EPA Environmentally Preferable Purchasing Program Pilot to Assess Standards and Ecolabels for EPA's Recommendations to Federal Agencies

Final PILOT Assessment Guidelines

Contents

General Scoping Information

The following information is requested of organizations completing the assessment.

1. Name of Standard/Ecolabel _____
2. Who is the primary contact person for this Standards Developer, Certification Body and/or Scheme Owner? _____
3. To what product categories does the ecolabel or standard apply? _____
4. Which Section(s) of this assessment did your organization address? _____
5. If there are Sections not addressed, please explain why they are not applicable_____
6. Please provide any readily available documentation to elucidate product availability for the federal marketplace including presence of a competitive bidding climate, indication of business demographics (i.e. disabled veterans, women owned, small or micro businesses), and/or percent of the market certified to the standard/ecolabel for that product category.

OMB Control No. 2070-0199
Approval expires 06/30/19
Responses to this collection of information are voluntary. The public reporting and recordkeeping burden for this collection of information is estimated to average 8.5 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, included through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
SECTION I: PROCESS FOR DEVELOPING STANDARDS Consistent with Section 12(d) of the National Technology Transfer and Advancement Act (PL 104 – 113) and the Office of Management and Budget Circular A-119, EPA Recommendations give preference to Voluntary Consensus Standards (VCS) (defined below). Other standards may be considered in cases where VCS are inconsistent with law or otherwise impractical (e.g. in cases where VCS do not exist, a VCS does not address a particular environmental or human health impact, or a VCS would not be as effective at meeting the criteria outlined in Section II).			
I.1	L	The standard is a voluntary consensus standard as defined by OMB A119 Section 4.[3] If a standard is an ANSI approved American National Standard, then the standard is considered a voluntary consensus standard and the SDO does not need to provide additional information per the remaining Section I criteria. Other organization's standards development processes may also meet the OMB A-119 definition of voluntary consensus standard.	-ANS Document # -Other indication of the standard being a VCS (to be determined by EPA) For the pilot, if not an ANS then Criteria I.2-I.19 apply.
I.2	B	The SDO actively sought participation[4] from directly and materially affected stakeholders including producers, users, public interest groups, locally affected groups/persons, and others.	-Documentation of interest categories defined by SDO. - Outreach plan to identify and contact a diverse set of stakeholders. - Evidence of active outreach such as email invitations and communications with a diverse set of stakeholders. -- Must have evidence of identifying stakeholders AND evidence of outreach to them if 2013 and beyond; Or, where documentation cannot be located for standards developed prior to 2013, attestation within the pilot submission by the SDO indicating the criteria was met is acceptable.

[1] B=Baseline, L=Leadership, I=Informational

[2] It is within the IAE's purview to request multiple sources of evidence or determine if multiple sources are needed for a criterion to be sufficiently evaluated.

[3] Per the revised OMB Circular A119 Section 5b, there is a preference for the use of voluntary consensus standards. The Circular does not preclude the use of other standards in rulemaking, procurement, or other program activities in cases where voluntary consensus standards do not exist or use of existing voluntary consensus standards would be inconsistent with law or otherwise impractical, including where use of a voluntary consensus standard would not be as effective at meeting the agency's regulatory, procurement or program needs. EPA has determined that American National Standards meet the definition of voluntary consensus standards per the revised OMB A119 available at https://www.whitehouse.gov/sites/default/files/omb/inforeg/revised_circular_a-119_as_of_1_22.pdf. Other organization's standards development processes may also meet this definition; EPA would update this criterion and sources of evidence accordingly.

[4] Active outreach may include but are not limited to identifying and contacting stakeholders, inviting participation, and maintaining appropriate communications with stakeholders.

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I.3	B	Key standard setting activities[5] were announced in suitable media[6] in order to encourage participation in standards development activities by stakeholders directly and materially affected by the standard.	- During the pilot this will apply to <u>some</u> key activities (as outlined in footnote 5). - Must have evidence of announcements made in suitable media Or, where documentation cannot be located for standards developed prior to 2013, attestation through the pilot submission by the SDO indicating the criteria was met is acceptable.
I.4	B	Timely and adequate[7] notice was made to generate stakeholder participation in key standard setting activities.	- Schedule of notifications published on key standards activities and deadlines imposed for participation. - Notifications of key standards activities indicating when posted. - Minimum threshold for notice that a draft standard was available is 30 calendar days Or, where documentation cannot be located for standards developed prior to 2013, attestation through the pilot submission by the SDO indicating the criteria was met is acceptable.
I.5	B	Directly and materially affected stakeholders – including producers, users, public interest groups, locally affected groups/persons, and others – were able to participate in the standard development process in a timely manner[8]including by accessing draft standards documents, providing input to draft standards documents, receiving meaningful written response regarding how their input is acted on or not acted on, and where voting/balloting is used, having their input made available to the voting members and considered before a final vote is taken on the standard. Note:	-Instructions for accessing information on key activities. -Publicly accessible online postings of draft documents and comment periods. -Policy for a minimum number of days in a comment period. -Comments on draft documents received from stakeholders. -Meeting minutes showing stakeholder participation. -Online posting of written comments.

[5] Key standard setting activities represent the significant stages of the standard's development, including any action to create, revise, reaffirm, or withdraw a standard, the establishment of a new decision-making body; Selection and scoping of product categories and product functional characteristics; Call for members/ participation (voting, participating, and/or commenting); Selection and development of environmental/ human health criteria; Availability of proposals for comment and/or vote; Responses to comments posted; Modified proposals as a result of comments available for comment and/or vote; Announcement of final action; Complaints and/or appeals received; Publication of standard; Other key activities as determined by the SDO.

[6] Suitable media should match up to the methods utilized and available to materially affected persons (including public interest groups, affected local and indigenous persons). Suitable media could include (but are not limited to): maintenance of an open email subscription list/ list serve throughout the SD process, email notifications, publication of press releases, online publication, newsletters, use of social media (such as Linked-in announcements and updates), posting of notifications in external standards' or trade media bulletins and news-services such as ANSI's "Standards Action". Note: A posting on a website to check back for more information and updates periodically is not considered sufficient.

[7] Sufficient time varies by key standard activity but is generally defined as keeping stakeholders up to date and engaged in the standard setting activities, and providing sufficient time for response from stakeholders. For example, ANSI essential requirements stipulates 30-day comment periods for proposals 5 pages or less in length, 45-days for readily available proposals (available within 1-day of a request to receive it), or 60-days if the above 2 options are not applicable.

[8] Timely manner is defined as keeping stakeholders up to date and engaged in the standard setting activities, and providing sufficient time for response from stakeholders.

