○ Responsible sourcing (materials sourcing) Progress Level
		  ○ GHG values at site level: crude steel GHG emissions intensity and/or Decarbonisation Progress Level (DPL)
		  ○ GHG values at production-line and product level (based on the IPS v3.0 allocation method)
		  ○ Scrap ratio
		  ○ Total site GHG emissions
		INTENDED OUTCOMES
		• Confirm the purpose of the CoC Standard and its added value for the certified steel market
		• Agree the types of claims to offer downstream

Mtg #	Date	Content & Intended Outcomes
		• Agree a shortlist of attributes to pass on downstream (the phasing is confirmed in session 3; at this meeting we will begin the discussion of phasing)
2	First week of December 2026	**Certification Pathways in Claims** • Review the upcoming pathways and how they affect claims: Production Standard v3.0 (June 2027), GHG Standalone Certification (H2 2027), and the Interoperability Pathway with CISA (H2 2027) and LESS (timing to be confirmed) • Review whether claims should name the pathway, or allow mixing within one group: the full-standard group (Core Site Certification v2.1.1 and v3.0) and the GHG-only group (GHG Standalone Certification and the Interoperability Pathway) **Downstream CoC Model for Each Type of Attribute** • Review the range of CoC models the CoC Standard will allow • Review the CoC model for each attribute, considering practical feasibility, credibility and added value: o Certified status: identity preserved and/or segregation, with no mixing of certified and non-certified steel o Certification pathways: segregation by group (steel in one group can be mixed; the two groups are kept apart) o Value attributes (progress levels, GHG values, scrap ratio): see session 3 **Intended Outcomes** • Agree the CoC model for certified status, and how pathways are shown in claims • Gather initial views on the CoC model for GHG-only pathways
3	Second week of December 2026	**Attribution Method for GHG Value Attributes** • Review the attribution rules: how GHG attribute values (DPL, crude steel GHG emissions intensity at site or production-line /product level, and scrap ratio, if passed on downstream) are assigned to steel outputs when inputs with different values are mixed within an organisation's CoC boundary. • Review alignment with International Production Standard v3.0, Principle 10 (Workstream 3) • Review the balancing period, if a mass balance model is adopted • Review disclosure requirements on the attribution method, at site level and downstream **Phasing** • Review the phasing of the revision, taking into account market needs, technical complexity, the progress of other ongoing projects, legal requirements, and the readiness of the pilot **Intended Outcomes** • For the value attributes shortlisted in session 1, agree the attribution method, balancing period and disclosure requirements • Agree the phasing of the revision

Mtg #	Date	Content & Intended Outcomes
4	Third week of December 2026	**Traceability Requirements** • Review the unbroken chain of custody and the one-up, one-down approach to traceability • Review the core data that passes with certified steel • Review internal traceability requirements, including physical marking or documented process control, management system, and volume reconciliation • Review record-keeping and reporting requirements (e.g. reporting frequency) • Review which data the CoC could later provide as evidence for regulatory / downstream procurement requirements (e.g. melt-and-pour country, EPD or PCF cradle-to-gate A1–A3, recycled content, upstream material sourcing) **Oversight** • Review whether the oversight mechanism available today are enough for the intended claims and attributes • Review the risks (e.g. double counting, double selling) and the mitigation measures • Define what the registry should contain (e.g. certificate holders, certified volumes, claims made) **Intended Outcomes** • Agree the core data set, the oversight approach and the content of the central registry • Identify main risks and the mitigation measures
5	First week of January 2027	**Qualifying Requirements for Downstream Organisations** • Consider a one-size-fits-all or a risk-tiered approach (by type of activity) for ESG requirements (ISO 9001, ISO 14001, ISO 45001 or equivalent) • For the product carbon footprint requirement, consider material significance, and whether to pass on a static upstream GHG value or pave the way for a dynamic carbon build-up along the chain (which needs more complex governance) • Review the material sourcing requirements for downstream to align with the material sourcing requirements at site level in the IPS v3.0 • Review which requirements apply to each actor in the value chain. For example, traders are currently exempt from the ESG requirements **Audit Burden for Steelmakers and Downstream Actors** • Review ways to reduce the audit burden for steelmakers and downstream organisations (e.g. one combined CoC and Production Standard audit for steelmakers, audit frequency) **Product Scope** • Review whether product claims cover co-products, by-products and composite products **Intended Outcomes** • Agree the qualifying requirements for each type of actor, the audit approach for steelmakers, and the product scope

Mtg #	Date	Content & Intended Outcomes
6	Second week of January 2027	**Claims Rules and Governance** • Review permitted and forbidden wording and logo use for each type of claim, in line with the CoC model and supported by the traced evidence • Review how ResponsibleSteel monitors claims and acts on misuse, and how far monitoring should go (e.g. approval of claims, or guidance only) • Review legal compliance, liability and risks for claim makers and for ResponsibleSteel **Intended Outcomes** • Agree the principles for claim wording and logo use, and the approach to monitoring claims
7	After the first draft is ready (February 2027)	**Review of the First Draft** • Review the first draft of the CoC Standard and the Claims and Logo Use Guidelines against the decisions in sessions 1–6 **Intended Outcomes** • Comment on the first draft before the pilot and consultation
8	After the pilot and consultation (March 2027)	**Pilot and Consultation Results** • Review the results of the pilot and consultation • Review the revised draft that includes the pilot and consultation feedback **Intended Outcomes** • Agree the changes to the draft before the fnalisation

References

ResponsibleSteel Downstream CoC Standard v0.2

https://www.responsiblesteel.org/resources/responsiblesteel-international-chain-of-custody-standard-draft-version-0-2

ResponsibleSteel Claims and Logo Use Guidelines

https://www.responsiblesteel.org/resources/claims-and-logo-use-guidelines

ResponsibleSteel International Production Standard v3.0 Public Consultation 2026 (Enabling Claims)

https://www.responsiblesteel.org/resources/enabling-market-claims-public-consultation-2026

ResponsibleSteel International Production Standard v3.0 Public Consultation 2026 (Climate Change & GHG Emissions)
https://www.responsiblesteel.org/resources/climate-change-ghg-emissions-public-consultation-2026

