



**EPA Guidelines Pilot for
Assessing Standards and
Ecolabels for Federal
Government Procurement**

Draft Independent Assessment Entity
(IAE) Findings and Recommendations
Report

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prepared for:

EPA, Governance Committee, Product Category
Panels

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INTRODUCTION

Industrial Economics, Inc. (IEc), under contract to Resolve and EPA, was commissioned to independently assess the responses provided by volunteer standards, certifiers, and ecolabel programs to meeting EPA’s pilot criteria for federal procurement. The assessment criteria were based on the draft *Guidelines for Assessing Environmental Performance Standards and Ecolabels for Federal Procurement*, and further developed and refined by the three product category panels (furniture, flooring, and paints & coatings) and Governance Committee, groups facilitated by Resolve in 2015 and 2016. The assessment took place between June and August, 2016.

In the report, we used the term “applicant” to mean all of the organizations that submitted a response to the pilot, including standard development organizations (SDOs), ecolabel programs (also called “scheme owners”), and conformity assessment bodies (CABs). “IAE” refers to the “Independent Assessment Entity” - which in this pilot was Industrial Economics, Incorporated (IEc).

In this report, IEc summarizes the assessment process and results from applications submitted by 22 volunteer organizations and 47 unique submissions. *It is important to note that at the time of this draft, EPA and IEc are still in the process of receiving helpful feedback and suggestions from the applicant community, which is not reflected in this draft report.*

The relationship between applicants, and standards is complex and resulted in a different number of individual assessments for each section of the Guidelines. Many individual standards had more than one organization applying for assessment, in many cases a Standard Development Organization (SDO) and a conformity assessment body, as shown in Exhibit 1 below.

EXHIBIT 1. STANDARDS ASSESSED PER GUIDELINE SECTION

GUIDELINES SECTION	# ASSESSED	NOTES
I: Standards Development Process	36	Unit of analysis for Section I is the development process for the individual standard, but many development processes vary little from standard to standard within the same applicant.
II: Environmental Effectiveness	35	Unit of analysis is the individual standard.
III: Conformity Assessment	41	Both CABs for standards assessed under Section II and applicants for rules for CABs were assessed in this section.
IV: Ecolabel Program Management	34	Unit of analysis is the ecolabel program for the specific standard; some standards do not have corresponding ecolabels.

This report first provides an overview of the assessment steps taken, and then presents global findings that are applicable across sections of the criteria, and across product categories. We then report on results for each of the four sections of the criteria, describing key decision rules used in the assessment, and potential alternative approaches to scoring the assessments, where warranted. Section II, criteria II.1 (hotspots) varies by product category. For this section of the report, we present some specific insights into each of three sets of hotspots and reflections on scoring approaches that drive the results.

The full and detailed set of results across all of the criteria, and for each of the applicants, will be provided at the [Participant Workspace website for the project](#). The results also include comments, reference to additional sources of evidence, and questions from applicants on the IAE's findings. Note that in many cases the evidence provided contains copyrighted and/or Confidential Business Information; therefore, the supporting documentation will not be posted to the Resolve website and may or may not be available upon request.

The next step for the pilot process is for the panels and the GC to deliberate on these results, and to provide feedback on lessons learned during the pilot process. A final pilot report will make purchase category-specific and general recommendations on the criteria and will address the pilot's broader goals, including the potential usefulness of the assessment results for federal environmentally preferable purchasing, potential for future assessment updates, the potential business models for future assessments, etc.

ASSESSMENT PROCESS

EPA and IEc took the following steps to complete the assessment process:

1. The invitation to submit a response was issued by the [Federal Register Notice](#) (Issued April 22, 2016: EPA-HQ-OPPT-2014-0838-0023).
2. Applicants submitted first their intent to participate via email alongside their responses to "scoping questions." Answers to scoping questions were not assessed.
3. Applicants then submitted a response to the ["information collection instrument"](#) and emailed additional sources of evidence and documentation to EPA. Confidential information (attachments or responses to criteria) were marked as CONFIDENTIAL or CBI in the name of the file or in the text provided.
4. An initial completeness check was conducted by the assessment team, to ensure that responses and adequate documentation were received, and that responses were clear. In response to the completeness check, some applicants submitted additional information.
5. The assessment team at IEc conducted the assessment based on the information submitted. For many criteria, IEc developed decision rules to ensure consistent and objective assessments across applications. All decision rules are noted in Appendix B of this report.

6. Based on the pilot assessment process and results, IEc developed suggestions for changing approaches for the pilot, for consideration by EPA, panels, and the GC. These are also noted in Appendix B and in summary results files on the Pilot workspace.
7. IEc sent each applicant a workbook with their initial assessment results, decision rules, and potential alternative scoring approaches. They were invited to submit additional comments and information as a response to the assessment. All responses received are provided within the assessment files in the Pilot workspace.

Input on the assessment criteria and recommendations on improving the assessment will be gathered from applicants, panel members, and GC members during meetings in September and through a short follow-up survey.

HIGH-LEVEL FINDINGS ACROSS SECTIONS

IEc assessed 47 standards submitted by 22 organizations against the relevant 75 criteria. An additional four certifications were also submitted but were found to be out of scope for the assessment, due to not being tied to an ecolabel or standard that was under assessment, or being a type of disclosure tool that was not classified as an ecolabel or standard (as the EPA pilot project envisaged). It was clear that many applicants spent a significant level of effort in submitting a response to the assessment and associated evidence, and in providing post-assessment recommendations and responses.

In evaluating applicants' responses, IEc set certain decision rules that applied to all criteria:

- Many applicants claimed that certain criteria were not applicable, but IEc systematically determined the applicability of each criterion to each application.
- We reviewed all evidence specifically referenced by applicants in their responses to individual criteria. In some cases, evidence cited was found in the text of the standard itself. In Section II, where necessary (i.e., if the applicant provided no response or claimed that a given criterion was not applicable), we reviewed all evidence files submitted to make an assessment. However, we only reviewed specifically cited evidence files for the other sections, due to resource constraints.
- In a few limited instances, the evidence provided did not provide a sufficient basis to determine whether a standard passed the criterion; we scored these as “not enough information.” As noted above, “not enough information” was treated as a “no” in scoring.

No standards met all of the baseline criteria in the initial IAE assessment.

This was driven by three main factors (in addition to other issues discussed in this section):

1. There were many criteria – 75 criteria in total across all four sections– which required a significant level of effort to meet and demonstrate that they were met.

2. There were many gaps in the evidence submitted, so it is possible that some applicants could have met criteria had they provided additional information.
3. There are many baseline criteria (50 across all four sections), all of which were deemed prerequisites by the Panels and Governance Committee during the criterion development phase.

Post-pilot, IEC recommends:

- *Streamlining the criteria, by recognizing existing accreditations and determinations of equivalencies for Section I and III, and reducing redundancies of concepts across criteria.*
- *Requiring only a certain percentage of baseline criteria in order to meet the overall criteria, and/or turning some baseline into leadership criteria.*
- *Considering allowing more self-attestations as evidence, coupled with a targeted audit approach for assurance purposes.*

Scoping helped to identify the subject for the assessment, but could be refined.

Up front scoping steps conducted with applicants helped to identify the correct sections to respond to. However, for section III (conformity assessment), some organizations submitted their rules for conformity assessment bodies (CABs), whereas others submitted as CABs themselves. IEC assessed both groups in the pilot; however, only those CABs where the associated standard was also being assessed in the pilot process (for Section II) were assessed.

Some applicants applied for all three product categories with one standard, others just one or two of the product categories. In this case, the results only changed for the product-category specific criterion (II.1 on hotspots).

