



Summary Report:

Assessment conducted by Big Room Inc for the Section 13 Product Standards and Labeling Interagency workgroup on Standards and Ecolabels.

November 1, 2011

©

**Author: Dr. Anastasia O'Rourke
Co-Founder, Big Room Inc
anastasia@bigroom.ca**



Table of Contents: Summary Report

Background and Guide to the Summary Report	3
Report 1a: Initial Analysis and Benchmarking	4
1. Background	5
2. Approach	5
3. Assessment Systems Analyzed	6
4. Framework for Analysis and Comparison	9
5. Findings: Mapping and Analysis of Assessment Systems	11
7. Draft Guidelines Applications Test	14
Report 1b: Recommendations	24
Report 1c: Conformity Assessment, Program Management and Market Presence Guidelines	29
1. Background	30
2. Standards and Assessment Systems Analyzed	30
3. Recommendations for Conformity Assessment Principles and Guidelines	31
4. Recommendations for Program Management Principles and Guidelines	34
5. Recommendations on Market Presence	35
Report 2a: Testing the Draft Guidelines: Survey of Selected Ecolabels and Standards	37
1. Background to Report 2a	38
2. Methodology	39
3. More about the Survey Respondents	44
4. High-Level Findings and Recommendations per Framework Category	54
5. Final Recommendations and Next Steps	66
6. Appendix:	68
1. Mapping of standards and ecolabels to Draft Guidelines	
2. Survey 1 Questions	
3. Survey 2 Questions	
4. Supplementary Guidance to Survey - Glossary of Key Terms	
5. Survey Results per Question/Section	

Background and Guide to the Summary Report

The purpose of the assessment undertaken by Big Room Inc was to assess relevant ecolabels and environmental standards against Draft Guidelines created by the Section 13 Product Standards and Labeling workgroup (henceforth: “The Workgroup”) to meet the environmentally sustainable purchasing requirements of E.O. 13514. The Workgroup aims to guide federal buyers on which environmental standards and ecolabels are appropriate for use in federal procurements.

The assessment undertaken by Big Room Inc informed the workgroup by:

1. Comparing the draft Guidelines against existing codes, standards, best practices, principles and rating systems for ecolabels;
2. Gathering and testing data on relevant ecolabels and standards in a systematic format; and
3. Providing feedback on the draft Guidelines in order to determine their suitability for use in environmentally sustainable purchasing by the Federal Government.

The Assessment was undertaken in two main tasks:

- ⇒ *Task 1* provided an assessment of the draft guidelines which resulted in the following reports:
 - Report 1a: Results of Initial Assessment (June 21, 2011)
 - Report 1b: Recommendations (July 5, 2011)
 - Report 1c: Recommendations on Conformity Assessment, Program Management and Market Presence (September 14, 2011)
- ⇒ *Task 2* assessed the revised Guidelines against a set of ecolabels and environmental standards with a presence in North America, which resulted in reports:
 - Report 2a: Analysis of draft guidelines based on a survey of selected North American ecolabels and standards (October 4, 2011)
 - Report 2b: Detailed findings of survey results and recommendations (October 25)
 - Report 2c: Further analysis of survey representativeness (November 1, 2011)

This Report synthesizes the above listed Reports into one document. Some of the detailed recommendations are excluded from this summary report for the sake of brevity, *but may be accessed on request directly from the author (Anastasia@bigroom.ca).*

Presentations to the full workgroup were also made by project lead Anastasia O’Rourke on July 7, 2011 and October 6, 2011. Several Interim presentations to the Workgroup co-leads were also made throughout the project.



Report 1a: Initial Analysis and Benchmarking

Report 1a: Initial Analysis and Benchmarking

1. Background

This Report brings together the initial findings of Task 1 - to analyze and inform the refinement of existing draft guidelines for ecolabels and environmental standards by comparing them against other guidelines and assessment systems and by identifying commonalities, difference and gaps. It also reports on an initial test of the Draft Guidelines undertaken on a select number of relevant data fields and ecolabels in the existing Ecolabel Index database, showing where and how the guidelines can be implemented in practice. Recommendations are made on improving scope and measurability of the Draft Guidelines to be considered by the Workgroup.

2. Approach

The Draft Guidelines are written from perspective of what kinds of information purchasers might look for in assessing ecolabels and environmental standards. Here we are comparing them to other rating systems, principles and standards-systems that were created for other purposes, by and for other stakeholders. As such, there will naturally be differences in their scope, criteria, indicators used and where they place emphasis. Nonetheless comparing the Draft Guidelines to these other assessment systems is useful in providing a comprehensive and rigorous review, in highlighting gaps, and in identifying potential questions that will likely be asked of the Guidelines from the perspective of different stakeholders' interests.

In order to critically review and comparatively assess the Draft Guidelines for Task 1 in the project, the following steps were undertaken.

First we researched relevant assessment systems currently in circulation. Some of these are in draft form, and some are final published standards. In all, 13 assessment systems were identified and analyzed including:

- Standard-setting codes and standards
- Best practice, principles and guidelines for ecolabels and voluntary standards
- Existing rating systems of ecolabels
- The current data fields for Ecolabel Index

A Framework for assessing ecolabels was established in order to group similar concepts and indicators across the systems, and therefore make more meaningful comparisons with the Draft Guidelines. This framework was presented to and discussed with the co-leads of the workgroup on June 14 by telephone, and refinements then made to improve its' utility. The result is a 5-dimensional framework for assessing ecolabels and environmental standards.

The assessment systems were then mapped and analyzed in terms of:

- a. How they compared to the Draft Guidelines;
- b. Where and how there was convergence or commonality;
- c. Where there was divergence between them; and
- d. Issues they raise that could be considered potential gaps in the Draft Guidelines.

A set of draft recommendations for improving the Draft Guidelines was then created based on the analysis done to date.

We then built on this analysis by testing the guidelines as a screening tool against a set of North American ecolabels in Ecolabel Index. Where fields matched between the Draft Guidelines and



existing data fields in Ecolabel Index for a select group of ecolabels in four product categories (building products, office supplies, furniture and IT products), data was downloaded and analyzed. We also reviewed the Draft Guidelines from the perspective of what would need to be clarified or adapted in order to increase the ability to gather systematic data on how the labels and standards may meet each guideline criteria.

From this analysis we present a set of recommendations towards improving the guidelines in terms of the content and scope, as well as measurability. A set of detailed suggestions for improvement will be considered by the Workgroup at the July 7 2011 meeting in Washington DC.

3. Assessment Systems Analyzed

Several other assessments and guidance documents exist today to help assess the credibility of ecolabels and environmental standards. Some assessments are made informally or are implied, such as media and green lifestyle guides that list a select number of ecolabels, or green/environmental online shopping sites that pre-select products and services based on a set of ecolabels (but don't disclose how those ecolabels were selected). Others are more formal assessment systems with a set of guidelines or indicators for credibility in ecolabels and environmental standards- practices.

Figure 1 illustrates all the different stakeholder groups who currently assess ecolabels and environmental standards – either explicitly or implicitly.

Who assess ecolabels and standards, and why?

Buyers	Producers	NGOs	Government
To select products using labels as filter	To decide which label (if any) to certify products	To advocate on specific issues	To set policy
Ecolabels	To screen suppliers	To decide which labels to support as stakeholders	To establish market leadership
To protect reputation of ecolabels	To benchmark performance against credible standards	Consumers' Associations	In own purchasing
To build out own standards w. other criteria	Accreditation Bodies	To guide & protect consumers	Media
To expand market impact via mutual recognition	To improve quality of standards & maintain trust	Info providers	To write articles
		To guide users of labels	Guide choices
			Consortia & Roundtables
			Multi-stakeholder guidance

Figure 1: Overview of stakeholder groups who assess ecolabels and environmental standards, and the reasons they do so.

This analysis looked at those assessment systems with more formal rules and designations, that is:

- Principles & best practices for ecolabels and standards;
- Ratings of ecolabels by consumers' associations and NGOs;
- Standards/codes for standard-setting (such as provided by standards organizations such as ANSI, ISEAL and ISO); and
- Specialist information and data collection systems on ecolabels.

Thirteen assessment systems were identified as relevant for comparison to the Draft Guidelines, as seen in Figure 2. The Types of organizations, the status of the document are provided, and web links to the original source are given (where available).

Count	Type	Name of Assessment	Type of Organization	Status
1	Draft Guideline	Section 13 Product Standards and Labeling Workgroup Draft Guidelines	Government	Draft 5.40 (w. EPA comments)
2	Data	Ecolabel Index Fields V.. 04.01.2011	Information provider	June 2011
3	Principles/ Best practices	Green Products Roundtable: Preferred Practices for Organizational Credibility, v 06.01.2011	Multi-Stakeholder Consortium	Draft 2011
4		ISEAL Alliance: Draft Credibility Principles	Voluntary Std's Association	Draft 2011
5		WWF: "Must-Be" Principles for voluntary standards	Environmental NGO	2010
6		US EPA "Developing and Recognizing Standards for Green Products" v. 5.4.11	Government	Draft 2011
7	Ratings	Consumer Reports: Label Report-Card	Consumers' Association	2005
8		NRDC Label Look-up: Leaf Rating Scheme	Environmental NGO	2011
9		Die Verbraucher Initiative: Label-online.de rating system	Consumers' Association	2008
10	Standards/ Codes	ANSI Essential Requirements	Standards Association	2010
11		ISO/IEC Guide 59 Code of good practice for standardization	Standards Association	1994
12		ISO 14020 : Environmental labels and declarations - General principles	Standards Association	2 nd ed., 2000
13		ISO 14024 : Environmental labels and declarations -- Type I environmental labelling - Principles and procedures	Standards Association	1999
14		ISEAL Code for Standard Setting, v 5.01	Voluntary Std's Association	2010

Figure 2: Assessments mapped and analyzed in Task 1a.

4. Framework for Analysis and Comparison

Each of the assessment systems studied follow a different structure, though many encapsulate similar concepts, principles and themes. In order to meaningfully compare them, we created a framework that separates criteria into five dimensions or aspects of an ecolabel or environmental standard system (see Figure 3).

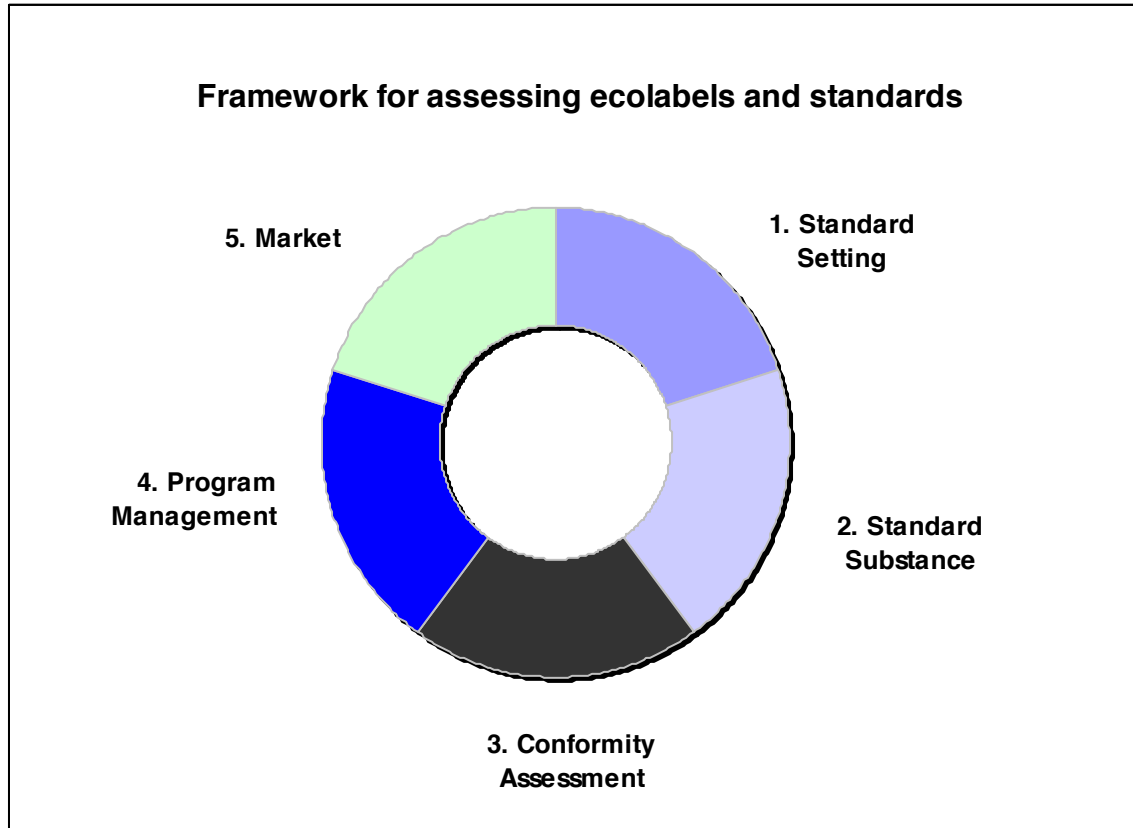


Figure 3: Framework for Assessing Standards and Ecolabels

This Framework is an amalgam of the main themes found across the assessment systems. It is intended to provide a holistic view for the different aspects of determining the credibility of ecolabels and standards in the context of governmental purchasing.

It should be noted that not all five dimensions are equally applicable to both standards and ecolabels. In the Recommendations Section (9) we address this difference with a recommendation on setting guidelines for ecolabels and those for standards. In general, ecolabels are built on standards, but there are also standards that are independent of any ecolabelling program, and that do not result in the application of a label as seen in the marketplace.

In what follows, each of the dimensions is described in turn.

4.1 Standard-Setting Practices: How the Standard was created

How a standard is created and who is part of that creation contributes to the outcome and credibility of the final standard or ecolabel. Recognizing this, several organizations have created standards, codes or guides for standard-setting that focus on the procedures and practices that should be followed in order to create a legitimate and recognized standard. In some cases (like ANSI and ISO) these apply across all types of standards – not only environmental – while others like ISEAL’s code of practice follows similar methodology but includes some aspects they deem relevant to environmental and social issues in standard-setting. Oftentimes rules and guidance on standard-setting include issues of the degree of accessibility, opportunities for participation and appeals, processes for decision making, and processes to update the standard in the future to respond to changing market, technological and or scientific conditions.

4.2 Standard Substance: the content, relevance and effectiveness of the criteria within the Standard

This is the content or criteria of the standard, what environmental issues are addressed, what scope of their application, how those issues map to what is considered best, preferred or “greener” practices when it comes to integrating environmental considerations into products and services. Judgments can be made on how rigorous are these criteria, how relevant they are for that particular product category given current understanding of what are that products’ main environmental impacts, and how effective the standard’s criteria are in addressing the main issues of concern. Guidance is also sometimes given on the measurability and verifiability of the criteria so that it can potentially be clearly substantiated.

4.3 Conformity Assessment: The certification, verification and auditing processes by which entities are assessed against the Standard

This includes the processes and procedures used to verify or certify whether a product or company meets the standard. Typically conformity assessment guidance is given in the context of how ecolabels should be applied, but there is some crossover into how standards should be applied also. In some guides and standards for standard setting, rules for how verification should proceed are expressly excluded (such as in ISO / IEC Guide 59 and ANSI Essential Requirements), while in other systems conformity assessment is included in the standard itself.

The main themes addressed in conformity assessment guidelines and practices are: the process by which an entity can claim to meet a standard or show an ecolabel, who verifies compliance and how they do that, how rigorous and independent is that verification, and rules around how long can an entity claim to meet the standard and/or carry an ecolabel.

4.4 Program Management: How the Standard and/or Ecolabel is implemented, managed and governed

Ecolabels and standards have to be managed by an organization to roll out their implementation and gain traction in the market. Management issues concern how the program is governed, how often a standard is and should be updated to meet changing technological conditions and scientific knowledge; how the ecolabel or standard is marketed to both potential applicants and users; how its’ use it controlled or monitored in the marketplace; processes for complaints and appeals; and how the organization is funded. Underlying all of these issues are the principles of transparency, accessibility, continuous improvement, financial sustainability, and accountability to stakeholders. Issues on the rise include how these programs interact with each-other in terms of harmonization, mutual recognition or interoperability of their systems; and what how they monitor and evaluate their own performance as organizations and in meeting their stated environmental goals.

4.5 Market: The extent to which the Standard or Ecolabel is used and recognized in the marketplace.

For purchasers who might specify either a standard, an ecolabel or otherwise use the criteria embedded in each in their purchasing specifications, having an understanding of how many products or services can meet that standard is key to how effective that condition will be. In addition, in some cases it is important for purchasers to know how these provisions might interact with other goals or conditions for purchasing, such as enhancing competitiveness or favoring locally produced items. Finally, many purchasers want to know what kind of recognition in the marketplace a given standard or ecolabel has already achieved. While it's not necessarily a conditional requirement (meaning that ecolabel or standard should have reached X% market share), having some sense of its uptake will be an important consideration in many instances.

Information could be sought on the number of products and services that have met a given standard or ecolabel and within certain sector and geographic markets. As this data today spread across many different actors in the standards and ecolabelling arena, gathering it is not as straightforward as one might imagine. This is a topic for which the workgroup could play a leading role in asking for such information.

The UNEP Sustainable Public Procurement Program¹ takes a similar approach wherein they help national governments assess the “market readiness” for sustainability criteria to be implemented in their sustainability purchasing program’s roll out. We are currently looking further into their methodology and researching other guidance from purchasers on this topic to provide a more comprehensive assessment of what is possible here, whether market considerations could be included in the guidelines at this time, and if so, how they could be feasibly implemented.

5. Findings: Mapping and Analysis of Assessment Systems

The spread of the different criteria contained within each of the assessments across the five framework dimensions is illustrated in Figure 4 (over), and also indicates the level of detail each system contains. It serves as a “snapshot” of each of the assessment systems covered in terms of the total number of criteria they encompass, as well as how those are spread across the five framework dimensions.

From this overview the following observation can be made.

- The Draft Guidelines currently focus on two of the five dimensions of the framework – how the standard was set (1. Standard Setting), and what is contained within it (2. Standard Substance).
- On both of these dimensions (1 and 2), the Draft Guidelines are relatively comprehensive and reflect best practices gleaned from the assessment systems.
- Most of the systems assessed focus on the first four dimensions of the framework and do not consider the extent to which the standard or label is being used and recognized in the marketplace. This finding is partially explained by the reason for which these assessment systems were created, and by whom, however we propose that this is an important gap that the workgroup should consider addressing in order to meet its goal.
- The spread of criteria across the different systems reflects their purpose for the assessment, as well as the general interest of the organization that created them. For example, Standards Associations are naturally concerned with the processes by which a

¹ <http://www.unep.org/scp/procurement/>

standard is created but less so on the exact content of the standard; while non-governmental organizations such as WWF and government agencies who determine environmental policy (such as the EPA) are concerned with the rigor and scope of the standard's criteria. Consumer advocates are concerned with participation and transparency across the board in order to protect consumer interests.

- Because of the different level of detail contained within each of the assessment systems, oftentimes where there is a match between them and the draft guidelines, it is at the level of reflecting the same principles rather than the specifics of the practices.
- Oftentimes the assessment systems contain or make use of standardized definitions and glossaries which are useful in providing clarity on the exact concepts being described. Inclusion of a list of definition for terms of art is also recommended with the final version of the Guidelines.
- Some gaps in concepts, principles and detailed criteria within the Draft Guidelines compared to the other assessment systems were found. These are documented for consideration in each of the five framework dimensions below.