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		Participation does not necessarily include a voting role, but goes beyond public notification that a draft exists.	-Online posting of written responses to comments from the SDO. -Other evidence of stakeholder participation as supplied by SDO -"Materially affected stakeholders" include the technical committee, not necessarily the general public. -Response must include proof of notice – either public draft of standard or other notice. -Response must include proof of meaningful interaction with stakeholders on the content of the standard, which could take the form of any of the evidence suggestions above (except for the first two which deal with timeliness) -Response does not require proof that the SDO provided 30 days for the technical committee to provide comment. - If the standard was developed before 2013, a detailed description provided by the SDO via the pilot submission is acceptable.
I.6	B	Minutes of all committee and decision-making body meetings, comments and responses thereto, and complaints and appeals made during the standard development process were available to stakeholders for inspection in a timely manner.	- Instructions for accessing information on key activities. - Policy on posting meeting minutes, comments & responses, complaints & appeals. - Meeting minutes of decision making body with documentation of prompt date of posting. - Complaints and appeals made. - Comments and responses thereto posted publicly to the SDO/standards website. Or, where documentation cannot be located for standards developed prior to 2013, attestation through the pilot submission by the SDO indicating the criteria was met is acceptable. - "Stakeholders" include the technical committee, not necessarily the general public. - Any one of the listed sources of evidence suffices, but the evidence must cover minutes, comments/responses, and appeals/complaints.
I.7	B	A procedure or a policy ensures fair and equitable consideration of timely stakeholder input during the standard-development process[9]. Input on the standard received was documented, adjudicated[10], and responded to by the SDO in accordance with its procedures.	- Policy/ procedure for ensuring stakeholder input during standards development process are fairly considered. - Access to all, but for assessment, review a sample of stakeholder comments and responses to comments on draft documents – direct responses to individuals or general responses to key themes.

[9] The standard setting process includes key steps starting with the announcement of a new standard or review of an existing standard, and ending with the publication of the standard and all activities between.
[10] Adjudicate - make a formal judgment or decision about a problem or disputed matter. (from Google)

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			- Other evidence of stakeholder participation as supplied by SDO - If the standard was developed before 2013, a detailed description provided by the SDO via the pilot submission is acceptable. - "Stakeholders" include the technical committee, not necessarily the general public.
I.8	L	Option 1: There was no fee or travel requirement to participate in the development of the standard. OR Option 2: If there was a fee, it is minimal or offset by sliding scale for individual/NGO/academic stakeholders. The SDO provided travel funds to hardship parties/stakeholders without financial means to attend in-person meetings, virtual access to meetings, fee waivers, and/or other mechanism to retain stakeholders' ability to participate in standards activities.	- Notification that participation is free. -Fee schedule showing sliding scale / waivers. -Travel funds policy. -Evidence of virtual access to meetings (e.g. webinar recordings, conference call lines) - If the standard was developed before 2013, a detailed description provided by the SDO via the pilot submission is acceptable. - If the response addresses meeting fee only, it will be marked as "not enough info"
I.9	L	Membership of any decision-making body/bodies was not unreasonably restricted on the basis of technical qualifications or other such requirements (e.g., membership in an organization). Restrictions for the purposes of achieving a predefined target size of the body, achieving a balance of stakeholders, and engaging diverse expertise shall be considered reasonable restrictions.	-Written policy for selection of technical committee members. -Roster of voting members of decision- making body. - List of restrictions (if any) on voting membership of decision-making body/bodies. Explanation as to why they are reasonable. - The criterion is applicable to all decision-making bodies. - Submission of the roster alone is not sufficient. SDO should submit a roster and the policy and/or an explanation of the process in the pilot submission. - A submitted roster must clearly present membership by stakeholder group. If the membership appears balanced among the groups, it will be sufficient evidence. The IAE will not conduct analysis to categorize voting members into groups in order to assess against this criterion. - The IAE will review any restrictions noted for reasonableness against the 3 possible reasons provided in the criterion. - If the standard was developed before 2013, a detailed description provided by the SDO via the pilot submission is acceptable.
1.10	L	The SDO achieved a balance of interest in any decision-making body/bodies by ensuring that no single interest	- Guidelines/Policy for balance of interest in forming decision-making body parallel with ANSI Essential

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		category constituted more than a one-third (33%) of the membership of that body if there are 4 or more interest categories, or 40% of the membership if there are 3 designated interest categories.[11]	Requirements 1.3 and 2.3. - Documentation that no more than 1/3 of decision-making body/bodies is from one interest category, or 40% if there are only 3 interest categories. - The criterion is applicable to all decision-making bodies. - Decision-making body is defined by the SDO. - If the standard was developed before 2013, a detailed description provided by the SDO via the pilot submission is acceptable.
I.11	B	Decision making procedures/guidance ensured that no single interest category or organization can dominate[12] resolutions made by the decision-making body.	-Guidelines/procedures that reflect that no organization or interest category, as defined by the SDO can dominate decision-making. -Evidence that no directly and materially affected party has submitted a written complaint about dominance (see ANSI Essential Procedures Section 2.2) -Evidence that guidance/ procedure was followed; e.g. voting records on key decisions. -Policy references or parallels ANSI Essential Requirements "Lack of Dominance" criteria at 1.2 and 2.2: "The standards development process shall not be dominated by any single interest category, individual or organization. Dominance means a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints." - "Interest category" is defined by the SDO. - If the standard was developed before 2013, a detailed description provided by the SDO via the pilot submission is acceptable.
I.12	B	Standards Development Organization has a conflicts of interest[13] policy or procedure that addresses potential conflicts of interest and in particular, that funding sources for standards development are fully disclosed.	A disclosure statement somewhere in the standard document that external funding was received and in compliance with conflict of interest policy.

[11] Per OMB A119 sect 2e(ii), "The standards development process should be balanced. Specifically, there should be meaningful involvement from a broad range of parties, with no single interest dominating the decision-making." Definition of "balance of interest" may also be informed by ANSI Essential Requirements (2015), which defines and "balance" as "a) no single interest category constitutes more than one-third of the membership of a consensus body dealing with safety-related standards or b) no single interest category constitutes a majority of the membership of a consensus body dealing with other than safety-related standards. Additional steps have been taken by a number of SDOs to further ensure a balance of diverse interests (e.g. limiting number of votes per organization, confirming accuracy of affiliations, actively recruiting additional members from other stakeholder categories).

[12] ANSI Essential Requirements 1.2 defines "dominate" as "to take a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints."