Another scoping issue occurred in Sections I and III, wherein some met recognized accreditations (for criteria I.1 and III.8), yet also went ahead and completed the assessment (for I.2 to I.7, I.9, I.11, and 1.13 to I.18 in Section I, and for III.8.1 to III.8.20 in Section III).

Post pilot, IEC recommends:

- *Improving the clarity of communications as to which organizations should submit a response to which section of the criteria.*
- *Providing more information for applicants to ensure an agreed-upon scope before a full response is submitted and assessed.*
- *For Section I and III, reorganizing the criteria and building a two-step process wherein applicants only need to submit information on the additional sub-criteria where they are found to not meet the recognized accreditations. Doing so would help to reduce the level of effort and complexity for both applicants and IAEs in completing the assessment. An online system can accommodate this.*

Data quality and gaps, limits the ability to rely on “self-assessment”.

The quality of the responses and evidence submitted by applicants varied widely, even after a “completeness check” and the opportunity for applicants to update responses. In many cases, applications contained several gaps in responses including missing responses, missing evidence, and unsubstantiated claims that criteria were “not applicable.” Notably, although the instructions clearly stated that applicants were to provide a “yes” or “no” answer as to whether they met the criteria, most applicants did not follow that instruction and instead provided textual responses that communicated a yes or no response. Other applications routinely claimed that their standards met criteria that they clearly did not meet. There were also several gaps wherein no evidence was submitted, or where evidence submitted did not support the response made. Routinely, the submissions did not point to specific evidence relevant to specific criterion, making it time consuming and challenging to assess. In general, where there were gaps in responses or in evidence, the decision rule used was that there was “not enough information” to assess the response.

Post pilot, IEc recommends:

- *Changing the format for the application to a more structured, ideally online system that asks direct questions of applicants and requires responses to move ahead.*
- *Allowing more self-attestation in lieu of evidence for criteria outside of the environmental effectiveness realm. However, couple the increased use of self-attestation with an audit function for assurance purposes.*

Over-use of “not applicable”.

Applicants overused the option of stating “not applicable” with no or weak explanation as to why. Upon further investigation, many of these criteria were found to be applicable. If the applicant indicated “not applicable” without an acceptable explanation, the decision rule used was that they did not meet the criterion.

Post pilot, IEc recommends:

- *Limiting the availability of “not applicable” as an option, and giving more explanation as to what would be considered truly not applicable. If “not applicable” is chosen, applicant explanations as to why this was chosen should be required.*

Further definitions needed.

There was apparent misunderstanding of some criteria by applicants, as some responses submitted were clearly not relevant to the particular criterion. IEc and EPA developed some decision rules during the assessment to address this need, and noted where more definition is needed.

Post pilot, IEc recommends:

- *For all criteria, providing additional guidance and definitions to applicants and assessors to further improve assessment quality. There is a need for more fine-grained definitions, thresholds, benchmarks and guidance as to what would meet and not meet the criteria in an assessment manual.*

Answered some but not all of the criteria.

Where criteria had multiple parts, some responses only addressed a part – not all - of the criteria. Where the applicant met only part of a criterion (but not all of it), the decision rule used was that they did not meet the criterion.

Post pilot, IEc recommends:

- *For those criteria with multiple parts, breaking these out into individual criteria in the future. However, IEc also recommends streamlining criteria to reduce redundancy.*

International equivalencies may be needed.

For some non-US based applicants, equivalent standards and accreditations were not provided (nor found with a brief desktop search by the IEc team), making it difficult to assess their response to some criteria. In these cases, the decision rule used was that there was “not enough information” to assess the response.

Post pilot, IEc recommends:

- *For each criterion, researching international equivalencies to standards cited by criteria (where readily available), and/or requiring applicants to provide this information in order to be assessed.*

The rest of the report presents findings and recommendations for each of the four sections of the criteria.

SECTION I | STANDARD DEVELOPMENT PROCESS

Summary IAE results for Section I are as follows:

INITIAL RESULT PER IAE ASSESSMENT	NUMBER OF STANDARDS
Meets Baseline	2
Does Not Meet Baseline	34
Not Assessed	11

Currently, only 2 standards meet the 14 baseline criteria for Section I, which emphasize various aspects of voluntary consensus and other process integrity procedures for standards development. The reasons for the low passage rate are diffuse; there is no one or two criteria driving this result. However, 14 baseline criteria are a lot of baseline criteria for one topic, and standards had a difficult time meeting all of them. Related, only 5 of the standards participating in the pilot are American National Standards (ANS) that are assumed to meet OMB's definition of a voluntary consensus standard. ANS standards did not need to be evaluated against Section I criteria: 2-7; 9; 11; and 13-18.

Criteria-specific findings for Baseline criteria include:

- For I.2 (Open Participation): 9 applicants were assessed as not meeting this criterion and three did not provide enough information and therefore did not meet the criterion. Many of these applicants did not provide evidence of outreach to stakeholders, and three did not provide documentation of the identification of interest categories. *IEc recommends potentially dropping evidence of outreach as a decision rule; or allow self-attestation for the outreach component for standards developed prior to 2013.*
- For I.11 (Dominance): Seven applicants were assessed as not meeting this criterion and 12 did not provide enough information and therefore did not meet the criterion. Of the seven standards which did not meet this criterion, five did not have policies specifying what constitutes a balance of interest; and two do not use a committee model, which is a prerequisite for achieving a balance of interest. *IEc recommends changing this criterion to leadership.*
- For I.12 (Conflicts of Interest) Six applicants were assessed as not meeting this criterion and 11 did not provide enough information and therefore did not meet the criterion. All of the applicants which did not provide enough information did not provide evidence of a documented COI policy. All of the standards which did not meet the criterion lack a policy requiring the disclosure of significant funding to stakeholders. *IEc does not recommend changes to scoring for this criterion, but*

does recommend EPA follow up with the 11 applicants that did not provide enough information to give them another opportunity to produce, or perhaps to develop, a binding COI policy.

- For I.13 (Consensus): All applicants that provided information met the criteria, but 13 did not provide enough information. *IEc recommends changing this criterion to leadership.*
- For I.14 (Objections): Thirteen applicants were assessed as not meeting this criterion and 12 did not provide enough information and therefore did not meet the criterion. Of the 13 standards which did not meet this criterion, nine provided policies which did not include a process for appeals; and four self-attested when not eligible for it. *IEc recommends removing communication of right to appeal from this criterion since it is covered elsewhere.*
- For I.15 (Appeals Mechanism): Seven applicants were assessed as not meeting this criterion and nine did not provide enough information and therefore did not meet the criterion. All of the standards which did not meet this criterion do not have a documented appeals mechanism. All of the applicants which did not provide enough information either did not provide a response, or provided no rationale for claiming N/A. *No changes recommended; see recommendations below on appeals.*
- For I.16 (Appeals Process): Ten applicants were assessed as not meeting this criterion and nine did not provide enough information and therefore did not meet the criterion. *IEc recommends changing this from Baseline to Leadership status. I.15 is a more basic criterion regarding the appeals mechanism.*
- For I.17 (Conflicting Standards): Fifteen applicants did not provide enough information and therefore did not meet the criterion; all applicants that provided information met this criterion. Of the 15 applicants which did not provide enough information, 11 either did not provide a response, or did not provide evidence/self-attested when not eligible; 4 apparently misunderstood the criterion and addressed an appeals process instead of conflicts with other standards. *IEc recommends changing this criterion to leadership and clarifying it.*

IEc's additional Section I recommendations post-pilot include:

- *De-emphasize the focus on consensus as an outcome. There are criteria in Section I, including stakeholder involvement, COI policies, and documented mechanisms for objections, that appear to be fundamental for ensuring reasonableness and process integrity in a standards development process. However, given the Government's ability to specify standards that are not based on a consensus outcome in certain cases, per OMB A-119, IEC recommends de-emphasizing consensus as an outcome by switching some Section I criteria to leadership.*
- *Appeals are covered in three separate criteria in redundant ways. This is unnecessarily burdensome and confusing; IEC suggests consolidating criteria into one criterion on appeals.*

- *Allow for additional self-attestation in Section I in particular, which would increase the passage rate. As noted above, combine self-attestation with an audit approach for assurance purposes.*

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SECTION II | ENVIRONMENTAL EFFECTIVENESS

Summary IAE results for Section II are as follows:

INITIAL RESULT PER IAE ASSESSMENT	NUMBER OF STANDARDS*
Meets Baseline	11
Does Not Meet Baseline	21
Not Assessed	12
* Totals do not include standards that met Baseline criteria for certain product categories but not for others. One standard was not assessed for Section II because it does not contain environmental criteria.	