Comparison of guides/principles/ratings and standards			Number of criteria covering this issue					
Count	Type	Name	1. Standard setting	2. Standard Substance	3. Conformity Assessment	4. Program Management	5. Market Recognition	Total # criteria
1	Guidelines	GSA Guidelines, draft 5.40	20	15	2	6	0	43
2	Data	Ecolabelindex.com substantive fields	5	9	14	14	4	46
3	Principles	ISEAL Draft Credibility Principles	6	5	5	5	1	22
4	Principles	WWF "Must-be" Principles	4	5	3	9	1	22
5	Principles	GPR Preferred Practices	10	6	13	8	3	40
6	Principles	EPA Preferred Characteristics	2	5	0	0	0	7
7	Rating	Consumer Reports label report-card	3	1	2	2	0	8
8	Rating	NRDC Label look-up leaf rating	2	2	1	1	0	6
9	Rating	Label-online rating system	1	4	3	4	0	12
10	Code	ANSI Essential Requirements	23	0	0	5	0	28
11	Code	ISO/IEC Guide 59	16	8	1	3	0	28
12	Code	ISO 14020	1	8	4	3	0	16
13	Code	ISO 14024	11	19	9	16	1	56
14	Code	ISEAL Code for Standard Setting	45	11	2	15	0	73

Note: in some cases, criteria map into more than one framework categories, so are counted as many times as they occur. Irrelevant criteria were excluded.

Figure 4: Overview of criteria within the guides, principles, ratings and codes/standards analyzed.

In the Report (Report1a), for each of the five framework dimensions, the following issues were considered and analyzed in detail in Sections 6.1 – 6.5 of the report (p 12-23):

- a. *Commonalities* between the Draft Guidelines and the other assessment systems;
- b. *Differences* of opinion or approach between the assessment systems and or between the assessment systems and the Draft Guidelines; and
- c. *Gaps* within the current Draft Guidelines, that is, issues not currently addressed by the Draft Guidelines that other standards assessment consider.

The gaps identified were not recommendations for inclusion, rather for consideration and discussion purposes by the workgroup.

7. Draft Guidelines Applications Test

In order to “test” the Draft Guidelines as a potential assessment or measurement tool, we analyzed a set of 72 ecolabels found in North America (and tracked in Ecolabelindex) against the Draft Guidelines.

Ecolabel Index is an online database of ecolabels created and managed by Big Room Inc². The platform collects and structures data on ecolabels globally, aiming to increase transparency and help buyers and sellers use them more effectively. At the time the assessment was undertaken, there were 380 ecolabels tracked by Ecolabel Index spread throughout the world and 167 of these with a presence in North America. For each ecolabel a profile is created, addressing 46 substantive issues and 12 administrative details (such as their location, contact information, web address, etc). Once a draft profile is created based on publicly available information, it is sent by Big Room to the labeling organization for verification of accuracy. Following this check, the profile page is published online and periodically checked and updated by Big Room Inc staff.

The first step in this phase of the testing was to conduct a detailed mapping of the Draft Guidelines (v6.21) to the existing data fields of Ecolabel Index. Second, we identified the group of ecolabels to analyze for this first test of the Draft Guidelines. These were chosen on the following three criteria:

- a. A presence in North American Markets;
- b. Product labels (not those solely for companies, buildings, processes, facilities, forests, land or individuals; or for carbon offsets); and
- c. Serving or providing inputs into one of the following product categories: IT products, furniture, building materials, and office supplies.

It is important to note the following constraints in the Ecolabel Index database in mapping and testing the Draft Guidelines at this juncture:

- It is a database of ecolabels, not standards. Some information is gathered on the standards underlying the labels, but analysis of the standard’s criteria beyond some basic categories is not currently part of the database;
- Not all the issues raised in the Draft Guidelines are covered by the current fields tracked in the index;
- Some of the prospective guidelines in framework dimensions 3, 4 and 5 (Conformity Assessment, Program Management and Market issues) are included where there is a field in the Ecolabel Index that could serve as a basic indicator of the principle being raised;

² www.ecolabelindex.com

- Some of the ecolabels serve multiple sectors and have multiple standards (for example, GreenSeal has 31 issued standards that cover over 230 product and service categories³). At this stage, each ecolabel as a program is counted once;
- Ecolabel Index also categorizes ecolabels in terms of what types of “entities” can be labeled by the program, such as products, buildings, farms, processes and companies. Some ecolabels span several of these entities, others are focused on just one type of entity. Distinctions should be made in applying the guidelines to ecolabels relevant for the category of product or service being purchased; and
- There are some data gaps in the fields, where information is either not published when the profile was created, or the labeling organizations have not provided thus far.

Once the Draft Guidelines have been updated by the workgroup; in Task 2 of the project the fields will be updated in the database and outreach to ecolabels to respond to the new questions and to address any missing data.

Appendixes to the report showed how the Draft Guidelines (V 6.21) map to current Ecolabel Index for standard-setting and standard-substance fields. The field name, related question and categories of possible responses are shown; followed by an explanation of how they match or could be adapted to match; and what “qualifying criteria” might be used as a proxy (for example, if they already are an ANSI accredited standard or standard-developer, then they will automatically meet several of the Guidelines). Some of the Draft Guidelines match more than one Ecolabel Index field because they address several issues.

Appendixes to the report also showed where and how Prospective Guidelines for Framework Dimensions 3, 4 and 5 could be informed by the data fields in Ecolabel Index currently; and where there are gaps. These prospective guidelines are yet to be fully articulated and decided upon by the workgroup, so this section is more indicative of what data currently exists and could potentially be used to assess the labels and standards. We selected the dominant themes and issues covered in other assessment systems under each category as identified in Sections 5 and 6 of the report; and also reflected in the Recommendations Section 9 below.

8.1 Data Analysis

8.1.1 Analysis of Sample

For those fields where there was a match or close enough match, the Draft Guidelines were tested across a set of 72 ecolabels with a presence in North American markets. The Task 2 testing will provide a more thorough assessment of the revised guidelines with new, more precisely matching data fields. A list of the labels assessed is in Appendix 8.

The sample of labels chosen for analysis represent the following organization types, entities and priority product categories.

³ <http://www.greenseal.org/GreenBusiness/Standards.aspx>

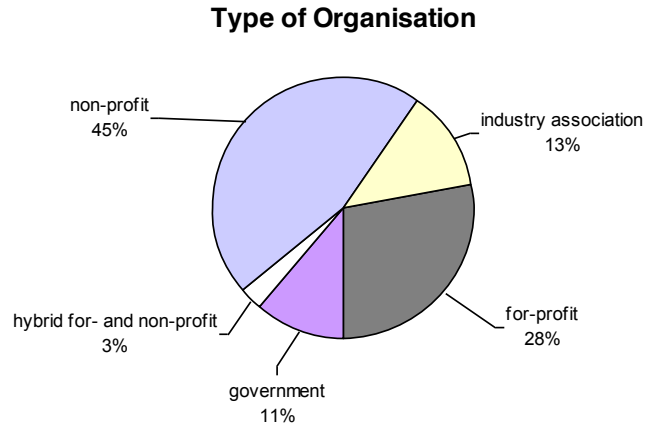


Figure 5: Type of organization managing the sample ecolabels

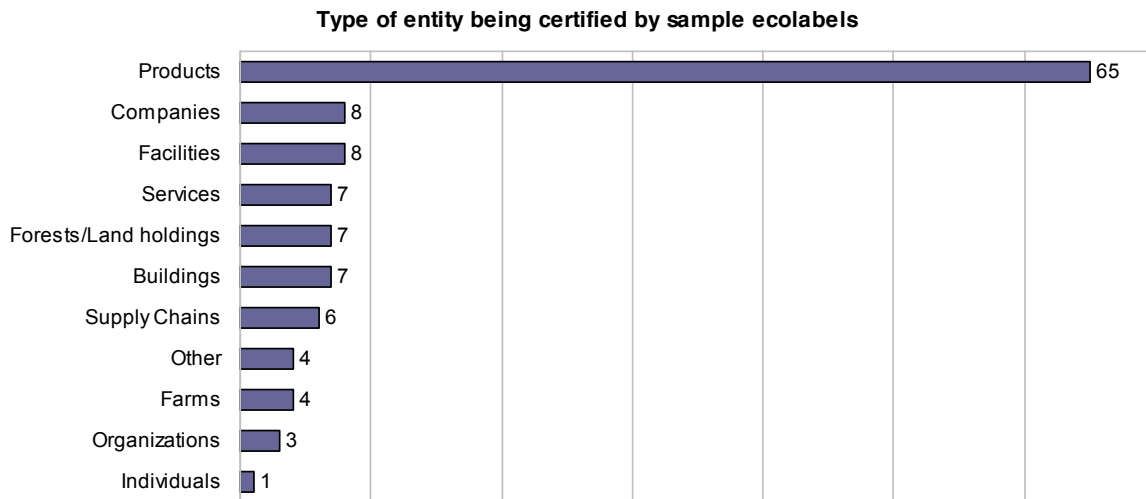


Figure 6: Type of entities being assessed and labelled by the sample ecolabels (note that some are double counted because they label more than one type of entity)

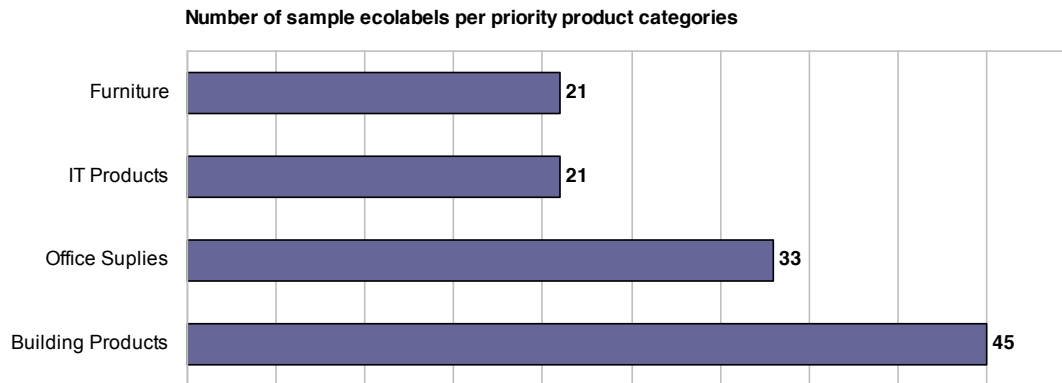


Figure 7: Number of ecolabels in sample per priority product category (note that some ecolabels have standards covering more than one of these product categories)

It is important to note that several of the labels analysed make up components of each of these categories, for example, timber ecolabels are included here in furniture, office supplies and building products. A decision will need to be made as to how to exactly apply product categories to the different labels for the Second task in the project, ideally matching them to standard-ized product categories that governmental purchasers already use.

For those fields that matched, the following observations can be made.

8.1.2 Standard-Setting

Standards and Norms Guidelines (1,2,3,5,6,7,8,9,10,11,12,13,14,15,16,17,18,20)

Many of the Guidelines in the “Standard Setting” category can be answered directly if the standard-setting process or organization was accredited to one of the standards identified – ANSI, ISO 14020/14024 or ISEAL Code for Standard Setting. One of the fields in ecolabelindex asks labels to identify what standard-setting code or standard they followed (if any); and lists several for selection. In addition, a “comment” field allows them to elaborate or add others we do not list. Some explain that they used “an open and consensus” process (but not following a code); and others list the following standards not elsewhere determined: IEEE Standard; LCA methodology BES 6050, PEFC Annex 4, ISO Guide 65, ISO/IEC Guide 2:2004; ISO 9000:2000; ISO 9001:2000; ISO 14001:2004; and following a “regulatory rule making process with public comment”.

- 68% of the labels in the sample indicated that they followed one of the listed standards. Of the remaining 32% only 2 listed another method, leaving 29% (or 21 labels) indicating that no standard was followed.

In the cases that ecolabels did not follow any particular code or standard for standard-setting, they are able to indicate that they meet the following criteria.

Openness/ Stakeholder Consultation (Guideline 1):

Aside from whether or not standard-setting norms were met (all of which include provisions for stakeholder consultation and participation), an indicator that assists in meeting this guideline is whether stakeholder groups were consulted; and if so, what groups were consulted. In the same vein, we found that:

- 68% (48 labels) listed one or another stakeholder groups as having been consulted.

- Nearly all ecolabels listed as having consulted a stakeholder group list more than 2 groups, such as companies, NGOs and Academics.

Transparency of the standard setting process (Guideline 5)

Aside from whether or not standard-setting norms were met (all of which include provisions for transparency), an indicator of transparency is whether or not the ecolabel publishes their standard online. Of those in the sample:

- 21% (15 labels) did not publish an easy to find version of their standard online.
- Of these 15 labels – 6 are corporate self-certification programs that list criteria in very generic terms (e.g. “reduces energy consumption”) without providing details on exactly how they measure this or by how thresholds are set.

Appeals – Dispute Resolution Procedure (Guideline 12)

Aside from whether or not standard-setting norms were met (all of which include provisions for handling appeals and disputes), an indicator here is whether the ecolabel has a dispute resolution procedure or a procedure for stakeholders to raise objections. In the sample,

- 15% (11) ecolabels indicate a specific dispute resolution procedure. However this should be tempered by the fact the majority of these also indicated that they followed standard-setting norms/accreditations, so presumably those procedures were met previously.

Standard Maintenance (Guideline 20)

Aside from whether or not standard-setting norms were met (all of which include provisions for updating the standard periodically), an indicator here is how often the standard is updated or reviewed. Of the sample,

- 65% (47 labels) disclose at least some time period for updating or reviewing the standard, such yearly (3 labels); every 2 years (5 labels); 3 years (4 labels), more than 3 years (7 labels) and “as needed” (28 labels). This shows that the majority of labels are updating their standards on as “as needed” and thus non-fixed schedule.

8.1.3 Standard-Substance

The following findings from the test were made for the Standard-Substance section of the Draft Guidelines. Here there is less overlap with the Ecolabelindex Fields.

Basis for Environmental Criteria – Life Cycle (Guidelines 28,29)

Each ecolabel in EcoLabel Index is asked to indicate what life cycle phases of a product it covers.

- 17% (24 labels) indicate that only one life cycle phase is addressed by the label’s standard, such as ‘End/Consumer Use’ for Energy Star.
- The spread of responses between the different life cycle stages can be seen below, where the largest category is End/Consumer Use’ followed by Processing/Manufacturing.

Mining / Extraction	14
Commodity Production	29
Processing / Manufacturing	33
Trade / Retail	8
End / Consumer Use	46
Product Recovery / Recycling	19
Transportation / Logistics	17
Other	2
Full life cycle	2
Chain of custody	18

Basis for Environmental Criteria – Multi-Environmental Attributes (Guidelines 29)

Each ecolabel in EcoLabel Index is asked to indicate the environmental attributes that their standards cover.

- In most cases (88%) more than one environmental attribute is selected, providing some indication that they are indeed tracking multiple-attributes. Note that the definition of what is a single versus a multiple attribute needs to be refined, so this is just an indicator. Here is a breakdown of the environmental attributes listed for the sample ecolabels.

Animal welfare	2
Biodiversity	26
Carbon / GHG Emissions	36
Carbon / GHG Offsets	12
Chemicals	42
Energy - Production / Sources	25
Energy - Use / Efficiency	34
Forests	21
GMOs	0
Material use	6
Natural resources	27
Natural resources	1
Other	1
Pesticides / Herbicides / Fungicides	0
Recycling	2
Soil	14
Toxics	42
Waste	33
Wastewater / Sewage	18
Water Quality	22
Water Use	24

Selectivity/ Differentiation and Consistent Application (Guidelines 31, 35)

No exact match was found for determining these Guidelines, however some data in Ecolabel Index may serve as a useful indicator for the types of ecolabels in this sample.

- 68% (49 labels) are of the type that are either awarded or not awarded – that is, are of the “pass/fail” type.
- The remaining 32% (23 labels) are comprised of Tiers – for example, gold, silver and bronze such as in EPEAT; and indicate minimum thresholds as well as more leadership standards.

A review of the substance of each of the standards to see if they qualify to meeting the guidelines would be necessary to truly assess their level of selectivity.

8.1.4 Conformity Assessment

This prospective set of Guidelines is currently at the level of principles and sub-principles, and has not been mapped or checked against other existing standards. Nonetheless, as several of the fields within Ecolabel Index currently track aspects of conformity assessment, they are included here to serve as illustration for what types of data could conceivably be collected.

Procedures and Best Practices for verification, certification and auditing (Guideline 36, 37, 38, 39, 40)

There are standards for aspects of conformity assessment just as there are standards for standard-setting. We have not researched these in depth, however in Ecolabel Index we do ask ecolabels to disclose on the following issues; and found in the sample database these outcomes.

Verification or Certification to Standards (Guideline 42)

- Who verifies or certifies compliance with your ecolabel?
 - Options include: Required third party; Required second party; Required first party; or Not required.
- For the sample ecolabels, Figure 8 shows a spread of verification requirements, the largest group requiring 3rd party independent verification.

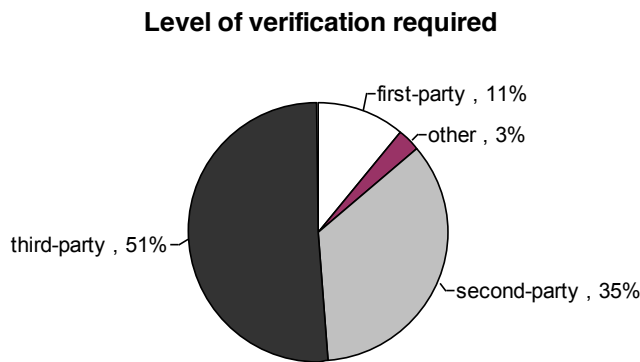


Figure 8: Level of Verification required by sample ecolabels

Accreditation of Verifiers (Guideline 36)

- If independent verifiers are used, do they have to be accredited and by whom?
 - 31% (22 labels) indicate that they require verifiers to be accredited.
- If accredited, to what norms?
 - The following is a list of norms and codes indicated by the ecolabels that would be worth researching for possible mapping into the Guidelines.

- ITTO
- ITTO/IUCN
- ANSI-ASQ National Accreditation Board (ANAB)
- ASTM Practice D5116
- ATO
- EPA Requirements for EPP Product Certifiers
- FTC Environmental Marketing Requirements
- IEEE standard
- ISO 14020 Environmental Label Principles
- ISO 14021 Environmental Label Requirements
- ISO 14024 Environmental Label Requirements
- ISO 17011 Accreditation
- ISO 17021 Management system certification
- ISO 17025 Testing and Calibration Laboratories
- ISO 19011 QMS and EMS auditing (and auditor qualifications)
- ISO Guide 59

Time limits to the use of the standard or label (Guideline 37)

- For how long can people use the ecolabel once it has been awarded?
- We found the following responses amongst the sample ecolabels, where we can see that almost half (46%) are not reporting this or do not set a limit.

