



Recognition Methodology

Version 1.0

13 June 2022

About this document

This document describes ResponsibleSteel's methodology for the recognition of input material programmes. It is underpinned by a series of Excel templates, the 'ResponsibleSteel Recognition Assessment Tool', that serve to implement the methodology. We considered [good practice defined by ISEAL](#) and took inspiration from a number of other publicly available recognition procedures in developing our methodology and assessment tool (see Annex).

The methodology and assessment tool were developed by the ResponsibleSteel Secretariat and tested in pilot assessments in 2021. The methodology and the pilot assessments were published on the ResponsibleSteel website in October 2021 to solicit stakeholder feedback. Received feedback from 1:1 conversations with ResponsibleSteel members and stakeholders was used to finalise the methodology, the assessment tool and the pilot assessments. The final versions of the methodology, the assessment tool and the pilot assessments were approved by the ResponsibleSteel Board in May 2022. It is expected that this methodology and the recognition assessment tool will be slightly revised once ResponsibleSteel's additional responsible sourcing and GHG requirements have been approved.

For further information about ResponsibleSteel, visit

<https://www.responsiblesteel.org/>.

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Version history

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Draft Version 3.0	23 Dec 2020	Third draft used to conduct pilot assessments
Draft Version 3.1	14 September 2021	Revised draft version for publication on the ResponsibleSteel website
Version 1.0	13 June 2022	Final, approved version for publication on the ResponsibleSteel website

Disclaimer

The official language of this document is English. The definitive approved version will be 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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Introduction & Background

ResponsibleSteel's vision is to “maximise steel’s contribution to a sustainable society”. To achieve this, our programme must eventually cover the entire steel supply chain. The ResponsibleSteel Standard (version 1.1, launched in June 2021) applies to steel production and processing and, potentially, to intermediate production like coking, sintering, and pelletisation. The Standard comprises a Responsible Sourcing Criterion, but does not address the issue of input material sourcing in a comprehensive manner.

The key ingredients for steel making are mined materials and scrap and, for some steel companies, charcoal. There are many programmes that define environmental, social and governance (ESG) requirements for responsible mining, and with the FSC there is a well-established programme for responsible forestry. Initial steps have been made to create such programmes for scrap as well. The most effective and efficient way for ResponsibleSteel to address sourcing aspects is to recognise input material programmes that credibly verify ESG performance of suppliers and to build our [responsible sourcing requirements](#) for ‘Certified Steel’ on these programmes.

Recognition decisions by ResponsibleSteel are intended to create a demand pull for recognised programmes. Demand should lead to an increasing number of suppliers working to meet the recognised programmes’ standards. This is thought to lead to positive change on the ground, increase the availability of input material from suppliers that can credibly demonstrate strong ESG performance, and, ultimately, to contribute to ResponsibleSteel and the recognised programmes achieving their missions.

The methodology outlined in this document:

- outlines our approach to recognition
- describes the procedure to be applied when assessing input material programmes
- points to the procedures for reviewing draft assessments and taking decisions on the recognition of other programmes

The methodology must be read in conjunction with the ‘ResponsibleSteel Recognition Assessment Tool’ which contains the application form and a series of templates, describing the criteria for recognition assessments and providing guidance to the assessors and reviewers. The templates serve to calculate the assessment result.

The recognition methodology and assessment tool may subsequently be adapted for supply chain activities other than mining. For example, the collection and processing of scrap shares some of the ESG challenges that are common in mining and steel making, but it also faces sector-specific issues that might warrant adapted criteria to assess whether any upcoming ESG programmes for scrap can be recognised by ResponsibleSteel. Another example is

that of responsible forestry. With the Forest Stewardship Council (FSC), there is a long-running ESG programme that has seen broad take-up globally and is generally considered the strongest programme of its kind. ResponsibleSteel and its members might decide that FSC is recognised without the need for a recognition assessment since the FSC – through its members and stakeholders – carries expertise and has created consensus on what it means to be a responsible forestry operation. For the recognition of additional forestry programmes, the FSC might then serve as the benchmark. The analysis of whether adaptation of the methodology and/or the assessment tool is necessary and appropriate will be undertaken when programmes covering other supply chain activities are identified as potential candidates for recognition.