Currently, 11 standards meet the two implemented baseline criteria for Section II: II.1 (Hotspots) and II.4 (Weighting). It is important to note that II.3: (Reputable Sources of Information) could not be implemented as currently written, due to the difficulty and level of effort required and the overall resources available for the pilot assessment effort.

HOTSPOTS

IEc applied several decision rules in evaluating applicants' responses on hotspots. These rules had a significant impact on the overall results.

- As directed by the Panels and Governance Committee, we required that standards address all Baseline hotspots for the lifecycle stages they covered. Many standards did not pass as a result. If the standard clearly did not address a particular lifecycle stage, those hotspots were determined to be not applicable. Single-attribute standards generally benefited from this decision rule, although there were some single-attribute standards that failed because the attribute they addressed was not considered a hotspot.
- Either required or optional practices within a standard were allowed as means to address a hotspot. Counting only required practices would have further reduced the number of applicants passing the criteria.
- For Baseline hotspots, a management plan approach was considered acceptable. Leadership hotspots required more specific measures to demonstrate performance outcomes. This was communicated in the example sources of evidence provided to applicants.

Furniture Hotspots

Nine standards met the Baseline hotspots for furniture, and four were awarded leadership credit. Fourteen did not meet the Baseline criteria. Among those that failed, by far the

most challenging lifecycle stage was pre-extraction and raw materials sourcing, but that was due to issues specific to forestry standards (discussed below). Excluding forestry standards, only three furniture standards failed the pre-extraction and raw materials sourcing stage hotspots; two failed to address the manufacturing stage hotspots; and one each failed to address the installation and use and end-of-life hotspots. Only one standard failed to address the hotspots for more than one lifecycle stage covered by the standard. This suggests that for furniture, the hotspots chosen for the pilot reflect the current state of the marketplace reasonably well.

Flooring Hotspots

Nine flooring standards met the Baseline hotspots and three met the Leadership hotspots, while 12 did not satisfy the Baseline criteria. Similar to furniture, the main area of failure was in the pre-extraction and raw materials sourcing stage, driven by forestry standards. Excluding forestry standards, four other flooring standards failed to address the hotspots for that lifecycle stage (two of these also failed the evaluation for furniture, and two were flooring-specific standards). Also similar to furniture, only two standards failed the evaluation for the manufacturing stage and one failed the installation and use stage. Only one standard (the same one as for furniture) failed the hotspot assessment in multiple lifecycle stages. Again, this relative level of success demonstrates that the flooring hotspots chosen are consistent with the current market landscape.

Paints and Coatings Hotspots

Eight paints and coatings standards met the Baseline hotspots and four met the leadership hotspots, while four did not satisfy the Baseline hotspots. Because there were no Baseline hotspots in the pre-extraction and raw materials sourcing stage or the manufacturing stage, most of the standards that failed did so because they did not meet II.1.3, on indoor air quality. In other product sectors, some standards that failed II.1.3 were international standards whose indoor air quality provisions were not readily comparable to the U.S.-based requirements; however, for paints and coatings, all of the standards failing II.1.3 were from U.S. organizations. It is also worth noting that none of the standards failing the hotspots assessment for paints and coatings were paint-specific standards. Thus, as with the other product sectors, the hotspots chosen appear appropriate given the current state of the marketplace.

Forestry Specific Sub-Hotspots

To provide more definition where needed to assess the forestry standards submitted, and to be more transparent and consistent in the assessments, EPA and the IEC team further defined twenty sub-hotspots specific to forestry standards, as shown in Appendix A. For example, biodiversity was split into “identify biodiversity types and values pre-deforesting,” “invasive, exotic and alien species,” “regularly monitor impacts to biodiversity and adapt management plans as necessary,” and “old growth forests”. These sub-hotspots were based on a detailed review of relevant literature conducted by EPA staff. The forestry experts on the Panels will help to further refine these sub-hotspots based on the initial findings and applicant responses. Forestry standards were required to meet > 50% of the sub-hotspots to meet each hotspot overall. As with the other standards,

forestry standards were required to meet all Baseline hotspots in order to pass the overall Baseline hotspot criterion.

This approach proved to be challenging for the forestry standards to meet. Only one out of six passed the overall Baseline hotspots criterion. While the standards generally had practices on each of the hotspots (e.g., biodiversity), their coverage of the more specific sub-hotspots (e.g., “old growth forests”) was inconsistent. The endangered species hotspot was met by most of the forestry standards, but none of the other hotspots were met by a majority of the standards. Only one standard satisfied the habitat degradation and biodiversity hotspots.

Overall Hotspots Recommendations

For the pilot assessment and for future efforts, we recommend greater flexibility in applying the hotspots criterion. Specifically, rather than meeting all Baseline hotspots, we recommend that standards be allowed to pass the overall Hotspots criterion if they meet the hotspots for three out of four lifecycle stages. (This would not affect standards that address three or fewer lifecycle stages.) Requiring that standards meet all hotspots for applicable life cycle stages could, paradoxically, discourage standards from addressing a given lifecycle stage at all; allowing greater flexibility would solve this problem.

A similar approach could be used for the forestry standards. As one possibility, forestry standards could be required to meet only four or five of the six hotspots. Another option would be to count an overall hotspot as being met if the standard address 50 percent or more of the sub-hotspots (rather than requiring a clear majority, as we did in the current evaluation).

OTHER SECTION II CONSIDERATIONS AND RECOMMENDATIONS

No standards passed the other Section II Baseline criterion: II.4 (Weighting). Most standards do not weight attributes, meaning this criterion was not applicable to them. However, among those that do weight attributes, none provided the type of information sought (i.e., an explanation of weighting methodologies, including the decision science/tool used to develop weights). *We recommend changing this to a Leadership criterion; with this change, any standards that pass II.1 (Hotspots) would meet the minimum requirements for Section II as a whole.*

Among the Leadership criteria, a relatively high number of standards met II.5 (toxic hazards) and II.6 (disclosure of chemical substances), although the high success rate for II.5 may be due in part to the nature of the review undertaken for the pilot. For II.5, many applicants cited information sources other than the ones that were listed as examples. In these cases, there is currently no quick check method to assess whether these other sources are reputable. *EPA may also want to consider broadening the current list, and/or further defining reputable for this criterion as referring, more broadly, to relevant U.S. federal, select state (e.g., WA, CA), or select EU regulations, policies, or standards that include listings of Chemicals of Concern.*

II.7 (public disclosure of chemical substances of concern) represents one criterion where applicants' performance could improve with better information, and/or a more in-depth evaluation process. Many applicants cited information sources other than the ones that were listed as examples. There is no quick check method to assess whether these other sources of information are reputable. There is also no quick check method to ascertain if the chemicals addressed by the standard are relevant to the product category. In some cases, the applicant appeared to have rigorous hazards criteria, but did not provide any information on the method for developing those criteria, and therefore did not meet this leadership criterion in our assessment. In the future, applicants may be able to meet this criterion by providing clearer documentation.