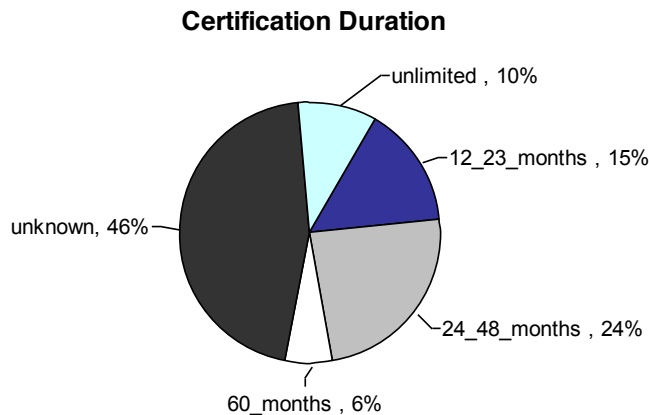


Figure 9: Required certification duration amongst ecolabel sample.

Dispute Resolution Processes (Guideline 40)

- Is there a dispute resolution procedure or a procedure for stakeholders to raise objections?
- This is the same question as we posed under standard-setting, that is an indicator here is whether the ecolabel has a dispute resolution procedure or a procedure for stakeholders to raise objections. In the sample,
 - 15% (11) ecolabels indicate a specific dispute resolution procedure. However this should be tempered by the fact the majority of these also indicated that they followed standard-setting norms/accreditations, so presumably those procedures were met otherwise.

8.1.5 Program Management

As with conformity assessment, this prospective set of Guidelines is currently at the level of principles and sub-principles, and has not been mapped or checked against other existing standards. Nonetheless, as several of the fields within Ecolabel Index currently track aspects of related to program management, they are included here to serve as illustration for what types of data could conceivably be collected.

Transparency (Guideline 45)

In order to assess the credibility of an ecolabel program, basic information needs to be shared, for example, on the content of their standards, the labels that have been awarded and on funding sources for the program (amongst other issues).

- Is the standard published online, and if so, where?
 - 21% (15 labels) did not publish an easy to find version of their standard online; and 79% provided a link.

8.1.6 Market

Number of current labels issued (Guideline 54)

- Number of Awardees of labels in 2010 or 2011
 - Currently only 24% of labels in the sample have provided a total number of labels issued for either 2010 or 2011. However it should be noted that this data point is not very accurate, as sometimes the information is published, but not in an easily accessible format so it not included in Ecolabel Index to date.

Publication of labels issued (Guideline 55)

- Is a link to section of website where lists of current holders of the ecolabel can be found:
 - 71% currently provide a link.

8.2 General findings on Applicability of the Draft Guidelines

In order to use the Guidelines as a way of pre-assessing ecolabels and standards, some of the Guidelines will need to be re-framed. In general we can think of two ways of improving their applicability, by:

- a. Addressing the measurability of the guidelines so that comparable data can be gathered; and
- b. Addressing the ability to assess ecolabels and standards using the Guidelines.

In general, once the draft Guidelines are revised, more extensive data gathering will be needed to ensure that gaps accurately reflect a lack of transparency and not simply a gap in the data gathering. In addition, several new fields will needed to be added.

Where possible, it is efficient to use pre-qualifying criteria where possible (e.g. if they met ANSI Essential Requirements for standard setting, then they meet many of the standard-setting guidelines). However in the interests of retaining accessibility and flexibility, it is important not to restrict the universe to only those standards or labels that have been through one of those processes. Therefore Guidelines covering the important and relevant issues should be retained and alternative means to proving that the guidelines are met should be allowed for and measured.

Many of the ecolabels assessed make up components of the designated priority product categories, for example, in furniture, there are far fewer standards and labels just for “furniture” as a whole, but many more for components that make up furniture. The question of classification of the ecolabels to more precise and useful product categories needs to be taken up in Task 2 of the analysis.

The category that needs the most work in terms of improving measurability and the ability to assess labels based on the Draft Guidelines is that relating to Standard-substance. This partly reflects the limitations of the Ecolabel Index in terms of analyzing the content of the standards, but also the many technical terms and concepts that are embedded within the Standard-Substance Guidelines that will require further definition, delineation and evaluation protocols. Right now, many of the guidelines would require the assessor to make a determination whether the standard is “good enough”, and thus could be seen as somewhat subjective. This can be addressed by re-writing the questions, by clearly defining terms, by referring to other standards that help answer those questions and by developing standardized evaluation protocols.

In addition, guidance could be provided not only on the labels, but also on how they fit into the main environmental aspects for that particular product category. This would help to assess when

and how the label's criteria addresses the most relevant environmental issues, which will be especially useful in analyzing the utility of single-attribute labels.

Another question to address is whether all of the Guidelines should be equally weighted, how they should be applied toward standards versus labels, and how to handle those instances where a standard or label is strong on one guideline or set of guidelines, but weak on another. One possibility is to create a sub-set of guidelines that make up a "minimum bar" that must at least be met; and the full set of guidelines for preferred standards and ecolabels. Because some labels or standards will relate directly to relevant environmental issues in some product categories but less so in others, it may be that a product-category by product-category approach be delivered particularly when it comes to assessing the substance of a standard. This would also reflect the fact that for some product categories there are many ecolabels and standards so a higher-bar could be expected, while for others there are few or even none.

Report 1b: Recommendations

Report 1b Recommendations

Based on the analysis undertaken so far, the following recommended changes could be made to the Draft Guidelines.

Structural changes are first recommended, including creating five framework categories with guidelines under each (Standard-setting; Standard-Substance; Conformity Assessment; Program Management and Market) and associated questions that would aid in gathering data to meet the guidelines.

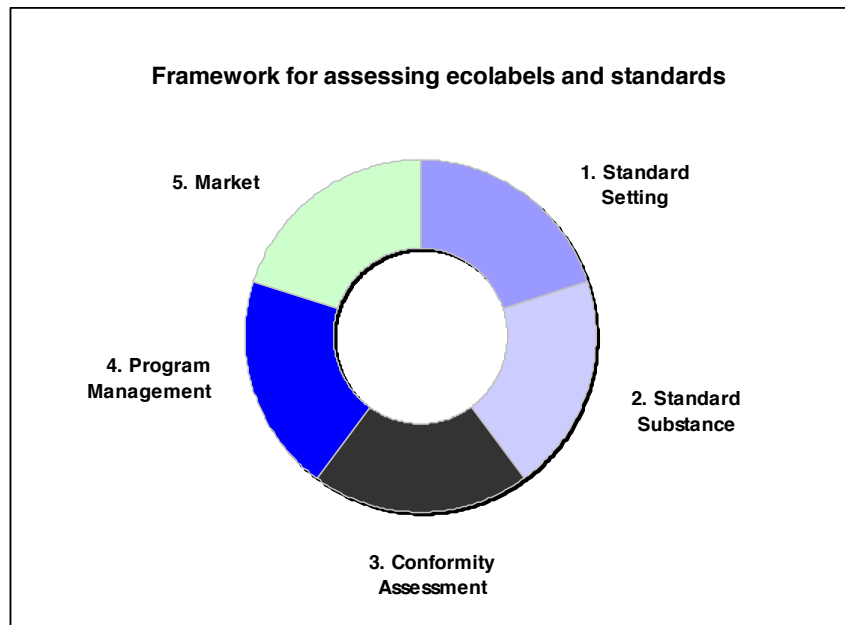
Suggested edits and additions are provided with the goal of improving both the comprehensiveness (per the Task 1a comparative review), and to improve the ability to gather comparable information on each of the ecolabels and standards (per task 1b). We also note issues for which further research or work-group discussion are required.

In addition, we recommend clearly demarcating those guidelines that relate to standards, and those that relate to ecolabels. While there is some overlap, not all apply to each.

1.1 Structure of the Guidelines

The Draft Guidelines are currently structured as a list of Guidelines, Meta-Guidelines and more specific Definitions/Guidelines. We recommend keeping this basic structure but changing the naming for these columns as: “Principles, Sub-Principles and Guidelines” to more accurately reflect their content.

It is clear that Guidelines 1-20 relate primarily to standard-setting activities, and 21-35 to the substance of the standards. In light of the fact that the current Guidelines do not directly address the issues of conformity assessment, program management and market issues, we recommend adding these aspects as additional “framework categories”.



In order to improve the precision of application of the Guidelines to ecolabels and standards and to improve the data-gathering process, we recommend creating for each Guideline an associated

question or questions that could be posed directly to the ecolabels and/or standards organizations; such as in a survey format. Where possible, we recommend that pre-determined options also be created, to cut down on the level of interpretation needed to be made by assessors and also to help streamline the data collection. To illustrate the types of questions that could be created, we provide examples for questions on Guidelines 1-5 below.

We recommend marking those guidelines that relate to standards, those that relate to ecolabels, and those that relate to both. While there is some overlap, not all Guidelines will apply to each.

To implement these structural changes:

- Create a new column with the new high-level categories reflected in the framework to serve as a navigation tool, and with principles, sub-principles and guidelines to be created within each. Categorize existing Guidelines 1-20 as “standard setting” and 21-35 as “standard substance”;
- Rename “Guidelines” to “Principle”; and “Meta-guideline” to “Sub-principle”; and “Definitions/Guideline” to “Guideline”;
- Create three new categories of “Conformity assessment”, “Program management” and “Market issues” with additional principles, sub-principles and guidelines to be created within each;
- Keep the columns “applies to ecolabels” and “applies to standards”;
- Create two new columns with “Question” and “Response-Fields” so that each of the Guidelines can have data gathered on it and where possible, with pre-determined options;
- Delete the “ANSI Accredited” column and add accreditation for standard-setting as a new guideline (see below list of additions); and
- Keep the “Authority” column and use to show where guidelines are referenced in several (credible and published) assessment systems.

With these changes made, the proposed new structure would look like this:

Category	Principle	Sub-Principle	Guideline #	Guideline	Question	Response Fields	Applies to ecolabels	Applied to standards	Authority/Reference
----------	-----------	---------------	-------------	-----------	----------	-----------------	----------------------	----------------------	---------------------

Some more specific re-allocations between the Guidelines and meta-Guidelines (in our suggestion, termed Principles and Sub-principles) are recommended as follows:

- Elevate “transparency” its own principle, taking it out of “openness”.
- Group the following guidelines that related to the setting of environmental criteria under one new Principle: “Basis for environmental criteria”. For each, list the sub-principle as:
 - Guideline 25 and 26 “Scientific basis of product environmental criteria” – move this as a sub-principle
 - Guideline 28 “Life Cycle Considerations” – move it as a sub-principle
 - Sub-guideline 29 “Consider a broad array of potential impacts over the full product life cycle” re-name to new sub-principle “multiple attributes”
 - Guideline 30 “Hotspots” - move it as sub-principle
 - Guideline 33 “Hazard based approach” – move it to a sub-principle
 - Guideline 34 “Disclosure of ingredients and impacts” – move it to a sub-principle
- Move Guideline 27 from “Basis for criteria” to the principle of “Selectivity” and re-name its sub-principle as “Accessibility”.
- Guideline 35 - assign principle "selectivity" and sub-principle "clear and consistent guidelines"

In what follows we take each framework category and make recommendations for edits, additions and areas for further research or consideration. Where new text is suggested it is in *italics* and where supplementary questions are recommended, these are indicated with a *.

1.2 Provide Definitions

Certain terms used in the Guidelines should be defined in a supplement in order to improve their comprehension and consistent application. These definitions should be based on existing standards wherever possible, and a reference clearly provided. The following terms requiring definition have been identified so far:

- Certification
- Conformity assessment
- Consensus
- Ecolabel
- First party, second party, third party
- Fitness for purpose
- Hazard based approach
- Hotspots
- Interested Party
- Life cycle
- Materially affected parties
- Multi-attribute
- Product category
- Relevance
- Sound scientific and engineering principles
- Standard
- Stakeholder
- Verification
- Verifiable /Measurable and testable criteria

1.3 Detailed Recommendations

An addendum was provided that has detailed recommendations for improving the draft Guidelines under each of the categories. For each Framework Category, Recommendations were made on:

- Specific edits to the Draft Guidelines (v 6.21);
- Additions to the existing Guidelines;
- How to improve their measurability and the likelihood to gather comparable data;
- How to address assessment requirements (that is, how the Guidelines could be reformulated so that labels and standards could be assessed using them); and
- Where further research or discussion is required.

This material is available by request and is excluded here for brevity.

1.4 Conclusions and Next Steps

The Task 1 analysis has revealed several areas in which the Draft Guidelines are comparatively rigorous, as well some areas where they could be both refined and supplemented. Testing the Guidelines on an existing database of ecolabels showed that certain constraints of measurability of the Guidelines should be considered as part of this revision, in light of both what data might be possible to collect, and how to effectively judge the data that is gathered.

Several issues still remain to be considered:

- If included, further research and delineation of Guidelines for the framework dimensions 3,4 and 5;
- Agreed upon definitions of key terms;
- The extent to which the Guidelines will be applied as an assessment or screening tool and how they will be applied in practice;
- The application of standardised product classification systems to ecolabels and standards; and
- How assigning points or weightings to the Guidelines might be utilized to determine some minimum bars, best practices and/or thresholds;
- Differentiation between guidelines for standards and ecolabels;
- How to improve the usability of the Guidelines for the intended purchasing audience in terms of communication style and format.

The next steps for this project are to take the revised Guidelines and re-test them against a set of ecolabels *and* standards. In doing so we will also conduct a sensitivity analysis on the Guidelines to determine their applicability to the universe of ecolabels and standards currently on the market.



Report 1c: Conformity Assessment, Program Management and Market Presence Guidelines

Report 1c: Conformity Assessment, Program Management and Market Presence Guidelines

1. Background

Report 1c makes a series of recommendations on building Guidelines for ecolabels and environmental standards on the areas of:

- *Conformity Assessment* –the process by which products meet the requirements of standards, regulations or other specifications.
- *Program Management* - How the ecolabel or Standard body is managed and governed.
- *Market Presence* - The extent to which the Standard or Ecolabel is used and recognized in the marketplace.

For each of these categories, draft guidelines are proposed that are based on a review of existing standards and a consideration of what information may be available and the purpose of the Guidelines – namely to ultimately guide Federal purchasing policy. In addition, associated questions for each of the guidelines are also proposed which will form the basis for Task 2 testing with a sample set of ecolabel programs via a survey tool.

In order to develop these recommendations, the following work was undertaken:

1. Identification of requirements and criteria for conformity assessment, program management and market presence in Task 1 of the assessment.
2. Informal Interview with conformity assessment standards expert Gordon Gillerman at NIST; and subsequent NIST review.
3. Identification of relevant ISO conformity assessment standards (see Section 2)
4. Review and mapping of said standards – identification of common principles, sub-principles
5. Development of draft principles, sub-principles, guidelines, references, and survey questions for each of the three categories

2. Standards and Assessment Systems Analyzed

Figure 2 shows the standards that were reviewed on conformity assessment.

Conformity Assessment Specific Standards

Count	Standard name	Description	Year
1	ISO/IEC Guide 65	General requirements for bodies operating product certification systems	1996
2	ISO 17011 Accreditation	Conformity assessment -- General requirements for accreditation bodies accrediting conformity assessment bodies	2004
3	ISO/IEC 17020	General criteria for the operation of various types of bodies performing inspection.	1998
4	ISO/IEC 17021	Conformity assessment -- Requirements for bodies providing audit and certification of	2011

		management systems	
5	ISO 17025	General requirements for the competence of testing and calibration laboratories	2005
6	ISO/IEC 17050 -1	Conformity assessment -- Supplier's declaration of conformity -- Part 1: General requirements	2004
7	ISO/IEC 17050 -2	Conformity assessment -- Supplier's declaration of conformity -- Part 1: General requirements	2004

Figure 2: ISO Conformity Assessment standards reviewed.

In addition, the following ISO publications were used as reference documents on conformity assessment:

- ISO CASCO (2005) ISO and conformity assessment. ISO, Geneva. ISBN 92-67-10403-9
- ISO CASCO & UNDIO (2010) Building Trust: The conformity assessment toolbox. ISO, Geneva. ISBN 978-92-67-10511-6

In the next section of the Report, each of the three new framework categories are described and recommended Principles, sub-principles and guidelines posed.

The detailed recommendations for the wording of each proposed Guideline are excluded from this Summary Report; but are available on request.

3. Recommendations for Conformity Assessment Principles and Guidelines

Conformity assessment refers to checking whether products, services, materials, processes, systems and personnel “measure up” to the requirements of standards, regulations or other specifications (ISO CASCO, 2005). Conformity assessment may consist of any one or, some of or all of the following activities:

- sample testing;
- inspection;
- process evaluation;
- supplier’s declaration of conformity;
- management system certification/registration;
- personnel certification;
- product certification;
- mutual recognition of results; and
- accreditation and peer assessment of the competence of the organizations conducting these activities – collectively known as “conformity assessment bodies”. (ISO CASCO, 2005).

For our purposes, conformity assessment includes the processes and procedures used to verify or confirm whether a product meets the environmental criteria in a standard and/or ecolabelling program. This process may be undertaken by the supplier of the product themselves, or by a different organization.

A typical conformity assessment process is illustrated in Figure 3.

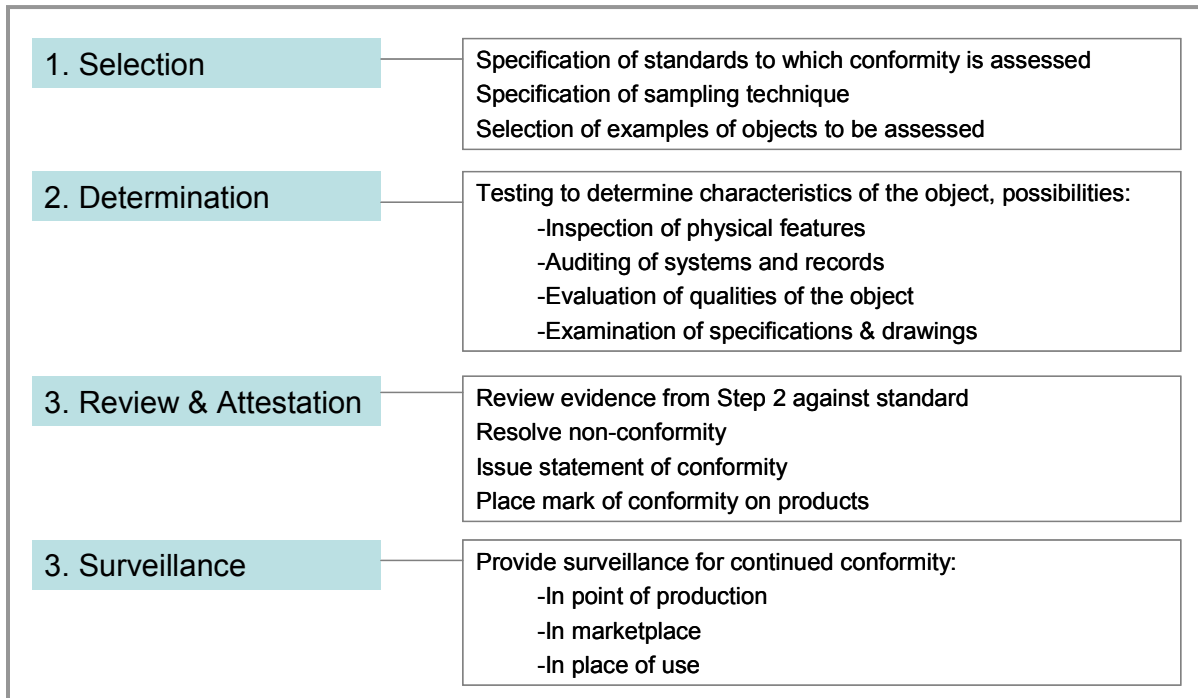


Figure 3: Generic conformity assessment process. Based on ISO CASCO/UNIDO (2010).