ResponsibleSteel will use the insights gathered from recognition assessments to inform its own programme development. We are committed to reviewing our recognition methodology and assessment tool on a regular basis, at least every five years or more frequently if uncovered improvement potential warrants an earlier update.

Note that the methodology described in this document does not apply to standards that steel sites are usually certified against, such as ISO 14001 or ISO 45001. Potential recognition of audit results against these standards is described in the ResponsibleSteel Assurance Manual.

ResponsibleSteel's approach to recognition

The core principles of our recognition work

We hope to create a market pull for programmes that are recognised by ResponsibleSteel. Beyond demand from steel companies, recognition decisions could also be reflected in the sourcing policies of downstream companies, in public procurement specifications, and within green finance products. Recognition decisions can have far-reaching implications, so it is important that they build on a solid foundation. We are committed to the following core principles to provide that foundation:

- **Rigour:** Our recognition methodology and assessment tool are structured and implemented to produce quality outcomes.
- **Impartiality:** To ensure the integrity of our recognition work, the assessments results are published for stakeholder feedback.
- **Stakeholder engagement:** Interested stakeholders are invited to participate in and provide input to the development of the methodology and assessment tool and to the actual assessments.
- **Efficiency:** Our recognition work is structured as simply as possible and as complex as necessary to achieve our stated aims.

- **Transparency:** Our recognition methodology and assessment tool are freely and publicly available. Where programmes decide to continue pursuing recognition once a draft assessment has been produced, these draft assessments will also be made public
- **Accessibility:** Entry criteria for recognition assessments do not create unnecessary barriers to participation.
- **Improvement:** Our recognition methodology and the way that assessment results are used are aimed at incentivising better practices at the level of the programmes and at the entities they cover.

The meaning of our recognition assessments

ResponsibleSteel's recognition methodology combines a benchmark with an improvement model. To be granted initial recognition, a programme must reach at least 60% of the maximum achievable points for each of the 15 tabs of the assessment tool. It must also achieve 'Met' for the criteria marked as 'Precondition'. This benchmarking mechanism is described in more detail below. A few criteria are marked as 'Deferred condition'. This means that the programme will be expected to come into closer alignment with the benchmark to remain recognised in the future. We hope that programmes will work to fill any identified gaps over time since the stronger the programme and, therefore, the more reliable its stated outcomes, the more likely it is to support ResponsibleSteel in achieving its Vision and Mission. More information on this improvement mechanism can be found below.

It should be noted that ResponsibleSteel recognition assessments are based on a review of programme documentation. Insights derived from such a review are supplemented with feedback we receive through stakeholder consultation. Stakeholder input will inform our conversations with the assessed programmes, but it does not lead to exclusion of programmes unless there are well-founded reasons to do so. A comprehensive review of how well the written rules and procedures of a programme are implemented in practice is beyond what we can deliver.

We also want to stress that ResponsibleSteel uses the recognition methodology outlined in this documents to assess programmes against a defined benchmark that is based on our own standard and assurance mechanisms. The methodology does not serve to compare programmes to one another to establish whether they are equivalent or not. If we see a need to conduct equivalency assessments in the future, these will require their own benchmark and methodology.

The scope of our recognition assessments

At the heart of a programme is its standard. However, a standard that is not consistently implemented will not lead to positive impact. It also needs to be backed up by an assurance and oversight programme that ensures that audits are delivered well and come to the 'right' conclusions. It also needs to be embedded in governance and

management structures that help achieve the programme’s vision, mission and strategy, and it has to be supported by operational practices that ensure an effective running of the whole system. Our recognition assessments therefore look beyond the standard and cover the following elements of a programme:

<p>Governance and Management</p>	<p>Reviewing a programme’s governance and management will help understand how its vision, mission and strategy are reflected in the way the programme is directed and operated. There are many different governance and management models, and pros and cons can be cited for all of them when it comes to their effectiveness, so we do not assess the overall governance model. However, transparency on what a programme wants to achieve and how, the way it is governed and managed, and mechanisms for stakeholders to participate in key decision-making and standard-setting are important for building credibility and trust. Our assessment of governance and management focuses on these issues.</p>
<p>Assurance and Oversight</p>	<p>The role of assurance is to establish whether assessed entities conform with the requirements of a standard and to do so in a consistent and robust manner. Put simply, it is about how audits are conducted, how stakeholders may engage in the process, how decisions on compliance are taken, how non-conformities are addressed, what happens after the audit, how compliance results are communicated to the outside world and how competence of auditors and assurance providers is ensured. Oversight, on the other hand, serves to make sure that assurance providers and auditors are indeed fit to do their job and deliver it well. Both assurance and oversight are important quality control functions, which is why they contribute to our recognition assessments.</p> <p>Where assurance mechanisms are very loosely defined or through non-binding guidance only, the respective programme cannot be recognised. The non-binding nature of guidance makes it impossible to say that the programme can deliver a certain performance level across all participating entities. The risk that comes with this uncertainty means that recognition cannot be granted (see more detail below).</p>

<p>Claims and Labels</p>	<p>Claims and labels communicate to business partners and stakeholders that an entity meets a certain level of performance. To not be misleading, it is important that claims and - where offered - labels are truthful and justified and are used in an appropriate manner. Permitted claims must be aligned with the provided level of assurance and must be reflected in the standard’s content.</p> <p>While not all programmes offer labels to communicate ESG credentials, they should all have clear rules on how entities may communicate their programme participation and any ESG audit results to make sure that messages (also called ‘claims’) are appropriate. For example, it would not be acceptable if an entity stated that it is ‘certified to the highest ESG standards’ if the programme it participates in does not offer certification and positions itself as a baseline initiative rather than a programme that aims at recognising the top performers only.</p>
<p>Standard</p>	<p>For the assessment of a programme’s standard, we use the ResponsibleSteel Standard as the benchmark. Our Standard was developed over the course of 3 years in a process designed to align with ISEAL good practice for standard-setting. A number of important international norms and guidelines and other relevant standards were considered in its development and we believe it sets an ambitious yet achievable bar.</p> <p>The 49 criteria of the ResponsibleSteel Standard serve as the default basis for recognition assessments and they are spread across 12 different tabs in the assessment tool. Criteria that are not addressed by a programme do not contribute to the recognition assessment, but entities participating in the respective programme would be expected to fill this gap by applying the relevant criteria of another recognised programme.</p> <p>Where a programme’s standard is mostly made up of non-binding guidance or is comprised of very high-level requirements that leave a lot of room for interpretation, the respective programme cannot be recognised. The non-binding nature of guidance and loose framing of a standard mean that one cannot be confident that the programme and its participating entities will interpret and implement the standard in a consistent manner. The risk that comes with this uncertainty means that recognition cannot be granted (see more detail below).</p> <p>Depending on the sector that a programme covers, some of the criteria of the ResponsibleSteel Standard might not apply since our Standard was written for steel making operations. Likewise, where issues relevant for a certain sector are not covered by the ResponsibleSteel Standard, additional criteria might be added in the future.</p>

The ways that stakeholders can participate in a programme's governance structure and key decision-making, in standard development and in audits are not considered in an isolated manner. Instead, aspects of stakeholder engagement are incorporated into the Governance and Management, Assurance and Oversight and the Claims and Labels tabs of the 'ResponsibleSteel Recognition Assessment Tool'.

Which programmes can apply for recognition?

Only programmes that are operational (i.e. not under development) and that include third-party auditing to a defined audit protocol can apply for ResponsibleSteel recognition. ResponsibleSteel might also proactively reach out to a programme for the purpose of recognition if we consider it relevant for achieving our Vision and Mission. Programmes of global and of regional scope are eligible to apply for recognition with ResponsibleSteel. Likewise, programmes covering both environmental and social issues can apply, but also programmes that are limited to either the environmental or the social dimension.