[13] Conflict of interest – a situation in which a person or organization is in a position to derive personal benefit from actions or decisions made in their official capacity. (from Google)

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		If significant external funding is made by one or more parties to support standard development, the SDO shall put in place supplemental procedures to ensure that no domination occurs and balance of interests is respected in the standard development process. "Significant funding" shall mean more than $10,000 or its in-kind equivalent, or 20% or more of the anticipated funding needs of the SDO for standard development.	- If the SDO has not received funding or other significant support from an external source, then they can self-attest that point. - If the SDO receives funding or other significant support from an external source, it must have a conflict of interest policy. -Documentation of policy or procedure on conflicts of interest. -Original sources of funding for standards development are disclosed to stakeholders throughout the process. -Formal policy separating functions of organization if there is a potential conflict of interest. -Potential conflicts of interest are disclosed at the stakeholder outreach stage so that parties with competing or adverse interests can be invited to participate in the standard development process and the integrity of balance requirements is maintained.
I.13	B	Reasonable efforts to achieve consensus[14] are made by the decision-making body and SDO.	-Policy/ procedure that lays out decision making process and consensus definition including: applicable definition of what constitutes consensus (percentage of affirmative votes required to approve any ballot), how it is reached, and that the standard setting process includes procedures for registering comments. -Policy/procedure shows an adequate process for resolving objections; objectors are each advised as to the reasons why the objection was resolved or not resolved; and the members of the decision making body are able to change their votes after reviewing the comments. -Agenda and/or minutes of key meetings showing that efforts towards consensus were on the agenda, and appropriate time was given to reach decisions and reach consensus. Examples include: • Documentation reflects that key development committees selected their own chairmen from the relevant stakeholder group and chairmen were not "selected" by administrators in the SDO. • Documentation reflects frequent straw votes were made at the committee, work group, and technical committee levels. • Documentation shows that where straw votes suggested significant disagreement, additional discussion was scheduled (see agenda and/or minutes) • Proceedings reflect a lack of written criticism, complaint, or "no votes" in straw or final voting • Proceedings reflect that where disagreement was sustained, the SDO made efforts to bring in a third party mediator, changed the chairmanship,

[14] Per OMB A119 Section 2e(v) "Consensus is defined as general agreement, but not necessarily unanimity. During the development of consensus, comments and objections are considered using fair, impartial, open, and transparent processes."

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			changed committee composition, referred the matter back to a technical or development committee, or otherwise offered mediation/dispute resolution assistance to resolve the disagreement.
I.14	B	Objections regarding procedures received during the standard setting process are documented and made available to interested parties in a timely manner by the standard development organization. Objectors are advised as to their right of appeal. If an objection is made in writing, the SDO makes a timely and meaningful response to the objection, which response is in writing and made available. If an objection is continuing and is not resolved in the development process, objectors are ultimately advised as to their right and scope of appeal.	-Documentation of a diverse sample of the objections received during the standard setting process. -Agendas and/or minutes of key meetings showing objections and their resolution. -Sample of records of communication between the objector and the SDO reflecting work toward resolution. - To meet the first part of the criterion, the SDO must provide 1) Policy or procedures on communication of objections and 2) Notification of right to appeal, OR agenda/meeting minutes that demonstrate both in practice. - To meet the second part of the criterion, some record of the actual practice of resolving specific objections in a timely and meaningful manner must be provided; a policy/procedures document alone does not suffice. If the SDO claims that no objections were received, that self-attestation is acceptable. - Or, where documentation cannot be located for standards developed prior to 2013, attestation through the pilot submission by the SDO indicating the criteria was met is acceptable.
I.15	B	A documented appeals mechanism is published to address procedural appeals following the final decision.	-Proof that the relevant policy/procedure was made public and or available to participants before the standard development process (e.g. website posting, email, etc.) Or, where documentation cannot be located for standards developed prior to 2013, attestation through the pilot submission by the SDO indicating the criteria was met is acceptable.
I.16	B	The process for initiating the appeal is straightforward, requires simple notice (articulation) of the basis for the appeal, and does not impose redundant or unnecessary costs, paperwork or documentary requirements. A reasonable time[15] is offered from the time of the final vote to the deadline for lodging notice of appeal	-Appeals policy and procedures available (easy to find with a clear process defined in straightforward language). SDO must provide a description or a link to the appeals process. -Documentation of policy and/or disclosure of any financial imposition made on stakeholders undertaking an appeal. -Appeals must be submitted to a body not directly involved in developing the standard.

[15] A reasonable time to file a notice of appeal, as long as the paperwork and documentation burden is limited, is generally considered to be at least 15 days from the date of the final vote.

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I.17	L	At the outset of the standard development process the SDO identified existing standards that may be in conflict or incompatible with the draft standard and demonstrated effort to coordinate and/or resolve conflicts/incompatibilities with those standards, or merge standards, as appropriate.	-SDO documents that at the outset of the standard development process, it searched for potentially conflicting / incompatible standards in existence or under development. -If standards identified as conflicting/incompatible, documentation of outreach to other standards developer and effort to resolve issue. -Evidence may be that the SDOs sought to merge efforts. Evidence may also be that a request was made to a critical stakeholder or an accreditation body to help lead discussions to align or merge efforts. Or -Rationale for why an existing standard was not approached, including, for example, because of an insufficient level of protection or fundamental geographical factors or fundamental technological problems. Or, where documentation of outreach to other standards developers cannot be located for standards developed prior to 2013, attestation through the pilot submission by the SDO indicating the criteria was met is acceptable.
I.18	B	Standard has been opened for either revision or reaffirmation at least every five years. For a younger standard, it is scheduled to be revised or reaffirmed at least every 5 years.	-Policy or standard text stating schedule for expected revision or re-affirmation of the standard. -Text supplied shows that standard is scheduled to be revised/ reaffirmed every 5 years or less from the date of the last standard version.
I.19	L	The SDO shall make available to the participating stakeholders an analysis of the environmental and human health hotspots affecting the product category and for the life cycle stages under consideration. Such analysis shall utilize documented hotspot methodologies for identifying and analyzing such hotspots. Any participant shall be given the opportunity to provide supplementary information if they wish.	- Documented hotspots (or related) methods and findings. - Evidence that these findings were shared or made available to stakeholder as part of standard development process. – Procedure or policy indicating that stakeholders were able to introduce supplementary information. -SDO must provide evidence that LCA or hotspot analyses were shared with stakeholders, such as documentation of communication, or meeting agenda or minutes discussing these analyses. SDOs may alternately provide a policy/procedure stipulating that stakeholders are to receive these analyses. -SDOs may self-attest that participants have opportunities to provide supplementary information on hotspots/LCAs because this may not be specified in policy. They may alternately provide a policy/procedure showing that stakeholders are able to introduce supplementary information. They may alternately point to evidence of this opportunity occurring in practice by citing meeting agendas and/or minutes. -This criterion is not applicable to single attribute standards.

