EPA Environmentally Preferable Purchasing Program Pilot to Assess Standards and Ecolabels for EPA's Recommendations per EO 13693

– DRAFT Options for Panel and Governance Committee Feedback

With the initial pilot assessment results "under our belt," EPA is seeking feedback from the Governance Committee members on the following (Product Category Panel members are asked to focus their comments on Section II criteria and the potential approaches to presenting EPA Recommendations)**:**

Reminder of the EPA's Goals and Objectives for the Guidelines

Executive departments and agencies of the US government are directed via Executive Order 13693 to specify in the procurement of products and services federal standards and ecolabels that identify products meeting strict federal standards for energy efficiency, water efficiency, and safer chemicals (e.g., Energy Star, WaterSense, and Safer Choice). The Executive Order recognizes, however, that there are hundreds of non-federal standards and ecolabels in the marketplace claiming to validate environmental and human health benefits. This presents the federal acquisition community both great opportunities and challenges.

EPA's overall objective in developing the Guidelines is to create a transparent, fair, and consistent approach to selecting environmental performance standards and ecolabels that support the Agency's mission and federal environmentally preferable purchasing mandates. The fundamental aim of the Guidelines is to establish a cross-sector framework to be used in recognizing environmental standards and ecolabels for use in federal procurement. By designating individual guidelines as baseline or leadership, EPA believes the Guidelines encourage continuous improvement of both standards and ecolabels and the products and services that those standards and ecolabels address, while providing flexibility to accommodate the variety of approaches to and types of standards and ecolabels that exist in the marketplace today.

Specifically, the goals of the Guidelines are to:

- Leverage existing standards and ecolabels to create positive, measurable, and meaningful change in the environmental performance of products and services procured by the US Government.
- Develop a framework that recognizes environmental performance that is better than standard industry practice and further distinguishes higher performance.
- Develop a framework that filters out standards or ecolabels that are not appropriate for federal procurement and/or do not support environmentally preferable purchasing and/or do not address the key environmental or health impacts of a particular product category.

I. Lessons Learned from the Pilot: Potential Process Improvement Measures

In considering the lessons learned, including those reflected in the DRAFT IAE Findings and Recommendations Report, EPA asks: *How do we efficiently and cost-effectively assess standards and ecolabels for recommendation for federal purchasing over the next decade?*

In the pilot, approximately 100 organizations participated in the process, with 21 GC panelists and 48 organizations on product category panels; 17 organizations on the service sector panel; 20 volunteer SDOs who volunteered their standards, certification programs, and/or ecolabels to be assessed; and three contractors. Recognizing that the Pilot process for developing criteria and assessing volunteer ecolabels and standards was resource-intensive, in the following we present some ideas for streamlining and improving the assessment of ecolabels and standards process.

Then, we describe three potential business models (A-1, A-2 and B). For each model, we explore some potential benefits and drawbacks.

Guidelines/Criteria Development: Potential Process Improvement Measures

1. **Potential Approaches to Developing Criteria**

- Additional expertise is needed only to identify the hotspots for criterion II.1 for new product/service categories, including potentially to identify product/service-category specific chemicals of concern.
- Dispensing with independently facilitated, consensus-driven multi-stakeholder panels would significantly reduce contractor costs to manage processes, save time, and improve scalability.
- Potential alternative approaches to identifying and defining hotspots include:

- *Multistakeholder Panel Approach - EPA (or partner) develops first draft of criteria and then selects and convenes volunteer panels with three calls per panel to gain input on product/service category specific hotspots.*
    - Can be used with Models A-1, A-2, or B (see discussion of models starting on p. 6)
    - Can be relatively cost effective
        - Factors that drive cost to EPA, contractors, or partners include:
            - the breadth of the panel's charge (if EPA already developed a draft, etc.)
            - the number of people on the panel (affects hours required for recruiting as well as panel management)
            - the number of meetings
            - the clarity and feasibility of each meeting's goals and objectives
            - the amount of preparation and follow up required by all parties for each meeting
            - perhaps most importantly, the frequency of informal communications among parties between meetings
        - During the pilot process, the multi-stakeholder process was labor intensive for EPA, contractors, and panelists because of the above factors
            - Focusing work on hotspots moving forward narrows the breadth of the panel's charge above, which indirectly affects other factors including number of meetings. However, the number of people on the panel and the frequency of informal communications could still make the process time consuming.
            - EPA, contractors, and/or partners could facilitate the panels
    - Could be challenged for not being sufficiently representative or multi-stakeholder.
    - EPA would need to consider Paperwork Reduction Act/Information Collection Request and Federal Advisory Committee Act (FACA) requirements and triggers

- *Public Comment Approach - EPA (or partner) develops criteria and then seeks comment via the Federal Register (FR)*
    - Most suited for Models A-1 and A-2 below
    - Most efficient approach
        - EPA (or a partner), with or without contractor assistance, could develop the criteria based on a literature review and targeted expert interviews, and could organize, consider, and respond to FR comments.
    - Least transparent in terms of how EPA settles on criteria
    - EPA (or partner) could explore interactive, online public comment tools to facilitate stakeholder dialogue around key issues

- *Expert Interview Approach - Develop Criteria Using Delphi Panel or Expert Elicitation approach*[1]
    - Can be used with Models A-1, A-2, or B

[1] In a Delphi panel process, stakeholders are interviewed, one-on-one, over the phone, in a structured manner. Interviews would cover specific questions for setting and hotspots for a specific product category. After the interview, EPA or a third-party synthesizes input and provides a summary back to all interviewees. For quantitative questions, the summary shows avg/median responses and shows the distribution of responses and where individuals fall in the distribution (anonymized). A second and potentially third interview is conducted to see gather your feedback on the summary and gage how the summary affects individual input.

- Respected approach, used by EPA for policy-making[2]
- Efficient mechanism for engaging experts and identifying consensus view of experts. Avoids potentially time consuming meetings and challenging group dynamics.
- But it may be an unfamiliar approach to stakeholders who are accustomed to multi-stakeholder processes
- EPA would need to consider Paperwork Reduction Act/Information Collection Request and Federal Advisory Committee Act (FACA) requirements and triggers
- Although EPA could replicate the balance of interests approach of the multi-stakeholder panel within the context of a Delphi panel, from the perspective of what is needed to have a successful Delphi panel, balance of interests is not a required criterion. Retaining panelists with the most relevant scientific expertise is paramount for Delphi panel success.
- Cost considerations: Delphi panel costs are easier to predict and contain than multi-stakeholder panels, which have extensive communications demands. To develop and implement the process would likely require 125-200 labor hours of EPA, contractor, or partner time per product/service category, if the work is limited to hotspot identification
    - EPA may be able to carry out Delphi panels on its own with minimal outside expert guidance
- Less time commitment for panelists to serve on a Delphi panel than to serve on a multi-stakeholder panel. In Delphi panel, time commitment is limited to 2-3 one hour interviews, reading background materials, and reading summary of feedback from other panelists.

- Neither option i nor ii nor iii necessarily lead to consensus, although Delphi processes are designed to identify a range of outcomes that may be acceptable to stakeholders even if they don't lead to consensus.
    - The final pilot deliverable on hotspots needed extensive interpretation by IAE and EPA to operationalize
    - A requirement for consensus on the criteria may reduce the feasibility of implementing model C, as it increases the level of effort/cost of the process.

2. **Options for Streamlining Criteria** *(assumes we maintain assessment to Sections I, III, and IV; see alternative considerations on this below)*
    - Overall high number of criteria led to a high assessment burden in the pilot and high Independent Assessment Entity (IAE) cost.
    - Reduce the number of criteria from 75 by:
        - Reducing redundancies between sections
        - Cutting some criteria that had poor response rates and/or that were particularly challenging to assess without substantial additional guidance
        - Ensure that each criteria is just one concept (some were multi-part, which added time for applicants and to assess)
        - Paring back Section III to recognize existing accreditations.

[2] Delphi Panels and Expert Solicitation are already being employed for Policy Analysis by EPA and other agencies. EPA used expert elicitation studies of the concentration-response relationship between $PM_{2.5}$ exposure and mortality. These studies produced comprehensive probabilistic distributions of uncertainty in the PM-mortality concentration-response relationship elicited from some of the world's leading experts in PM health effects. The EE approach provided a means to integrate a complex set of uncertainties in the epidemiological, toxicological, and clinical literature that could not be captured by statistical confidence intervals from a single study or combination of studies. Also, NYSERDA is currently using Delphi Panels to estimate compliance with building energy codes.

- Break-down criteria into individual yes/no questions.

Assessment of Standards and Ecolabels: Potential Process Improvement Measures

3. Proposal to Increase Quality of Initial Submissions Using a Platform

- Pilot submission quality was highly variable, and required several rounds of one-on-one communication with applicants. In part, this was due to the format of the application used (excel and email).
- Instead, explore using an online system on a secure site with required fields, "skip logic," links to key definitions and concepts, submission of supporting documentation, breakdown of criteria into individual yes/no questions (as noted above).
- Could be a stand –alone system, housed by a third party, and/or linked to other relevant databases of ecolabels and standards.
- Benefits include:
  - Improve speed, transparency, quality, and accuracy of the assessment
  - Reducing the burden on IAE and applicant in identifying and organizing files, especially over time
  - Allow SDOs applying in multiple categories to use their prior submission information where relevant
  - Allow SDOs to ask questions of IAE, EPA, Partner, or NGO as they are filling out applications
  - Allow EPA and/or partner(s) to easily review assessments and documentation, especially useful for appeals.
- Cost include:
  - Initial building and ongoing maintenance of the platform
    - To build such a platform, relying on some existing software and tools, would be in the range of $50,000 - $75,000 depending on complexity and design features.
    - Ongoing maintenance would be around $5-10,000 yearly.
    - A simpler system could be built for less, though may not meet all objectives.
  - Cost to set up system would be re-gained longer term by efficiencies in assessment process.