II.9 (innovation): 13 standards were awarded a Leadership credit for the innovation criterion. IEc reviewed responses, those marked "N/A" by the application, and also considered reasons other than those stated in the response (i.e. if the standard itself showed meaningful and innovative criteria). A "yes" was assigned if: i) the standard includes additional attributes (beyond hotspots); ii) those attributes are not typically covered by the other standards reviewed in the assessment for this category; and iii) those attributes meaningfully address environmental human health impacts (meets leadership threshold that a specific approach or measurable outcomes are required). IEc excluded claims regarding the user-friendliness of their system; general social responsibilities; or common practices that mean the company/ facility is in compliance with applicable laws and regulations. *In the future, assessment for this criterion would greatly benefit from defining the criteria more closely to II.1 (hotspots), listing potential criteria that would meet the threshold of "innovative" for each product category, and providing examples of what would not meet the definition of innovative.*

None of the other Leadership criteria were met by any more than three standards, indicating that these criteria proved to be very challenging. Regardless, we do not recommend any changes to the scoring or assessment decision rules for these Leadership criteria.

Informational criteria (II.10) (determining industry averages): 9 organizations included a response, but no methods documents were provided. Suggestions for measuring market averages included:

- The number and percentage of companies in the relevant industry, the number and percentages of products assessed, and the achievement levels that are being attained.
- To be based on meeting baseline government standards.
- To be based on literature reviews to determine "business as usual" and "best practice."

Informational criteria (II.11) (using quantitative vs qualitative measures): 7 organizations included a response. Many of the standards use a combination of quantitative and qualitative measures, although quantitative measures were generally described in more detail; and definitions varied.

SECTION III | CONFORMITY ASSESSMENT

Summary IAE results for Section III are as follows:

INITIAL RESULT PER IAE ASSESSMENT	NUMBER OF ORGANIZATIONS
Meets Baseline	14
Does Not Meet Baseline	27
Not Assessed	6

Using the original Baseline/Leadership designations, 14 applicants met the Section III baseline criteria. Section III is structured in such a way that if an applicant met III.8, they did not need to also demonstrate conformance to III.8.1-20. In addition, if they met III.8, they also met III.1, III.2 and III.3 – as these criteria are covered by the ISO 17065 designation.

As noted in the first section of this report, IEc ran into some scoping problems with this section of the criteria – some ‘scheme owners’ submitted their rules for Conformity Assessment Bodies (CABs), whereas in other instances, CABs themselves submitted to be assessed for this section.

Some organizations submitted evidence that was drawn from another standard (to which they are also a CAB), and in these cases, IEc did not consider this as evidence to meet the criteria. If the organization were able to prove (or attest) that they used the same procedure, this type of evidence could be allowed in post-pilot assessments.

Criterion-specific findings in Section III are as follows:

- For III.1 (CAB is independent), all 41 applicants met III.1 (the CAB is defined and independent to the organization whose products/services are being assessed for conformity).
- For III.2 (neutrality as to the specific CAB), 26 organizations met the leadership criteria and were counted as meeting it if they were open to *any* CAB that met their criteria (not just more than one). The 13 that did not generally provided CAB services “in house”. *This should remain a leadership criteria.*
- For III.4 (offers a sliding scale of fees) only 9 organizations met this criterion. Many who were scheme owners claimed that they are unable to require CABs to do this or to disclose their fee information. Many who did not meet the criteria did not submit a response and/or did not provide evidence.
- For III.5 (disclosing scoring method) – for this, some 21 standards were judged as “not applicable” for this criterion as they are “pass-fail” binary standards for

whom it does not make sense to disclose scoring methods. Moreover, there was some confusion as to whether the disclosure was about the CABs scoring approach (as intended) or the scoring approach embedded into the standard: further definition is warranted post-pilot.

- For III.6 (disclosing specific credits achieved by products) like III.5, some 22 standards were judged as “not applicable” for this criterion as they are “pass-fail” binary standards for whom it does not make sense to disclose criteria-level results (as they have to meet all of them). Even of the applicable tiered standards, only one standard met this criterion, suggesting that this is truly a leadership criterion.
- For III.7 (public access to means of financial support). Only 9 organizations met this criterion. Many that are scheme owners claimed that they are unable to require CABs to do this or to disclose their fee information; organizations that met it were all NGOs proffering I-990 disclosures to the IRS. *IEc recommends that that this criterion could potentially be cut as it does not provide much descriptive value.*
- For III.8 (Accredited CAB), some 17 organizations met this criterion either as accredited CABs themselves, or as scheme owners with rules requiring accreditation. The list of potential accreditations needed to be relevant to the standard being assessed to be recognized. In addition, only those accreditations provided by members of either the *International Laboratory Accreditation Cooperation (ILAC)* by the International Accreditation Forum (IAF) were recognized. IEc checked each accreditation cited, as meeting III.8 meant already meeting III.8.1- 8.20; and III.8.1-8.3.
- For III.8.12 (traceability/chain of custody) there was some confusion over the definition of traceability, IEc defined it as not related to protection of the CAB or ecolabels marks, but rather protection of the product being certified. IEc allowed not applicable responses if the applicant made the case that traceability/chain of custody is not relevant to standard (e.g. for single attribute standards on indoor air quality).

Post pilot, IEc recommends the following for Section III:

- *Section III be written in such a way that both types of entities-- CABs and applicants with rules for CABs, and CABs for standards assessed under Section II-- could apply for the section. EPA should clarify what evidence to provide in either case.*
- *Re-structure the Section so that III.8 comes first, and so that III.1-3 and III.8.1-20 only appear after an assessment of III.8 is completed.*
- *Consider cutting III.7 as it offers little value to the assessment as written.*
- *Revise III.5 and III.6 so that they are clearly not-applicable for pass-fail standards.*

- *Consider allowing for evidence to be provided by organizations even if it relates to a different standard, so long as the organization can attest that they follow the same procedures for the standard being assessed.*

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SECTION IV | ECOLABEL PROGRAM MANAGEMENT

Summary IAE results for Section IV are as follows:

INITIAL RESULT PER IAE ASSESSMENT	NUMBER OF ECOLABEL PROGRAMS
Meets Baseline	2
Does Not Meet Baseline	32
Not Assessed	13

Using the original Baseline/Leadership designations, only two ecolabel programs met all of the Section IV Baseline criteria. The most challenging Baseline criteria were IV.1, and IV.2; the remaining Baseline criteria were all met by a majority of ecolabels.

Half of the ecolabel programs that provided information (15 out of 30) passed IV.1, which requires a documented commitment to fulfilling quality objectives and/or an established quality management system. Those that did not pass typically provided inadequate responses that did not constitute either a ‘documented commitment’ or an ‘established system’ on quality. In evaluating responses, we required that the documentation provided make a clear reference to organizational quality objectives and/or a quality management system; furthermore, we required that quality objectives apply to the ecolabel program itself, and not to other conformity assessment bodies. While this proved to be one of the more difficult Baseline criteria, we believe it is appropriately stringent, and we do not recommend any changes.

Only six ecolabel programs satisfied IV.2, which requires an established methodology and procedure to evaluate a standard’s environmental effectiveness. Several ecolabel programs provided responses related to the standard-setting process (which is addressed under Section I). Quality requirements at that stage are not applicable to this criterion, which requires procedures to evaluate standards once they are developed. We also did not consider credit surveys (which show which optional credits are being used most often by manufacturers using the standard) or market uptake surveys to be sufficient, because they do not address the overall environmental impacts of the use of the standard. *EPA may want to consider such surveys as sufficient for meeting this criterion given that it is a valuable first step and not common practice among ecolabels today.*

Only two ecolabel programs met both IV.1 and IV.2. They also satisfied the other Section IV Baseline criteria. Notably, they were also the only two ecolabels that satisfied Leadership criteria IV.3 and IV.4, which relate to evaluation.