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SECTION II: ENVIRONMENTAL EFFECTIVENESS OF THE STANDARD			
II.1		RELEVANT HOTSPOTS **II.1.1** For standards claiming to address the <u>pre-extraction and raw materials sourcing stages</u>, the standard meaningfully and measurably addresses: *Flooring & Furniture:* [NOT ASSESSED AT THIS TIME FOR FLOORING AND FURNITURE.] *Paints/Coatings:* • L - Percent recycled, renewable and/or bio-based content • L - Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions And **II.1.2** For standards claiming to address the <u>manufacturing stage</u>, the standard meaningfully and measurably addresses: *Flooring & Furniture:* • B - Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • L - Ozone depletion potential • L -Criteria air pollutants, air toxics, and photochemical smog • L - Pollution discharges to water • L - Water use • L - Solid waste generation Note that chemicals of concern have also been identified as a potential hotspot in the manufacturing stage. These issues are addressed in criteria II.5, II.6, and II.7. *Paints/Coatings:* • None identified - LCAs indicate that the manufacturing stage is a minor contributor to the overall impacts of paints/coatings Note that chemicals of concern have also been identified as a potential hotspot in the manufacturing stage. These issues are addressed in criteria II.5, II.6, and II.7. And **II.1.3** For standards claiming to address <u>product chemical emissions in the installation/use stages</u>, the standard incorporates by reference or aligns with: *Flooring:*	- Text of the standard provides a clear protocol for measuring whether a product has achieved the standard's target level(s) of performance for the hotspot(s) addressed - SDO justification for each of the impact categories claimed to be meaningfully and measurably addressed. - Unacceptably vague criteria for a hotspot would include those stating that an entity should "be involved in" or "promote" an activity, approach, or philosophy without specifying resulting performance or prescriptive outcomes. Note that both performance criteria and prescriptive criteria may appear in the same standard. - For Baseline credit, minimally, the text of the standard requires a management plan approach to addressing the hotspot. A "management plan" approach is acceptable. -For Leadership credit, the text of the standard requires specific approaches and/or measures to demonstrate performance outcomes are achieved per the hotspot. "Management plans or policies" approaches are not acceptable. - Where hotspots refer to specific standards (e.g., for VOC emissions), SDOs can demonstrate compliance either by incorporating the relevant standard by reference, or by demonstrating alignment with the standards (i.e., performance requirements equivalent to or stricter than the relevant standard). *Baseline Criteria Requirements:* -Within a given lifecycle stage, standards must meet the hotspot sub-criteria for all applicable baseline hotspots (i.e. those they are claiming to address) in order to be counted as a "meets" for that lifecycle stage. - For the pilot, given II.1.1 is not being assessed at this time, for multi-attribute standards to meet II.1 overall, it is acceptable to 'not meet' II.1.2 or II.1.4, but II.1.3 must be met. *Leadership Criteria Requirements:* For lifecycle stages where leadership hotspots address only one environmental impact area, only one leadership hotspot is needed to be awarded a leadership credit; if leadership hotspots in a given

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		• B - "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1" (2010) (CDPH Standard Method 1.1-2010) (This is the emission testing method for California Specification 01350.) Note that additional chemicals of concern have been identified as potential hotspots in the installation/use stage. These issues are addressed in criteria II.5, II.6, and II.7. *Furniture:* • B - ANSI/BIFMA X7.1 Standard for Formaldehyde and TVOC Emissions • L - "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1" (2010) (CDPH Standard Method 1.1-2010) (This is the emission testing method for California Specification 01350.) (Note that if this VOC leadership criterion is met, ANSI/BIFMA X7.1 Standard does not need to be incorporated by reference.) • L- California's furniture flammability standard (Technical Bulletin 117-2013) and requires products to be labeled as not containing flame retardant chemicals consistent with the manner described in Section 19094 of the California Business and Professions Code Note that additional chemicals of concern have been identified as potential hotspots in the installation/use stage. These issues are addressed in criteria II.5, II.6, and II.7. *Paints/Coatings:* • B -California Air Resources Board's (CARB) Suggested Control Measures (SCM) 2007 for VOC content for Paints/Coatings (addresses smog formation not indoor air quality) • L - "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1" (2010) (CDPH Standard Method 1.1-2010) (This is the emission testing method for California Specification 01350.) (Note that if this VOC leadership criterion is met, the baseline (CARB) does not need to be incorporated by reference.) And **II.1.4** For standards claiming to address the end of life stage, the standard meaningfully and measurably addresses: *For all sectors:* • B - Solid waste generation (e.g., design for disassembly, product take-back programs, remanufactured/repurpose capabilities, or minimizing disposal impacts).	lifecycle stage address two or more impact areas, two leadership hotspots are needed to be awarded a leadership credit.

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II.2	L	The standard and/or supplementary materials that accompany the standard clearly identifies any known trade-offs among approaches to address multiple impact areas.	- Must provide sources of evidence including but not limited to text of standard, supplementary materials, meeting minutes that accompany the standard addressing trade-offs among impacts (if applicable, as determined by the SDO). - Simply addressing multiple environmental impacts is not sufficient. - A requirement that proposed environmental criteria identify tradeoffs is considered sufficient, even if the standard being evaluated does not identify specific tradeoffs itself. - Tradeoffs addressed must be between different environmental impact areas, not between environmental impacts and non-environmental concerns.
II.3	I	**Informational:** Please provide information regarding the research and assessment methods used to determine the approach to addressing impacts. Note: EPA is interested in the environmental and/or human health criteria in the standard being based on recent available research (at the time the standard was developed) that was peer-reviewed and available for stakeholder review. Additionally, standards developers should use the most appropriate types of assessment methods for the determination of the impacts or attributes.[16]	Optional, to be determined by the SDO
II.4	B	If a weighting scheme is used, the standard, website, meeting minutes, and/or other supplementary materials that accompany the standard fully and transparently explains the weighting methodologies/point allocations, including identification of the number of points or credits associated with each attribute and a clear explanation of how these points are determined.[17] This criterion is only applicable to environmental and human health attributes.	- Where standards award a different number of points or credits for each attribute (e.g. energy reduction, EMS certification, etc.), must provide identification of the number of points or credits associated with each attribute and a clear explanation of how these points are awarded. - Evidence provided must be publicly available. - N/A if all environmental attributes and environmental and human health impacts have equal value; no additional weighting or adjustment is made for certain categories or types of criteria.

[16] Impact assessment methodologies for issues of toxicity, land use, biodiversity, water use and other spatially explicit impacts are nascent in LCA and there is not sufficient scientific evidence to reflect their effectiveness. For those impact areas, LCA is not sufficient in determining relative importance and other methods (e.g., traditional toxicity risk assessment studies, hazard identification, biodiversity surveys/IUCN redlist threats, peer-reviewed scientific literature) should be utilized in making these determinations. Given the vast data gaps in life cycle assessment databases on these impact areas, even if new methods exist, the results of the studies cannot be relied upon to determine importance.