Options for Roles of Section II (Environmental Effectiveness) vs Section I (Standards Development Process), Section III (Conformity Assessment), and Section IV (Ecolabel Program Management)

- We currently see the following options:
  1. Assess for conformity to all 4 Sections of the Guidelines, but EPA's Recommendations (federal EO requirements) would be based on Environmental Effectiveness (Section II) only. Information would be provided to federal agencies regarding the results of assessments per Section I (i.e., if it meets the OMB A119 definition of a voluntary consensus standard (VCS)), Section III (information re: available conformity assessment processes), and IV (i.e., information re: ecolabel program management). Each agency would take this information and decide whether or not to use a VCS and/or whether or not to require third-party certification to the standard.
  2. A to-be-formed federal agency council develops Recommendations on a product category by product category basis based on Section II assessment AND answering the above questions per assessments to I, III, and IV for government-wide adoption.

3. EPA alone develops Recommendations on a product category by product category basis based on Section II assessment AND answering the questions above per assessments to I, III, and IV for government-wide adoption.
4. EPA only assesses and makes Recommendations per Section II (no assessment or information provided per Section I, II, and IV).

- In each of these scenarios, we can consider if/how/when to allow standards/ecolabels to self-declare compliance to the criteria for Sections I, III, and/or IV.
    - Could be combined with an existing platform of information on ecolabels (such as ITC's Standards Map which would house such information, if agreed)
    - Poor quality of applications during Pilot indicates that this is a risky strategy unless it is paired with an audit function
        - Could potential publishing the names of the standards/ecolabels that have declared compliance in the FR on a set schedule (e.g. every 6 months) and only doing additional analysis if we receive negative comments from stakeholders.
        - Could be combined with a random audit of non-assessed criteria by the IAE.
        - Audit function: should target a statistically valid proportion of applicants for audit that includes stakeholder interview components, especially for verification of standards development process (Section I) claims
        - Audit functions are used by Energy Star, EPEAT currently for this purpose
- Penalty is needed if SDO misrepresents the std/label
    - Removal from the list of recommended labels may not be sufficient deterrent to gaming.
- Would reduce cost for IAE and reduce burden on applicant community.

II. Potential Business Models

As we present some potential business models, keep in mind that regardless of the model, the following tasks will be needed (which *may* need contractor or other partner support). Tasks/functions with an * may be inherently governmental under any business model:

1. *Identifying the purchase categories to be assessed for inclusion in EPA Recommendations (and any notifications, solicitations via FR)
2. Developing hotspots criteria for each purchase category
3. Maintaining and updating the Guidelines
4. Developing and maintaining a supporting "assessment manual" with instructions and definitions of key terms
5. Maintaining criteria for (and accredit?) Independent Assessment Entities (IAEs)
6. Seek volunteer standards/ecolabels for assessment
7. Collect self-assessments and supporting documentation
8. Conduct independent assessments
9. *Determining appropriateness (e.g., product availability, cost, etc.) of conforming standards/ecolabels for federal government wide procurement (hopefully with help from other feds)
10. *Maintain and disseminate EPA Recommendations of standards and ecolabels for Federal agencies per the EO 13693 obligations.
11. *Provide outreach and education on updated Recommendation to federal community
12. *Integrate Recommendations into federal e-procurement systems

Model A-1- Pilot Model/Federal Funding of Criteria and Assessments

- Federally funded program:
    - EPA, or
    - EPA and Agency partners such as: GSA PBS, GSA FAS, DOE, DOD, NIST.
- One federal process for assessing and recommending ecolabels and standards is preferable to several for assessed community, for suppliers, and for the federal government (cost, effectiveness, and efficiency).
- Section II criteria developed for hotspots (using one of the processes outlined above)
- Assessment is conducted by contracted 3rd party IAE(s), paid for by EPA and/or other agencies
- Key Benefits:
    - Gov't retains control of process
        - Retains direct control over work quality and speed at which work is completed
        - Does not have negotiate with a partner organization(s)
        - Exercises direct oversight over gov't contractors that help to carry out the work
    - Can start quickly
        - Can use existing contract mechanisms to retain contractual assistance- no need for new contract or MOU
- Potential Drawbacks:
    - Cost could be substantial.
        - Cost of pilot for 3 product categories was substantial, and also required significant staff time from EPA, and to a lesser extent, NIST, GSA, DOD, and DOE as panel & Governance Committee members.
        - Significant staff and contractor time spent coordinating the large numbers of organizations participating, managing expectations, and ensuring clear communication.
        - Significant volunteer panelists time in creating criteria and reviewing scoring.
        - In the pilot, each assessment (per standard) cost ~$1500 in contractor funding and 13.5 hours in FTE allocation.
            - This excludes EPA costs in communicating with SDOs, conducting completeness checks and running webinars explaining results.
            - This also excludes costs EPA may incur for re-assessing per new information provided and revision to criteria,
    - Also, there was an additional cost of $11,000 in contractor funding for analyzing, reporting, and communicating results (equivalent to ~$268 per standard)
    - Costs could be reduced by employing process improvement measures discussed above (alternative criteria development processes, streamlining criteria, using an online platform, and/or using self-attestation).
    - Other drawbacks to model A (aside from cost)
        - This approach is "reinventing the wheel" and potentially fragmenting the market when there are other recognized standards accreditation programs in existence.
        - May be vulnerable to changes in Administration priorities and federal funding
        - Makes the federal government potentially vulnerable to long appeals processes
        - The final pilot deliverable on hotspots needed extensive interpretation by IAE and EPA to operationalize.

- Increasingly, the standards community defines "sustainable" as encompassing social factors. If EPA led process, the federal gov'ts definition of sustainability = "environmental" sustainability may be out of step with trends, and adopted less widely as a result.

Model A-2- Standards and Ecolabels pay for 3rd party assessment and present results to EPA

- Same as Model A, except:
  - Assessments are paid for directly by applicants (ecolabels and standards)
  - Could be one or more IAEs that EPA/ other agencies select based on criteria
  - Assessment costs estimated to be:
    - Around $5,000 for all four sections, and $2,500 for Section II only.
    - The above estimate is based on the time taken to assess each standard by the IAE in the pilot, assuming criteria and process are somewhat similar. It does not include these potential cost savings:
      - If applicants are already accredited per Section I and III.
      - If processes are the same for Sections I, III and IV (and applicants do not have to be reassessed)
      - If criteria are streamlined
      - If Sections I, III and IV rely on self-attestation + audit
  - The projected assessment costs above are *less than* other accreditation and membership programs in ecolabels/ environmental standards space:
    - ISEAL cost for assessment is around $11,600 (excluding annual membership fees) (see table below)
    - ANSI cost for assessment for ecolabel program accreditation is around $15,000 (independent of ongoing program fee) (see table below).
- Key Benefits:
  - Reduces cost to government by shifting assessment cost to applicant (which is assumed Model C as well).
  - Reflects current practice for accreditation and membership fees used by ANSI, ISEAL and others.
- Potential Drawbacks:
  - IAE market:
    - Sufficient qualified IAEs may not materialize.
    - High learning curve and high initial cost associated with getting multiple IAEs up to speed, some of which would likely have to be born by government.
    - Some potential IAEs may not be positioned to administer a fee for certification model and /or may have COI concerns. Additional overhead required for contracting and COI checks.
  - Process Integrity Risk
    - Gov't does not have direct control over quality of assessment; they are only accrediting the IAE(s)
    - IAE "accreditation" could potentially be managed by an external entity such as ANAB or ANSI but would add cost and complexity to do so.
    - Incentive for "pay to play" if the market *does* support multiple IAEs
    - EPA would need to monitor and police this carefully to preserve process integrity.

- Remaining Questions:
    - How much would SDOs and Ecolabel programs be willing to spend?
    - Are there multiple IAEs that could serve this role?
        - Pilot program struggled to identify and solicit IAEs with sufficient experience and neutrality.
    - Are there existing models for accrediting IAEs that EPA could replicate (e.g. by EnergyStar or SaferChoice)?
    - Are there other cost benchmarks that would be useful to review, such as from CBs, ITC, others? What is their average cost for CBs to assess a product against a standard?

Model B- Public/Private Partnership (PPP)

- EPA enters into an MOU(s) with an NGO(s) to run the program, including developing criteria, maintaining a platform, and/or managing IAE(s) to assess ecolabels. EPA determines recommendations for federal procurement per the EO.
- PPP is a model that EPA has successfully used for other initiatives
- Co-funded by Federal government, NGO(s), and potentially applicant community (for IAE assessments)
- NGO could:
    - Assemble a team with requisite expertise including accreditation bodies, IAE(s)
    - Several NGOs have sustainable procurement as their mission, have requisite subject matter expertise
        - Some have expertise running conformity assessment programs
        - Some have expertise in managing multi-stakeholder processes and protecting from dominance by one or more groups
    - Access cross-subsidization through membership fees, grants, and other income sources
- Key Benefit:
    - Reduces cost to government, while preserving some government control over process
    - Expands marketplace participation and likelihood of other organizations adopting recommendations, improving marketplace harmonization
- Potential Drawbacks:
    - There may be few entities that will vie for this role, leaving the government with few options
    - Will likely require federal funding for startup costs
    - Significant LOE to establish MOU
    - Mission of partnering organization may not align completely with EPA's purpose in implementing the Guidelines
    - Gov't doesn't have control over the speed of process: May extend time required for Federal Government to broadly use selected standards and ecolabels in procurement.
    - Gov't does not have direct control over quality of assessment
        - If multiple IAEs, NGO has to guard against "pay to play" and preserve process integrity
    - Non-governmental body(ies) may have the appearance of being approved by the Federal Government, but without the same oversight that the government can exercise over contractors.