There were two decisions rules on other criteria that significantly influenced results.

- Several criteria required certain information to be publicly available. We considered information that is available to the public upon request to be ‘publicly available.’
- IV.13 (Market Surveillance) requires ecolabel programs to have established market surveillance procedures. For this criterion, we required documentation of an established procedure; attestation was not sufficient. We also considered periodic auditing of certified products to be insufficient, since the intent of the criterion was to encourage market surveillance more broadly. For the same reason, a process to respond to complaints of misuse of the label, without any proactive market surveillance, was also insufficient. Only three ecolabels satisfied the criterion under these terms.

We recommend changing IV.2 from Baseline to Leadership. With that change, 10 ecolabels would meet all of the Baseline criteria in this section. In the future, the guidance provided to ecolabel programs should also clarify that IV.2 does not concern the standard-setting process.

**APPENDIX A:
FORESTRY SUBHOTSPOTS**

Draft

HOTSPOT	BASELINE/ LEADERSHIP	SUB-HOTSPOT
Land use	Baseline	Conversion to non-forest land
		Sustainable levels of deforestation
		Reforestation to pre-existing conditions
		Natural disturbance regimes
		Plantations
		Clear cutting
Ecosystem services	Baseline	Loss of services to humans / human health
Habitat degradation	Baseline	Overall habitat degradation
		Riparian management zones
Biodiversity	Baseline	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
Endangered species	Baseline	Required to protect endangered species and their habitat
		Distinction between endangered, threatened, imperiled, critically imperiled, etc.
		Forests with exceptional conservation value
Soil health, compaction and erosion (carbon, siltation, eutrophication, biodiversity of soil fauna)	Baseline	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

Sustainable Yield	Leadership	Harvest at sustainable levels
Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions	Leadership	Estimate emissions and sequestrations of greenhouse gases from management unit
		Measures to reduce greenhouse gas emissions
Criteria air pollutants, air toxics, and photochemical smog	Leadership	Not defined
Pollution discharges to water	Leadership	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

APPENDIX B:
IAE DECISION RULES & SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS

Draft

IAE DECISION RULES & SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS				
CRITERIA #	CRITERIA	EXAMPLE SOURCES OF EVIDENCE	IAE COMMENT ON EVIDENCE/ DECISION RULE	IAE SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS
I.1	The standard is a voluntary consensus standard as defined by OMB A119 Section 4. If a standard is an ANSI approved American National Standard, then the SDO is assumed to meet and need not be assessed to 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.	<ul style="list-style-type: none"> - ANS Document # - Other (to be determined by EPA) 	IEC only checked if std is an ANS std under I.1 because the rest of the criteria in Section 1 address the other aspects of voluntary consensus std definition.	N/A
I.2	The SDO actively sought participation from directly and materially affected stakeholders including producers, users, public interest groups, locally affected groups/persons, and others. <i>Addresses the following Draft Guideline(s):</i> <i>I.1 Open Participation</i> <i>I.4 Progress/Updates are communicated</i>	<ul style="list-style-type: none"> - 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 prior to 2012, attestation by the SDO indicating the criteria was met.	Must have evidence of identifying stakeholders AND evidence of outreach to them if 2013 and beyond; self-attestation ok before then.	Potentially drop evidence of outreach as a decision rule; or allow self-attestation for the outreach component for standards developed prior to 2013.
I.3	Key standard setting activities were announced in suitable media in order to encourage participation in standards development activities by stakeholders directly and materially affected by the standard. <i>Addresses the following Draft Guideline(s):</i> <i>I.4 Progress/Updates are communicated</i>	<ul style="list-style-type: none"> - Examples of announcements made in suitable media Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.	Must have evidence of announcements in suitable media. Decision rule is that "key" = some standard setting activities, not all activities.	No changes recommended at this time.
I.4	Timely and adequate notice was made to generate stakeholder participation in key standard setting activities. <i>Addresses the following Draft Guideline(s):</i> <i>I.4 Progress/Updates are communicated</i>	<ul style="list-style-type: none"> - 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. Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.	Min threshold for notice that a draft standard will be available- 30 days	No changes recommended at this time.
I.5	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 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	<ul style="list-style-type: none"> - 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. 	"materially affected stakeholders" = technical committee not necessarily general public Need proof of notice- either public draft of standard or other notice and Need proof of meaningful interaction with stakeholders on the content of the standard, which	No changes recommended at this time.

IAE DECISION RULES & SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS

CRITERIA #	CRITERIA	EXAMPLE SOURCES OF EVIDENCE	IAE COMMENT ON EVIDENCE/ DECISION RULE	IAE SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS
	<p>standard. Note: Participation does not necessarily include a voting role, but goes beyond public notification that a draft exists. <i>Addresses the following Draft Guideline(s):</i> 1.1 Open Participation 1.5 Transparent 1.6 Consideration of all viewpoints</p>		<p>could take the form of any of the evidence suggestions in the criteria (except the first 2 that deal with timeliness) (do not need proof that applicant provided 30 days for technical committee to provide comment)</p>	
1.6	<p>Minutes of all committee and decision-making body meetings, comments and responses thereto, and complaints and appeals made during the standard development process were available to stakeholders for inspection in a timely manner. <i>Addresses the following Draft Guideline(s):</i> 1.4 Progress/Updates are communicated 1.5 Transparent</p>	<ul style="list-style-type: none"> - Instructions for accessing information on key activities. - Policy on posting meeting minutes, comments & responses, complaints & appeals. - Meeting minutes of decision making body with documentation of prompt date of posting. - Complaints and appeals made. - Comments and responses thereto posted publicly to the SDO/standards website. <p>Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.</p>	<p>"stakeholders" = technical committee not necessarily general public</p> <p>Any one of the listed sources of evidence suffices, but the evidence must cover minutes, comments/responses, and appeals/complaints.</p>	<p>Potentially allow self-attestation for this criterion.</p>
1.7	<p>A procedure or a policy ensures fair and equitable consideration of timely stakeholder input during the standard-development process. Input on the standard received was documented, adjudicated, and responded to by the SDO in accordance with its procedures. <i>Addresses the following Draft Guideline(s):</i> 1.5 Transparent 1.6 Consideration of all viewpoints</p>	<ul style="list-style-type: none"> - Policy/ procedure for ensuring stakeholder input during standards development process are fairly considered. - Access to all, but for assessment, review a sample of stakeholder comments and responses to comments on draft documents – direct responses to individuals or general responses to key themes. - Other evidence of stakeholder participation as supplied by SDO 	<p>"stakeholders" = technical committee not necessarily general public</p>	<p>Conceptually, 1.7 overlaps with 1.5, and 1.5 is more comprehensive. As such, consider allowing self-attestation for this criterion, and/or consider changing it to leadership.</p>
1.8	<p>Option 1: There was no fee or travel requirement to participate in the development of the standard. OR Option 2: If there was a fee, it is minimal or offset by sliding scale for individual/NGO/academic stakeholders. The SDO provided travel funds to hardship parties/stakeholders without financial means to attend in-person meetings, virtual access to meetings, fee waivers, and/or other mechanism to retain stakeholders' ability to participate in standards activities. <i>Addresses the following Draft Guideline(s):</i> 1.1 Open Participation.</p>	<ul style="list-style-type: none"> - Notification that participation is free.-Fee schedule showing sliding scale / waivers.-Travel funds policy.-Evidence of virtual access to meetings (e.g. webinar recordings, conference call lines) 	<p>If the response addresses meeting fee only, marked as "not enough info"</p>	<p>Since this is leadership, and applicants did not seem to be confused, no changes recommended at this time.</p>
1.9	<p>Membership of the decision-making body 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</p>	<ul style="list-style-type: none"> - Roster of voting members of decision- making body. - List of restrictions (if any) on voting membership of decision-making body. Explanation as to why they are reasonable. 	<p>Criteria are applicable to all decision-making bodies.</p> <p>If applicant submits a roster of voting members, if the roster clearly presents membership by</p>	<p>No changes recommended at this time.</p>