[17] There are a number of potential concerns surrounding weighting and aggregating of impacts. Weighting and aggregation of impacts introduces levels of subjectivity above and beyond the inherent uncertainty in any given impact indicator result. Therefore, such approaches run the risk of reducing transparency—diminishing the opportunity to improve purchasers' environmental literacy and hiding potential environmental and/or human health trade-offs.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
II.5	L	The standard includes environmental and human health protection criteria to decrease the toxicological hazard[18] of the product through one or more of the following: alternatives assessment; safer substitution; reduction or elimination of hazardous substance(s); or alternative design approaches. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI). The standard fully and transparently explains its methodology for the criteria. Alternatives assessment criteria are in accordance with the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives.	- Must specify at least 1 of the 4 methods listed in the criterion. If alternatives assessment is the only method specified, must provide evidence that the assessment was conducted using the same basic steps as the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives. - SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted. Carcinogens •Listed by the International Agency for Research on Cancer as: -Group 1: carcinogenic to humans -Group 2A: probably carcinogenic to humans •Listed by the National Toxicology Program as: -Known human carcinogen -Reasonably anticipated human carcinogen •Meet the criteria under the Globally Harmonized System of Classification and Labeling (GHS) for the carcinogenicity hazard class (codes H350, H351) Mutagens •Globally Harmonized System of Classification and Labeling (GHS) -Category 1A: Chemicals known to induce heritable mutations in germ cells of humans -Category 1B: Chemicals which should be regarded as if they induce heritable mutations in the germ cells of humans -Category 2: Chemicals which cause concern for humans owing to the possibility that they may induce heritable mutations in the germ cells of humans Reproductive toxicants •Listed under the State of California Safe Drinking Water and Toxic Enforcement Act (Prop 65) for reproductive or developmental toxicity •Meet the criteria under the Globally Harmonized System of Classification and Labeling (GHS) for the Reproductive Toxicity hazard class (codes H360 Categories 1A and 1B, H361, H362) PBT substances •Stockholm Convention Persistent Organic Pollutants

[18] An intrinsic hazard is the potential for harm based on the chemical structure and properties that define its ability to interact with biological molecules. A hazard-based approach, grounded in Green Chemistry principles, can reduce the use of hazardous substances, and lower overall risk to people and the environment. While intrinsic hazard assessment may be the most cautious approach to identifying potential chemicals of concern, intrinsic hazard assessment does not necessarily reflect the overall safety/risk of the product and it does not represent the findings of a comprehensive risk assessment, as it does not consider possible or probable exposure pathways. As such, the results of such an assessment do not necessarily reflect product safety nor the potential trade-offs associated with alternatives/substitutes elsewhere in a product's lifecycle nor impacts on the functional ("fitness for use") performance of the product. Finally, hazard assessments may not distinguish between hazardous raw materials versus post-reacted and finished products.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
			U.S. – Canada Binational Toxics •Toxics Release Inventory (TRI) PBT chemicals •Chemicals listed in 40 CFR 372.28 due to their PBT characteristics •RCRA Waste Minimization Priority Chemicals EPA TRI complete, current list (also at 40 CFR 372.65): http://www2.epa.gov/sites/production/files/2015-11/tri_chemical_list_for_ry15_11_5_2015_1.xlsx Others sources used could include, but are not limited to: •The Toxic Substance Control Act Test Submission Database (TSCATS): http://www.ntis.gov/products/ots.aspx and http://yosemite.epa.gov/oppts/epatscat8.nsf/ReportSearch?OpenForm •Hazardous Substances Data Bank (HSDB): http://toxnet.nlm.nih.gov/ •Integrated Risk Information System (IRIS): http://www.epa.gov/IRIS/ •The National Toxicology Program (NTP): http://ntp.niehs.nih.gov/ •US EPA HPV Challenge Program: http://www.epa.gov/hpv/ •The Distributed Structure-Searchable Toxicity Database Network (DSSTox): http://www.epa.gov/ncct/dsstox/ •Acute Exposure Guideline Levels (AEGLS): http://www.epa.gov/oppt/aegl/pubs/chemlist.htm •The Agency for Toxic Substances & Disease Registry (ATSDR) Toxic Substances Portal: http://www.atsdr.cdc.gov/substances/index.asp •US EPA: Public Databases Routinely Searched for Hazard Information: http://www.epa.gov/hpvis/hazardinfo.htm •U.S. Environmental Protection Agency's (EPA) Design for the Environment Program (DfE)—DfE's Alternatives Assessment Criteria: http://www.epa.gov/dfe/alternative_assessments.html •U.S. Environmental Protection Agency's (EPA) TRACI - The Tool for the Reduction and Assessment of Chemical and other environmental Impacts
II.6	L	The standard includes criteria to require or incentivize disclosure (either publicly or to a third party) of all intentionally added chemical substances present in each homogenous material in the final product at 1000 parts per million (.1%) or greater.	- Text of standard indicating it is solely a process and production method (PPM) standard, or a standard that does not address the environmental or human health performance of a finished product. -Text of standard requires chemical disclosure at the specified threshold(s). -SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
		Note: If the standard is a process and production method (PPM) standard, this Guideline is not applicable, and will not be used in scoring.[19]	and evidence that source (s) are reputable. (See II.5 Sources of Evidence "Lists of Lists")
II.7	L	The standard includes criteria to require or incentivize public disclosure of the intentionally added chemical substances of concern present in each homogenous material in the final product at 100 parts per million (0.01%) or greater. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI).	- Text of standard requires or incentivizes chemical disclosure at the specified threshold(s). - SDOs indication of the source(s) consulted in developing criteria to identify chemicals of concern.
II.8	L	Where they may exist, standard incentivizes the manufacturer to publicly disclose any of the following: - the results of existing LCAs, - an Environmental Product Declaration (EPD) pursuant to ISO standards; and/or - the results of other environmental and human health impact assessments	- Text of standard: standard requires or gives credit for public disclosure of results of existing LCAs and/or other existing assessments of environmental and human health impacts. - If SDO does not provide specific location of evidence, the standard will be searched for the following key words: "impact assessment", "EPD", "life cycle" or "lifecycle" and "LCA."
II.9	L	Innovation. The standard meaningfully and measurably addresses environmental and/or human health impacts in some way not already recognized in the above criteria.	- Text of criteria and explanation of how the approach is innovative and how it results in improved environmental and/or human health performance. - No double counting: if an SDO claims a specific attribute within the standard addresses a hotspot, that same attribute cannot also count as an innovation credit. Appropriate evidence includes: i) standard includes additional attributes (beyond hotspots); ii) those attributes are not typically covered by the other standards reviewed in the assessment for this category; and iii) those attributes meaningfully address environmental human health impacts (meeting the Leadership threshold that a specific approach or measurable outcomes are required, i.e., no 'management plan' approach as allowed for Baseline hotspots) Other innovations may be considered. The following are not considered innovations for the purposes of this criterion: - Process level (e.g. supply chain or application process) or organization-level (e.g. social responsibility, or labor issues) innovations - "Optional innovation credits" within standards