Benchmarking Accreditation Costs Results

ANSI	Charge for Assessment		Ongoing Annual Program Fee
ANSI product and ecolabeling certification body accreditation (Accreditation Cycle 2 years- Initial - Surveillance and Re-assessment)*	Application Fee	$ 5,000.00	- $3,000 for companies with revenue of $500,000 or less - 0.6% of revenue for companies with revenue of $500,001 to $12,500,000 - $75,000 for companies with revenue of over $12,500,000 - Total $3,000 to $75,000
	Product and Eco-Labeling Certification Body Accreditation (daily per assessor $1250; average 10 days**)	$ 10,000.00	
	Estimated total - ANSI product and ecolabeling certification body accreditation*	**$ 15,000.00**	
ANSI Eligibility of eco-labeling scheme owners	Application Fee	$ 3,000.00	
	Eligibility of eco-labeling scheme owners assessment (daily per assessor $1250; 3 days)*	$ 3,750.00	
	Estimated total - Eligibility of eco-labeling scheme owners (Eligibility Cycle 3 years)	**$ 6,750.00**	
*Note: Additional fees may be incurred should the applicant want to pursue appeals and extensions. The appeal fee is $1,000 and the scope extension fee is $1,500.			
**Note: estimate of day and rate ranges provided by ANSI over email. Range depends on size of organization; number of certification schemes; number and location of sites involved in the certification process. Travel expenses for site visits are extra. Fee (https://www.ansi.org/Accreditation/product-certification/DocumentDetail.aspx?DRId=654)			
Sources: ANSI email communications 9.26.2016; Fee information also posted on ANSI website at: https://www.ansi.org/accreditation/product-certification/DocumentDetail.aspx?DRId=486#Assessment Fees			

ISEAL Membership	Charge for Assessment		Ongoing Annual Program Fee
ISEAL Membership***	Standard-Setting Code - Stage 1. Pre-Standard Setting Process	$ 2,469.28	- $4,489.60 plus 0.003% of total organizational income up to a maximum fee of $44,896.00
	Standard-Setting Code - Stage 2. Post-Standard Setting Process	$ 1,571.36	
	Impacts Code Peer Review	$ 673.44	
	Impacts Code Independent Evaluation	$ 3,142.72	
	Assurance Code Peer Review	$ 673.44	
	Assurance Code Independent Evaluation	$ 3,142.72	
	Total	**$ 11,672.96**	**$4,489.60 to $44,896.00**
***Note: Fee quotes were in euros. Euros were converted to dollars based on the 9/22/2016 conversion rate: 1 euro = 1.1224 USD.			
source: ISEAL Alliance website: http://www.isealalliance.org/online-community/resources/iseal-member-fee-schedule			

III. Considerations for which purchase categories to apply the Guidelines next

Federal purchasers and external stakeholders have suggested a number of purchase categories for EPA's Recommendations of Standards and Ecolabels, including the following:

- Cleaning products and janitorial services
- Food and food services
- Office copy paper
- Information technology products and services
- Landscaping services
- Renewable energy
- Roads and other infrastructure

EPA is interested in Governance Committee feedback on these and other categories, considering the following:

- Environmental and/or human health impacts
- Volume of federal purchases (US and Worldwide)
- Existence of private sector standards/ ecolabels
- Availability of products/ services that meet the standards/ ecolabels

In addition, EPA is interested in feedback regarding circumstances where the guidelines might not be a useful tool for assisting purchasers in achieving meaningful environmental and human health outcomes, such as:

- Categories of products/services that do not pose significant environmental or human health concerns at the scale of the economy as a whole;
- Categories of products/services for which human and environmental health performance is not readily assessed through the use of a product/service-level eco-label or standard (e.g. a category whose performance may be better addressed through enterprise-level assessment, which might or might not be codified in a standard);
- When environmental and human health performance improvement could be better achieved through other strategies than buying the more environmentally preferable, new product/service (e.g. buying used goods; refurbishing existing inventory; reducing waste associated with a category; managing demand related to a category; writing performance-based specifications, especially in multi-year contracts that require annual performance improvements on specific criteria);
- When an Administration or agency seeks to set higher performance thresholds than those prescribed by existing ecolabels or standards
- When environmental impacts or hotspots prioritized by an Administration or Agency are not well addressed by existing ecolabels or standards
- When there are no effective standards or ecolabels in a particular sector
- When purchasers need advice on specific material choices (i.e., wood vs concrete vs steel).

IV. Potential Approaches to Presenting EPA's Recommendations

DRAFT Mock-Up for Illustration Purposes Only

Recommended Specifications/ Standards/ Ecolabels To Use in Federal Procurement to Meet EO 13693 3(i)(iii) Environmentally Sustainable Purchasing Requirements

Product Category: Furniture

*For more information about each of the Recommended standards/ecolabels click **here** [next slide...].*

The Following Federal Requirements Apply:	Bio-Preferred CPG

Recommended Multi-Attribute Standards and Ecolabels:

- **Standard USA**
- **Ecolabel GB**
- **Ecolabel ABC**

If a product meeting one of the standards is not available use one or more of the following Single Attribute/ Single Material Standards and Ecolabels:

Indoor Air Quality/VOC Emissions - California Department of Public Health (CDPH) Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1-2010. (This is the VOC emission testing method for California Specification 01350.) The following furniture certifications, ecolabels, and/or other conformity assessment programs have been assessed and require conformity to CDPH v1.1-2010 (there may be others):

- **VOC Ecolabel XYZ**
- **VOC Ecolabel EFG**

Sustainable Forest Management:

- **Forestry Standard**

In addition, purchasers [should consider specifying] [must specify] the following environmental/human health performance requirements not covered by the above standards/ecolabels:

• Hazardous Flame Retardants: Products shall meet California's furniture flammability standard (Technical Bulletin 117-2013) and be labeled as not containing flame retardant chemicals consistent with the manner described in Section 19094 of the California Business and Professions Code.

Recommended Specifications/ Standards/ Ecolabels To Use in Federal Procurement to Meet EO 13693 3(i)(iii) Environmentally Sustainable Purchasing Requirements

Product Category: Furniture

	Applicable Federal Requirements		Environmental/Human Health Hotspots per Life Cycle Stage (EPA Guidelines Section II Results)																				EPA Guidelines Section I,III & IV Information		
			Pre- Extraction/ Raw Materials Hotspot(s)										Manufacturing Hotspot(s)						Installation Hotspot(s)				End of Life Hotspot(s)				
				Baseline					Leadership					Baseline	Leadership					Baseline	Leadership			Baseline			
Click on the Standard/ Ecolabel to gain access.	Bio-Preferred	CPG	Addresses Life Cycle Stage	Land Use Change	Ecosystem Service Loss	Habitat Degradation	Biodiversity/ Endangered Species	Soil Health	Sustainable Yield	Energy Use	Criteria Air Pollutants	Pollution Discharges to Water	Addresses Life Cycle Stage	Energy Use, Fossil Fuel Use, Global Warming Potential, and/ or Greenhouse Gas Emissions	Ozone Depletion Potential	Criteria Air Pollutants	Pollution Discharges to Water	Water Use	Waste Generation	Addresses Life Cycle Stage	ANSI/ BIFMA X7.1 Standard for Formaldehyde and TVOC Emissions	CDHP Standard Method 1.1-2010 for VOC Emissions	TB 117-2013- CA furniture flammability standard	Addresses Life Cycle Stage	Solid Waste Generation (e.g. design for disassembly, product take-back programs, remanufactured/ repurpose capabilities, or minimizing disposal impacts)	Is it a Voluntary Consensus Standard (Per OMB a-119)?	Entities providing Certification	Product Availability
Recommended Multi-Attribute Standards and Ecolabels																												
Standard USA		✓ Optional Criteria 5.7	YES	✓	✓	✓	✓	✓	✓	✓	✓	✓	YES	✓	✓	✓	✓	✓	✓	YES	✓	✓	✓	YES	✓	✓	Certification Y	Link to product registry
Ecolabel GB		✓ Optional Criteria 2.5	YES	✓	✓	✓	✓	✓					YES	✓	✓	✓	✓	✓	✓	YES	✓	✓		YES	✓	✓	Certification Z	No Info Available
Ecolabel ABC	✓ Optional Criteria 6.3		N/A										YES	✓						YES	✓	✓		YES	✓	✓		Link to product registry
Recommended Single Attribute/ Single Material Standards and Ecolabels																												
Forestry Standard			YES	✓	✓	✓	✓	✓	✓			✓	N/A							N/A				N/A		✓		Link to product registry
VOC Standard EFG			N/A										N/A							YES	✓	✓		N/A		✓		Link to product registry
VOC Standard XYZ			N/A										N/A							YES	✓	✓		N/A				No Info Available

In addition, purchasers [should consider specifying] [must specify] the following environmental/human health performance requirements not covered by the above standards/ecolabels:

• Hazardous Flame Retardants: Products shall meet California's furniture flammability standard (Technical Bulletin 117-2013) and be labeled as not containing flame retardant chemicals consistent with the manner described in Section 19094 of the California Business and Professions Code.

V. DRAFT REVISIONS TO GUIDELINES Post-Initial Assessment

Please provide comments on and/or addition to the redline/strikeouts herein. These are only initial ideas based on IAE findings and pilot applicant and Panel/Governance Committee comments.

Guidelines for Environmental Performance Standards and Ecolabels for Federal Government Procurement per Executive Order 13693

General Scoping Information Requested

The following information is requested of organizations completing the assessment.

1. Name of Standard/Ecolabel _____

2. Who is the primary contact person for this Standards Developer, Certification Body and/or Scheme Owner?

_____

3. To what product/service categories does the ecolabel or standard apply? _____

4. Which Section(s) of this assessment did your organization address? _____

5. If there are Sections not addressed, please explain why they are not applicable_____

6. Please provide any readily available documentation to elucidate product/service availability for the federal marketplace including presence of a competitive bidding climate, indication of business demographics (i.e. disabled veterans, women owned, small or micro businesses), and/or percent of the market certified to the standard/ecolabel for that product/service category.