IAE DECISION RULES & SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS

CRITERIA #	CRITERIA	EXAMPLE SOURCES OF EVIDENCE	IAE COMMENT ON EVIDENCE/ DECISION RULE	IAE SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS
	engaging diverse expertise shall be considered reasonable restrictions. <i>Addresses the following Draft Guideline(s):</i> 1.3 Reasonable voting qualifications		stakeholder group, and the membership appears balanced among the groups, this will suffice as evidence for this criterion. However, IEC did not conduct analysis to categorize voting members into groups in order to assess against this criterion. and IEC reviewed any restrictions noted for reasonableness against the 3 possible reasons provided in criteria.	
1.10	The SDO achieved a balance of interest in the decision- making body 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. <i>Addresses the following Draft Guideline(s):</i> 1.7 Diversity of Interests	<ul style="list-style-type: none"> - 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 is from one interest category, or 40% if there are only 3 interest categories. 	Criteria are applicable to all decision-making bodies. (See 1.9 for how we are reviewing 1.9 vs. 1.10)	No changes recommended at this time.
1.11	Decision making procedures/guidance ensured that no single interest category or organization can dominate resolutions made by the decision-making body. <i>Addresses the following Draft Guideline(s):</i> 1.x Lack of Dominance [SUBMITTED FROM GC MEMBER ON V2.0]	<ul style="list-style-type: none"> - 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." 		Consider changing this criterion to leadership.
1.12	Standards Development Organization has a conflicts of interest 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	<ul style="list-style-type: none"> - Documentation of policy or procedure on conflicts of interest. - Original sources of funding for standards development are disclosed to stakeholders throughout the process. - Formal policy separating functions of organization if there is a potential conflict of interest. - Potential conflicts of interest are disclosed at the 	If applicant provides COI policy, the policy must require that funding sources are disclosed.	COI policy seems to be a core baseline criterion. Given this, IEC recommends that EPA follow up with the 12 applicants that did not provide enough information to give them another opportunity to produce, or perhaps to develop, a

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	<p>that no domination occurs and balance of interests is respected in the standard development process. “Significant funding” shall mean more than \$10,000 or its in-kind equivalent, or 20% or more of the anticipated funding needs of the SDO for standard development. <i>Addresses the following Draft Guideline(s):</i> 1.5 Transparent 1.x Lack of Dominance [SUBMITTED FROM GC MEMBER ON V2.0]</p>	<p>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.</p>		<p>binding COI policy.</p>
I.13	<p>Reasonable efforts to achieve consensus are made by the decision-making body and SDO.<i>Addresses the following Draft Guideline(s):</i>1.9 Consensus effort</p>	<p>-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.</p>	<p>applicant needs to provide either:1) a policy and procedure that describes the process for making decisions that incorporates viewpoints and contributions of stakeholders, and a process for resolving objections/conflict.or2) agenda or meeting minutes that demonstrate, in practice, the above decision rules. applicants need to cite specific page(s) of such documents, as resources are not available for the IAE to sift through long documents searching for text that can be interpreted to meet the criteria.</p>	<p>Consider changing this criterion to leadership.</p>
I.14	<p>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</p>	<ul style="list-style-type: none"> - 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. 	<p>IEc accepted self-attestations for this entire criterion for stds developed before 2012, per the allowance in the example sources of evidence.</p>	<p>Consider removing decision rule on communication of right to appeal (which IEc enforced given the wording of the criterion). However, appeals are also covered in I.15 and i.16.</p>

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	<p>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. <i>Addresses the following Draft Guideline(s):</i> <i>1.5 Transparent</i> <i>1.9 Consensus effort</i> <i>1.10 Efforts to Resolve Objections</i></p>	<p>Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.</p>	<p>The example evidence did not list policies/procedures documents as applicable evidence; IEC is accepting them to meet the first part of the criteria. Thus, the applicant needs to provide 1), policy or procedures on communication of objections and 2) notification of right to appeal, OR agenda/meeting minutes that demonstrate both in practice.</p> <p>AND</p> <p>However, the second part of the criteria is clear that in the case where a formal objection was received, that the applicant provided a timely and meaningful response in writing, and that response is made available to stakeholders. Thus, some record of the actual practice of resolving specific objections must be provided, a policy/procedures document does not suffice. If an SDO claims that no objections were received, IEC accepted this self-attestation.</p>	
I.15	<p>A documented appeals mechanism is published to address procedural appeals following the final decision. <i>Addresses the following Draft Guideline(s):</i> <i>1.11 Appeals mechanism</i></p>	<p>-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.</p>		<p>No changes recommended at this time.</p>
I.16	<p>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 time¹⁷ is offered from the time of the final vote to the deadline for lodging notice of appeal <i>Addresses the following Draft Guideline(s):</i> <i>1.11 Appeals mechanism</i> <i>1.12 Appeals Open</i></p>	<p>-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.</p>	<p>Appeals body must be separate body. Applicant must provide description or link to appeals process, and the process must be clear and straightforward.</p>	<p>Consider changing from Baseline to Leadership status. I.15 is a more basic criterion regarding the appeals mechanism.</p>

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CRITERIA #	CRITERIA	EXAMPLE SOURCES OF EVIDENCE	IAE COMMENT ON EVIDENCE/ DECISION RULE	IAE SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS
I.17	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. <i>Addresses the following Draft Guideline(s): I.13 Good faith on conflicts</i>	-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.	Any one of the five methods of evidence is acceptable.	Consider changing this criterion to leadership.
I.18	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. <i>Addresses the following Draft Guideline(s): I.14 Standards Updated II.3 Data Quality and Reliability</i>	-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.		No changes recommended at this time.
I.19	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.	Applicant must provide evidence that LCA or hotspot analyses were shared with stakeholders, such as documentation of communication, or meeting agenda or meeting minutes discussing these analyses, OR Applicants may provide a policy/procedure stipulating that stakeholders are to receive these analyses. Applicants can self-attest that participants have opportunities to provide supplementary information on hotspots/LCAs because this may not be specified in policy. Or they can provide a policy/procedure is showing that stakeholders are able to introduce supplementary information. Or Applicants can point to evidence of this opportunity	No changes recommended at this time.