[19] PPM standards address unfinished (not final) products and have a more limited focus on performance issues related to specific aspects of production or preproduction, such as (for example) extraction or transport.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
			- Attributes using a 'management plan' approach without setting a more specific approach or measurable outcomes
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from SDOs on how to determine whether the environmental and/or human health protection criteria in the standard result in products that exceed the industry average level of environmental and/or human health performance for this product category.	Optional, to be determined by the SDO
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from SDOs on how and when the environmental and/or human health protection criteria in the standard uses quantitative vs qualitative measures.	Optional, to be determined by the SDO
SECTION III: CONFORMITY ASSESSMENT[20, 21]			
III.1	B	The CAB is defined and is independent from the organization whose products/services are being assessed for conformity.	-Accreditation certificate (as supplied in III.8) -Declaration that the CAB is independent from the producer. -Organizational structure/chart of CAB entity showing independence from producers. -Ownership structure of CAB explained/declared.
III.2	L	The standard, ecolabel and/or SDO are neutral as to the specific CAB entity being used; any accredited/registered CAB can assess conformance to the standard.[22] Reference: ISO/IEC 17007	-Accreditation certificate (as supplied in III.8) -Documentation that any accredited/registered CAB can provide CA services to the standard, e.g. with public information.
III.3	B	The CAB periodically reviews risks to its impartiality, and takes appropriate steps to mitigate identified risks.	-Accreditation certificate (as supplied in III.8) -Plan for periodic review of risks and steps taken to mitigate risks (may be in quality procedures, advisory body minutes, management meeting minutes) -Results of reviews and actions taken.
III.4	L	The CAB offers a sliding scale of conformity assessment fees or other means to be accessible to small businesses.	-Documentation of sliding fee scale (does not need to be publicly accessible). -Demonstration of accessibility to small businesses.
III.5	B	The CAB or SDO publicly discloses the scoring methodology and levels achieved by products that conform to the	-Documentation of scoring methodology and levels achieved by products that conform to the standard. Description of where and how this information is

[20] In Section III, the term "CAB" is applicable to CAB themselves (i.e. independent certification/verification providers, or to scheme owners/ecolabel programs that provide rules or policies for CABs that certify products / services to the standard). All criteria must be met by the CAB unless otherwise noted.

[21] Section III of EPA's Guidelines contains the requirements necessary to demonstrate that a conformity assessment body is competent to assess conformance with the standard and follows general good practice specific to conformity assessment for environmental performance standards. An alternative method to demonstrate that a conformity assessment body is competent to assess conformance to a standard is proof of accreditation by an accreditation body that is a signatory to the International Accreditation Forum Multilateral Recognition Arrangement (IAF MLA) for a scope including ISO/IEC 17065 and this applicable standard. Guidance on Federal Conformity Assessment (15 CFR Part 287) directs federal agencies to identify appropriate private sector conformity assessment practices and programs (including third-party certification) and consider the results of such practices and/or programs as appropriate in procurement activities. The Guidance stresses that responsibility for the determination of appropriateness rests with each agency.

[22] Note that the revenue from conformity assessment is often necessary to offset the significant investment in standards development and, to address any issues (perceived or real) related to conflicts of interest, organizations should separate the management and operations of conformity assessment and standards development.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
		standard; and describes how the public can access this information. (N/A for pass/fail standards, and if products have not yet been certified to the standard)	made publically available; declaration that this information is available by request is sufficient. -Attestation that the CAB has not yet certified products to the standard.
III.6	L	The CAB or SDO publicly discloses the credits achieved by products that conform to the standard; and describes how the public can access this information. (N/A for pass/fail standards, and if products have not yet been certified to the standard)	-Documentation of credits/criteria achieved by products that conform to the standard. Description of where and how this information is made publically available; declaration that this information is available by request is sufficient. -Attestation that the CAB has not yet certified products to the standard.
III. 7	L	The CAB provides public access to or disclosure of up to date information on the means by which it obtains financial support. Reflects ISO/IEC 17065 - 4.6	-Example description of means of CAB financial support and description of where and how this information can be accessed.
III.8	B	The CAB demonstrates (through accreditation by a member body to ILAC or IAF)[23] conformance to relevant standards within the ISO/IEC 17000 series, e.g., ISO/IEC 17065 {for the ecolabeling certification program scope in accordance with (ISO 17020)}; 17025 (testing); 17024 (personnel); 17020 (inspection). **OR** Apply the evaluation factors below, which are consistent with the requirements of internationally accepted standards for operations of a conformity assessment body.	-Certificate of accreditation to relevant standard(s) within the ISO/IEC 17000 series. Accreditation body must be a member body to ILAC or IAF. -If the CAB is accredited to the relevant standard(s) within the ISO/IEC 17000 series for a different standard/ecolabel than is being submitted for assessment, declaration that they follow the same procedures is sufficient.
III. 8.1	B	**Objective & Impartial Structure.** Organizational chart and management system of the CAB reflect impartiality of decision making on conformity assessment. Reflects ISO/IEC 17065 - 5.1.1	-Policy, organizational chart, procedure, or quality manual showing independence. Evidence needs to demonstrate clear separation of certification from other business activities (if any) and structures (such as reporting, or separation of roles) to ensure impartiality of certification decisions.
III. 8.2	B	Formal decision-making procedures and thresholds are documented demonstrating rules for when conformance or nonconformance is determined by the CAB.	-Documented procedures for determining conformance to the particular standard submitted for assessment, rather than general procedures for any standard. The standard itself is not sufficient to meet this criterion.
III. 8.3	B	**Free from Undue Pressures.** The CAB does not allow commercial, financial or other pressures to compromise impartiality, including ensuring that personnel (management and staff) are free from such pressures. Reflects ISO 17065/IEC - 4.2.2	-Policy / procedure demonstrating that staff and management remain impartial in their CA work and are not subject to undue pressure. Evidence must clearly describe risks and safeguards against them.
III. 8.4	B	The CAB has a procedure or policy to ensure that the personnel conducting conformity assessment have not had	-Policy / procedure for managing conflicts of interest of staff that covers past and present relationships