The different ISO standards and assessment systems reviewed for this assessment specify the practices and procedures for organizations involved in the various aspects of conformity assessment. However not all of these requirements are relevant or generalizable.

There are many different systems for conformity assessment, varying in the degree of complexity and rigor being applied and procedures employed. It is difficult to specify an exact system that all ecolabels or standards should follow because of variation between:

- The objects being evaluated (i.e. products, people, buildings, processes etc)
- The environmental criteria of ecolabels and standards
- Sector-specific practices and constraints,
- Different levels of risks associated with the conformity, for example, in determining safety
- Accessibility requirements
- Marketing and positioning strategies of the ecolabels
- The availability of competent conformity assessment bodies.

The final conformity assessment schema will depend on the balancing of these considerations by the ecolabelling or standard-body and the supplier seeking certification to that label or standard. This approach is supported by the ISO 14024 standard for type 1 ecolabels, which states: “*The methodology for assessing whether a product complies with the product environmental criteria and product function characteristics, and of verifying on-going compliance, shall be documented and have sufficient rigour to maintain confidence in the programme. There may be many factors*

influencing the choice of compliance procedures, and the methodologies may vary from one programme to another.” (ISO 14024: 7.4.1)

The approach taken to developing draft Conformity Assessment Guidelines was to first focus on the most common general principles, and then to build up a set of preferred practices and guidance associated with each. These principles, sub-principles and guidelines will then be tested against typical conformity assessment process that a set of major ecolabels are currently using (during the testing phase). As such, associated survey questions to gather information are presented alongside the guidelines.

Given the level of variation in ecolabelling and environmental standards in the types of conformity assessment processes followed, as well as the types and sizes of organizations providing these services, the Guidelines refer to “Conformity Assessment bodies” to cover any or all organizations providing conformity assessment services and methodologies. This may include certification, evaluation, testing, inspections, laboratories, calibration, and so on. “Conformity assessment bodies” include the spectrum of organizations involved in addressing conformance– from suppliers determining their own conformance (1st party), to buyers assessing conformance (2nd party) to the ecolabels creating and maintaining standards and/or independent organizations or individuals contracted or sub-contracted to determine conformance (3rd party). The draft guidelines proposed seek to focus on the nature of the *activities* and *best practices* these bodies make and do not at this time specify any particular conformity assessment organizational format.

The following Principles and Sub-principles are proposed:

Principle	Sub-Principle	Guideline Number
Coordination and Harmonization	Follow standardized procedures for conformity assessment	31
	Accredited bodies	32
Independence/Impartiality	Independence of conformity assessment bodies	33
	Objectivity	34
	Avoiding conflicts of interest	35
Procedural Integrity	Procedures	36
	Steps to evaluate conformance	37
	Decision making responsibility	38
	Awarding certification	39
	Consistency of results	40
	Procedures for controlling documents and data	41
	Protect confidentiality	42
	Appeals – policies for	43
	Appeals – resolution of	44
	Traceability	45
Market Surveillance	Continued conformance	46
	Controlling marks/declarations	47
	Addressing misleading uses of marks/declarations	48
Competence	Quality system	49
	Competent personnel of sufficient number	50
	Quality of facilities and equipment	51

Accessibility	No constraints to access	52
Openness/Transparency	Information on processes	53
	Information on financial means of CA bodies	54

3.4 Areas for refinement and discussion in Conformity Assessment

Aside from the notes made in the table of proposed guidelines (in red italic font) the following feedback and input is highlighted for discussion for the Working Group.

The set of draft guidelines proposed presented are comprehensive. The working group should determine which of these is most “core” to indicating a credible conformity assessment system and also indicate which should be considered “baseline”.

There is a question as to how strongly to indicate a preference for third party conformity assessment systems. Some options are:

Option A (more generic):

- All bodies involved in the conformity assessment process (including those evaluating, inspecting and testing products' conformity) shall be independent to the extent that is required with regard to the conditions under which they performs their services.

Option B (stronger):

- All bodies involved in the conformity assessment process (including those evaluating, inspecting and testing products' conformity) shall be independent from those organisations to whom they are providing their services, and ideally be third party

Option C (more specific):

- The conformity assessment body shall not: a) supply or design products of the type it certifies, nor b) provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its certification process and decisions.

Right now there are no guidelines that specifically address the sometimes considerable costs of conformity assessment procedures for suppliers. None of the ISO standards make reference to it either.

Cost considerations are now included in the program management portion of the guidelines ask about costs of applying for and maintaining an ecolabel, with conformity assessment fees such as tests included.

4. Recommendations for Program Management Principles and Guidelines

Program Management refers to how the Standard and/or Ecolabel is managed and governed. Ecolabels and standards have to be managed by an organization to roll out their implementation and gain traction in the market.

Management issues concern how the program is governed, how it is financially sustained; how accountable it is to various stakeholders, how the ecolabel or standard is

marketed to both potential applicants and users; how accessible it is cost-wise; how its' use is controlled or monitored in the marketplace; processes for complaints and appeals; and whether and how it coordinates with other standards and labeling systems. There are also some program management issues covered in the standard-setting, conformity assessment and market presence framework categories which are excluded here as guidelines in order to reduce redundancy.

As with conformity assessment, there is a high variation between the management practices and institutional design of ecolabels and standards. Therefore the approach taken to developing guidelines is to focus first on a set of common principles, then translate these into potential guidelines for preferred practices.

Principle	Sub-Principle	Guideline Number
Competence/Management	Management/quality systems	55
	Monitoring and evaluation	56
	Evaluation of environmental effectiveness	57
Complaints and Appeals	Processes	58
Governance	Disclosure of stakeholder involvement	59
	Formal rules for stakeholder involvement	60
	Balance of interest	61
	Avoidance of conflicts of interest	62
Accessibility	Cost	63
	Administrative burden	64
	No restrictions	65
Transparency	Disclosure of funding sources	66
	Disclosure of standards	67
Market surveillance	Licensing	68
	Control of the use of logos' marks	69
Coordination and Harmonization	Membership/Accreditation	70
	Mutual recognition	71

5. Recommendations on Market Presence

Market presence refers to the extent to which the Standard or Ecolabel is used and recognized in the marketplace. For purchasers who might specify either a standard, an ecolabel or otherwise use the criteria embedded in each in their purchasing specifications, having an understanding of how many products or services can meet that standard is key to how effective that condition will be. In addition, in some cases it is important for purchasers to know how these provisions might interact with other goals or conditions for purchasing, such as enhancing competitiveness or favoring locally produced items. Finally, many purchasers want to know what kind of recognition in the marketplace a given standard or ecolabel has already achieved. While it's not necessarily a conditional requirement (meaning that ecolabel or standard should have reached X% market share), having some sense of its uptake will be an important consideration.

Information could be sought on the number of products and services that have met a given standard or ecolabel and within certain sector and geographic markets. In addition consideration can be given as to the quality of that information, its user-friendliness, and accessibility. Finally, whether or not the uptake and impact of the label or standard on the market has been analyzed, and the results of such an analysis, is of interest.

The following principles and sub-principles address the questions about the market uptake of labels. Note that the guidelines are worded in such a way that its is open as to which party involved in the ecolabel/standard process should provide this information – in some cases it will be the ecolabel / standard program managers, in others the 3rd party certifiers, and/or by 1st party certification systems.

Principle	Sub-Principle	Guideline #
Transparency	Certification information disclosed	72
	Information is current	73
	Information is accessible	74
	Market applicability - product categories & regions	75
Market Impact	Assessment	76

Report 2a: Testing the Draft Guidelines: Survey of Selected Ecolabels and Standards

Report 2a: Testing the Draft Guidelines: Survey

High Level Findings from an Analysis of Guidelines based on a Survey of Selected North American Ecolabels and Standards.

1. Background to Report 2a

Report 2a presents the results from a survey of 17 Ecolabels and 34 Environmental Standards undertaken in September 2011. A series of recommendations for refining the guidelines based on the outcomes of the analysis are proposed for consideration by the Working Group.

- This Report summarizes the key findings and recommendations.
- The Addendum Report “2B Detailed Report” provides the findings per Guideline
- The Survey Questions and Supplementary Guidance that was sent to participants is also provided as an Appendix.

The purpose for this analysis was to conduct an initial small sample analysis of the Draft Guidelines against a sample of current market offerings. The aim is to contribute to understanding of how the current Draft Guidelines meet current market conditions and best practices in the creation and use of ecolabelling and environmental standards.

We also aimed to validate the usability and eventual implementation of the Guidelines. The survey served as a “beta test” of the types of information that could be gathered from ecolabelling and environmental standards programs. To this end, feedback was also sought from participants in the survey as to the questions’ scope and clarity within the survey itself.

Given the small sample size that the survey was sent to, the results are not representative of the general population of ecolabels and standards. The analysis rather serves as an indicator of the types of issues and refinements that may be made in the near-term to the Guidelines; and serve to provide some experience on their eventual implementation.

The following steps were undertaken to conduct the analysis presented in this report:

1. Identification and selection of the sample group
2. Invitation to participate in the Survey, via a webinar and email invitation
3. Creation of the Survey tool, including questions relating to each of the Guidelines as well as some general tracking/categorizing questions
4. Implementation of the Survey and gathering of results
5. Analysis of the Survey results, per framework category, guideline and question.
6. Recommendations based on the analysis.

2. Methodology

2.1. Sample Design

In order to test the Draft Guidelines against a set of existing ecolabels and standards, a group of voluntary and governmental ecolabels and standards were selected for assessment. Requirements of the Federal Reduction of Paperwork Act kept the sample group to a set of nine non-governmental organizations.

2.1.1 Sample Selection Criteria

The following criteria were used to create the final sample group for the assessment:

Criteria:

- North American presence
- Product Categories of relevance to Federal Purchasers

Ensuring a spread or mix of

- Government-run (e.g. Energy Star) and non-government-run labels and standards
- Labels and standards
- Product and Service categories
- Pass/Fail and tiered labeling systems
- Single and multi-attributes standards/ labels
- Organization types behind – industry associations, NGO, Gov and private companies

Other considerations:

- Priority product categories for federal purchasing (in selecting standards)
- Responsiveness of organization to request
- The total number of non-governmental organizations/standards to be surveyed was limited to ensure that Reduction of Paperwork Act (1980) requirements were observed.

Given these criteria, the final sample group is not intended to be representative of the full spectrum of ecolabels and environmental standards on the market today. Further analysis will be made of how well this sample represents (or fits) the full landscape of ecolabels and environmental standards (based on Big Room's Ecolabel Index data) so that the results generated from the Survey can be placed in context.

2.1.2 The Final Sample Group Surveyed/Assessed

This total sample size across the two surveys was:

- Survey 1 (Program Management, Conformity Assessment & Market): 17
- Survey 2 (Standard-Setting & Standard Substance): 34

The final group of programs and standards that were either surveyed or assessed are seen in the following table.

Organization/ Program	Survey 1	Survey 2	Name of Standard(s)
External Organizations			
Forest Stewardship Council (FSC)	1	2	FSC US Forest Management Standard, FSC Chain of Custody standard (FSC-STD-40-004)
GreenSeal	1	5	Printing and Writing Paper (GS 7); Paints and Coatings (GS-11), Hotels and Lodging Properties (GS 33); Cleaning Product for Industrial and Institutional Use (GS-37); Stains and Finishes (GS-47)
Business and Institutional Furniture Manufacturers Association (BIFMA)	1	1	LEVEL – The Furniture Sustainability Standard
Scientific Certification Systems	1	2	FloorScore certification standard: SCS-EC10.2-2007; Indoor Advantage certification standard: SCS-EC10.2-2007
Sustainable Forestry Initiative	1	1	Integrated response for: SFI 2010-2014 Standard (includes Forest Management and Fiber Sourcing) & Chain-of-Custody Standard
SMaRT	1	1	Sustainable Materials Rating Technology (SMaRT)
TCO Development	1	1	Integrated response for: TCO Certified Displays, Projectors, Notebooks, Headsets, All in One Computers and Desktops.
Carbon Neutral Company	1	1	The CarbonNeutral Protocol
Underwriters Laboratory Environment (ULE)	3	9	<i>Ecologo</i> : Hard Surface Cleaners; Toilet Tissue; Paper; Printing Cartridges; Renewable Low-Impact Electricity Products; <i>GreenGuard</i> : Children & Schools; Building Materials, Finishes and Furnishings; <i>ULE</i> : Door Leafs; Gypsum Boards and Panels
Government Run Labels			
EPA/DOE Energy Star	1	1	Energy Star
EPA WaterSense	1	4	Tank-Type Toilets; Showerheads; Flushing Urinals; High Efficiency Lavatory Faucet
EPA DFE	1	1	Standard for Safer Cleaning Products

USDA BioBased	1	1	BioBased
EPA CPG/ RMANs	1	1	Recovered Materials Advisory Notices (RMANs)/ CPG

In addition, two assessments were made by the project team of standards of interest:

Assessments			
GEC/IEEE - EPEAT	1	1	IEEE 1680.1 Standard for the Environmental Assessment of Personal Computer Products
NSF	0	2	Resilient Floor Coverings; Commercial Furnishings Fabric

2.2. Survey Structure and Implementation

The Survey was designed using an online platform. Participants were sent instructions, a Weblink to access the Survey, and supplementary guidance document with all the questions (in Word and PDF file formats) and a Glossary of Key Terms (see Appendix).

Each of the two Survey's began with "Basic/ Tracking Questions", followed by questions relating to each of the framework categories, each on its own Survey Page.

Participants were able to log-in at later times and then finally submit their Surveys.

The Survey opened on Thursday September 8, 2011 and Closed on Sept 23rd, 9pm EST

Because some ecolabelling programs have multiple standards for different product categories (for example, GreenSeal currently has 33 issued standards), the Survey was administered in two parts, 'Survey 1' and 'Survey2'.

Survey 1	Basic/Tracking: 5 Questions	Per Program
	Program Management: 24 Questions	
	Conformity Assessment: 17 Questions	
	Market Presence: 13 Questions	
Survey 2	Basic Tracking: 9 Questions	Per standard
	Standard Setting 27 Questions	
	Standard Substance: 22 Questions	

Survey 1 - covered the issues of Program Management, Conformity Assessment and Market Presence. Each program responded once to this survey, except for UL Environment which filled it out for their three programs (ULE, Ecologo and GreenGuard) given that they were only recently merged into the one organization and were developed and run as independent programs.

Survey 2 - covered Standard-Setting and Standard-Substance Issues. In consultation with Big Room Inc, those organizations with multiple standards were asked to select a set of 4-5 standards a sub-sample to fill out for Survey 2. The following criteria were used to select this sub-sample:

- Standards for product categories commonly used in Federal Purchasing (IT products, Building Products, Furniture, Office Supplies and Cleaning Supplies)
- Where possible, a mix of standards for both Products and Services
- Where possible, a mix of standards covering either a single environmental attribute or multiple environmental attributes.
- The scale of the program – preference for those standards where many certifications have already been issued and with an established market presence.

2.3. Analytical Approach

Each of the Survey questions was mapped to the current Draft Guidelines; and are reported in detail in the Addendum Report “2B Detailed Findings”

Responses to each Survey Question (including any comments received) were analyzed in regards to how close are the Draft Guidelines to conditions found in the current market for ecolabels and standards, as represented by the sample.

Indicators of “distance” from the Draft Guidelines to the market were:

- There were many gaps in responses or skipped questions,
- Where there were many comments; or
- Where there was a large variation in the responses.

Given that the sample group was purposely diverse, in terms of scope and type of programs supporting the standards, variation per se is not a bad thing. Rather – served to show where and how the guidelines variously “fit” in different contexts and may be refined as a result.

Recommendations are made on the following fronts:

1. Guidelines Revisions:
 - Suggested near-term revisions to the Guidelines, including minor text changes, and suggestions to combine some of them
 - More substantive changes to the Draft Guidelines
 - Possible New Guidelines to add, based on feedback received by respondents
2. Adjustments to future Survey Questions and data gathering efforts; including:
 - Where question wording could be improved for clarity
 - Where options for responses need to be adjusted; and
 - Where “substantiation” of the responses may be requested in future surveys. The reason to substantiate responses (for example, by including the actual text of policies) is so that evaluators could eventually check that questions were interpreted correctly, and that answers are consistently analyzed.
3. Recommendations for creating evaluation methods and guides to help to interpret the results on specific topics that may require an expert view.

These are tabulated for each of the framework categories and presented in detail for each guideline in the addendum report (“2B: Detailed Findings”).

3. More about the Survey Respondents

Each of the Survey respondents was asked to complete a set of “basic/tracking questions” which help give an overview of their scope.

In order to see how “representative” the final sample group was of the North American population of ecolabels and environmental standards, in this addendum we compare the survey sample against a larger dataset of 216 North American ecolabels and standards (tracked by Ecolabel Index⁴). For those categorical issues (such as type of labeling program), the ecolabels in the larger Ecolabel Index dataset were classified in the same way as the sample group to enable comparability.

The following characteristics are covered in the analysis

1. Type of Organization
2. Longevity of the Program
3. Number of standards per labeling program
4. Types of Standards (tiered vs. pass/fail)
5. What gets labeled? - Object of the Ecolabelling Program/Standard
6. Types of Conformity Assessment Procedure (1st, 2nd, 3rd party)
7. Product Categories

In selecting these characteristics, we considered how complete the larger dataset of North American ecolabels in Ecolabel Index, as not all labeling programs disclose information requested at present.

3.1 Type of Organization

The sample group was selected based on a range of types of organizations that run the ecolabelling program – from non-profit to government to industry associations and privately-held entities. A category “hybrid/social venture” indicates that the organization may have a for- and non-profit arm (such as EcoLogo which is for profit, but is owned by the non-profit Underwriters Lab; or TCO development, which also has both for- and non-profit divisions).

⁴ www.ecolabelindex.com

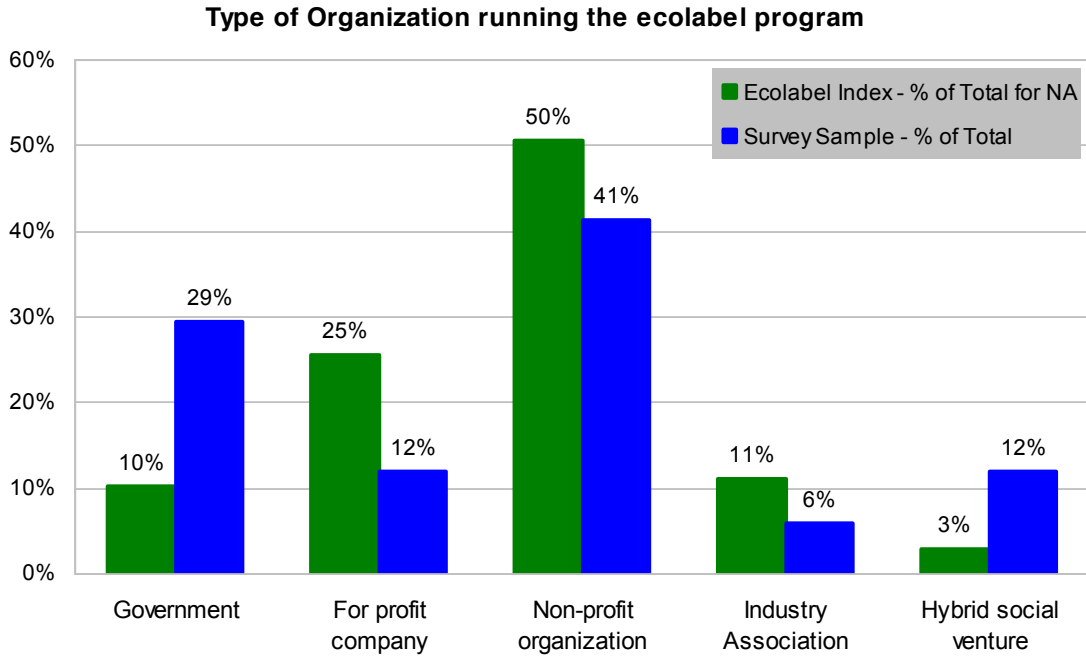


Figure 1: Type of organization.

