

SPECIAL CONDITION: Mixed Recycled Content

Version: SC MixedRC/2018-02-23

BACKGROUND

Definition: Mixed recycled content includes recycled content of mixed/unknown composition and/or composition that varies on a batch-by-batch basis. Such materials may come from a post-consumer source where there is low regard for separation, identification, and/or cleaning the materials to a higher level of purity¹.

NOTE: Recycled content comes in many different forms. Some recycled content is of well-defined composition, either because the recycled input is pure (such as post-industrial scrap and select post-consumer scrap like aluminum cans), or because of extensive processing to meet demands of specific applications; this material is not considered a Special Condition. *Recycled content of well-defined composition that can be identified by the CAS numbers of the contained chemical substances must be inventoried according to the HPD standard inventory method.*

Why is this a Special Condition: *A content inventory cannot be created with methods outlined in the current version of the HPD Open Standard due to variable or unknown composition and lack of CAS RNs.* Mixed recycled content, whether post-industrial or post-consumer, is sometimes used in manufacturing as-is with very little processing, or is only processed for cleaning or physical form. These complex mixtures of variable or unknown composition cannot be readily broken down by CAS number. In addition, there is no clearly defined protocol today for characterizing and testing the composition and potential for impurities in mixed recycled content streams.

Scope: Any binders, coatings, and finishes, which are considered unique homogeneous materials in the HPD Open Standard, along with additives or other identifiable substances added to the material, must be inventoried as a separate substance or material on the HPD.

Harmonization: This Special Condition has been harmonized with the following:

- Cradle to Cradle Certified™, *Recycled Content Materials Assessment Methodology*, May 2017; <http://www.c2ccertified.org/resources/detail/recycled-content-materials-assessment-methodology> (Type 4 post-consumer material from undefined sources with fluctuating chemistry typically receives an X or Grey assessment and cannot be used in C2C Certified Silver, Gold or Platinum products).
- International Living Future Institute, [Declare Manufacturer's Guide](https://living-future.org/wp-content/uploads/2017/05/Declare-Manufacturers-Guide-2017.pdf), May 2017; <https://living-future.org/wp-content/uploads/2017/05/Declare-Manufacturers-Guide-2017.pdf> ("Recycled content should be reported using all known primary ingredients; a CASRN should be reported as applicable", Page 6)
- BIFMA e3 2014 (no specific requirements)

¹ Cradle to Cradle Certified, *Recycled Content Materials Assessment Methodology*, May 2017, page 6. <http://www.c2ccertified.org/resources/detail/recycled-content-materials-assessment-methodology>

GUIDANCE/ INSTRUCTIONS:

Special Conditions instructions for specific data fields follow; **if there are no instructions for a data field, the requirements of the HPD Open Standard should be followed.** If the HPD Open Standard and Special Conditions instructions are followed, the HPD will not be barred from qualifying for the LEED v4 Material Disclosure and Optimization, Material Ingredients credit, Option 1.

NOTE: Recycled content material of well-defined composition that can be identified by the CAS numbers of the contained chemical substances must be inventoried according to the HPD standard inventory method (the Special Condition for Mixed Recycled Content does not apply).

*Data field auto-fills if using HPD Online Builder

HPD 2.1.1 Data Field	Special Condition Requirements
SECTION 1: SUMMARY	
Content in Descending Order of Quantity*	Materials and Substances must be listed by the Material Name if applicable (and/or Substance Name as instructed in Section 2.
Characterized Screened Identified*	<ul style="list-style-type: none"> • “Yes” should be checked if all Standard requirements are met. • “Yes ex/SC” should be checked to indicate all substances were characterized, screened and/or identified as required except one or more Special Condition (SC) substances were screened and identified according to SC guidance. The following is printed below the options for each item as appropriate: <ul style="list-style-type: none"> ○ “% weight and role provided for all substances except Special Conditions (SC) which were characterized according to SC guidance” ○ “All substances screened using Priority Hazard Lists with results disclosed except Special Conditions (SC) which were screened according to SC guidance” ○ “All substances disclosed by Name (Specific or Generic) and Identifier except Special Conditions (SC) which were identified according to SC guidance”
Inventory and Screening Notes*	<ul style="list-style-type: none"> • If the only content not screened is covered by the Special Condition, Inventory and Screening Notes should include the following notes: <ul style="list-style-type: none"> ○ “Special conditions applied: MixedRecycledContent.” ○ [LEED v4] “Yes ex/SC ” result is due only to materials and substances for which Special Conditions were applied. Thus “Yes ex/SC” does not disqualify the product for the LEED v4 Materials and Resources Disclosure and Optimization credit, Option 1.
SECTION 2: CONTENT IN DESCENDING ORDER OF QUANTITY	
Materials – instructions apply only to Nested Materials Inventory format	
Material Name	Enter “MixedRecycledContent”

Material Notes	Enter "SpecialConditionApplied:MixedRecycledContent"
Substances – instructions apply to both Nested Materials and Basic Inventory formats	
Substance Name	<ul style="list-style-type: none"> • Enter all Substances with known CAS RNs, quantities, and thus with (known) hazards identified by the HPD Builder, as required by the HPD Open Standard. Substances are considered "Identified"="Yes" and "Screened"="Yes". • For all other substances, enter common name preceded by "SC:UnknownSubstance:"
ID (Identifier):	Enter "SC:MixedRC"
Substance Notes	<p>For "SC:UnknownSubstance"</p> <ul style="list-style-type: none"> • Enter the most recent Special Condition version nomenclature with date, available on the Emerging Best Practices web page (e.g., Version = SCMixedRC/2018-02-23). <p>In <i>Substance Notes</i> data field, answer the following, optional questions:</p> <ul style="list-style-type: none"> • Is regular, analytical testing performed on the material/ substances? <ul style="list-style-type: none"> ○ If "no", describe how the substance was inventoried (manufacturer/ supplier attestation or other?). ○ If "yes", include the following information: <ul style="list-style-type: none"> ▪ list of chemicals and/or elements (including those of a hazardous nature) that are covered by the testing; ▪ test method(s) employed; ▪ name and accreditation of the lab(s) that perform the testing; ▪ representative material sample covered by the testing. • Is there any batch variation for the material/substances? What are the causes of such variation? • What is the source or country of origin of the material/ substances? • Why is there limited information or a lack thereof? • If no information is available on hazards, include the statement/disclaimer "This disclosure does not provide information on the potential presence of hazardous substances which may be found in certain mixed recycled materials."
Hazards and Agency(ies) with Warnings	Enter "Hazard Screening not performed"
SECTION 3: CERTIFICATIONS AND COMPLIANCE	
No changes to requirements for Special Conditions	
SECTION 4: ACCESSORIES	
No changes to requirements for Special Conditions	
SECTION 5: GENERAL NOTES	



No changes to requirements for Special Conditions

SECTION 6: REFERENCES

No changes to requirements for Special Conditions