[23] Examples of US-based members to ILAC and/or IAF include ANSI; A2LA; IAS; LAB; NVLAP.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
		a professional relationship in the past two years nor on-going financial connection with the organization to which they are providing their services. Reflects ISO/IEC 17065 4.2 AND 5.2	specific to the CA being undertaken. Evidence must mention a two-year period.
III. 8.5	B	**Documented Procedures.** Procedures are documented for CAB processes. For example, procedures may be documented through a quality management system that provides general management system documentation (e.g. manual, policies, and definition of responsibilities); control of documents; control of records; management review; internal audit; corrective actions; preventive actions. Reflects ISO/IEC 17065 - 8.1	-List of documented relevant policies and procedures. -Documentation of quality management system, including a copy of the internal audit and management review, log of complaints and comments, and corrective actions taken. -Other relevant documentation of procedures for conducting CA.
III. 8.6	B	**Take All Necessary Steps to Evaluate Conformance.** The CAB demonstrates that it takes all steps necessary to determine conformance with the standard, following the principles of ISO 17000: 2004[24]. Reflects ISO/IEC 17065 – 7.4.1; 7.1.2; 7.2, 7.3, 7.4, 7.5, 7.6	-Policy/procedure used to evaluate the product/process. Evidence must be specific to the particular standard submitted for assessment, rather than general procedures for any standard, and clearly indicate that the CAB takes all steps necessary to determine conformance. The standard itself is not sufficient to meet this criterion.
III. 8.7	B	**Role separation.** The CAB demonstrates that the process for making conformity decisions includes an independent review that the product has met the specified requirements. Reflects ISO/IEC 17065 7.6	-Policy/Procedure describing the evaluation process and who makes the CA review and decision. Evidence must be specific to the particular standard submitted for assessment, rather than general procedures for any standard.
III. 8.8	B	**Certification Conditions Specified.** The CAB demonstrates that it documents how and when conformance is maintained, extended or suspended or withdrawn. Reflects ISO/IEC 17065 - 7.6.2	-Policy/procedure on how and when conformance is maintained, extended or suspended
III. 8.9	B	In the event that non-conformity is substantiated, the CAB has a procedure that considers and decides on appropriate action such as increased surveillance, reduction in the scope of the certification to remove non-conforming products, suspension of the certification or withdrawal of the certification. Reflects ISO/IEC 17065 - 7.11.1	-Procedure on appropriate actions or steps taken in cases of non-conformity. Evidence must be specific to the particular standard submitted for assessment, rather than general procedures for any standard.
III. 8.10	B	**Records Management.** The CAB has procedures for ensuring documents are identified, stored, protected, retrieved and retained and disposed of to ensure the protection of confidential information.	-Policy/procedure for document control and retention policy to protect client confidentiality. -Evidence of quality management system covering document management and client confidentiality.

[24] ISO 17000: 2004: Vocabulary and General Principles. See: http://www.iso.org/iso/catalogue_detail.htm?csnumber=29316

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
		Reflects ISO/IEC 17065 - 8.4.1	
III. 8.11	B	**Dispute Resolution Procedures.** The CAB has a documented policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals. (N/A if CAB does not address complaints and appeals. This is addressed for SDOs in Section IV.) Reflects ISO/IEC 17065 - - 7.13.1 (ISO/IEC 17065 takes out term "disputes").	-Policy/procedure for complaints and appeals. -Sample records of complaints, and or appeals and corrective actions taken. -Attestation that the CAB does not address complaints and appeals.
III. 8.12	B	**Traceability Procedures.** The CAB has traceability or chain-of-custody procedures where this is necessary to ensure qualified products meet the standard.	-Policy/ procedures for traceability/chain of custody by CAB demonstrating conformance with the criteria. Traceability/ chain of custody relates to the product in question or components therein, if relevant to that product category, and does not relate to protection of the CAB or ecolabels marks. OR justification of how this is not applicable.
III. 8.13	B	**Periodic evaluation of marked products.** When continuing use of a conformity-assurance mark on a product is authorized, the CAB periodically conducts surveillance of marked products to ensure ongoing validity of continued conformance. Reflects ISO/IEC 17065 - 7.9.3	-Policy/procedures on how long products can display the certification mark demonstrating conformance. -Policy/procedure describing surveillance activities. Including how often they occur.
III. 8.14	B	**Content of Declarations of Conformity.** The CAB provides declarations of conformity that clearly conveys information on: the name and address of the CAB; the date conformity assurance is granted (if applicable); name and address of the client; the scope of the conformity assurance; the term or expiration date of conformity assurance (if applicable); the signature or other defined authorization of the person(s) of the CAB assigned such responsibility. Reflects ISO/IEC 17065 - 7.7.1 & 7.7.2	-Example declaration of conformity meeting at least five of the six criteria listed. Required information may be located in separate documents.
III. 8.15	B	**Suitable Action for Misuse.** The CAB has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is conformant, including market surveillance. Procedures describe actions to take for incorrect, misleading or un-authorized use of its mark and licenses. (N/A if CAB does not address misuse of marks or licenses. This is addressed for SDOs in Section IV.) Reflects ISO/IEC 17065 - 4.1.3.1, 7.11.1, 7.9.3 and 7.9.4	-Policy / procedure to take action on incorrect, misleading, or unauthorized use of marks or licenses. -Attestation that the CAB does not address misuse of marks or licenses.
III.	B	**Quality Objectives.**	-Policy / procedure indicating commitment to quality

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
8.16		The CAB has a documented commitment to fulfilling quality objectives and/or an established quality management system that is implemented in the CAB's organization. Reflects ISO/IEC 17065 - 8.2.1.	-Quality management system documentation.
III. 8.17	B	**Sufficient Personnel.** The CAB has a process to ensure that they have sufficient personnel with the education, training, technical knowledge and experience necessary for performing conformity assessment functions. Reflects 17065/IEC - 6.1.1.1	-Description by CAB on how it ensures that its staff is qualified for CA activities, including staff qualifications (in job advertisements, records, or CVs) and description of training to assess conformance to the standard. Evidence must be specific to the particular standard submitted for assessment, rather than general procedures for any standard.
III. 8.18	B	**Adequate Facilities & Equipment.** The CAB has all the facilities and equipment needed to carry out its work; if testing is required by the standard, competent and/or accredited laboratories are utilized. (N/A if testing is not required.) Broadly reflects ISO/IEC 17065 - 7.3.1	-If testing is required for certification, laboratory accreditation certificate for conformance with ISO 17025 or equivalent standard. -Attestation that testing is not required by the standard.
III. 8.19	B	**Transparent Process.** The CAB or SDO maintains through publications, electronic media or other means, and makes available upon request, information about the conformity assessment process including the rules and procedures for granting, maintaining, extending, reducing the scope of, suspending, withdrawing or refusing conformity assurance. Reflects ISO/IEC 17065 - 4.6	-Documentation of CAB certification processes are disclosed publicly or are available upon request. Must include information on granting, maintaining, extending, reducing the scope of, suspending, withdrawing, and refusing conformity assurance, as well as detailed information on the conformity assessment process (in addition to the standard itself).
III. 8.20	B	**Information on Fees.** The CAB provides general information on fees, and/or makes this information available to applicants and clients. Reflects ISO/IEC 17065 - 4.6	-Example communication to applicants that includes information on fees, and information on when and how this information is provided. Evidence must refer to fees for certification services, not other fees such as for licensing or application to the ecolabel program, unless the fees are combined and an explanation is provided.
SECTION IV: MANAGEMENT OF ECOLABELING PROGRAMS[25]			
IV.1	B	The ecolabel program has a documented commitment to fulfilling quality objectives and/or an established quality management system[26] that is implemented in the organization.	-Policy/procedure indicating commitment to quality. -Evidence of a documented Quality Management System.