Entities that participate in a recognised programme and want their input material to qualify for specific levels of ResponsibleSteel's responsible sourcing requirements, will need to have their performance third-party audited (note that the latest [draft version of the responsible sourcing requirements](#) is available from the ResponsibleSteel website and that the final version will be uploaded once approved). In cases where programmes are only recognised for either the social or the environmental dimension or where they lack certain principles within these dimensions, participating entities will have to be third-party audited against the missing dimension and/or the missing principles using the standard of another recognised programme.

Programmes can apply for recognition at any time. However, whether the assessment can be carried out right away depends on ResponsibleSteel's capacity at the time of application.

Reducing potential bias in recognition assessments

The recognition process starts with a programme's self-assessment which is reviewed by the ResponsibleSteel Secretariat and discussed with the applying programme (see the detailed process below). The resulting draft assessment is published for stakeholder feedback to seek additional input and thus help reduce potential bias in assessments. The Secretariat takes account of received input to finalise the assessment and to make a recommendation to the ResponsibleSteel Board. In line with its usual approval process and voting mechanism as outlined in the [Constitution](#), the Board takes the decision on programme recognition.

Recognition assessment process

The table below shows the different steps of the pilot recognition assessments.

Step
1. Programme submits completed 'ResponsibleSteel Recognition Assessment Tool' (including the application form and 15 tabs for self-assessment) to assurance@responsiblesteel.org . The self-assessments must be explained in the 'Comments' fields. Ideally, short extracts from the programme's standard, assurance manual, etc. are provided in the Comments fields. The self-assessments must also be substantiated by 'References' to evidence, and any documented evidence must be submitted to ResponsibleSteel too
2. ResponsibleSteel sends signed Recognition Agreement to programme and asks for counter-signature
3. Upon receiving countersigned agreement, ResponsibleSteel sends recognition fee invoice of USD 3000 to programme
4. Personnel from the ResponsibleSteel Secretariat (called a reviewer) conducts desk-based review of self-assessment and programme documentation
5. Draft assessment is sent to programme for review. Beyond stating whether the programme meets or does not meet the benchmark, the reviewer might make recommendations for improvement on any assessment criterion
6. Assessed programme and reviewer meet virtually to address open questions and discuss the assessment results. Programme may provide further evidence and information to Reviewer
7. Draft assessment is revised as needed based on the conversations and is shared again with programme
8. Programme decides whether it wants to take time to address any identified gaps, whether it wants to stop the recognition process or whether it wants to proceed to stakeholder consultation. If proceeding to stakeholder consultation, programme may identify confidential information in the draft assessment that cannot be published
9. Draft assessment is published on ResponsibleSteel website for at least 30 days for stakeholders to provide input. Stakeholders are informed of the consultation opportunity via the ResponsibleSteel newsletter and might also be approached directly by ResponsibleSteel to seek their feedback
10. Subject to feedback from stakeholder consultation, reviewer revises the assessment. In case of material changes, another feedback loop with the programme is arranged. Programme may provide further evidence and information to Reviewer

11. Assessment is finalised by the reviewer and sent to the ResponsibleSteel Board together with a recognition recommendation
12. ResponsibleSteel Board takes the decision on recognition in line with its regular decision-making process
13. Programme is provided with the full final assessment and is informed of the recognition decision, including any conditions and recommendations attached the decision. ResponsibleSteel points to its Issues Resolution System in case the programme does not accept the decision
14. If programme is recognised: Programme and ResponsibleSteel sign a Memorandum of Understanding to guide their future collaboration, including a commitment to implement any conditions and to consider the recommendations made by ResponsibleSteel. Final assessment is published on the ResponsibleSteel website and results, including conditions and recommendations, are communicated via the ResponsibleSteel newsletter. If programme is not recognised: A summary of the assessment results is published as agreed between ResponsibleSteel and the programme and as outlined in the signed Recognition Agreement
15. Recognition assessment is revised if and when programme changes materially (for example, if a revised standard or assurance methodology is launched) or if the ResponsibleSteel recognition methodology changes considerably. Revisions are not full re-assessments but are limited to those criteria where changes occurred either on the part of the programme or on the part of ResponsibleSteel. The revisions will also include progress on any conditions and recommendations that were placed on the programme.