_____

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
SECTION I: PROCESS FOR DEVELOPING STANDARDS Consistent with Section 12(d) of the National Technology Transfer and Advancement Act (PL 104 – 113) and the Office of Management and Budget Circular A-119, EPA Recommendations give preference to Voluntary Consensus Standards (VCS) (defined below). Other standards may be considered in cases where VCS are inconsistent with law or otherwise impractical (e.g. in cases where VCS do not exist, a VCS does not address a particular environmental or human health impact, or a VCS would not be as effective at meeting the criteria outlined in Section II).			
I.1	L	The standard is a voluntary consensus standard as defined by OMB A119 Section 4.[4] If a standard is an ANSI approved American National Standard, then the standard is considered a voluntary	-ANS Document # -Other (to be determined by EPA)

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

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		consensus standard and the SDO ~~is assumed to meet and~~does not need ~~not~~ to provide additional information per~~be assessed to~~ the remaining Section I criteria~~: 2-7; 9; 11; and 13-18~~. Other organization's standards development processes may also meet the OMB A-119 definition of voluntary consensus standard.	
I.2	~~L~~B	The SDO actively sought participation[5] from directly and materially affected stakeholders including producers, users, public interest groups, locally affected groups/persons, and others. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.1 Open Participation*~~ ~~*I.4 Progress/Updates are communicated*~~	-~~- Must have evidence of identifying stakeholders AND evidence of outreach to them if 2013 and beyond; self-attestation ok before then.~~ -~~-~~Documentation of interest categories defined by SDO. ~~- Evidence of outreach to actively recruit members from pre-defined interest categories.~~ - Outreach plan to identify and contact a diverse set of stakeholders. - Evidence of active outreach such as email invitations and communications with a diverse set of stakeholders. Or, where documentation cannot be located for standards developed more than five years prior to assessment date~~prior to 2013~~2, attestation by the SDO indicating the criteria was met.
I.3	B	Key standard setting activities[6] were announced in suitable media[7] in order to encourage participation in standards development activities by stakeholders directly and materially affected by the standard. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.4 Progress/Updates are communicated*~~	- During the pilot this will apply to some key activities outlined in footnote 6. After the pilot, this will apply to all ~~Applies to all~~ key activities outlined in footnote 6~~some standard setting activities, not all activities~~. - ~~Examples of~~Must have evidence of announcements made in suitable media Or, where documentation cannot be located for standards developed more than five years prior to the

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

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

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
			assessment date~~20132~~, attestation by the SDO indicating the criteria was met is sufficient.
I.4	B	Timely and adequate[8] notice was made to generate stakeholder participation in key standard setting activities. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.4 Progress/Updates are communicated*~~	- Schedule of notifications published on key standards activities and deadlines imposed for participation. - Notifications of key standards activities indicating when posted. ~~- For example, time periods prescribed are 30 days for comment on draft standards.~~ - Minimum threshold for notice that a draft standard ~~will be~~was available- is 30 days Or, where documentation cannot be located for standards developed more than 5 years prior to the assessment date~~20132~~, attestation by the SDO indicating the criteria was met is sufficient.
I.5	B	Technical Committee members ~~Directly and materially affected stakeholders~~ – including producers, users, public interest groups, locally affected groups/persons, and others – were able to participate in the standard development process in a timely manner[9]including by accessing draft standards documents, providing input to draft standards documents, receiving meaningful written response regarding how their input is acted on or not acted on, and where voting/balloting is used, having their input made available to the voting members and considered before a final vote is taken on the standard. Note: Participation does not necessarily include a voting role, but goes beyond public notification that a draft exists. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.1 Open Participation*~~ ~~*I.5 Transparent*~~ ~~*I.6 Consideration of all viewpoints*~~	-Instructions for accessing information on key activities. -Publicly accessible online postings of draft documents and comment periods. -Policy for a minimum number of days in a comment period. -Comments on draft documents received from stakeholders. -Meeting minutes showing stakeholder participation. -Online posting of written comments. -Online posting of written responses to comments from the SDO. -Other evidence of stakeholder participation as supplied by SDO.
I.6	B	Minutes of all committee and decision-making body meetings, comments and responses thereto, and complaints and appeals made during the standard development process were available to technical committee members ~~stakeholders~~ for inspection in a timely manner.	- Instructions for accessing information on key activities. - Policy on posting meeting minutes, comments & responses, complaints & appeals.

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

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		~~*Addresses the following Draft Guideline(s):*~~ ~~*I.4 Progress/Updates are communicated*~~ ~~*I.5 Transparent*~~	- Meeting minutes of decision making body with documentation of prompt date of posting. - Complaints and appeals made. - Comments and responses thereto posted publicly to the SDO/standards website. Or, where documentation cannot be located for standards developed more than five years prior to the assessment date~~20132~~, attestation by the SDO indicating the criteria was met.
I.7	B	A procedure or a policy ensures fair and equitable consideration of timely ~~stakeholder~~ input received from technical committee members and from other materially affected stakeholders during the standard-development process[10]. Input on the standard received was documented, adjudicated[11], and responded to by the SDO in accordance with its procedures. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.5 Transparent*~~ ~~*I.6 Consideration of all viewpoints*~~	- Policy/ procedure for ensuring technical committee member/stakeholder input during standards development process are fairly considered. - Access to all, but for assessment, review a sample of stakeholder comments and responses to comments on draft documents – direct responses to individuals or general responses to key themes. - Other evidence of stakeholder participation as supplied by SDO
I.8	L	Option 1: There was no membership fee for participation in the technical committee, or travel requirement to participate in the development of the standard.OR Option 2: If there was a meeting fee, it is minimal or offset by sliding scale for individual/NGO/academic stakeholders. The SDO provided travel funds to hardship parties/stakeholders without financial means to attend in-person meetings, virtual access to meetings, fee waivers, and/or other mechanism to retain stakeholders' ability to participate in standards activities. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.1 Open Participation.*~~	- Notification that membership/participation in the technical committee is free. -Fee schedule showing sliding scale / waivers. -Travel funds policy. -Evidence of virtual access to meetings (e.g. webinar recordings, conference call lines)
I.9	~~B~~L	Processes and procedures for selecting members of the technical committee are transparent and non-discriminatory. [This addresses OMB A-119 criteria for VCS: Openness]Membership of ~~the~~ any decision-making body/bodies~~y~~ was not unreasonably restricted on the basis of technical qualifications or other such requirements (e.g., membership in an organization). Restrictions for the purposes of achieving a predefined target size of the body, achieving a balance of stakeholders, and engaging diverse expertise shall be considered reasonable restrictions.	-Written policy for selection of technical committee members. -Roster of voting members of decision- making body. - List of restrictions (if any) on voting membership of decision-making body/bodies. Explanation as to why they are reasonable.

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		~~*Addresses the following Draft Guideline(s): I.3 Reasonable voting qualifications*~~	
1.10	~~B~~L	The SDO achieved a balance of interest in any ~~the~~ decision-making body/bodies by ensuring that no single interest category constituted more than a one-third (33%) of the membership of that body if there are 4 or more interest categories, or 40% of the membership if there are 3 designated interest categories.[12] ~~*Addresses the following Draft Guideline(s): I.7 Diversity of Interests*~~	- Guidelines/Policy for balance of interest in forming decision-making body parallel with ANSI Essential Requirements 1.3 and 2.3. - Documentation that no more than 1/3 of decision-making body/bodies is from one interest category, or 40% if there are only 3 interest categories.
I.11	B	Decision making procedures/guidance ensured that no single interest category or organization can dominate[13] resolutions made by the decision-making body. ~~*Addresses the following Draft Guideline(s): 1.x Lack of Dominance [SUBMITTED FROM GC MEMBER ON V2.0]*~~	-Guidelines/procedures that reflect that no interest category or organization can dominate decision-making. -Evidence that no directly and materially affected party has submitted a written complaint about dominance (see ANSI Essential Procedures Section 2.2) -Evidence that guidance/ procedure was followed; e.g. voting records on key decisions. -Policy references or parallels ANSI Essential Requirements "Lack of Dominance" criteria at 1.2 and 2.2: "The standards development process shall not be dominated by any single interest category, individual or organization. Dominance means a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints."
I.12	B	Standards Development Organization has a conflicts of interest[14] policy or procedure that addresses potential conflicts of interest and in particular, that funding sources for standards development are fully disclosed. If significant external funding is made by one or more parties to support standard development, the SDO shall put in place supplemental procedures to ensure that no	-Documentation of policy or procedure on conflicts of interest. -Original sources of funding for standards development are disclosed to stakeholders throughout the process. -Formal policy separating functions of organization if there is a potential conflict of interest.

[12] Per OMB A119 sect 2e(ii), "The standards development process should be balanced. Specifically, there should be meaningful involvement from a broad range of parties, with no single interest dominating the decision-making." Definition of "balance of interest" may also be informed by ANSI Essential Requirements (2015), which defines and "balance" as "a) no single interest category constitutes more than one-third of the membership of a consensus body dealing with safety-related standards or b) no single interest category constitutes a majority of the membership of a consensus body dealing with other than safety-related standards. In addition, the Draft EPA Guidelines footnote #3 states that in the case of standards development organizations: "additional steps have been taken by a number of SDOs to further ensure a balance of diverse interests (e.g. limiting number of votes per organization, confirming accuracy of affiliations, actively recruiting additional members from other stakeholder categories)."

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

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		domination occurs and balance of interests is respected in the standard development process. "Significant funding" shall mean more than $10,000 or its in-kind equivalent, or 20% or more of the anticipated funding needs of the SDO for standard development. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.5 Transparent*~~ ~~*1.x Lack of Dominance [SUBMITTED FROM GC MEMBER ON V2.0]*~~	-Potential conflicts of interest are disclosed at the stakeholder outreach stage so that parties with competing or adverse interests can be invited to participate in the standard development process and the integrity of balance requirements is maintained.
I.13	B	Reasonable efforts to achieve consensus[15] are made by the decision-making body and SDO with processes to ensure that comments and objections from technical committee members as well as other materially affected stakeholders are considered using fair, impartial and open processes. [This incorporates language from the new OMB A-119 so the criteria should stay as baseline.] ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.9 Consensus effort*~~	-Policy/ procedure that lays out decision making process and consensus definition including: applicable definition of what constitutes consensus, how it is reached, and that the standard setting process includes procedures for registering comments. -Policy/procedure shows an adequate process for resolving objections; objectors are each advised as to the reasons why the objection was resolved or not resolved; and the members of the decision making body are able to change their votes after reviewing the comments. -Agenda and/or minutes of key meetings showing that efforts towards consensus were on the agenda, and appropriate time was given to reach decisions and reach consensus. Examples include: • Documentation reflects that key development committees selected their own chairmen from the relevant stakeholder group and chairmen were not "selected" by administrators in the NGO. • Documentation reflects frequent straw votes were made at the committee, work group, and technical committee levels. • Documentation shows that where straw votes suggested significant disagreement, additional discussion was scheduled (see agenda and/or minutes) • Proceedings reflect a lack of written criticism, complaint, or "no votes" in straw or final voting • Proceedings reflect that where disagreement was sustained, the SDO made efforts to bring in a third party mediator, changed the chairmanship, changed committee composition, referred the matter back to a technical or development committee, or otherwise offered mediation/dispute resolution assistance to resolve the disagreement.