Compared to the larger universe of North American Ecolabels, the sample group had a higher percentage of government-run programs than is typical (29% compared to 10%), and a higher percentage of hybrid type organizations. It had a lower than average percentage of non-profit and for-profit organizations than what is found in North America typically.

3.2 Longevity of the program

A range of program longevity is found in the sample group of ecolabels surveyed, going back to 1984 (EPA’s CPG/RMAN program) and as recently as 2010 (USDA’s Bio-based program).

Year of launch: Ecolabel Program Surveyed

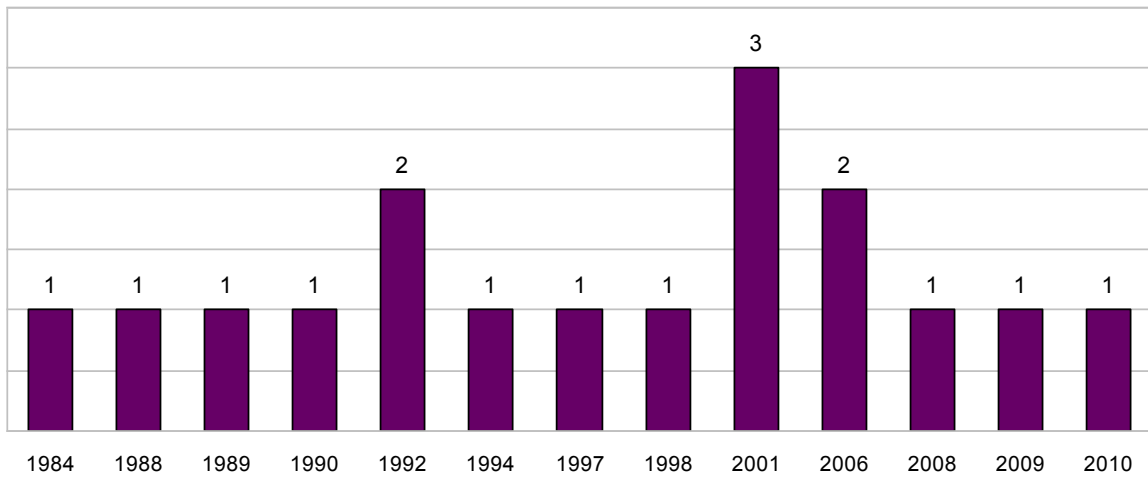


Figure 2: Year the ecolabel program was launched – survey sample.

Breaking the sample group into decades and comparing that to when ecolabels in North America were launched, we can see that the sample group has more longevity than the general North American ecolabel population - a larger percentage of the survey sample group were launched in the 1980's than in Ecolabel Index; and a smaller percentage in 2001-2011.

Year ecolabel program was launched

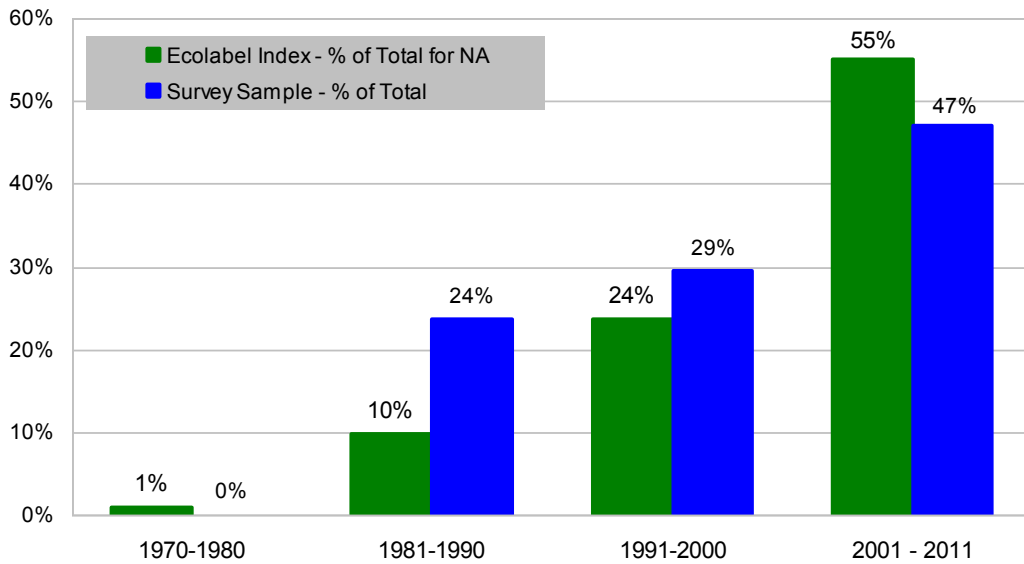


Figure 3: Comparison of decade of launch of survey sample to North American ecolabels

There was also a range of years in which the standards we selected for further information gathering were first published – from 1984 right up until 2010 and 2011.

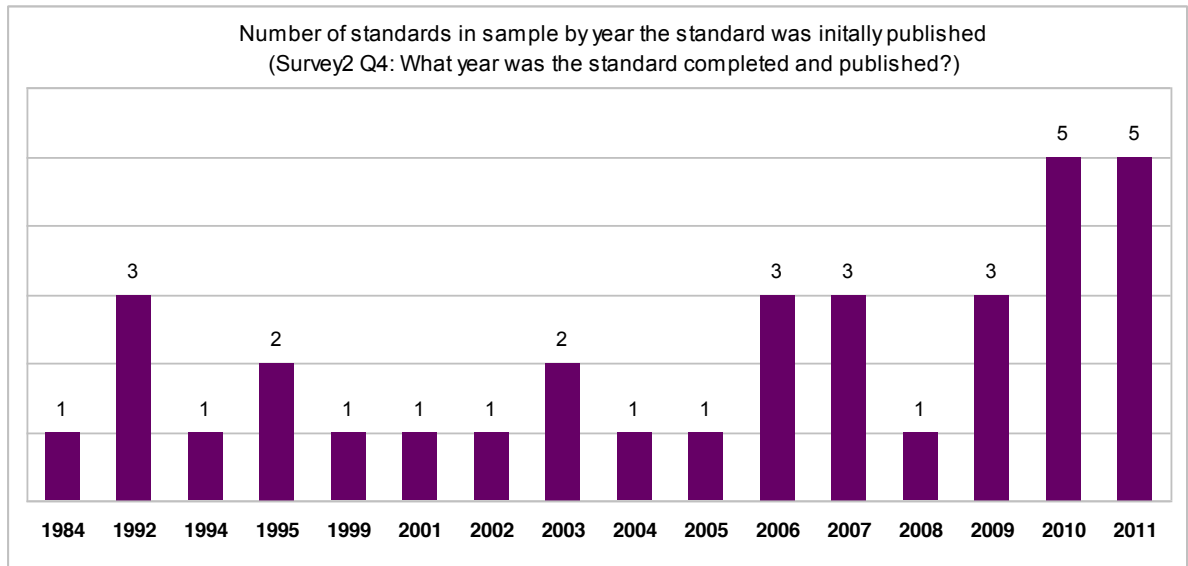


Figure 4: Year the Standard was Published

While the labeling programs have been existence for some time, they are also actively creating new standards. Figure 5 shows some 61% of the sample group have new standards currently in development. Whatever system is created for implementing the guidelines, it will need to take into account the dynamic nature of the programs and standards being offered and create an effective system for monitoring those in the future as they come online, are updated, or are retired.

Do you have any new categories or standards currently in development?

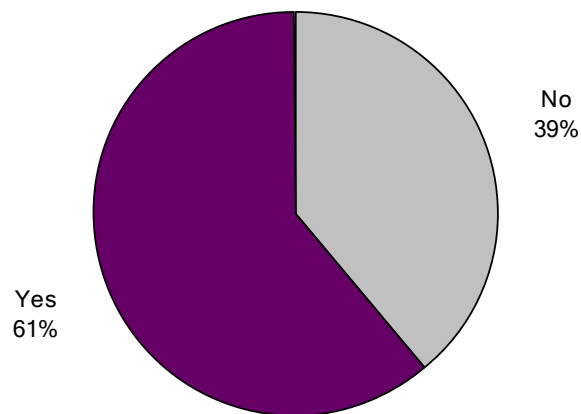


Figure 5: New Standards in Development – Survey Sample.

3.3 Number of standards per labeling program

The majority of the survey sample had more than one standard that they were managing (at 71%); and some 29% had just one standard. For the larger North American population of ecolabels, the inverse is true whereby the majority manage 1 standard per program.

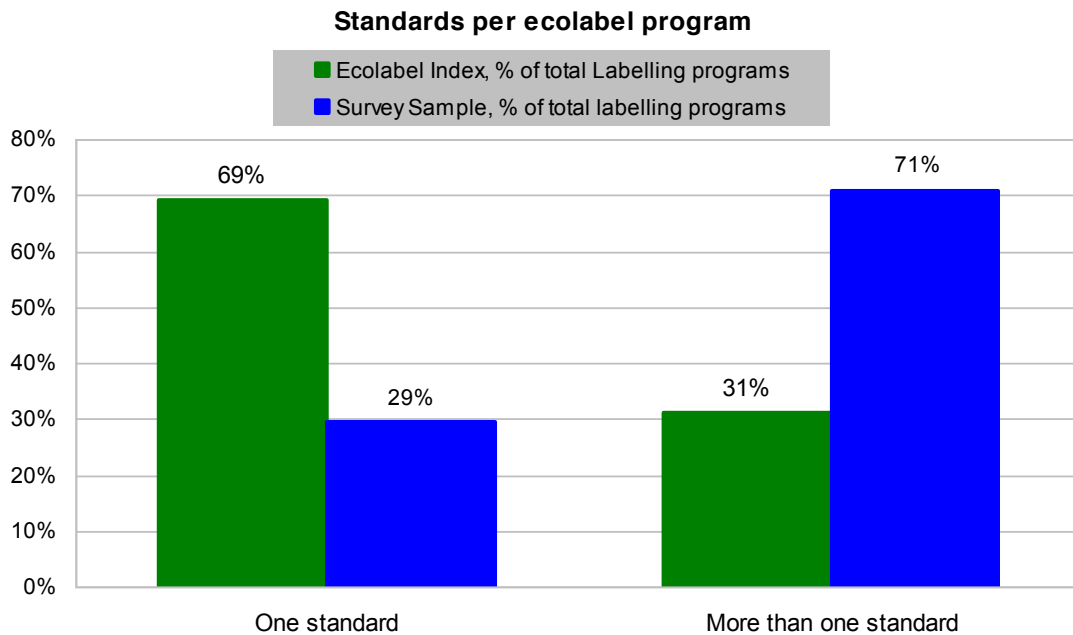


Figure 6: Single versus multiple standards per ecolabel program – survey sample compared to North American ecolabels

3.4 Types of Standards

Two types of standards can be delineated – those that are ultimately awarded or not, and those that have levels of conformance, such as a gold/silver/bronze type system. Within the sample group, the larger percentage of labels included were of the “pass/fail” type, at 76%.

This is consistent with the broader North American ecolabel population, where in Figure 7 we can see that some 76% of ecolabels are of the pass/fail type.

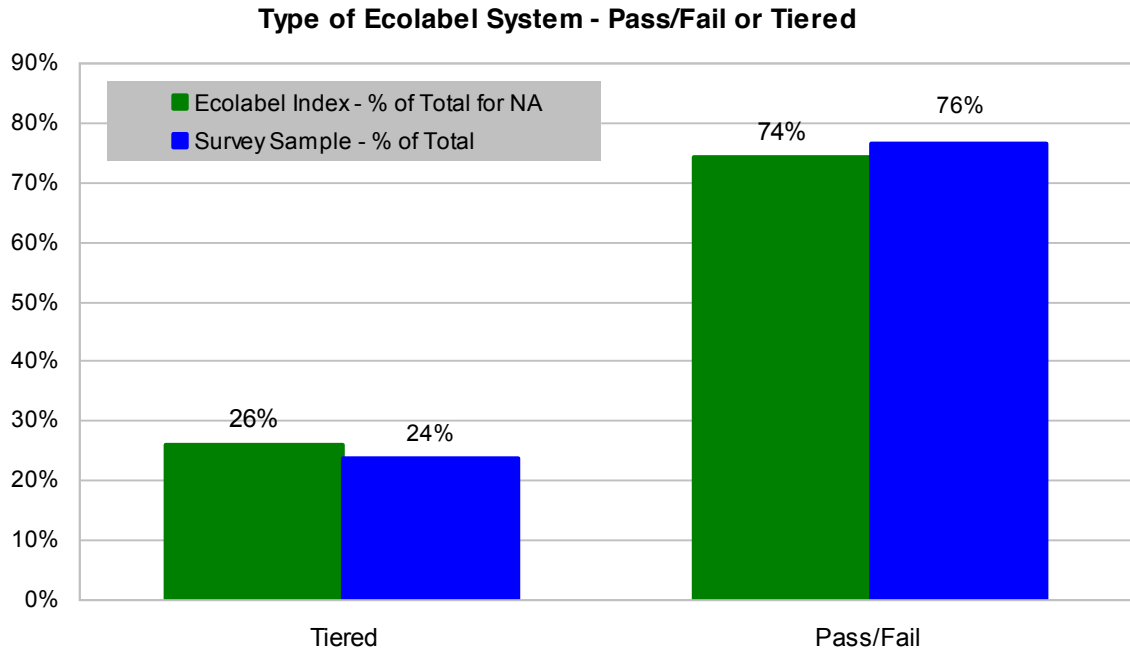


Figure 7 – Tiered versus pass fail ecolabel programs – survey sample compared to North American ecolabels

3.5 What gets labeled? - Object of the Ecolabelling Program/Standard

One of the criteria for inclusion in the sample was that products (as a type of “object” for certification) are able to be labeled, which is why in Figure 8 we see that 100% of the survey sample programs label products. Some of the survey sample programs also provide labeling for a range of other objects, including buildings, companies, processes and services; as do many of the ecolabels in the North American market in general.

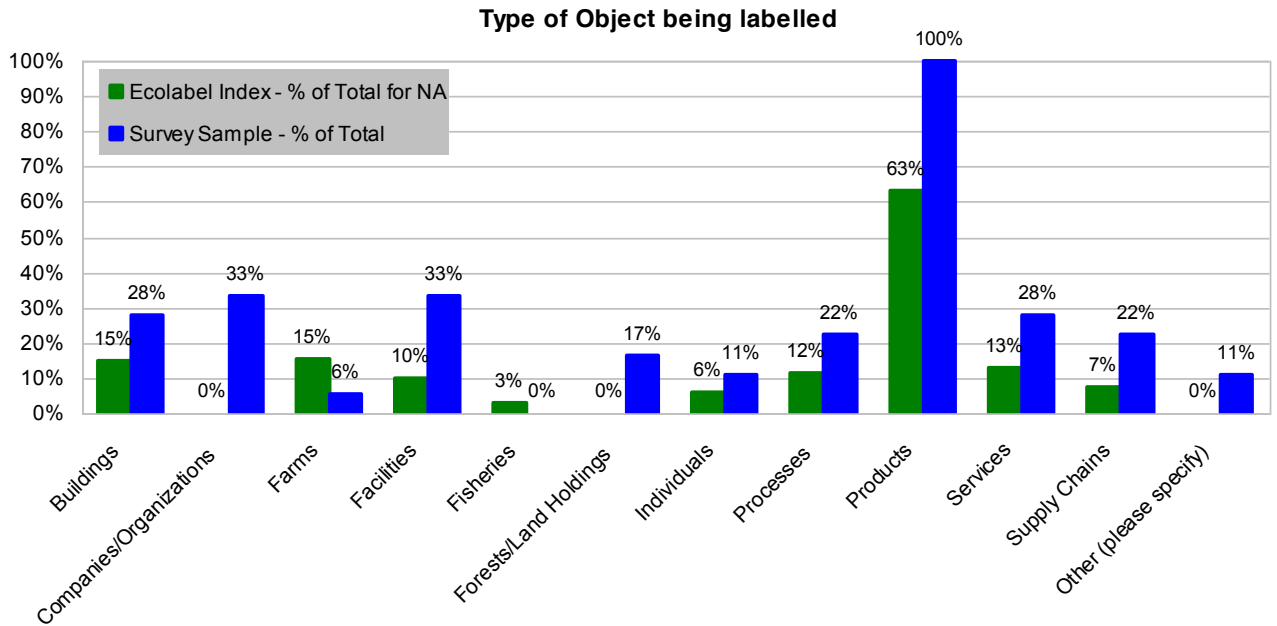


Figure 8: Type of objects that can be labeled – Survey Sample compared to North American ecolabels

3.6 Type of Conformity Assessment Procedure

A key guideline with which to compare ecolabels is what type of conformity assessment procedure is used – that is:

- **First party** is generally the person or organization that provides the object, such as the supplier.
- **Second party** is usually a person or organization that has a user interest in the product, such as the customer.
- **Third party** is a person or body that is recognized as being independent of the person or organization that provides the object, and is independent from the user or customer of the object. In the survey we split this into two further sub-categories:
 - a) the ecolabel program provides the conformity assessment
 - b) Organization(s) independent from the ecolabelling program provide the conformity assessment

Figure 8 captures is a result of our re-classification of both the ecolabels in the sample and in the Ecolabel Index using a consistent approach. It reflects that the sample group is on-par with the broader North American ecolabel population, with the majority of labels having some kind of third-party system.

Please note that this classification and analysis requires further verification with the programs directly as they were re-classified for the purpose of this analysis. In some cases, the survey responded selected several options of first, second and third parties because different aspects of the conformity assessment are undertaken by different

groups (ie some is done by the organizations applying for the label, some in-house, some by independent 3rd parties. Further analysis of the survey group and the broader population as a whole would tease out these differences and add a more nuanced approach to the question of how independent are the conformity assessment bodies.