Recognition assessment mechanism and result

The ‘ResponsibleSteel Recognition Assessment Tool’ comprises 15 tabs showing the assessment criteria and guidance, as well as columns for the programme’s self-assessment and the review of that self-assessment. Some of the criteria must achieve ‘Met’ for a programme to qualify for recognition. These are highlighted with the term ‘Precondition’. There are also ‘Deferred conditions’. These are criteria that are expected to be elevated to ‘Met’ in case the programme is found to meet the respective criterion only partially or not at all. There is no fixed timeline for achieving ‘Met’ on these criteria, but ResponsibleSteel will want to see progress on these issues over time (see the table in ‘Overall recognition assessment result’ for more information).

Apart from the conditional ones, all criteria are considered to be of equal importance, so they are not weighted. The assessment of each criterion leads to one of the following results:

Criterion result	Extent to which programme addresses the criterion	Achieved points
Met	Covers all elements of the criterion	2
Partially met	Covers the elements of the criterion to a large extent	1
Not met	Does not or hardly covers the elements of the criterion	0

Assessing whether a programme aligns with the stated criteria will not always be straightforward and will sometimes require interpretation and a judgement call from the self-assessor and reviewer. Especially where interpretation and judgement calls are made, the assessor and reviewer must explain in the ‘Comments’ column how they interpreted the respective criterion and why they judged the respective programme the way they did.

Assessment of a programme’s standard

The criteria for assessing a programme’s standard are spread across 12 tabs of the assessment tool. The names of the tabs mirror the 12 Principles of the ResponsibleSteel Standard. The assessment of the standard is more detailed than that of the other three tabs in the assessment tool and follows a different logic. The purpose of assessing a programme’s standard is to establish whether its objective and ambition are aligned with that of ResponsibleSteel. We recognise that there are different ways for achieving a certain objective and ambition. Rather than being prescriptive and doing a word-for-word comparison at the level of the 270 requirements of the ResponsibleSteel Standard, we use the 49 criteria of our Standard and their stated objective as the benchmark. Guidance on how a programme should meet the benchmark comes in the form a summary of the criterion’s underlying requirements. For example, the objective of the ResponsibleSteel Standard’s criterion on legal and signatory compliance and its summarised underlying requirements are as follows:

<p>Objective:</p> <p>The site has effective procedures in place to ensure that it complies with applicable law and operates in consistence with formal agreements* it is committed to meet. (*e.g. UN Global Compact)</p>
<p>Summarised requirements:</p> <ul style="list-style-type: none"> • Legal and signatory obligations are identified and understood • Obligations are reflected in processes and activities • Site compliance is monitored • Legal developments are monitored • Legal compliance evaluations are carried out • Non-complying situations are addressed • Records to demonstrate regulatory compliance are maintained

The summarised requirements guide the assessor and reviewer in allocating a result to the assessed criterion. Where a programme’s standard addresses the objective of the specific ResponsibleSteel criterion in a similarly comprehensive manner as judged by considering the summarised requirements, this results in the criterion being ‘Met’. Standards that are mostly made up of non-binding guidance or are comprised of very high-level criteria that leave a lot of room for interpretation, cannot achieve ‘Met’. The non-binding nature of guidance and loose framing of a standard mean that one cannot be confident that the programme and its participating entities will interpret and implement the standard in a consistent manner. Overall, the assessment of a programme’s standard will often be a judgement call rather than a rigid scoring. However, the approach outlined above allows for a similar objective to be reached in different ways.