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
I.14	B	Objections regarding procedures received during the standard setting process are documented and made available to interested parties in a timely manner by the standard development organization. Objectors are advised as to their right of appeal. If an objection is made in writing, the SDO makes a timely and meaningful response to the objection, which response is in writing and made available. If an objection is continuing and is not resolved in the development process, objectors are ultimately advised as to their right and scope of appeal. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.5 Transparent*~~ ~~*I.9 Consensus effort*~~ ~~*I.10 Efforts to Resolve Objections*~~	-Documentation of a diverse sample of the objections received during the standard setting process. -Agendas and/or minutes of key meetings showing objections and their resolution. -Sample of records of communication between the objector and the SDO reflecting work toward resolution. Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.
I.15	B	A documented appeals mechanism is published to address procedural appeals following the final decision; the body handling appeals should be separate and independent from the body handling objections. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.11 Appeals mechanism*~~	-Proof that the relevant policy/procedure was made public and or available to participants before the standard development process (e.g. website posting, email, etc.) Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.
I.16	B	The process for initiating the appeal is straightforward, requires simple notice (articulation) of the basis for the appeal, and does not impose redundant or unnecessary costs, paperwork or documentary requirements. A reasonable time[16] is offered from the time of the final vote to the deadline for lodging notice of appeal ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.11 Appeals mechanism*~~ ~~*I.12 Appeals Open*~~	-Appeals policy and procedures available (easy to find with a clear process defined in straightforward language). -Documentation of policy and/or disclosure of any financial imposition made on stakeholders undertaking an appeal.

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
I.17	~~L~~B	At the outset of the standard development process the SDO identified existing standards that may be in conflict or incompatible with the draft standard and demonstrated effort to coordinate and/or resolve conflicts/incompatibilities with those standards, or merge standards, as appropriate. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.13 Good faith on conflicts*~~	-SDO documents that at the outset of the standard development process, it searched for potentially conflicting / incompatible standards in existence or under development. -If standards identified as conflicting/incompatible, documentation of outreach to other standards developer and effort to resolve issue. -Evidence may be that the SDOs sought to merge efforts. Evidence may also be that a request was made to a critical stakeholder or an accreditation body to help lead discussions to align or merge efforts. Or -Rationale for why an existing standard was not approached, including, for example, because of an insufficient level of protection or fundamental geographical factors or fundamental technological problems. Or, where documentation of outreach to other standards developers cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.
I.18	~~L~~B	Standard has been opened for either revision or reaffirmation at least every five years. For a younger standard, it is scheduled to be revised or reaffirmed at least every 5 years. ~~*Addresses the following Draft Guideline(s):*~~ ~~*I.14 Standards Updated*~~ ~~*II.3 Data Quality and Reliability*~~	-Policy or standard text stating schedule for expected revision or re-affirmation of the standard. -Text supplied shows that standard is scheduled to be revised/ reaffirmed every 5 years or less from the date of the last standard version.
I.19	L	The SDO shall make available to the participating stakeholders an analysis of the environmental and human health hotspots affecting the product category and for the life cycle stages under consideration. Such analysis shall utilize documented hotspot methodologies for identifying and analyzing such hotspots. Any participant shall be given the opportunity to provide supplementary information if they wish.	- Documented hotspots (or related) methods and findings. - Evidence that these findings were shared or made available to stakeholder as part of standard development process. – Procedure or policy indicating that stakeholders were able to introduce supplementary information.
I.20	B	The procedures or processes for participating in standards development and for developing the standard are transparent.	Weblink to standards development policies and procedures
I.21	L	Selecting of leadership for decision making body/bodies is made according to is based on a fair, impartial and open processes	Written procedure for leadership selection showing no unreasonable selection criteria.
1.22	B	Intellectual Property Rights (IPR) Policies: Standards that include patented technology are governed by IPR policies that include provisions requiring that owners of relevant	Either (1) a statement that the standard does not include patented technology; or (2) a copy of the

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		patented technology incorporated into a standard make that intellectual property available to implementers of the standard on nondiscriminatory and royalty-free or reasonable royalty terms (and to bind subsequent owners of standards essential patents to the same terms). These policies should be easily accessible, set out clear rules governing the disclosure and licensing of the relevant intellectual property, and take into account the interests of all stakeholders, including the IPR holders and those seeking to implement the standard.	standard developing organization's patent policy that aligns to the criteria outlined above.
SECTION II: ENVIRONMENTAL EFFECTIVENESS OF THE STANDARD			
II.1		Meaningfully and Measurably addresses relevant HOTSPOTS Applies to single and multiple attribute standards. Addresses the following Draft Guidelines: II.1 Align with Relevant Standards II.2 Measurability and Significant Measurable Difference II.4 Performance-Based II.5 Hotspots II.6 Multiple Environmental Impacts II.7 Lifecycle Stages Awarded a "yes" if the standard required the criteria to be met, or if it had optional practices that met the criteria. Baseline Requirements: [All] [Three of the] Baseline impact areas ("B") need to be addressed unless demonstrated by the SDO to be non-applicable for the product subtype. Standards must meet the hotspot sub-criteria for all applicable baseline hotspots in order to be counted as a "yes" for the Baseline hotspots criterion as a whole. Leadership Requirements: At least two additional impact areas (line items) need to be addressed for Leadership credit to the sub-criterion (i.e., II.1.1, II.1.2, II.1.3, and II.1.4). Therefore, there are four (4) potential Leadership credits available in II.1). TBD for Service Sector Standards and Other Product Category Standards II.1.1 For standards claiming to address the pre-extraction	-Text of the standard provides a clear protocol for measuring whether a product has achieved the standard's target level(s) of performance for the hotspot(s) addressed -SDO justification for each of the impact categories claimed to be meaningfully and measurably addressed. - For baseline credit, minimally, the Text of the standard requires a management plan approach to addressing the hotspot. A "management plan" approach is acceptable. -For Leadership credit, the Text of the standard requires specific approaches and/or measures to demonstrate performance outcomes are achieved per the hotspot. "Management plans or policies" approach are not acceptable. - For lifecycle stages where leadership hotspots address only one environmental impact area, only one leadership hotspot is needed to be awarded a leadership credit; if leadership hotspots in a given lifecycle stage address two or more impact areas, two leadership hotspots are needed to be awarded a leadership credit. - Note that both performance criteria and prescriptive criteria may appear in the same standard. - Unacceptably vague criteria for a hotspot would include those stating that an entity should "be involved in" or "promote" an activity, approach, or philosophy without specifying resulting performance or prescriptive outcomes.

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		and raw materials sourcing stages, the standard meaningfully and measurably addresses: Flooring & Furniture: • B – Land use change, ecosystem services loss, and habitat degradation • B- Biodiversity/endangered species, • B-Soil health, compaction & erosion (carbon, siltation, eutrophication, biodiversity of soil fauna) • L-Sustainable yield • L-Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • L-Criteria air pollutants, air toxics, and photochemical smog • L-Pollution discharges to water Paints/Coatings: • L-Percent recycled, renewable and/or bio-based content • L- Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • For forestry standards, the above hotspots are broken into more specific sub-hotspots B - Land use change • Conversion to non-forest land • Sustainable levels of deforestation • Reforestation to pre-existing conditions • Natural disturbance regimes • Plantations • Clear cutting B - Ecosystem Services • Loss of Services to Humans/Human Health B - Habitat Degradation • Overall habitat degradation • Riparian Management Zones B - Biodiversity	- Where applicants meet criteria by referencing other standards, the referenced standard must also meet criteria. Example: furniture or flooring reference forestry standards: *- Each forestry standard cited must also meet criteria to be considered. If it's optional as to which forestry standard they can use, and not all of the standards meet the criteria, then it does not meet criteria. This is applicable to standards that have been assessed to the criteria. If some embedded standards pass but others have not been assessed against the criteria, then answer is Yes.*

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		• Identify biodiversity types and values pre-deforesting • Invasive, Exotic and Alien Species • Regularly monitor impacts to biodiversity and adapt management plans as necessary • Old Growth Forests B - Endangered Species • Required to protect endangered species and their habitat • Distinction between endangered, threatened, imperiled, critically imperiled, etc. • Forests with exceptional conservation value B - Soil Health, Compaction & Erosion (carbon, siltation, eutrophication, biodiversity of soil fauna) • Maintain and/or improve soil quality • Soil erosion control and minimization • Avoid or minimize runoff and siltation of watercourses • Regularly monitor impacts on soil and adapt management plans as necessary L - Sustainable Yield • Harvest at sustainable levels L- Energy Use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • Estimate emissions and sequestrations of greenhouse gasses from management unit • Measures to reduce greenhouse gas emissions L - Criteria air pollutants, air toxics, and photochemical smog L - Pollution discharges to water • Minimize and mitigate negative impacts from operations on water resources • Maintain or improve the quality of surface and groundwater • Regularly monitor their impacts on water and adapt management plans as necessary • Protection and maintenance of wetlands - Forestry standards are required to meet > 50% of the sub-hotspots to meet each hotspot overall. And	

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		II.1.2 For standards claiming to address the manufacturing stage, the standard meaningfully and measurably addresses: Flooring & Furniture: • B- Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • L- Ozone depletion potential • L-Criteria air pollutants, air toxics, and photochemical smog • L-Pollution discharges to water • L-Water use • L-Solid waste generation Note that chemicals of concern have also been identified as a potential hotspot in the manufacturing stage. These issues are addressed in criteria II.5, II.6, and II.7. Paints/Coatings: • None identified - LCAs indicate that the manufacturing stage is a minor contributor to the overall impacts of paints/coatings Note that chemicals of concern have also been identified as a potential hotspot in the manufacturing stage. These issues are addressed in criteria II.5, II.6, and II.7. And II.1.3 For standards claiming to address ~~human health impacts~~indoor VOC emissions of the product in the installation/use stages, the standard incorporates by reference or aligns with: Flooring: • B - "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1" (2010) (CDPH Standard Method 1.1-2010) (This is the emission testing method for California Specification 01350.) Note that chemicals of concern have also been identified as a potential hotspot in the installation/use stage. These issues are addressed in criteria II.5, II.6, and II.7.	