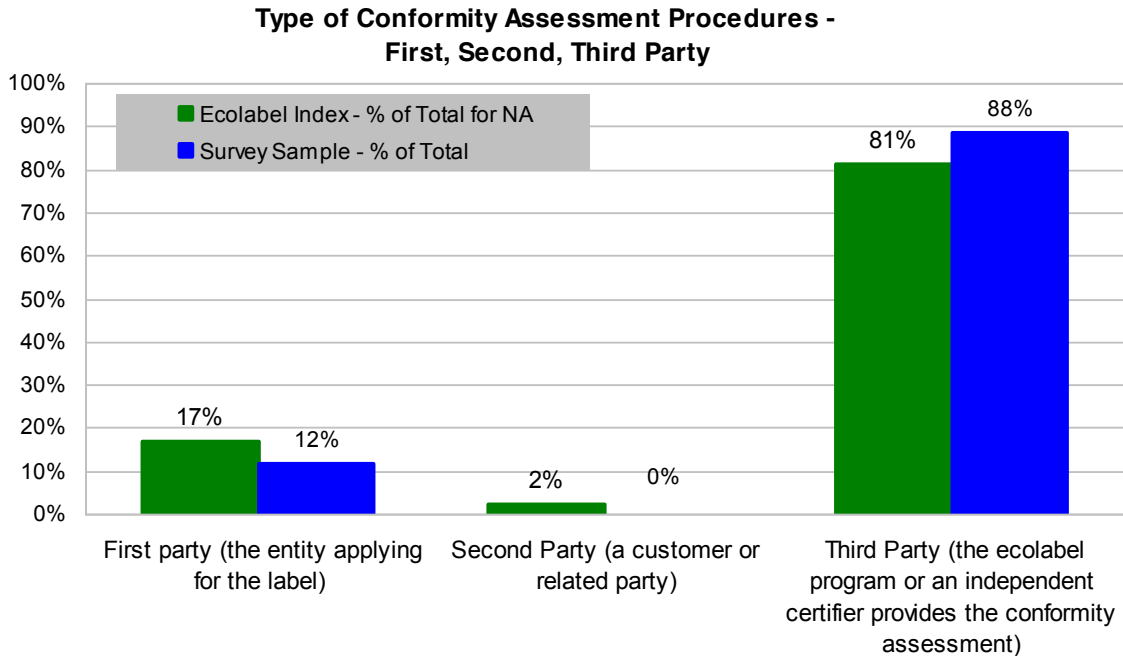


Figure 9: Type of conformity Assessment procedure employed – Survey Sample compared to North American population of ecolabels.

3.7 Product Categories Covered by the Standards

Each of the ecolabels that were surveyed have standards that may apply to different product categories, and survey respondents were asked to indicate which product categories they had standards for. In putting together the sample group, one of the criteria was whether they had a standard for any of the following categories common to federal procurement – building products, cleaning products, electronics, furniture, and office products/paper.

The influence of the criteria can clearly be seen in Figure 10, where the percentage of building products, cleaning products and furniture to total possible product categories for the sample group was much higher than for the general North American ecolabel population.

Percentage of total for Survey Sample and North American ecolabels with a standard for a particular product category

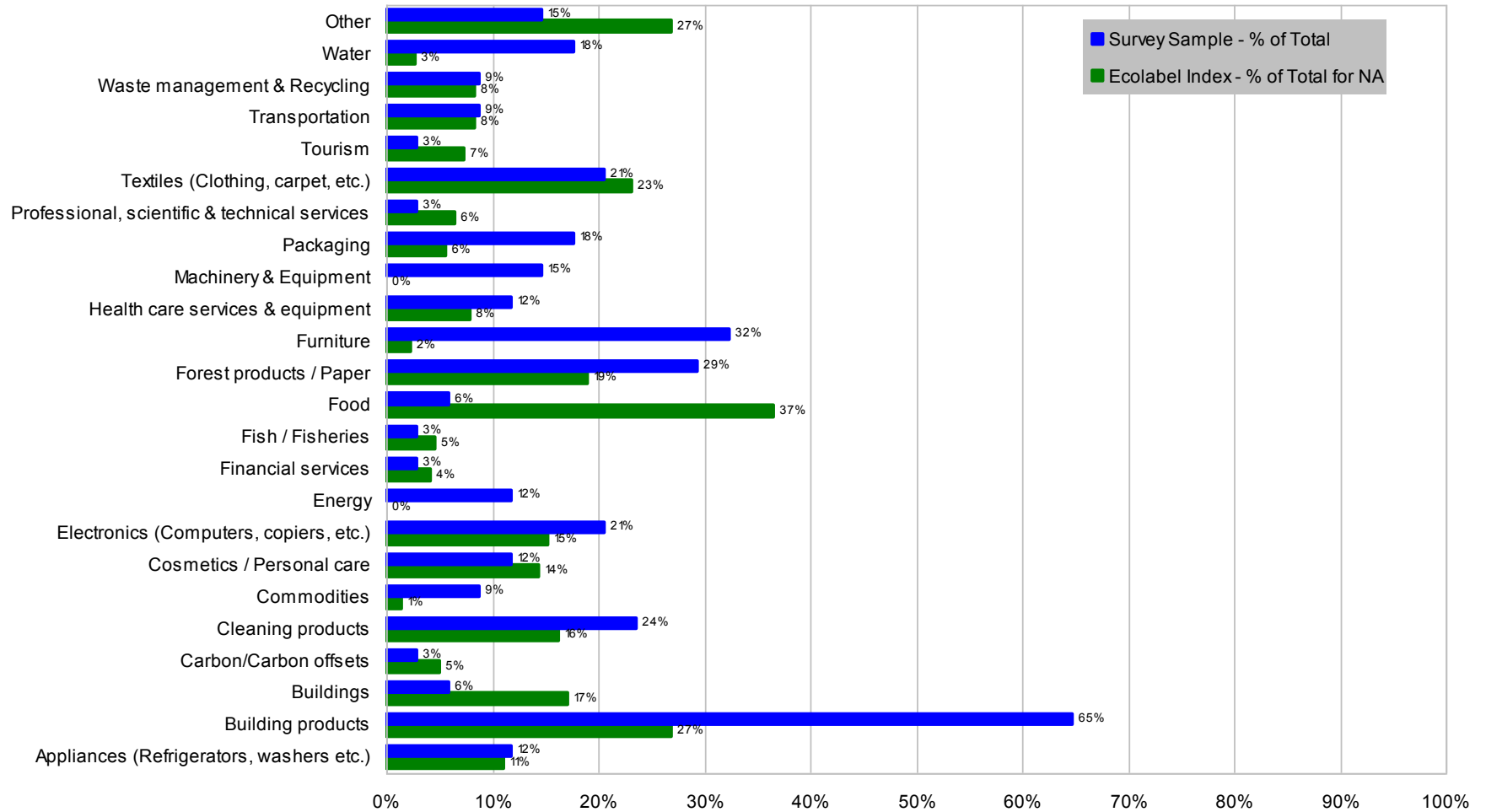


Figure 10: Product Categories covered by the Survey Sample of Ecolabels compared to North American ecolabels

The analysis of the survey sample compared to the broader population of ecolabels in North America, as tracked by Ecolabel Index shows that the survey sample group could be considered “representative” on the following characteristics:

- Types of Standards (tiered vs. pass/fail) – with the majority being of the pass/fail type in both groups
- Types of Conformity Assessment Procedure (1st, 2nd, 3rd party) – with the majority are third party systems. However, some further analysis and delineation of the larger dataset of third party labels is needed to confirm this finding.

We found some small differences between the survey sample and the broader North American ecolabel population on the following two characteristics:

- Longevity of the Program – where the survey sample has in general existed for a longer period than for the population of ecolabels as a whole, suggesting a greater maturity.
- Type of Organization – where there were more government run ecolabels (and less non-profit and private sector) in the survey sample than is typically found.

We found a larger divergence between the two groups on the following characteristics:

- Number of standards per labeling program – where there are a greater percentage of ecolabels with multiple (more than one) standards in the survey sample compared to the general population which is dominated by programs with single standards
- The object of the Ecolabelling Program/Standard – where there was a greater number of *product* labeling programs (compared to other objects, such as for companies, or processes) than for the general population of ecolabels, showing the influence of the sample design.
- Product Categories – where there was a significantly greater percentage of standards for those categories pre-selected for inclusion by the sample design (building products, cleaning products, furniture, electronics, and forest products/paper) compared to for the general population of ecolabels.

Further analysis of the larger population of ecolabels in North America on these and other key guidelines is recommended beyond what has been completed in this addendum. This would enable:

- A better understanding of the potential impact of the Draft Guidelines on the ecolabelling market in North America as a whole;
- A greater ability to conduct sensitivity analysis of particular Guidelines that are currently considered to be more “leadership” than baseline;
- A historical perspective on trends in the broader population of ecolabels, which may be used to support higher level policy decisions and inform some of the options for implementing the Guidelines, when ready.

While there were some differences between the survey sample and the general population on some key characteristics that highlighted the need for a larger sized sample/ further analysis; the Survey nonetheless served the purpose of testing the Guidelines across a range of different practices and types of programs, and highlighted some important areas for clarification and revision of the Draft Guidelines and their eventual implementation.

4. High-Level Findings and Recommendations per Framework Category

Here we present the overview of findings for each Framework Category, and a Summary Table of recommended changes for each.

A more detailed Guideline by Guideline and Associated Questions analysis, a Supplementary “Detailed Report” was provided, and is available on request.

The full set of Survey Results is also available in the Appendix.

4.1 High level findings

The survey proved to be a fruitful test for the potential applicability of the Draft Guidelines, highlighting a number of refinements to be made, some challenges in data gathering for future implementation, and some gaps. The open-ended questions brought 2-3 additional guidelines to consider.

Comments revealed how questioned were interpreted by respondents, which sometimes varied. The Survey made it clear that evaluation methods for interpreting and analyzing responses will be needed if the Draft Guidelines are used to evaluate standards and labels consistently. In addition, substantiation will be needed - actual policies and standards may need to be reviewed in order to make an assessment for future implementation.

Most respondents answered most of the questions, and there were no consistent gaps in the responses. Some completed Survey 2 for separate standards, others combined them into single responses because found answers for each to be materially the same.

Survey 1 showed a general convergence of practices despite not all being “ecolabels”. Survey 2 showed some convergence in standard-setting processes; but more divergence in standard-substance responses.

The Survey highlighted the need to determine equivalence of government processes exist (to standards) to evaluate government run standards.

Finally, Big Room recommends that further testing and analysis of the results is needed, and that the Draft Guidelines should be tested against larger data set and with analysis correlating the different types of ecolabels to responses to better understand how the Draft Guidelines will impact the market.

For each of the five framework categories, the following types of recommendations were made:

1. Guidelines Revisions:

- Substantive revisions to Draft Guidelines, including cuts/combining them
- Minor text revisions to Draft Guidelines
- Suggestions for new Guidelines

2. Survey/Data gathering tool revisions:

- Changes to Survey questions and/or options
- Request substantiation to aid analysis and evaluation given varied interpretations of questions

3. Develop evaluation method(s) to interpret results

- Address technical issues
- Determine what is sufficient
- Criteria for baseline vs leadership standards/labels

4.2 Ecolabel Program Management

'Ecolabel Program Management' refers to the organizational and management practices associated with running an ecolabel and/or environmental standards. Questions in this section covered issues and best practices associated with governance, management, accessibility, transparency, market surveillance and coordination/harmonization with other ecolabels.

There are a range of types of organizations running the ecolabels in the group surveyed, from non-profit to government, to for-profit. Likewise, the year in which each ecolabel program was launched initially spanned 1984 (the EPA's CPGG/RMAN program) to 2010 (USDA BioBased label).

4.2.1 General Findings: Ecolabel Program Management

- Some of the programs surveyed (governmental in particular) did not classify themselves as "ecolabels". They completed the section, but stated that the term "ecolabel" did not sufficiently represent their mission and scope.
- Nearly all of the programs surveyed involve external stakeholders in ongoing governance of the label, though the degree in which they influence decisions varies greatly.
- Nearly all are open for application from any locale, however:
 - Forestry standards are geographically limited given differing regional ecosystems (and standards that have been adapted for them).
 - Some specified additional conditions on applicants such as the requirement to sell in specific markets (such as Energy Star in the US).
- The fee structures and types of funding support for programs vary; most are disclosed.
- Use of the logo is mostly controlled by the labelling programs (not outside certifiers) and most have trademark protection.
- Over half (10 labels) have a mutual recognition process in place with other ecolabels.
- Many are members of, or are accredited to, organizations such as ANSI, ASTM, ISEAL, USGBC, GEN, IEEE and others. As these organizations have rules for conduct and expectations for program management, they are an indicator of quality.
- Nearly all have a program evaluation process; and many are already measuring – or plan to measure - their environmental impacts.

4.2.2 Index of Recommendations: Ecolabel Program Management

Guideline Number/ Principles	Revise Guideline - Major/ Discussion	Revise Guideline - minor	Revise survey/ info gathering Questions	Develop Evaluation Method
58 Competence/ Quality	Revise text to include equivalent governmental quality assurance mechanisms.	-	-	Research on equivalent government assurance mechanisms.
59 Competence/ Monitoring and evaluation	-	-	Request Substantiation	-
60 Competence/ Evaluation of environmental effectiveness	-	-	Request Substantiation	-
61 Competence/ Complaints and Appeals	-	Revise text, specify for program management	Request Substantiation	-
62 Governance/ Disclosure of stakeholder involvement	-	-	-	-
63 Governance/ Formal rules for stakeholder involvement	-	-	-	-
64 Governance/ Balance of interest	-	-	Yes, clarify “balance of interest”	-
65 Governance/ Avoidance of conflicts of interest	-	-	Substantiation	-
66 Accessibility/ Cost	-	-	Minor question changes.	Evaluation method for assessing how accessible fees are to different groups
67 Accessibility/ Administrative burden	-	Revise text, add “and determine ongoing conformance”	-	-
68 Accessibility/ no restrictions	-	-	-	Develop evaluation of “other restrictions”
69 Transparency/ Disclosure of funding sources	-	-	Differentiate on types of “public disclosure”	Develop evaluation method for what is sufficient/ expected to be

				disclosed.
70 Transparency/ Disclosure of standards	-	-	Additional question – for those with paid access to standards, level of info. provided	Evaluation method for evaluating paid to access standards
71 Market Surveillance / Licensing	-	-	Additional question on how decisions on awarding the label	Evaluation method for determining if answers are sufficient.
72 Market Surveillance / Control of the use of logos' marks	-	-	-	-
73 Coordination and harmonization/ membership	Revise to allow for governmental label restrictions	Add into guideline possibility of being “accredited”.	Add more organizations as options.	Develop evaluation method for quality of membership/ accreditation
74 Coordination and harmonization/ Mutual recognition	-	-	Revise question so more types of mutual recognition are specified.	Prepare supplementary guidance defining “mutual recognition”
Possible New Guidelines				
Assist clients to better market their certified products; Provide effective & efficient client services	New Guideline to consider		Develop new questions	
Be internationally applicable	New Guideline to consider/ Strengthen existing		Develop new questions	

4.3 Conformity Assessment

Conformity Assessment refers to the process and practices by which products are determined to have met the requirements of ecolabels and/or standards. This may include certification, evaluation, testing, inspections, laboratories, site visits, audits, and so on.

The term “Conformity Assessment bodies” used in the following questions refers to any or all organizations providing conformity assessment services and methodologies from first to second to third parties.

Questions in this section covered issues and best practices in conformity assessment, including independence, procedural integrity, competence, accessibility, transparency, market surveillance and coordination and harmonization with other conformity

4.3.1 General Findings: Conformity Assessment

- 82% (14 out of 17 in the sample) use 3rd party CA processes:
 - Half of these are done by the ecolabel program, the other half use independent bodies
 - Need to develop an evaluation method for preferred practice
- A full range of CA methods are utilized though not all will be applicable or appropriate to different entities, environmental claims and/or sectors.
- Nearly all (16/17) have policies and procedures for complaints/appeals; for granting/suspending certification; for determining competence and being free of conflicts of interest
- To ensure consistency of CA bodes various processes were mentioned, including accreditation, training programs, pilot tests and additional information for certifiers
- Most disclose information on CA processes and funding sources, however about half the time its available “upon request”
- Most include some kind of continued CA process, such as yearly audits
- A range of duration of use of labels is allowed – from 1-2 years; to unlimited; to being based on when the standard is updated
- Some possibilities to combine Guidelines for greater simplicity.
- Two new aspects of CA processes to be considered to inclusion.

4.3.2 Index of Recommendations: Conformity Assessment

Guideline Number/ Principles	Revise Guideline - Major/ Discussion	Revise Guideline - minor	Revise Survey/ info gathering Questions	Develop Evaluation Method
31 Coordination and harmonization/ Follow standardized procedures	Combine with Guideline 32. Consider equivalent gov. processes	-	Revise question so less dense	Develop guidance for equivalent governmental processes
32 Coordination and harmonization/ Accreditation	Combine with Guideline 31 – accreditation as preferred practice	-	-	-
33 Independence/ Impartiality/ Independence	Revisit guideline to indicate preference on 1 st -3 rd party systems	-	-	Develop evaluation protocol to determine preference for 1 st -3 rd party systems.
34 Independence/ Impartiality/ Objectivity	-	-	Develop questions/ Map	Develop evaluation

			against existing questions	method
35 Independence/ Impartiality/ Conflict of interest	-	-	-	-
36 Procedural integrity/ Procedures	-	-	Additional question on why appropriate	Develop evaluation method to determine if appropriate CA methods are used
37 Procedural integrity/ Steps to evaluate conformance	-	-	Add question on administrative burden	Develop evaluation to interpret results.
38 Procedural integrity/ Decision making responsibility	-	-	-	-
39 Procedural integrity/ Awarding certification	-	-	-	-
40 Procedural integrity/ Consistency of results	-	-	-	Recognize best practices
41 Procedural integrity/ Procedures for controlling documents and data	Combine with Guideline 42	-	-	-
42 Procedural integrity/ Protect confidentiality	Combine with Guideline 41	-	-	-
43 Procedural integrity/ Appeals - documented policies	Combine with Guideline 44	-		
44 Procedural integrity/ Appeals - resolved	Combine with Guideline 43	-		
45 Procedural integrity/ Traceability	-	-	Separate out as own question and ask for substantiation	-
46 Market surveillance/ Continued conformance	-	-	-	Develop an evaluation method to determine whether methods are appropriate
47 Market surveillance/ Content of declarations	-	-	-	-
48 Market surveillance/ Address misleading use of mark	-	-	-	-
49 Competence/ Quality system	-	-	-	-
50 Competence/	-	-	-	-

Competent personnel of sufficient number				
51 Competence/ Facilities and Equipment	-	-	-	-
52 Accessibility/ No constraints to accessing certification services	-	-	-	-
53 Openness/Transparency/ Information on processes	-	-	Include sub-options for public disclosure (online, other)	Develop evaluation of whether “as requested” disclosure is sufficient.
54 Openness/Transparency/ Information on financial means	-	-	Include sub-options for public disclosure (online, other)	Develop evaluation of whether “as as requested” disclosure is sufficient.
New Guidelines to Consider				
Public disclosure of credits and levels achieved by applicants	New Guideline – public disclosure of credits/ ratings	-	New question	
Differentiation between minor and major non-conformances and processes to handle	New Guideline – minor and major non-compliances, how handled	-	New question	

4.4 Market Assessment

Market presence refers to the extent to which the Ecolabel or Standard is used in the marketplace.

For purchasers who might specify either an ecolabel or standard, having an understanding of how many products or services are currently authorized to use it is helpful to gauge their own potential impact in the marketplace.