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			<p>occurring in practice by citing meeting agendas and/or minutes.</p> <p>This criterion is not applicable to single attribute standards.</p>	
II.1	<p>Meaningfully and Measurably addresses relevant HOTSPOTS</p> <p>Addresses the following Draft Guidelines:</p> <p>II.1 Align with Relevant Standards</p> <p>II.2 Measurability and Significant Measurable Difference</p> <p>II.4 Performance-Based</p> <p>II.5 Hotspots</p> <p>II.6 Multiple Environmental Impacts</p> <p>II.7 Lifecycle Stages</p> <p>All Baseline impact areas (“B”) need to be addressed unless demonstrated by the SDO to be non-applicable for the product subtype. 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).</p> <p>II.1.1 For standards claiming to address the pre-extraction and raw materials sourcing stages, the standard meaningfully and measurably addresses:</p> <p>Flooring & Furniture:</p> <ul style="list-style-type: none"> • 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) 	<p>-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</p> <p>-SDO justification for each of the impact categories claimed to be meaningfully and measurably addressed.</p> <p>- for baseline credit, minimally, the Text of the standard requires a management plan approach to addressing the hotspot</p> <p>-for Leadership credit, the Text of the standard requires specific approaches and/or measures to demonstrate performance outcomes are achieved per the hotspot</p> <p>- Note that both performance criteria and prescriptive criteria may appear in the same standard.</p> <p>- 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.</p>	<p>Applies to single and multiple attribute standards.</p> <p>Hotspots for a given lifecycle stage are "N/A" if standard clearly does not cover life cycle stage.</p> <p>Assess even if submitted "N/A" if found to be applicable to life cycle stage; assessed based on review of standard and any supplementary information.</p> <p>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.</p> <p>Awarded a "yes" if the standard required the criteria to be met, or if it had optional practices that met the criteria.</p> <p>Leadership sub-criteria must meet threshold to be awarded that "specific approaches and/or measures to demonstrate performance outcomes are achieved per the hotspot. In practice, no management plans or policies criteria for leadership credits." For baseline sub-criteria, a "management plan" approach was acceptable.</p> <p>Where applicants meet criteria by referencing other standards (e.g. furniture or flooring reference</p>	<p>Consider requiring that standards address some, but not all, baseline hotspots.</p>

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	<ul style="list-style-type: none"> • 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 <p>Paints/Coatings:</p> <ul style="list-style-type: none"> • L-Percent recycled, renewable and/or bio-based content • L- Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions <p>And</p> <p>II.1.2 For standards claiming to address the manufacturing stage, the standard meaningfully and measurably addresses:</p> <p>Flooring & Furniture:</p> <ul style="list-style-type: none"> • 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 <p>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.</p>		<p>forestry standards); each forestry standard cited must also meet criteria to be considered. If it's optional as to which standard they can use, and not all of the standards meet the criteria, then answer is No. If some embedded standards pass but others have not been assessed against the criteria, then answer is Yes.</p> <p>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.</p> <p>For forestry standards, hotspots were broken out into more specific sub-hotspots (e.g., biodiversity was broken out into "identify biodiversity types and values pre-deforesting," "invasive, exotic and alien species," "regularly monitor impacts to biodiversity and adapt management plans as necessary," and "old growth forests)." Standards were required to meet > 50% of the sub-hotspots to meet each hotspot overall. As with the other standards, forestry standards were required to meet all baseline hotspots in order to pass the overall baseline hotspot criterion.</p>	

IAE DECISION RULES & SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS

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	<p>Paints/Coatings:</p> <ul style="list-style-type: none"> • None identified - LCAs indicate that the manufacturing stage is a minor contributor to the overall impacts of paints/coatings <p>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.</p> <p>And</p> <p>II.1.3 For standards claiming to address human health impacts of the product in the installation/use stages, the standard incorporates by reference or aligns with:</p> <p>Flooring:</p> <ul style="list-style-type: none"> • 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.) <p>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.</p> <p>Furniture:</p> <ul style="list-style-type: none"> • 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.) 			

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	<ul style="list-style-type: none"> • 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 <p>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.</p> <p>Paints/Coatings:</p> <ul style="list-style-type: none"> • B -California Air Resources Board’s (CARB) Suggested Control Measures (SCM) 2007 for VOC content for Paints/Coatings. • L -“Standard Meth 			
II.2	<p>The standard and/or supplementary materials that accompany the standard clearly identifies any known trade- offs among approaches to address multiple impact areas.</p> <p>Addresses the following Draft Guideline(s):</p> <p>II.6 Multiple Environmental Impacts</p>	<p>- Text of standard, supplementary materials that accompany the standard addressing trade-offs among impacts (if applicable, as determined by the SDO).</p>	<p>Criterion is N/A for single-attribute standards.</p> <p>Simply addressing multiple environmental impacts is not sufficient.</p> <p>A requirement that proposed environmental criteria identify tradeoffs is considered sufficient, even if the standard being evaluated does not identify specific tradeoffs itself.</p> <p>Where standards did not identify sources of evidence, reviewed the standard itself but did not review any supplementary materials.</p>	<p>No changes to scoring recommended at this time.</p>
II.3	<p>The environmental and/or human health criteria in the standard are based on recent available research (at the time the standard was developed) that was peer-reviewed and available for stakeholder review. Additionally, standards developers used the most appropriate types of assessment methods for the</p>	<p>- 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</p>	<p>IAE determined that II.3 could not be implemented as currently written because of the difficulty and level of effort required to determine: if the organization used the most recent relevant research; if the research</p>	

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	determination of the impacts or attributes.18 Addresses the following Draft Guideline(s): II.3 Data Quality and Reliability	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.	was peer-reviewed; and if the most appropriate test methods were used.	
II.4	If a weighting scheme is used, the standard or supplementary materials that accompany the standard fully and transparently explains the weighting methodologies, including the decision science/tool selected and connection between scoring and the single attributes or single impacts.19 Addresses the following Draft Guideline(s): II.8 Weighting Methodologies	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.	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. [Standards with weighting are those that award a different number of points or credits for each attribute (e.g. energy reduction, EMS certification, etc.), and not those that have a different total number of points or credits between categories of attributes (e.g. energy, water, etc.) or those that require some attributes while others are optional. This criterion is only applicable to environmental and human health attributes.] Process to assess: Look at the standard document (in most cases the applicant did not cite evidence) and look to see if there is a different number of points or credits awarded per attribute. If no, "N/A", if yes, look to see if there is an explanation of how the points were derived (then determine Y/N).	Consider changing this criterion to a leadership criterion.
II.5	The standard includes environmental and human health protection criteria to decrease the toxicological hazard20 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	- Text of standard: criteria require hazard reduction through one or more of the approaches listed. - 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	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.	No changes to scoring recommended at this time.

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	<p>toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI).</p> <p>The SDO used reputable information sources in identifying chemicals of concern.</p> <p>The standard fully and transparently explains its methodology for the criteria. Alternatives assessment criteria are in accordance with the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives.</p> <p>Addresses the following Draft Guideline(s):</p> <p>II.9 Intrinsic Hazards</p>	<p>evidence, be peer-reviewed, and be 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).</p> <p>Carcinogens</p> <ul style="list-style-type: none"> •Listed by the International Agency for Research on Cancer as: <ul style="list-style-type: none"> -Group 1: carcinogenic to humans -Group 2A: probably carcinogenic to humans •Listed by the National Toxicology Program as: <ul style="list-style-type: none"> -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) <p>Mutagens</p> <ul style="list-style-type: none"> •Globally Harmonized System of Classification and Labeling (GHS) <ul style="list-style-type: none"> -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 <p>Reproductive toxicants</p> <ul style="list-style-type: none"> •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) <p>PBT substances</p> <ul style="list-style-type: none"> •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 characteristics •RCRA Waste Minimization Priority Chemicals 	<p>Did not check if sources cites are reputable.</p> <p>Did not check if chemicals addressed by the standard are relevant to the product category (although the decision rule should provide indirect evidence of this)"</p>	