[25] The Management of Ecolabeling Programs Guidelines would not apply to product environmental standards that are not associated with an ecolabel.

[26] A quality management system is a formalized system that documents the structure, responsibilities, and procedures required to achieve effective quality management. American Society for Quality (ASQ) Quality Glossary. Accessed online 12/3/2015 at http://asq.org/glossary/q.html. An example of a standard for quality management system is ISO 9000, see http://www.iso.org/iso/home/standards/management-standards/iso_9000.htm.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
IV.2	L	The ecolabel program has established a methodology and procedure to evaluate the effectiveness of addressing environmental and/or human health impacts covered by its standard.	-Procedure for completing the evaluation including a discussion of impact categories addressed, methods, data sources, indicators, time line. -Description of the methodology selected; including any methodology standards or norms referenced such as impact evaluation or the ISEAL Impacts code.[27]
IV.3	L	An evaluation, by the ecolabel program or a third-party, of the effectiveness of the standard in reducing environmental and/or human health impacts has been completed within the previous 5 years.	-Copy of completed report and publication date. -Description of methods and data sources used.
IV.4	L	Results of the evaluation are publicly available.	-Evidence that evaluation reports are publicly available; for example, publication of report online, website link, or statement that report is available on request.
IV.5	B	The ecolabel program has a documented and publicly available policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals concerning the management of the ecolabel program.	-Policy/procedure for complaints and appeals. -Sample records of complaints, and/or sample of appeals and corrective actions taken. -Public website address for complaints and appeals.
IV.6	B	The ecolabel program makes publicly available the stakeholders[28] who are involved in the ongoing governance and/or operations of the ecolabel program.	-Public website address with stakeholders listed. -Description of availability of information on stakeholders.
IV.7	B	The ecolabel program does not allow commercial, financial or other pressures to compromise the confidentiality, objectivity or impartiality of its operations and decisions that affect awarding the mark or registration, including ensuring that personnel (management and staff) are free from such pressures.	-Policy/procedure demonstrating that staff and management are able to remain impartial in its decisions concerning the ecolabel program.
IV.8	L	The ecolabel program provides public access to, or disclosure of, up-to-date information on the types of financial support received for administering the ecolabel program.	-Description of the types and sources financial support the ecolabel program relies on to support its work, such as application fees, license fees, royalties, membership fees, grants, sale of other goods and services, etc. -Description of where and how this information can be accessed.
IV.9	B	The ecolabel program provides general information on fees, and makes this information available to applicants.	-Fee schedule information OR -Process by which stakeholders and applicants can request information on fees (from ecolabel program, CAB or both).
IV. 10	B	The ecolabel program makes publicly available (free of charge or for a reasonable cost) the criteria and/or standard.	-Internal URL for accessing the criteria and/or standard and how interested parties can access the standard.
IV. 11	B	The ecolabel program grants the label, mark, or registration if the product is demonstrated to be in conformance with the applicable standard, and the applicant meets the administrative and technical requirements of the program (such as paying fees, and accepting license agreements).	-Declaration that no other conditions or limits are placed on products or applicants in granting the use of the mark beyond those required by the standard and or administrative or technical requirements of the program.

[27] The ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards (Impacts Code). Accessed online 12/3/2015 at: http://www.isealalliance.org/our-work/defining-credibility/codes-of-good-practice/impacts-code

[28] Stakeholders are defined as those organizations or individuals directly and materially affected by the ecolabel program and who have an ongoing relationship with the program and are involved in either its governance and/or operations.

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
			-Policy or procedure stating the conditions by which the label/mark/declaration will be granted and an explanation as to its purpose and why they are reasonable. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both.
IV. 12	B	The ecolabel program has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product meets the standard. Procedures describe actions to take for incorrect, misleading, or un-authorized use of its mark and licenses including suspension or removal of the mark if warranted.	-Policy/procedure to take action on incorrect, misleading, or unauthorized use of marks or licenses. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both.
IV. 13	L	The ecolabel program has established procedures to periodically conduct market surveillance to check for incorrect, unauthorized use of its licenses, certificates, and marks of conformity, and is responsive to complaints of misuse or misinterpretation in the marketplace.	-Policy/procedure requiring market surveillance by ecolabel program and/or the CAB. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both. -Procedure or resource for receiving complaints of misuse or trademark violations -Example of a market surveillance report.
IV. 14	L	If an ecolabel is associated with more than one standard/certification, those ecolabels are markedly different from each other in application as not to confuse the marketplace or inflate a sense of compliance.	-Consumer testing to make sure ecolabels associated with more than one standard are clearly interpreted as to the differences.
IV. 15	L	Ecolabel programs participate in mutual recognition activities such as equivalency assessments; formal mutual recognition of standards; and/or technical, administrative, or CA procedures.	-Documentation of participation in associations and fora such as ISO, ISEAL Alliance, Global Ecolabelling Network, ASTM, etc. -Documentation of public statement in which ecolabel programs and or standards are mutually recognized and on what grounds.
IV. 16	L	The ecolabel program makes publically available a directory of conformant products and their brand owner. The directory is up to date, and/or has been updated in the last 6 months.	-Example of the Directory in current use by the ecolabel program and/or CAB. -Instructions as to how access to the directory is provided to the public. -Date of last update to the directory is provided. -Demonstration that the directory was updated in the last 6 months prior to the pilot assessment. -Dates of when products are added to directory provided.
IV. 17	L	The ecolabel program's directory of conformant products and their brand owner can be searched so that users can find conforming products and suppliers	-Explanation or demonstration of how the directory is able to be searched. -Note that "searched" is not meant to imply a full online database. Search functions are also found in commonly used tools such as MS Word, MS Excel and Adobe PDF.
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs on if/how they provide regional information regarding labeled products (e.g., information on the location of suppliers; national or sub-national regions where products are available on the market.)	-Directory showing supplier addresses/location information. -Directory showing where products are available (country, state, other sub-national region).
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs on	-Example of analysis of marketplace uptake of the ecolabel products including market share, recognition

Guide line #	B/L/I[1]	Guideline	Example Sources of Evidence and key decision rules (one may be sufficient subject to IAE review)[2]
		if/how the ecolabel program conducts or participates in a periodic analysis and/or publishes the uptake of the ecolabel in the marketplace	in institutional procurement guidelines of the ecolabel or standard, or other indicators of the ecolabel's presence. -Example of market report published.
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs regarding rules and procedures that aim to ensure a balance of interests among stakeholders in the program's governance.	-Definition of interest/stakeholder categories relevant to the ecolabel program. -Documentation of formal rules and procedures for ensuring balance of interest.