Questions in this section covered disclosure of products’ certified or awarded to labels and standards; the quality of that information, its’ user-friendliness, and accessibility; and finally whether and how market impact and uptake of the label or standard is tracked.

4.4.1 General Findings: Market Assessment

- Nearly all disclose label holders:
 - Information is either updated monthly, in “real-time” or “as needed”.
 - 80% have an online searchable database

- Most of this information can be sorted by product category; not many by region
- Many struggled to provide accurate summary data (number of certifications by year by category)
- All have a presence in North America as this was one of the selection criteria. Many also are present in other regions, Europe 76%; Asia/Pacific 76%; Central South America 41%; Africa: 18%
- About half undertake market-share studies periodically:
 - However there are a range of measurements being used
 - Few could actually state their estimated market share today

4.4.2 Index of Recommendations: Market Assessment

Guideline Number/ Principles	Revise Guideline - Major/ Discussion	Revise Guideline - minor	Revise Survey/ info gathering Questions	Develop Evaluation Method
75 Transparency/ Disclosure	-	-	Clarify what counts as publicly available	-
76 Transparency/ Information is current	-	-	Add option for “real time updates” to data	-
77 Transparency/ Accessibility	-	-	-	Develop reporting template and guidance on data reporting
78 Transparency/ Market Applicability	Insert text to guideline -“total number of products certified”.	-	-	Develop reporting template and guidance on data reporting
80 Market Impact/ Assessment	-	-	Revise question so more precise data is reported	Develop guidance on doing market assessments
Possible New Guidelines				
External Recognition of programs by: a. Consortia/ NGOs b. Other purchasers	Possible new Guideline(s) on external recognition	-	New questions	Evaluation method/criteria needed for what to recognize.

4.5 Standard Setting

"Standard-setting" refers to the processes and procedures by which standards (or sets of criteria) are created and maintained.

Questions in this section cover openness and transparency, balance of interest, decision making processes, appeals mechanisms, procedures to update the standard, and

coordination and harmonization with other ecolabels and standards on standard-setting.

4.5.1 General Findings: Standard Setting

The responses in this section were relatively consistent – perhaps because there are established standards and best-practices for standard-setting.

- Most follow a standard-setting process/standard; however a smaller number are actually accredited or verified as being in compliance with such standards
- Nearly all were open to stakeholders to participate & placed notices in relevant venues
- A wide range of funding sources are used to support standard-setting practices; conflicts of interests stemming from funding sources are carefully managed.
- Nearly all did reviews of existing federal standards and existing standards & related standards were notified and invited to participate
- About 50% used consensus driven processes though there was variation in the extent and nature of the consensus processes and how final decisions are made.
- All had procedures to handle complaints, equitable participation and conflicts of interest
- Most disclose information on standard-setting, either publicly or as requested
- Most standards require periodic updating and are either updated every 5 years or “as needed”

4.5.2 Index of Recommendations: Standard Setting

Guideline Number/ Principles	Revise/Combine Guideline - major	Revise Guideline - minor	Revise Survey/ info gathering Questions	Develop Evaluation Method
1 Openness/ Participation	-	-	-	-
2 Openness/ Voting	Revise text from “shall” to “should” re voting	-	-	Research equivalent gov. decision making processes & develop evaluation method
3 Transparency/ Notification	-	-	-	-
4 Coordination/ Accreditation	Replace “accreditation” to “verified as being in compliance with” to allow for more verification	-	Revise text & Options	Research other std’s suggested. Research equivalent government processes.

	options than formal accreditation. Possibly add recognized std's			Assign leadership points
5 Transparency/ Demonstrate	-	-	Clarify options for "publicly available"	-
6 Balance of Interest/ No Dominance	-	-	-	-
7 Balance of Interest/ Diversity	Broaden guideline to apply principle of balance of interest to any decision making body, not only consensus body	-	-	Develop evaluation method on balance of interest in decision making bodies of all types
8 Balance of Interest/ Conflict of Interest	-	-	-	-
9 Consensus/ Document Consensus	Delete. Add concept of "documentation" to 10.	-	-	Develop evaluation method for assessing gov non-consensus stds
10 Consensus/ Reasonable effort	Adjust with insertion from 9	-	-	-
11 Appeals/ Prompt Consideration	Combine with 12	-	-	-
12 Appeals/ Efforts to Resolve	Combine with 11	-	Add into Question the consideration of views, not only complaints	-
13 Appeals/ formal mechanism	-	-	Revise text to include more than just "financial burden", also admin etc.	Develop evaluation method to determine what is a burden.
14 Appeals/ Participation	-	-	Revise text	-
15 Coordination/ Standards	-	-	Could ask for substantiation	-
16 Coordination/ Existing Standards	-	-	Revise text to ask when and how fed requirements & standards are integrated.	-
17 Maintenance/ Maintenance	-	-	Revise options to allow for both updating of	-

			standards periodically <i>and</i> as needed.	
Possible New Guideline				
Addressing Comments and Views: How are responses to each substantive comment made? Is this documented?	Possible new guideline on how comments are addressed. Review standards for standard-setting on topic.	-	-	-

4.6 Standard Substance

“Standard-Substance” refers to the criteria contained within the standard itself. Some ecolabelling programs manage multiple standards (e.g. for different product categories) while others manage just one standard.

Questions in this section covered issues such as the basis for the criteria, their scope, selectivity, and applicability to different product categories.

4.6.1 General Findings: Standard Substance

- The most varied responses were received to this category, partially explained by the survey sample design
- A mix of full life cycle and single life cycle phase standards, need to decide if there is a preference or preferred practice
- Wide range of environmental attributes considered across the sample
- 60% considered “key attributes” (hotspots) when selecting environmental criteria. These were determined using LCA’s, scoping studies and other methods. 80% state that the standard is focused on a key environmental attribute.
- Sector/product category evaluation methods will be needed to determine if life cycle, and environmental attributes are relevant
- 65% state that hazardous/substances of concern are addressed by criteria; but only 50% define safer substitutes; and only 20% state that ingredients must be disclosed
- 84% standards specify key performance elements for the products, and 70% also require product performance testing

4.6.2. Index of Recommendations: Standard-Substance

The following table is an index of the recommended changes stemming from the survey and analysis. After the table the results of the Survey and Assessment are presented and analyzed for each of the Guidelines, and more detail on the Recommended changes is made.

Guideline Number/ Principles	Revise/Combine Guideline -	Revise Guideline -	Revise survey/ info	Develop Evaluation
---------------------------------	----------------------------	--------------------	---------------------	--------------------

	major	minor	gathering questions	Method
18 Product Function/ Fitness	-	-	-	Develop evaluation method on applicability of guideline to non-end products.
19 Coordination/ Standards	-	-	-	-
20 Verifiability/ Criteria	-	-	-	Develop evaluation method on verifiability & how to assess.
21 Basis for criteria/ Science	-	-	-	Develop evaluation method for identifying “best available science”
22 Basis for criteria/ Supporting data	Cut & Combine with 30	-	Add questions on “data to support claims of environmental preferability”.	Develop definition of environmental preferability concept.
23 Selectivity / Accessibility	Revise – split into 2	-	-	Develop evaluation method on “attainable levels” and “measurement capability and accuracy”.
24 Basis for criteria /Life cycle	-	-	-	-
25 Basis for criteria /Environmental Attributes	-	Edit so Guideline is shorter	-	-
26 Basis for criteria/ Key attributes	-	Edit so Guideline is shorter	Address trade-off issue in questions. Provide lists and guidance on what is an attribute and an impact category.	Develop evaluation method on defining & evaluating key attributes.
27 Selectivity/ Differentiation	-	-	-	Develop evaluation method on determining what is a

				significant env. difference
28 Basis for criteria/ Addressing public health with hazard	-	-	-	Develop evaluation method on whether safer substitutes are in the standard.
29 Basis for criteria/ Disclosure of ingredients and impacts	Add to guideline who should information be disclosed to.	-	-	Develop evaluation method on rating in what circumstances this guideline is more or less relevant to a given product category.
30 Selectivity/ Consistent guidelines for product differentiation	Combine with Guideline 22.	-	-	Develop evaluation method & definition on environmental preferability.
Possible New Guideline				
New Guideline from Open-ended question	-	-	Test Survey on more standards for services.	-

5. Final Recommendations and Next Steps

The following Recommendations are made towards improving the Guidelines and their Implementation, first in the near-term (next 3-4 weeks); then in the longer term (following outreach and public comment, and moving into implementation).

Near-term Recommendations/ Steps

1. Interview and/or survey the sample group on the following topics, ensuring that the answers are not attributed and therefore “candid”:
 1. Do the 5 framework categories make sense for your program/standard?
 2. How long did it take your team (from start to finish) to complete the surveys?
 3. What sections/questions were the most difficult/time consuming to answer?
 4. In the case that you completed Survey 2 more than once, did you find your answers to each of them the same or different? Which were the same, which were different across the standards?

5. Were there any specific terminology issues you came across?
6. How can you imagine this survey being implemented in the future?
7. How can the data-gathering process be improved.
8. What other general feedback on the questions would you like to provide to the working-group?

Use the results from these interviews to inform a discussion about how to implement the Guidelines.

2. Re-order the Guidelines in each section to reflect survey questions/ make more logical sense.
3. Study the Guidelines across the principles and sub-principles that cut across all of the five categories (e.g. “openness” or “transparency”). Look for consistency in how they are approached, the level of detail addressed in each, and if there are any duplicative or overlapping requirements. Refine guidelines based on this assessment.
4. Revise the Guidelines based on the Recommendations made in this Report and the above steps.
5. Analyze the sample of the Survey against a larger data-set from Ecolabel Index to determine relative representativeness of group to the broader population.
6. Articulate key policy decisions for further deliberation.

Longer-Term Recommendations/ Steps

7. Differentiate between baseline (expected) and leadership guidelines in evaluation protocols/ methods, for example, in setting preferred practices for 3rd party conformity assessment systems.
8. Identify and assess equivalent governmental mechanisms to independent standards for each of the categories, and provide guidance on how to evaluate those governmental programs
9. Develop a set of evaluation methods and protocols to guide how to assess responses from labels and standards.
10. Create standard reporting formats for data gathering, analysis, and a method for keeping that data up to date in the longer term.
11. Once the Guidelines have been revised, test again over a larger group where we will likely find more differences between programs and standards.
12. Include as part of that assessment more substantiation from the ecolabels and standards to ensure results are truly consistent; and so that more detailed comparison and evaluations can be made.

6. Appendix:

Report 1 Appendix

1. Mapping of standards and ecolabels to Draft Guidelines

Report 2: Appendix

2. Survey 1 Questions
3. Survey 2 Questions
4. Supplementary Guidance to Survey - Glossary of Key Terms
5. Survey Results per Question/Section

Survey 1 on Program Management, Conformity Assessment and Market

1. Background and Instructions for the Survey

The purpose of this Survey is to assess a set of Draft Guidelines created by the Section 13 Product Standards and Labeling workgroup. The Draft Guidelines have been created to contribute to the environmentally sustainable purchasing requirements of E.O. 13514. The project aim is to guide federal buyers on which environmental standards and ecolabels are appropriate for use in federal procurement.

This survey will contribute to that assessment by gathering information on a sample group of ecolabels and standards in reference to the draft guidelines; and to then analyze the draft guidelines based on the results.

A supplementary guide to the survey was also distributed that includes a glossary of key terms, and all of the questions in one place.

Instructions:

- Your entries will automatically be saved
- You can return to continue filling out the survey by re-opening the link to the survey
- If you don't know the answer or cannot find information, please indicate "unknown" in the comment box.
- If you would like to review your responses prior to submitting them, please contact the survey administrator (Anastasia@bigroom.ca) and she will download your draft responses as a pdf and email it to you.
- When you are ready to submit the survey, hit "submit". Big Room will confirm receipt and send you a completed response for your records.

The survey will close on Tuesday September 20, 11pm.

Survey Administrator: Dr. Anastasia O'Rourke Anastasia@bigroom.ca; +1 203 215 1575 (New Haven, CT).

2. Basic Tracking Questions

1. Name of Ecolabel

2. Who is the primary contact person for this survey?

3. What does the ecolabel or standard get applied to?

Tick all that apply.

- | | | |
|--|--|--|
| <input type="checkbox"/> Buildings | <input type="checkbox"/> Fisheries | <input type="checkbox"/> Products |
| <input type="checkbox"/> Companies/Organizations | <input type="checkbox"/> Forests/Land Holdings | <input type="checkbox"/> Services |
| <input type="checkbox"/> Farms | <input type="checkbox"/> Individuals | <input type="checkbox"/> Supply Chains |
| <input type="checkbox"/> Facilities | <input type="checkbox"/> Processes | |

Other (please specify)

4. How many standards currently exist within the ecolabelling program?

5. Do you have any new standards currently in development?

- No
- Yes, please list them here

3. Ecolabel Program Management Questions

'Ecolabel Program Management' refers to the organizational and management practices associated with running an ecolabel and/or environmental standards. Questions in this section cover issues and best practices associated with governance, management, accessibility, transparency, market surveillance and coordination/harmonization with other ecolabel and standards programs.

Note that this section excludes questions on conformity assessment processes and standard-setting, which may well be run by the same organization, but are treated in other sections of the survey.

Several of the questions in this section draw from a consideration of ISO/IEC Guide 65, ISO 14024; IS 14020; ANSI Essential requirements, ISEAL Code fro Standard Setting; and other best practice systems for ecolabelling and voluntary standards organizations.

1. What type of organization runs the ecolabel program?

- Government
- For profit company
- Non-profit organization
- Industry Association
- Hybrid social venture

Other (please specify)

2. Are external stakeholders involved in the ongoing governance of the program, for example, by serving on a committee or board? If yes, please describe in what capacity they serve.

- Yes
- No

If yes, please describe their role

3. Are the external stakeholders and their role(s) publicly disclosed?

- Yes
- No
- N/A

Comment

Survey 1 on Program Management, Conformity Assessment and Market

4. Are there formal rules and procedures in place that:

	Yes	No	N/A
Ensure that there is a balance of interest in externally appointed stakeholders	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Govern external stakeholders' involvement in the program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure program management and staff are free from any undue commercial, financial and other pressures that could form a conflict of interest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide for a complaints and appeals process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide for a quality management system (such as ISO 9000)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment

5. Are the ecolabel's criteria and/or standard:

	Yes	No
Publicly available	<input type="radio"/>	<input type="radio"/>
Free to access	<input type="radio"/>	<input type="radio"/>

Comment

6. What types of funding sources support the ecolabel program?

- Application fees
- Registration fees
- Conformity assessment fees
- License fees
- Other (please specify)
- Grants from foundations
- Government grants/program funding
- Membership fees
- Consulting fees

Survey 1 on Program Management, Conformity Assessment and Market

7. Are the sources of funding for the program publicly disclosed?

- Yes
 No

Comment

8. What types of fees are applied to applicants in being awarded the ecolabel and/or meeting the standard?

- Application fees
 Registration fees
 Conformity assessment fees
 Other (please specify)
- Membership fees
 Licensing fees

9. Are fees applied equitably to all applicants and licensees?

- Yes
 No

Comment

10. Are there any administrative or informational demands placed on applicants **BEYOND** those necessary to establish conformance?

- Yes - please describe below
 No

Comment

Survey 1 on Program Management, Conformity Assessment and Market

11. Is the application and participation in the program open to:

	Yes	No
All potential applicants	<input type="radio"/>	<input type="radio"/>
Foreign applicants	<input type="radio"/>	<input type="radio"/>
Domestic applicants	<input type="radio"/>	<input type="radio"/>
Large companies	<input type="radio"/>	<input type="radio"/>
Small/medium-sized companies	<input type="radio"/>	<input type="radio"/>

Comment

12. Are there any other restrictions as to who can apply for and participate in the ecolabel program?

- Yes - please describe below
- No

Comment

13. What organization is responsible for controlling the use of the label, mark or declaration?

- Our organization
- The applicants who have been awarded it
- Certification companies
- Other (please specify)

14. Does the program have a policy that protects the use of the logo/label?

- Yes
- No

Comment

Survey 1 on Program Management, Conformity Assessment and Market

15. If yes, does the policy specify what corrective actions shall be taken if it is breached?

- Yes
- No
- N/A

Comment

16. Is the program a member of and/or accredited to, any of the following organizations?

- ANSI
- ISEAL Alliance
- ASTM
- IFOAM
- EU Ecolabel Program
- IEEE
- Global Ecolabelling Network
- Other membership/trade organization (please specify)

17. Are there any agreements in place for mutual recognition with other ecolabels and standards? If yes, please describe what is being recognized (e.g. conformity assessment, standards, administrative procedures, data)

- Yes
- No

Comment

18. Are applicants able to use conformity assessment results from other ecolabels or standards towards meeting this ecolabels' requirements (either partially or fully)?

- Yes - please describe below
- No

Comment

Survey 1 on Program Management, Conformity Assessment and Market

19. Does the program get periodically evaluated against its goals?

- Yes
- No
- Comment

20. Has the program ever conducted an evaluation of the effectiveness of the ecolabel/standard in reducing environmental impacts or in meeting its' environmental goals?

- Yes - completed
- Yes - in process
- No - but we have plans to do so
- No

Comment

Survey 1 on Program Management, Conformity Assessment and Market

4. Conformity Assessment

Conformity Assessment refers to the process and practices by which products are determined to have met the requirements of ecolabels and/or standards. This may include certification, evaluation, testing, inspections, laboratories, site visits, audits, and so on.

The term “Conformity Assessment bodies” used in the following questions refers to any or all organizations providing conformity assessment services and methodologies - from first to second to third parties.

Questions in this section cover issues and best practices in conformity assessment, including independence, procedural integrity, competence, accessibility, transparency, market surveillance and coordination and harmonization with other conformity assessment bodies.

Several of the questions in this section draw from a consideration of ISO/IEC Guide 65; as well as ISO 17011; 17020; 17021; 17025; ISO 17050 1&2 and other best practice systems for ecolabelling and voluntary standards organizations.

1. What levels of conformity does your ecolabel/standard use?

Does your ecolabel have levels of certification (ie. bronze, silver, gold) or is it a 'stamp of approval'?

- Stamp of approval
- Tiered
- Other

If Other, please specify

2. For how long can entities use the label/mark/declaration once it has been awarded?

- 1-2 years
- 2-4 years
- 5-10 years
- no set limit
- Other (please specify)

Survey 1 on Program Management, Conformity Assessment and Market

3. Who establishes conformance with your ecolabel's standard/criteria?

- First party (the entity applying for the label)
- Second Party (a customer or related party)
- Third Party A (the ecolabel program provides the conformity assessment)
- Third Party B (Organization(s) independent from the ecolabelling program provide the conformity assessment)
- N/A (no verification/certification is required)
- Other (please specify)

4. Please elaborate on why is this conformity assessment system appropriate for the ecolabel/standard, the product category or the sector you serve.

5. Do conformity assessment bodies (in-house or external) follow one or more of the following standards? If yes, please indicate if they have been verified as being in compliance with that standard.

	No	Follows but is not-verified	Verified as being in compliance	Unknown
ISO Guide 65 - requirements for product certification systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ISO 17020 - inspection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ISO 17021 - audit and certification of management systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ISO 17025 - testing and calibration of labs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ISO 17050-1 &2 - declaration of conformity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify

Survey 1 on Program Management, Conformity Assessment and Market

6. Do conformity assessment bodies (in-house or external) make services accessible to all applicants whose activities fall within its declared field of operation?