The following outcomes are possible when assessing the standard criteria:

Criterion result	Extent to which the programme’s standard addresses the objective of the criterion	Achieved points
Exceeded	Goes beyond the objective since standard is more ambitious than the summarised requirements	3
Met	Fully covers the objective since standard is equally ambitious and equally broad as the summarised requirements	2
Partially met	Covers the objective to a large extent but ambition is somewhat lower or is less broad (i.e. at least 50% of the summarised requirements are covered)	1
Not met	Hardly covers the objective since ambition is much lower than that of the summarised requirements or is defined very narrowly (i.e. less than 50% of the summarised requirements are covered)	0

The criterion result ‘Exceeded’ highlights a strength of the considered programme. It also points to opportunities for ResponsibleSteel to strengthen its own Standard, and these opportunities will be taken into account when our Standard comes up for review.

To qualify for recognition, a programme has to achieve at least ‘Partially met’ for each criterion that its standard addresses. A criterion that is not addressed by a programme’s standard does not contribute to the assessment. In addition, the programme must achieve at least 60% of the maximum achievable points in each of the 12 standard tabs. The maximum achievable points are calculated based on ‘Met’, not based on ‘Exceeded’. The table below summarises the necessary results for each of the 15 tabs for a programme to be recognised.

Overall recognition assessment result

The points that a programme achieves in each criterion are added up to produce the total achieved points. The assessment tool automatically does this calculation. To be granted recognition, a programme must reach:

- at least 60% of the maximum of achievable points in each of the 15 tabs of the assessment tool (60% rounded to the nearest full point)
- at least 'Partially met' for each criterion in the 12 standard tabs, if the programme covers the respective criterion
- 'Met' for all criteria marked as 'precondition'

The following table outlines the overall assessment result for all 15 tabs of the assessment tool.

Assessment tool tab	No. of criteria	Maximum of achievable points	Minimum points to be recognised (60% of max.)	Additional requirements
1 Governance and management	14	28	17	1 precondition 7 deferred conditions
2 Assurance and Oversight	24	48	29	1 preconditions 11 deferred conditions
3 Claims and Labels	5	10	6	3 deferred conditions
4 Corporate Leadership	2	4	2	All criteria that a programme's standard addresses have to achieve at least 'Partially met', i.e. 1 point. Criteria that are not covered by the programme do not contribute to the assessment. This means that the maximum of achievable points will be reduced by 2 for each criterion that is not
5 ESG Management Systems	5	10	6	
6 Occupational Health and Safety	7	14	8	
7 Labour Rights	10	20	12	
8 Human Rights	3	6	4	
9 Local Communities	3	6	4	
10 Stakeholder Engagement and Communication	4	8	5	

11 Climate Change and Greenhouse Gas Emissions	5	10	6	addressed by the programme's standard. The maximum of achievable points is calculated on the basis of 'Met', i.e. 2 points per criterion
12 Noise, Emissions, Effluents and Waste	4	8	5	
13 Water Stewardship	4	8	5	
14 Biodiversity	1	2	1	
15 Closure and Decommissioning	1	2	1	

Recognition claims

Recognised programmes may state “Our programme xyz is recognised by ResponsibleSteel” or, if conditions are attached to recognition, “Our programme xyz is recognised by ResponsibleSteel subject to certain conditions”. This claim has to be accompanied by a link to <https://www.responsiblesteel.org/recognition/> where information on recognised programmes and conditions will be displayed. This will ensure that assessment results and conclusions drawn from the recognition assessments are appropriately represented. Recognised programmes may use a different claim than the one above if that claim has been agreed with ResponsibleSteel.

Annex

Which other recognition and alignment programmes we considered

In defining the criteria for the ResponsibleSteel recognition programme, we looked to the work of ISEAL, the global membership organisation for credible sustainability standards. Namely the [ISEAL Codes of Good Practice](#) for Standard-Setting and Assurance, the [ISEAL Benchmarking Good Practice Guide](#) and the [ISEAL Sustainability Claims Good Practice Guide](#) served as our main references. We also took inspiration from other publicly available benchmarking and recognition procedures, such as those by [ASI](#) (Aluminium Stewardship Initiative), [GSSI](#) (Global Sustainable Seafood Initiative), [OECD](#), [RMI](#) (Responsible Minerals Initiative) and [SSCI](#) (Sustainable Supply Chain Initiative).