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		Furniture: • B - ANSI/BIFMA X7.1 Standard for Formaldehyde and TVOC Emissions. • L - "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1" (2010) (CDPH Standard Method 1.1-2010) (This is the emission testing method for California Specification 01350.) (Note that if this VOC leadership criterion is met, ANSI/BIFMA X7.1 Standard does not need to be incorporated by reference.) • L- California's furniture flammability standard (Technical Bulletin 117-2013) and requires products to be labeled as not containing flame retardant chemicals consistent with the manner described in Section 19094 of the California Business and Professions Code Note that additional chemicals of concern have also been identified as potential hotspots in the installation/use stage. These issues are addressed in criteria II.5, II.6, and II.7. Paints/Coatings: • B -California Air Resources Board's (CARB) Suggested Control Measures (SCM) 2007 for VOC content for Paints/Coatings. • L -"Standard Meth All product categories: II.1.5 [formerly II.5] The standard includes environmental and human health protection criteria to decrease the toxicological hazard of the product through one or more of the following: alternatives assessment; safer substitution; reduction or elimination of hazardous substance(s); or alternative design approaches. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI).	

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
II.2	~~I~~L	**Informational:** How does ~~T~~the standard and/or supplementary materials that accompany the standard ~~clearly identifies any~~educate the user about known trade-offs among approaches in the standard to address multiple impact areas?~~.~~ ~~*Addresses the following Draft Guideline(s): II.6 Multiple Environmental Impacts*~~*	[If this were to remain a leadership criterion the following helps to clarify the example sources of evidence and decision rules for the IAE]: - Must provide sources of evidence including but not limted to t~~T~~ext of standard, supplementary materials, meeting minutes that accompany the standard addressing trade-offs among impacts (if applicable, as determined by the SDO). - Simply addressing multiple environmental impacts is not sufficient. - A requirement that proposed environmental criteria identify tradeoffs is considered sufficient, even if the standard being evaluated does not identify specific tradeoffs itself.
~~II.3~~	~~I~~B	**Informational:** Please provide information regarding the research and assessment methods used to determine the approach to addressing impacts. Note: EPA is interested in ~~T~~the environmental and/or human health criteria in the standard ~~are~~ being based on recent available research (at the time the standard was developed) that was peer-reviewed and available for stakeholder review. Additionally, standards developers should use~~d~~ the most appropriate types of assessment methods for the determination of the impacts or attributes.[17] ~~*Addresses the following Draft Guideline(s): II.3 Data Quality and Reliability*~~	~~- SDO documentation of example information sources used in developing the environmental and/or human health performance criteria in the standard, including peer review panel statement, dates of oldest and most recent sources cited, identity of any independent experts consulted as part of the research, and, if applicable, SDO documentation of life cycle assessment data reviewed.~~ ~~- If any life cycle assessment was conducted as the basis of the criteria, it is consistent with ISO 14040 and ISO 14044, complying with the critical review process.~~ ~~- Alternatives assessment criteria are in accordance with the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives.~~

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
II.4	B	If a weighting scheme is used, the standard, the website, meeting minutes, and/or supplementary materials that accompany the standard fully and transparently explains the weighting methodologies/point allocations~~, including the decision science/tool selected and connection between scoring and the single attributes or single impacts~~.[18] This criterion is only applicable to environmental and human health attributes. ~~*Addresses the following Draft Guideline(s): II.8 Weighting Methodologies*~~	- Where standards award a different number of points or credits for each attribute (e.g. energy reduction, EMS certification, etc.), must provide an explanation of how the points or credits were derived. - N/A if all environmental attributes and environmental and human health impacts have equal value; no additional weighting or adjustment is made for certain categories or types of criteria. - Text of standard or supplementary materials that accompany the standard describes the weighting methodologies. - Documentation clearly describing the basis used for the weighting. - If applicant does not site evidence, the standard document will be assessed to see if there is a different number of points or credits awarded per attribute. If no, "N/A", if yes, will look to see if there is an explanation of how the points were derived (then determine Y/N).
II.5 or II.1.5	L	[Propose moving to II.1.5 as a new Hotspots criterion.] The standard includes environmental and human health protection criteria to decrease the toxicological hazard[19] of the product through one or more of the following: alternatives assessment; safer substitution; reduction or elimination of hazardous substance(s); or alternative design approaches. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI). ~~The SDO used reputable information sources in identifying chemicals of concern.~~ The standard fully and transparently explains its	- ~~Text of standard: criteria require hazard reduction through one or more of the approaches listed.~~ - Must specify at least 1 of the 4 methods listed in the criterion. If alternatives assessment is the only method specified, must provide evidence that the assessment was conducted using the same basic steps as the NAS Framework. - SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted ~~and provide evidence that source (s) are reputable.~~ For a hazard list to be considered 'reputable' it shall be based on scientific evidence, be peer-reviewed, and be

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

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		methodology for the criteria. Alternatives assessment criteria are in accordance with the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives. ~~*Addresses the following Draft Guideline(s):*~~ ~~*II.9 Intrinsic Hazards*~~	developed by experts free of any conflicts of interest regarding the outcome of the assessments. Hazard lists should also be constructed through an open-stakeholder process. To provide transparency, formal documentation on the methodology used to compile the list, including key assumptions, shall be publicly available. The standard shall include a formal mechanism to consider form-specific (e.g. respirable dust vs. liquid vs. solid) hazards (such as titanium dioxide). Carcinogens •Listed by the International Agency for Research on Cancer as: -Group 1: carcinogenic to humans -Group 2A: probably carcinogenic to humans •Listed by the National Toxicology Program as: -Known human carcinogen -Reasonably anticipated human carcinogen •Meet the criteria under the Globally Harmonized System of Classification and Labeling (GHS) for the carcinogenicity hazard class (codes H350, H351) Mutagens •Globally Harmonized System of Classification and Labeling (GHS) -Category 1A: Chemicals known to induce heritable mutations in germ cells of humans -Category 1B: Chemicals which should be regarded as if they induce heritable mutations in the germ cells of humans -Category 2: Chemicals which cause concern for humans owing to the possibility that they may induce heritable mutations in the germ cells of humans Reproductive toxicants •Listed under the State of California Safe Drinking Water and Toxic Enforcement Act (Prop 65) for reproductive or developmental toxicity •Meet the criteria under the Globally Harmonized System of Classification and Labeling (GHS) for the Reproductive Toxicity hazard class (codes H360 Categories 1A and 1B, H361, H362) PBT substances •Stockholm Convention Persistent Organic Pollutants U.S. – Canada Binational Toxics •Toxics Release Inventory (TRI) PBT chemicals •Chemicals listed in 40 CFR 372.28 due to their PBT

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
			characteristics •RCRA Waste Minimization Priority Chemicals EPA TRI complete, current list (also at 40 CFR 372.65): http://www2.epa.gov/sites/production/files/2015-11/tri_chemical_list_for_ry15_11_5_2015_1.xlsx Others sources used could include, but are not limited to: •The Toxic Substance Control Act Test Submission Database (TSCATS): http://www.ntis.gov/products/ots.aspx and http://yosemite.epa.gov/oppts/epatscat8.nsf/ReportSearch?OpenForm •Hazardous Substances Data Bank (HSDB): http://toxnet.nlm.nih.gov/ •Integrated Risk Information System (IRIS): http://www.epa.gov/IRIS/ •The National Toxicology Program (NTP): http://ntp.niehs.nih.gov/ •US EPA HPV Challenge Program: http://www.epa.gov/hpv/ •The Distributed Structure-Searchable Toxicity Database Network (DSSTox): http://www.epa.gov/ncct/dsstox/ •Acute Exposure Guideline Levels (AEGLS): http://www.epa.gov/oppt/aegl/pubs/chemlist.htm •The Agency for Toxic Substances & Disease Registry (ATSDR) Toxic Substances Portal: http://www.atsdr.cdc.gov/substances/index.asp •US EPA: Public Databases Routinely Searched for Hazard Information: http://www.epa.gov/hpvis/hazardinfo.htm •U.S. Environmental Protection Agency's (EPA) Design for the Environment Program (DfE)—DfE's Alternatives Assessment Criteria: http://www.epa.gov/dfe/alternative_assessments.html •U.S. Environmental Protection Agency's (EPA) TRACI - The Tool for the Reduction and Assessment of Chemical and other environmental Impacts
II.6	L	The standard includes criteria to require or incentivize disclosure (either publicly or to a third party) of all intentionally added chemical substances present in each homogenous material in the final product at 1000 parts per million (.1%) or greater.	- Text of standard indicating it is solely a process and production method (PPM) standard, or a standard that does not address the environmental or human health performance of a finished product. - Text of standard requires or incentivizes chemical

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		Note: If the standard is a process and production method (PPM) standard, this Guideline is not applicable, and will not be used in scoring.[20] ~~*Addresses the following Draft Guideline(s): II.10 Ingredient Disclosure*~~	disclosure at the specified threshold(s). - SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted and evidence that source (s) are reputable. (See II.5 Sources of Evidence "Lists of Lists")
II.7	L	The standard includes criteria to require or incentivize public disclosure of the intentionally added chemical substances of concern present in each homogenous material in the final product at 100 parts per million (0.01%) or greater. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI). The SDO used reputable information sources in identifying chemicals of concern. ~~*Addresses the following Draft Guideline(s): II.10 Ingredient Disclosure*~~	- Text of standard requires or incentivizes chemical disclosure at the specified threshold(s). - SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted and evidence that source (s) are reputable. (See II.5 Sources of Evidence "Lists of Lists")
II.8	L	Where they may exist, standard incentivizes the manufacturer to publicly disclose any of the following: -the results of existing LCAs, -an Environmental Product Declaration (EPD) pursuant to ISO standards; and/or -the results of other environmental and human health impact assessments ~~*Addresses the following Draft Guideline(s): II.11 Impact Assessment Disclosure*~~	- Text of standard: standard requires or gives credit for public disclosure of results of existing LCAs and/or other existing assessments of environmental and human health impacts. - If SDO does not provide specific location of evidence, the standard will be searched for the following key words: "impact assessment", "EPD", "life cycle" and "LCA."
II.9	L	Innovation. The standard meaningfully and measurably addresses environmental and/or human health impacts in some way not already recognized in the above criteria.	- Text of criteria and explanation of how the approach is innovative and how it results in improved environmental and/or human health performance. - No double counting: if an SDO claims an attribute for a hotpot, it cannot also count as an innovation. Appropriate evidence includes: i) standard includes additional attributes (beyond hotspots); ii) those attributes are not typically covered by the other standards reviewed in the assessment for this category iii) those attributes meaningfully address environmental human health impacts (meets