- Yes
- No - if no, please describe the nature of the restrictions

Comment

7. Does the conformity assessment process include any of the following?

	Yes	No	Unknown	N/A
Laboratory Testing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measurement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Auditing of systems and records	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Site visits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mechanisms to ensure traceability of products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inspections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Examinations of specifications and drawings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

Survey 1 on Program Management, Conformity Assessment and Market

8. Do conformity assessment bodies (in house or external) have any of the following:

	Yes	No	Unknown	N/A
A. Procedures for granting, maintaining and extending certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
B. Procedures for suspending or withdrawing certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C. Procedures to control all documents and data related to certification functions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D. Requirements to identify, manage and dispose of records in such a way as to protect the confidentiality of the information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
E. Policies and procedures for handling complaints, appeals and disputes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
F. Policies requiring that any complaints, disputes and appeals received are investigated and resolved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
G. Procedures for dealing with misleading use and/or incorrect references to marks of conformity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

Survey 1 on Program Management, Conformity Assessment and Market

9. Are there procedures in place to ensure that conformity assessment bodies (in house or external):

	Yes	No	Unknown	N/A
A. Ensure that management and personnel are free from any undue commercial, financial and other pressures that could compromise the confidentiality, objectivity or impartiality of its certification process and decisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
B. Employ a sufficient number of personnel and/or sub-contractors that have the necessary education, training, technical knowledge and experience for performing certification functions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C. That the individuals who conduct the evaluation are different from those who make the final determination of conformity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D. Have suitable and adequate facilities and equipment to permit all required activities to be carried out	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
E. Have a quality management system (such as ISO 9000)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

10. What steps are taken to ensure that conformity assessment bodies (in house or external) perform ALL the necessary tasks to determine conformance?

11. What processes and methods are in place to ensure that different conformity assessment bodies achieve consistent results?

Survey 1 on Program Management, Conformity Assessment and Market

12. BEYOND any aspects already mentioned, describe how conformity assessment bodies ensure that they provide an objective evaluation.

13. In cases where an external panel or review committee decides the certification, describe how it is organized to avoid conflicts of interest.

14. After conformance has initially been determined, how often is continued conformity to the standard evaluated?

- Never Every 2-5 years
- Every 1 year Unscheduled/surprise
- Every 2 years
- Other, please specify

15. Does the declaration of conformity include any of the following information?

- The issuer of the declaration (organization)
- The issuer of the declaration (person)
- The object of the declaration
- The standards or other specified requirements

Other (please specify)

Survey 1 on Program Management, Conformity Assessment and Market

16. Do conformity assessment bodies (in house or external) disclose:

	Yes - public disclosure	Yes - available by request	No
Appropriate and timely information about the evaluation procedures and certification processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules and procedures for granting, maintaining, extending, suspending and withdrawing certification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A description of the means by which the organization obtains financial support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General information on the fees charged to applicants and to suppliers of certified products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

Survey 1 on Program Management, Conformity Assessment and Market

5. Market Presence Questions

Market presence refers to the extent to which the Standard or Ecolabel is used in the marketplace.

For purchasers who might specify either a standard or an ecolabel, having an understanding of how many products or services currently conform to that standard is helpful to gauge their own potential impact in the marketplace.

Questions in this section cover disclosure of products' certified or awarded to labels and standards; the quality of that information, its' user-friendliness, and accessibility; and finally whether and how market impact and uptake of the label or standard is tracked.

Several of the questions in this section draw from a consideration of ISO/IEC Guide 65; 17020; 17021; ISO 10424: and other best practice systems for ecolabelling and voluntary standards organizations.

1. In what regions of the world is your ecolabel found - that is, where its currently has a market-presence.

- | | |
|--|---|
| <input type="checkbox"/> Africa | <input type="checkbox"/> Europe & Middle East |
| <input type="checkbox"/> Asia Pacific | <input type="checkbox"/> North America |
| <input type="checkbox"/> Central and South America | |

Comment

2. Please describe how you track the certifications that have been issued for your label.

3. How many entities or objects currently have the ecolabel?

4. Are lists of products and/or suppliers that have been awarded the ecolabel and/or been certified as having met the standard publicly available?

	Yes	No	N/A
Products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

Survey 1 on Program Management, Conformity Assessment and Market

5. How often is information on awardees/certifications issued updated?

- Updated monthly
- Updated quarterly
- Updated yearly
- Updated every 2 years or more
- Updated as needed
- N/A

Comment

6. In what format is information on awardees/certifications issued made available?

- A list is provided online
- A downloadable pdf, word or excel file is available online
- As an online searchable database
- It is reported in a publication
- In catalogues/directories managed by other parties
- Not available

Other (please specify)

7. If yes, is the information available to the general public, institutional buyers, or both?

- General public
- Institutional buyers
- Both

Other (please specify)

8. Is the information on awardees/certifications issued able to be sorted or searched:

	Yes	No
By product category	<input type="radio"/>	<input type="radio"/>
By regional market	<input type="radio"/>	<input type="radio"/>

Comment

Survey 1 on Program Management, Conformity Assessment and Market

9. Does the program periodically assess the relative uptake in the market of the label and or standard?

Yes

No

Comment

10. If market assessments are made, please describe the measures used (e.g. estimated market share, sales volume, etc)

11. What percentage of products in this category would you currently estimate could meet the standard today? (Please specify the market and product category in responding).

Survey 2 on Standard Setting and Standard Substance

Background and Instructions for the Survey

This is the second survey to be completed in tandem with the first.

It covers Standard-Setting and Standard-Substance issues, and should be answered in regards to the standard itself (not the ecolabel program or conformity assessment process associated with it).

Instructions:

- Your responses will be automatically saved as a draft
- You can return to continue filling out the survey by re-opening the link
- If you would like to review your responses prior to submitting them, please contact the survey administrator (Anastasia@bigroom.ca) and she will download your draft responses as a pdf and email it to you.
- When you are ready to submit the survey, hit "submit". Big Room will confirm receipt and send you a completed response for your records.
- If you don't know the answer or cannot find the information, please indicate "unknown" in the comment box.
- The survey closes on Tuesday 20th Sept, 11pm.

Survey Administrator: Dr. Anastasia O'Rourke, Co-Founder, Big Room Inc. Anastasia@bigroom.ca; +1 203 215 1575 (New Haven, CT).

Survey 2 on Standard Setting and Standard Substance

Basic tracking questions

1. Name of the standard

2. Name of the related ecolabel or organization managing the standard

3. Name of the primary contact person submitting this survey.

4. What year was the standard completed and launched?

5. What product categories does the standard address?

- | | | |
|---|---|--|
| <input type="checkbox"/> Appliances (Refrigerators, washers etc.) | <input type="checkbox"/> Energy | <input type="checkbox"/> Packaging |
| <input type="checkbox"/> Building products | <input type="checkbox"/> Financial services | <input type="checkbox"/> Professional, scientific & technical services |
| <input type="checkbox"/> Buildings | <input type="checkbox"/> Fish / Fisheries | <input type="checkbox"/> Textiles (Clothing, carpet, etc.) |
| <input type="checkbox"/> Carbon/Carbon offsets | <input type="checkbox"/> Food | <input type="checkbox"/> Tourism |
| <input type="checkbox"/> Cleaning products | <input type="checkbox"/> Forest products / Paper | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Commodities | <input type="checkbox"/> Furniture | <input type="checkbox"/> Waste management & Recycling |
| <input type="checkbox"/> Cosmetics / Personal care | <input type="checkbox"/> Health care services & equipment | <input type="checkbox"/> Water |
| <input type="checkbox"/> Electronics (Computers, copiers, etc.) | <input type="checkbox"/> Machinery & Equipment | <input type="checkbox"/> Other |

Other (please specify)

Survey 2 on Standard Setting and Standard Substance

6. What industry sectors are served by the standard? (Choose all that apply from the following NAICs codes)

- | | |
|--|---|
| <input type="checkbox"/> Agriculture, Forestry, Fishing and Hunting | <input type="checkbox"/> Real Estate and Rental and Leasing |
| <input type="checkbox"/> Mining, Quarrying, and Oil and Gas Extraction | <input type="checkbox"/> Professional, Scientific, and Technical Services |
| <input type="checkbox"/> Utilities | <input type="checkbox"/> Management of Companies and Enterprises |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Administrative and Support and Waste Management and Remediation Services |
| <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Educational Services |
| <input type="checkbox"/> Wholesale Trade | <input type="checkbox"/> Health Care and Social Assistance |
| <input type="checkbox"/> Retail Trade | <input type="checkbox"/> Arts, Entertainment, and Recreation |
| <input type="checkbox"/> Transportation and Warehousing | <input type="checkbox"/> Accommodation and Food Services |
| <input type="checkbox"/> Information | <input type="checkbox"/> Other Services (except Public Administration) |
| <input type="checkbox"/> Finance and Insurance | <input type="checkbox"/> Public Administration |

7. Is the standard freely available or do users pay to access it?

- Free
- Paid

Other (please specify)

8. Does your ecolabel have levels of certification or is it a 'stamp of approval' type of label or standard?

- Levels of certification (e.g. bronze, silver, gold)
- Stamp of approval (e.g. awarded/not-awarded)

Other (please specify)

Survey 2 on Standard Setting and Standard Substance

Standard-Setting Standards

"Standard-setting" refers to the processes and procedures by which standards (or sets of criteria) are created and maintained.

Questions in this section cover openness and transparency, balance of interest, decision making processes, appeals mechanisms, procedures to update the standard, and coordination and harmonization with other ecolabels and standards on standard-setting.

Several of the questions in this section draw from a consideration of ANSI Essential Requirements, ISO/IEC Guide 59; ISO 14024; and ISEAL Code for Standard Setting.

1. Was the standard-setting process either accredited to, compliant with, or followed one of these standards?

	Accredited	Compliant with	Followed
ANSI Essential Requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ANSI Accredited Standard Developer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ISEAL Code for Standard Setting (P005)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ISO/IEC Guide 59	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
ISO 10424	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
None of the above	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other standard for standard-setting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other, please specify the standard and status

Survey 2 on Standard Setting and Standard Substance

Standards Setting Procedures

1. Was participation in the standard-setting process open to all stakeholders that might be directly and materially affected by it?

- Yes
 No

Comment

2. Were there any financial requirements to participate (eg membership fees, registration fees, travel to attend meetings, etc)?

- Yes
 No

If yes, please describe

3. Were notices placed to announce the creation of new standard and invite participation by stakeholders in its development?

- Yes
 No

Comment

4. Where were notices placed?

- | | |
|---|---|
| <input type="checkbox"/> Own website | <input type="checkbox"/> Direct invitations |
| <input type="checkbox"/> Email notification | <input type="checkbox"/> n/a |
| <input type="checkbox"/> Other websites and blogs | <input type="checkbox"/> Other |
| <input type="checkbox"/> Notifications in trade magazines | |

Other (please specify)

Survey 2 on Standard Setting and Standard Substance

5. In creating the standard, which, if any, of the following information was publicly disclosed?

- | | |
|--|--|
| <input type="checkbox"/> The selection of product categories | <input type="checkbox"/> The period of the standard's validity |
| <input type="checkbox"/> The selection and development of product environmental criteria | <input type="checkbox"/> Decision-making procedures |
| <input type="checkbox"/> Product function characteristics | <input type="checkbox"/> Funding sources |
| <input type="checkbox"/> The method for conformity assessment | <input type="checkbox"/> Procedures for comments, complaints and appeals |
| <input type="checkbox"/> The review period | |

Comment

6. What sources of funding supported the standard-setting process?

- | | | |
|---|--|---|
| <input type="checkbox"/> Foundation grants | <input type="checkbox"/> NGO project funding | <input type="checkbox"/> Donations from individuals |
| <input type="checkbox"/> Government grants | <input type="checkbox"/> International NGO funding | <input type="checkbox"/> Membership fees |
| <input type="checkbox"/> Industry Association funding | <input type="checkbox"/> License fees | <input type="checkbox"/> Other |

Other (please specify)

7. What interest categories were represented in the decision-making body (i.e. the body that ultimately decided and agreed upon the standard)?

- | | | |
|--|--|---|
| <input type="checkbox"/> Academics/Technical experts | <input type="checkbox"/> Customers | <input type="checkbox"/> NGOs - International |
| <input type="checkbox"/> Companies - Large | <input type="checkbox"/> Government agencies/representatives | <input type="checkbox"/> Unions |
| <input type="checkbox"/> Companies - Small and Medium size | <input type="checkbox"/> Industry Associations | |
| <input type="checkbox"/> Consumer organizations | <input type="checkbox"/> NGOs - National and Local | |

Other (please specify)

8. Were there any restrictions or requirements as to who could be on the decision-making body for creating the standard?

- Yes
- No

If yes, what was the reason for the restriction/requirement?

Survey 2 on Standard Setting and Standard Substance

9. Was there a procedure, structure or policy to ensure that:

	Yes	No	Unknown	N/A
A. No conflicts of interest stemmed from funding sources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
B. That equitable participation in the standard setting process was made so that no single-interest category dominated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C. Complaints and Appeals are handled	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

10. If there was a complaints and appeals procedure, did it contain a mechanism for impartially handling any the following:

	Yes	No	Unknown	N/A
Consideration of all the concerns expressed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If any financial burden is placed on those making appeals and/or complaints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A process for handling procedural complaints (such as on technical issues)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prompt consideration of complaints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expeditious decisions on appeals/complaints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The resolution of complaints and appeals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
N/A	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

Survey 2 on Standard Setting and Standard Substance

11. In creating the standard, was a review made of:

	Yes	No	Unknown	N/A
Federal requirements relevant to the product category	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Existing relevant international or national standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

12. Were any changes to the draft standard made as a result of this review?

	Yes	No	Unknown	N/A
Federal Requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other relevant standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

13. Were other standards organizations (domestic and/or international with related standards)

	Yes	No	Unknown	N/A
Notified of the proposal to develop a new standard	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Invited to participate in the creation of the standard	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

14. Were efforts made to resolve any conflicts that arose between this and other related standards?

- Yes Unknown
 No N/A

Comment

15. Were any of the activities related to other relevant standards documented?

- Yes
 No

Comment

Survey 2 on Standard Setting and Standard Substance

16. Was a consensus-based procedure used to decide on the standard's criteria, and was this procedure documented?

	Yes	No	Unknown	N/A
Documented	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not-documented	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

17. Were reasonable efforts made to achieve consensus in creating the standard?

- Yes
- No
- N/A

Comment

18. Was consensus reached by the parties?

- Yes
- No
- N/A

Comment

19. Is periodic updating of the standard one of the requirements of the standard?

- Yes
- No
- N/A

Comment

Survey 2 on Standard Setting and Standard Substance

20. How often is the standard reviewed and updated (kept current)?

- 1 year Not defined
- 2 years As needed
- 5 years N/A
- More than 5 years

Other (please specify)

21. Now that the standard is created, is any of the following information publicly available and/or available by request?

	Publicly Available	Available on Request	Not Available
The standard-setting process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The stakeholder groups who participated in the creation of the standard	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Documented comments, complaints and appeals received during the creation of the standard	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

Survey 2 on Standard Setting and Standard Substance

Standard Substance

“Standard-Substance” refers to the criteria contained within the standard itself. Some ecolabelling programs manage multiple standards (e.g. for different product categories) while others manage just one standard.

Questions in this section cover issues such as the basis for the criteria, their scope, selectivity, and applicability to different product categories.

Several of the questions in this section draw from a consideration of ISO 14020 and ISO 14024 and other best practice systems for ecolabelling and voluntary standards organizations.

1. What were the primary references used in establishing the standard's criteria? (Please include a list of references or a link to references in the standard).

2. What approaches have been taken to ensure the standard's environmental/performance criteria are verifiable?

3. Do criteria in the standard clearly differentiate between those products who may meet the standard, and those would not?

Yes

No

Comment - please describe the thresholds

4. How was 'environmental preferability' determined for this product category?

5. What supporting data was used to make the determination of environmental preferability?

Survey 2 on Standard Setting and Standard Substance

6. What life cycle stages does the standard cover?

- | | |
|--|---|
| <input type="checkbox"/> Sourcing of materials and extraction of resources | <input type="checkbox"/> Distribution |
| <input type="checkbox"/> Materials processing | <input type="checkbox"/> Retailing |
| <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Use of the product |
| <input type="checkbox"/> Packaging | <input type="checkbox"/> Disposition (management of the product when no longer needed, through reuse, repair, upgrading, recycling, or safe disposal) |
| <input type="checkbox"/> Transportation | |

7. What other life cycle stages were taken into consideration in developing the criteria, and why were they not ultimately included?

8. If no other life cycle stages were taken into consideration in developing the criteria, why not?

9. Are the procedures and/or methods for determining the life cycle stages documented and available to interested parties?

- Yes
- No
- Comment

Survey 2 on Standard Setting and Standard Substance

10. Which of the following environmental attributes are addressed by the standard?

- | | |
|--|---|
| <input type="checkbox"/> Animal welfare | <input type="checkbox"/> Natural resources |
| <input type="checkbox"/> Biodiversity | <input type="checkbox"/> Pesticides / Herbicides / Fungicides |
| <input type="checkbox"/> Carbon / GHG Emissions | <input type="checkbox"/> Recycling |
| <input type="checkbox"/> Carbon / GHG Offsets | <input type="checkbox"/> Soil |
| <input type="checkbox"/> Chemicals | <input type="checkbox"/> Toxics |
| <input type="checkbox"/> Energy - Production / Sources | <input type="checkbox"/> Waste |
| <input type="checkbox"/> Energy - Use / Efficiency | <input type="checkbox"/> Wastewater / Sewage |
| <input type="checkbox"/> Forests | <input type="checkbox"/> Water Quality |
| <input type="checkbox"/> GMOs | <input type="checkbox"/> Water Use |
| <input type="checkbox"/> Material use | |
| <input type="checkbox"/> Other (please specify) | |

11. What other environmental attributes were taken into consideration in developing the criteria, and why were they not ultimately included?

12. If no other environmental attributes were taken into consideration in developing the criteria, why not?

13. Are the procedures and/or methods for determining the environmental attributes documented and available to interested parties?

- Yes
- No

Comment

Survey 2 on Standard Setting and Standard Substance

14. Did your organization research and determine what the key attributes (or "hotspots") are for this product category when selecting the environmental criteria?

- Yes
 No

Comment

15. If yes, how were the key attributes/hotspots determined? Describe the methodology used.

16. Is the standard focused on certain key attributes (or hotspots) for this product category?

- Yes (please list them below)
 No

Please list the key attributes of focus

17. Do any of the standard's criteria address hazards of chemicals and/or materials in the products or in the process to make the products?

- Yes
 No
 Comment

18. Are safer-substitutes to hazardous chemicals defined or otherwise encouraged in the standard?

- Yes
 No
 Comment

Survey 2 on Standard Setting and Standard Substance

19. Does the standard require the disclosure of ingredients in products?

- Yes
- No
- Comment

20. Does the standard otherwise specifically reward

	Yes	No	N/A
The disclosure of ingredients in products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The disclosure of evaluations undertaken to determine the public health and environmental impacts of the product	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comment

21. Does the standard require product performance testing?

- Yes
- No

Comment

22. Are key performance elements and necessary levels of performance for the product identified in the standard?

- Yes
- No

Comment