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
			leadership threshold that a specific approach or measurable outcomes are required) Other innovations may be considered. The following are not considered innovations for the purposes of this criterion: - No process level (e.g. supply chain or application process) or organization-level (e.g. social responsibility, or labor issues) innovations to be included at this time - No "optional innovation credits" count as innovations
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from SDOs on how to determine whether the environmental and/or human health protection criteria in the standard result in products that exceed the industry average level of environmental and/or human health performance for this product category. ~~*Addresses the following Draft Guideline(s):*~~ ~~*II.2 Measurability and Significant Measurable Difference*~~	Optional, to be determined by the SDO
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from SDOs on how and when the environmental and/or human health protection criteria in the standard uses quantitative vs qualitative measures. ~~*Addresses the following Draft Guideline(s):*~~ ~~*II.2 Measurability and Significant Measurable Difference*~~	Optional, to be determined by the SDO

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
SECTION III: CONFORMITY ASSESSMENT[21]			
III.1	B	*[Comment: Recommend moving III.1, III.2 and III.3 below III.8 so that accreditation can suffice as evidence that these criteria have been met.]* The CAB is defined and is independent from the organization whose products/services are being assessed for conformity. ~~*Addresses the following Draft Guideline(s): III.2 Independence*~~	-Accreditation certificate (as supplied in III: 1) -Declaration that the CAB is independent from the producer. -Organizational structure/chart of CAB entity showing independence from producers. -Ownership structure of CAB explained/declared.
III.2	L	The standard, ecolabel and/or SDO are neutral as to the specific CAB entity being used; and more than one CAB can assess conformance to the standard.[22] Reference: ISO/IEC 17007 ~~*Addresses the following Draft Guideline(s): III.2 Independence*~~	-Relevant text from policy/procedure on CAB entities showing independence from the SDO. -Accreditation requirements and or /screening procedure for determining independent CAB. -Declaration that the CAB is independent from the SDO -Demonstration that more than one CAB can provide CA services to the standard, e.g. with public information.
III.3	B	The CAB periodically reviews risks to its impartiality, and takes appropriate steps to mitigate identified risks.	-Quality procedures, advisory body minutes, management meeting minutes -Results of reviews and actions taken.
III.4	L	The CAB offers a sliding scale of conformity assessment fees or other means to be accessible to small businesses. ~~*Addresses the following Draft Guideline(s): III.3 Sliding fee scale*~~	-Documentation of sliding fee scale (does not need to be publicly accessible). Demonstration of accessibility to small businesses.
III.5	B	The CAB publicly discloses the scoring methodology and levels achieved by products that conform to the standard; and describes how the public can access this information. ~~*Addresses the following Draft Guideline(s): III.x Information on Scoring [New Guideline SUBMITTED FROM GC MEMBER ON V2.0]*~~	-Documentation of scoring and levels achieved by products that conform to the standard. -Description of where and how this information is made publically available.
III.6	L	The CAB publicly discloses the credits achieved by products that conform to the standard; and describes how the public can access this information.	-Documentation of credits/criteria achieved by products that conform to the standard. -Description of where and how this information is made publically available.

[21] If a standard does not have an associated second- or third-party conformity assessment program, or it is determined that a supplier's declaration is sufficient for a particular product standard, then this section of the Guidelines would not be applicable. Moreover, the Nov 2013 FAQ noted in answer to the question "Will 3rd party certification of products be required to meet the guidelines?" that the draft guidelines do not require manufacturers to seek third party conformity assessment. The EPA and the Federal interagency group that developed the draft guidelines recognized that the appropriate method of conformity assessment may vary across product categories based on cost, risk, and other factors.

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		~~*Addresses the following Draft Guideline(s):*~~ ~~*III.x Information on Scoring [New Guideline SUBMITTED FROM GC MEMBER ON V2.0]*~~	
III. 7	L	The CAB provides public access to or disclosure of up to date information on the means by which it obtains financial support. Reflects ISO/IEC 17065 - 4.6	-Example description of means of CAB financial support -Description of where and how this information can be accessed.
III.8	B	The CAB demonstrates (through accreditation by a member body to ILAC or IAF)[23] conformance to relevant standards within the ISO/IEC 17000 series, e.g., ISO/IEC 17065 {for the ecolabeling certification program scope in accordance with (ISO 14020)}; 17025 (testing); 17024 (personnel); 17020 (inspection). **OR** Apply the evaluation factors below, which are consistent with the requirements of internationally accepted standards for operations of a conformity assessment body. ~~*Addresses the following Draft Guideline(s):*~~ ~~*III.1 Follow relevant conformity assessment standards*~~ ~~*III.4 Accreditation*~~	-Accreditation certificate from a recognized accreditation body meeting ISO/IEC 17011. -The accreditation body meets international norms for accreditation. -SDO criteria showing requirements for CAB. -Copy of current certificate and scope of accreditation by CAB. - CAB is accredited by a signatory of an international peer evaluation organization.[24] -The accreditation body has been evaluated in conformance to ISO/IEC 17011.
III. 8.1	B	**Objective & Impartial Structure.** Organizational chart and management system of the CAB reflect impartiality of decision making on conformity assessment. Reflects ISO/IEC 17065 - 5.1.1	-Policy on management system. -Policy/ procedures showing independence.
III. 8.2	B	Formal decision-making procedures and thresholds are documented demonstrating rules for when conformance or nonconformance is determined by the CAB.	-Procedures showing thresholds for determining conformance.
III. 8.3	B	**Free from Undue Pressures.** The CAB does not allow commercial, financial or other pressures to compromise impartiality, including ensuring that personnel (management and staff) are free from such pressures. Reflects ISO 17065/IEC - 4.2.2	-Policy / procedure demonstrating that staff and management remain impartial in their CA work and are not subject to undue pressure.

[23] Examples of US-based members to ILAC and/or IAF include ANSI; A2LA; IAS; LAB; NVLAP.
[24] For example, those who are members of the International Accreditation Forum, http://www.iaf.nu/articles/Accred_Body_Members_by_Name/52

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
III. 8.4	B	The CAB has a procedure or policy to ensure that the personnel conducting conformity assessment have not had a professional relationship in the past two years nor on-going financial connection with the organization to which they are providing their services. Reflects ISO/IEC 17065 4.2 AND 5.2	-Policy / procedure for managing conflicts of interest of staff. -Policy that cover past and present relationships specific to the CA being undertaken.
III. 8.5	B	**Documented Procedures.** Procedures are documented for CAB processes. For example, procedures may be documented through a quality management system that provides general management system documentation (e.g. manual, policies, and definition of responsibilities); control of documents; control of records; management review; internal audit; corrective actions; preventive actions. Reflects ISO/IEC 17065 - 8.1	-List of documented relevant policies and procedures. -Documentation of quality management system, including a copy of the internal audit and management review, log of complaints and comments, and corrective actions taken. -Other relevant documentation of procedures for conducting CA.
III. 8.6	B	**Take All Necessary Steps to Evaluate Conformance.** The CAB demonstrates that it takes all steps necessary to determine conformance with the standard, following the principles of ISO 17000: 2004[25]. Reflects ISO/IEC 17065 – 7.4.1; 7.1.2; 7.2, 7.3, 7.4, 7.5, 7.6	-Policy/procedure used to evaluate the product/process. -Copy of an application to demonstrate all required information is contained. -Document describing application review process. -Record that demonstrates that certification decisions were adequately justified.
III. 8.7	B	**Role separation.** The CAB demonstrates that the process for making conformity decisions includes an independent review that the product/service has met the specified requirements. Reflects ISO/IEC 17065 7.6	-Policy/Procedure describing the evaluation process and who makes the CA review and decision. -Procedure for quality management system. -Policy / procedure documenting staffing roles for the CA process.
III. 8.8	B	**Certification Conditions Specified.** The CAB demonstrates that it documents how and when conformance is granted, maintained, extended or suspended or withdrawn. Reflects ISO/IEC 17065 - 7.6.2	-Policy/procedure on how and when conformance is granted, maintained, extended or suspended; AND policy on communication of this information
III. 8.9	B	In the event that non-conformity is substantiated, the CAB has a procedure that considers and decides on appropriate action such as increased surveillance, reduction in the scope of the certification to remove non-conforming products/services, suspension of the certification or withdrawal of the certification. Reflects ISO/IEC 17065 - 7.11.1	-Policy / procedure on appropriate actions in cases of non-conformity.

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
III. 8.10	B	**Records Management.** The CAB has procedures for ensuring documents are identified, stored, protected, retrieved and retained and disposed of to ensure the protection of confidential information. Reflects ISO/IEC 17065 - 8.4.1	-Policy/procedure for document control and retention policy. -Policy/ procedure to protect client confidentiality. -Evidence of quality management system covering document management and client confidentiality.
III. 8.11	B	**Dispute Resolution Procedures.** The CAB has a documented policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals. Reflects ISO/IEC 17065 - - 7.13.1 (ISO/IEC 17065 takes out term "disputes").	-Policy/procedure for complaints and appeals. -Sample records of complaints, and or appeals and corrective actions taken.
III. 8.12	B	**Traceability Procedures.** The CAB has traceability or chain-of-custody procedures where this is necessary to ensure qualified products/services meet the standard.	-Policy/ procedures for traceability/chain of custody by CAB demonstrating conformance with the criteria. OR justification of how this is not applicable.
III. 8.13	B	**Periodic evaluation of marked products.** When continuing use of a conformity-assurance mark on a product/service is authorized, the CAB periodically conducts surveillance of marked products/services to ensure ongoing validity of continued conformance. Reflects ISO/IEC 17065 - 7.9.3	-Policy/procedures on how long products can display the certification mark demonstrating conformance. -Policy/procedure indicating surveillance activities. -Copy of market surveillance report.
III. 8.14	B	**Content of Declarations of Conformity.** The CAB provides declarations of conformity that clearly conveys information on: the name and address of the CAB; the date conformity assurance is granted (if applicable); name and address of the client; the scope of the conformity assurance; the term or expiration date of conformity assurance (if applicable); the signature or other defined authorization of the person(s) of the CAB assigned such responsibility. Reflects ISO/IEC 17065 - 7.7.1 & 7.7.2	-Example declaration of conformity meeting criteria listed.
III. 8.15	B	**Suitable Action for Misuse.** The CAB has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is conformant, including market surveillance. Procedures describe actions to take for incorrect, misleading or un-authorized use of its mark and licenses. Reflects ISO/IEC 17065 - 4.1.3.1, 7.11.1, 7.9.3 and 7.9.4	-Policy / procedure to take action on incorrect, misleading, or unauthorized use of marks or licenses.

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
III. 8.16	B	**Quality Objectives.** The CAB has a documented commitment to fulfilling quality objectives and/or an established quality management system that is implemented in the CAB's organization. Reflects ISO/IEC 17065 - 8.2.1.	-Policy / procedure indicating commitment to quality -Quality management system documentation.
III. 8.17	B	**Sufficient Personnel.** The CAB has a process to ensure that they have sufficient personnel with the education, training, technical knowledge and experience necessary for performing conformity assessment functions. Reflects 17065/IEC - 6.1.1.1	-Description by CAB on how it ensures that its staff is qualified for CA activities. -Description of staffing requirements. -Qualifications stated in job advertisements for certification staff. -Records/ CVs of personnel reflecting required qualifications
III. 8.18	B	**Adequate Facilities & Equipment.** The CAB has all the facilities and equipment needed to carry out its work; if testing is required by the standard, competent and/or accredited laboratories are utilized. Broadly reflects ISO/IEC 17065 - 7.3.1	-Description of facility and equipment required to conduct certification. -If testing is required for certification, laboratories are in conformance with ISO 17025 or equivalent standard.
III. 8.19	B	**Transparent Process.** The CAB maintains through publications, electronic media or other means, and makes available upon request, information about the conformity assessment process including the rules and procedures for granting maintaining, extending, reducing the scope of, suspending, withdrawing or refusing conformity assurance. Reflects ISO/IEC 17065 - 4.6	-Documentation of appropriate and timely information disclosed publicly or available on request about the CAB certification processes.
III. 8.20	B	**Information on Fees.** The CAB provides general information on fees, and/or makes this information available to applicants and clients. Reflects ISO/IEC 17065 - 4.6	-Example communication to applicants that includes information on fees.

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
SECTION IV: MANAGEMENT OF ECOLABELING PROGRAMS[26]			
IV.1	B	The ecolabel program has a documented commitment to fulfilling quality objectives and/or an established quality management system[27] that is implemented in the organization. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.1 Document Commitment to Quality*~~	-Policy / procedure indicating commitment to quality. -Evidence of a documented Quality management system documentation.
IV.2	~~B~~L	The ecolabel program has established a methodology and procedure to evaluate the effectiveness of addressing environmental and/or human health impacts covered by its standard. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.2 Evaluate Effectiveness*~~	-Procedure for completing the evaluation including a discussion of impact categories addressed, methods, data sources, indicators, time line. -Description of the methodology selected; including any methodology standards or norms referenced such as impact evaluation or the ISEAL Impacts code[28].
IV.3	L	An evaluation, by the ecolabel program or a third-party, of the effectiveness of a standard in reducing environmental and/or human health impacts has been completed within the previous 5 years. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.2 Evaluate Effectiveness*~~	-Copy of completed report and publication date. -Description of methods and data sources used.
IV.4	L	Results of the evaluation are publicly available. *Addresses the following Draft Guideline(s):* ~~*IV.2 Evaluate Effectiveness*~~	-Evidence that evaluation reports are publicly available; for example, publication of report online, website link, or statement that report available on request.
IV.5	B	The ecolabel program has a documented and publicly available policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals concerning the management of the ecolabel program. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.3 Dispute Resolution Process*~~	-Policy/procedure for complaints and appeals. -Sample records of complaints, and/or sample of appeals and corrective actions taken. -Public website address for complaints and appeals.
IV.6	B	The ecolabel program makes publicly available the stakeholders[29] who are involved in the ongoing governance and/or operations of the ecolabel program. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.4 Disclose Stakeholders*~~	-Public website address with stakeholders listed. -Description of availability of information on stakeholders.

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

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

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

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

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
IV.7	B	The ecolabel program does not allow commercial, financial or other pressures to compromise the confidentiality, objectivity or impartiality of its operations and decisions that affect awarding the mark or registration, including ensuring that personnel (management and staff) are free from such pressures. ~~*Addresses the following Draft Guideline(s): IV.6 Free from Undue Pressures*~~	-Policy / procedure demonstrating that staff and management are able to remain impartial in its decisions concerning the ecolabel program.
IV.8	L	The ecolabel program provides public access to, or disclosure of, up- to-date information on the types of financial support received for administering the ecolabel program. ~~*Addresses the following Draft Guideline(s): IV.8 Information on Financial Support*~~	-Description of the types and sources financial support the ecolabel program relies on to support its work, such as application fees, license fees, royalties, membership fees, grants, sale of other goods and services, etc. -Description of where and how this information can be accessed.
IV.9	B	The ecolabel program provides general information on fees, and makes this information available to applicants. ~~*Addresses the following Draft Guideline(s): IV.9 Information on Fees*~~	-Fee schedule information OR -Process by which stakeholders and applicants can request information on fees (from ecolabel program, CAB or both).
IV. 10	B	The ecolabel program makes publicly available (free of charge or for a reasonable cost) the criteria and/or standard. ~~*Addresses the following Draft Guideline(s): IV.10 Publicly Available Criteria*~~	-Internal URL for accessing the criteria and/or standard and how interested parties can access the standard.
IV. 11	B	The ecolabel program grants the label, mark, or registration if the product/service is demonstrated to be in conformance with the applicable standard, and the applicant meets the administrative and technical requirements of the program (such as paying fees, and accepting license agreements). ~~*Addresses the following Draft Guideline(s): IV.11 Grant the Use of the Mark*~~	-Declaration that no other conditions or limits are placed on products or applicants in granting the use of the mark beyond those required by the standard and or administrative or technical requirements of the program. -Policy or procedure stating the conditions by which the label/mark/declaration will be granted and an explanation as to its purpose and why they are reasonable. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both.
IV. 12	B	The ecolabel program has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product/service meets the standard. Procedures describe actions to take for incorrect, misleading, or un-authorized use of its mark and licenses including suspension or removal of the mark if warranted. ~~*Addresses the following Draft Guideline(s): IV.12 Suitable Action for Misuse*~~	-Policy / procedure to take action on incorrect, misleading, or unauthorized use of marks or licenses. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both.
IV. 13	L	The ecolabel program has established procedures to periodically conduct market surveillance to check for incorrect, unauthorized use of its licenses, certificates, and	-Policy / procedure requiring market surveillance by ecolabel program and/or the CAB. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both.

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		marks of conformity, and is responsive to complaints of misuse or misinterpretation in the marketplace. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.12 Suitable Action for Misuse*~~	-Procedure or resource for receiving complaints of misuse or trademark violations -Example of a market surveillance report.
IV. 14	L	If an ecolabel is associated with more than one standard/certification, those ecolabels are markedly different from each other in application as not to confuse the marketplace or inflate a sense of compliance.	-Consumer testing to make sure ecolabels associated with more than one standard are clearly interpreted as to the differences.
IV. 15	L	Ecolabel programs participate in mutual recognition activities such as equivalency assessments; formal mutual recognition of standards; and/or technical, administrative, or CA procedures. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.13 Mutual Recognition*~~	-Documentation of participation in associations and fora such as ISO, ISEAL Alliance, Global Ecolabelling Network, ASTM, etc. -Documentation of public statement in which ecolabel programs and or standards are mutually recognized and on what grounds.
IV. 16	L	The ecolabel program makes publically available a searchable directory of conformant products/services and their brand owner. The directory is up to date, and/or has been updated in the last 6 months. ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.14 Publicly Available Directory*~~ ~~*IV.15 Current Directory*~~	-Example of the Directory in current use by the ecolabel program and/or CAB. -Instructions as to how access to the directory is provided to the public. -Date of last update to the directory is provided. -Demonstration that the directory was updated in the last 6 months prior to the pilot assessment. -Dates of when products are added to directory provided. -Explanation or demonstration of how the directory is able to be searched. -Note that "searched" is not meant to imply a full online database. Search functions are also found in commonly used tools such as MS Word, MS Excel and Adobe PDF.
~~IV. 17~~	~~L~~	[combined with IV.16 above] ~~The ecolabel program's directory of conformant products and their brand owner can be searched so that users can find conforming products and suppliers~~ ~~*Addresses the following Draft Guideline(s):*~~ ~~*IV.16 Searchable Directory*~~	~~-Explanation or demonstration of how the directory is able to be searched.~~ ~~-Note that "searched" is not meant to imply a full online database. Search functions are also found in commonly used tools such as MS Word, MS Excel and Adobe PDF.~~
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs on if/how they provide regional information regarding labeled products/services (e.g., information on the location of suppliers; national or sub-national regions where products/services are available on the market.) *Addresses the following Draft Guideline(s):* *IV.17 Regional Information*	-Directory showing supplier addresses/location information. -Directory showing where products are available (country, state, other sub-national region).
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs on	-Example of analysis of marketplace uptake of the ecolabel products including market share, recognition

Guide line #	B/L/I	Guideline	Example Sources of Evidence (one may be sufficient subject to IAE review)[3]
		if/how the ecolabel program conducts or participates in a periodic analysis and/or publishes the uptake of the ecolabel in the marketplace. ~~*Addresses the following Draft Guideline(s): IV.18 Analyses of Market Uptake*~~	in institutional procurement guidelines of the ecolabel or standard, or other indicators of the ecolabel's presence. -Example of market report published.
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs regarding rules and procedures that aim to ensure a balance of interests among stakeholders in the program's governance. ~~*Addresses the following Draft Guideline(s): IV.5 Balance of Interests*~~	-Definition of interest/stakeholder categories relevant to the ecolabel program. -Documentation of formal rules and procedures for ensuring balance of interest.