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		<p>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:</p> <ul style="list-style-type: none"> •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	<p>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.</p> <p>Note: If the standard is a process and production method (PPM) standard, this Guideline is not applicable, and will not be used in scoring.21</p> <p>Addresses the following Draft Guideline(s):</p> <p>II.10 Ingredient Disclosure</p>	<ul style="list-style-type: none"> - Text of standard indicating it is solely a process and production method (PPM) standard, or a standard that does not address the environmental or human health performance of a finished product. - Text of standard requires chemical disclosure at the specified threshold(s). - SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted and evidence that source (s) are reputable. (See II.5 Sources of Evidence "Lists of Lists") 	<p>Evidence instructions should be consistent with what is listed in the criterion. For instance, the criterion states, "The standard includes criteria to require or incentivize public disclosure of the intentionally added chemical substances...." however, possible sources of evidence states, "Text of standard requires chemical disclosure at the specified threshold(s)."</p>	<p>No changes to scoring recommended at this time.</p>

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II.7	<p>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).</p> <p>The SDO used reputable information sources in identifying chemicals of concern.</p> <p>Addresses the following Draft Guideline(s):</p> <p>II.10 Ingredient Disclosure</p>	<p>- Text of standard requires chemical disclosure at the specified threshold(s).</p> <p>- 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")</p>	<p>Evidence instructions should be consistent with what is listed in the criterion. For instance, the criterion states, "The standard includes criteria to require or incentivize public disclosure of the intentionally added chemical substances...." however, possible sources of evidence states, "Text of standard requires chemical disclosure at the specified threshold(s)."</p>	<p>No changes to scoring recommended at this time.</p>
II.8	<p>Where they may exist, standard incentivizes the manufacturer to publicly disclose any of the following:</p> <p>-the results of existing LCAs,</p> <p>-an Environmental Product Declaration (EPD) pursuant to ISO standards; and/or</p> <p>-the results of other environmental and human health impact assessments</p> <p>Addresses the following Draft Guideline(s):</p> <p>II.11 Impact Assessment Disclosure</p>	<p>- 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.</p>	<p>Must require or provide credit for PUBLIC disclosure of any environmental and human health impact assessments conducted by the manufacturer (e.g. LCAs and EPDs pursuant to ISO standards)</p> <p>Process to assess: search in standard document for "impact assessment", "EPD", "life cycle" or "LCA"</p>	<p>No changes to scoring recommended at this time.</p>
II.9	<p>Innovation. The standard meaningfully and measurably addresses environmental and/or human health impacts in some way not already recognized in the above criteria.</p>	<p>- Text of criteria and explanation of how the approach is innovative and how it results in improved environmental and/or human health performance.</p>	<p>Decision rules taken:</p> <p>- No double counting. if they claimed an attribute for a hotspot, they couldn't also have it count for an innovation.</p> <p>- Awarded yes if:</p> <p>i) standard includes additional attributes (beyond hotspots);</p> <p>ii) those attributes are not typically covered by the other standards reviewed in the assessment for this category</p> <p>ii) those attributes meaningfully address environmental human</p>	<p>No changes to scoring recommended at this time.</p>

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			health impacts (meets leadership threshold that a specific approach or measurable outcomes are required) - Even if submitted as "N/A", can be found to meet criteria - Can be found to meet criteria for reasons other than those stated in the response. - 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. Too tenuous a link to product category. - No "optional innovation credits" count as innovations for II.9- because those credits may or may not be used to meaningfully address environmental and human health issues.	
II.10	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			
II.11	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			

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III.1	<p>Difference</p> <p>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</p>	<ul style="list-style-type: none"> - 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. 	<p>Decision rule: if they are a yes to III.8, then they will automatically meet III.1; III.2 and III.3</p> <p>III.1 “independence of CAB” refers to independence from those producing the products. Includes types: YES: CABs that are recognised/accredited by applicant YES: applicants doing conformity assessment themselves YES: applicants requiring manufacturers to submit test results (so long as test results are from accredited labs, and they explain how they accredit the labs & to what standard) Does not include these types NO: product manufacturers doing self declarations (1st party) NO: retailers doing conformity assessment work (2nd party, we don’t have any examples of this).</p>	<p>No changes recommended at this time.</p>
III.2	<p>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. Reference: ISO/IEC 17007 Addresses the following Draft Guideline(s): III.2 Independence</p>	<ul style="list-style-type: none"> - 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. 	<p>Decision rule: if they are a yes to III.8, then they will automatically meet III.1; III.2 and III.3</p> <p>Leadership</p> <p>YES if open to any CAB (so long as registered/accredited), not just more than one; NO if they have a different department doing CA than running program/ developing standard; all in one organization. Even if they have a wall etc., the question is: are many CABs able to certify to the standard?</p> <p>Being open to more than one CAB is not the same as being open to any</p>	<p>No changes recommended at this time.</p>

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			<p>CAB.</p> <p>If the standard was an ANS or ANSI accredited CAB or applicant, they normally would meet this requirement. We checked.</p>	
III.3	The CAB periodically reviews risks to its impartiality, and takes appropriate steps to mitigate identified risks.	<ul style="list-style-type: none"> - Quality procedures, advisory body minutes, management meeting minutes - Results of reviews and actions taken. 	Decision rule: if they are a yes to III.8, then they will automatically meet III.1; III.2 and III.3	No changes recommended at this time.
III.4	<p>The CAB offers a sliding scale of conformity assessment fees or other means to be accessible to small businesses.</p> <p>Addresses the following Draft Guideline(s): III.3 Sliding fee scale</p>	<ul style="list-style-type: none"> - Documentation of sliding fee scale (does not need to be publicly accessible). Demonstration of accessibility to small businesses. 	<p>YES Fees show sliding scale – we are agnostic on what scale (\$, #'s products, market share, FTE etc)</p> <p>YES CAB or applicant makes a reasonable case that SMEs can access services. We should not be the judge of actual dollar amounts.</p> <p>NO if the fees are not determined by the applicant but rather the CAB, and the applicant doesn't have rules for the CAB</p> <p>ADDITIONAL EVIDENCE not required: submission response considered as attestation so long as reasonable case is made</p>	No changes recommended at this time.
III.5	<p>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.</p> <p>Addresses the following Draft Guideline(s): III.x Information on Scoring [New Guideline SUBMITTED FROM GC MEMBER ON V2.0]</p>	<ul style="list-style-type: none"> - Documentation of scoring and levels achieved by products that conform to the standard. - Description of where and how this information is made publicly available. 	<p>Must disclose BOTH scoring method AND levels achieved by products. Cannot pass if only one of these is met.</p> <p>“disclosure” defined as “can be made available” not that its online already. However, should not be at permission of manufacturer, rather of CAB or applicant.</p> <p>If it's an applicant who applies (and not the CABs) - the CABs be a no, while aApplicant is a yes (and vice versa).</p>	No changes recommended at this time.

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			<p>Not Applicable (N/A) for pass/fail standards. If pass/fail standards have required and optional criteria, they need to disclose the scoring method.</p> <p>Applicable for standards with levels of conformance - tiers</p>	
III.6	<p>The CAB publicly discloses the credits 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]</p>	<p>- Documentation of credits/criteria achieved by products that conform to the standard. - Description of where and how this information is made publically available.</p>	<p>"disclosure" defined as "can be made available" not that its online already. However, should not be at permission of manufacturer, rather of CAB or applicant. If it's an applicant who applies (and not the CABs) - the CABs be a no, while applicant is a yes. Not Applicable (N/A) for pass/fail standards, unless they have required and optional criteria. Applicable for standards with levels of conformance - tiers</p>	<p>No changes recommended at this time.</p>
III.7	<p>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</p>	<p>- Example description of means of CAB financial support - Description of where and how this information can be accessed.</p>	<p>If it's an applicant (Scheme owner) who applies (and not the CABs) - the CABs can be a no, while applicant is a yes. Vice versa: CABs can be a yes, and applicants no.</p>	<p>No changes recommended at this time.</p>
III.8	<p>The CAB demonstrates (through accreditation by a member body to ILAC or IAF)²⁴ 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 14024)); ; 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</p>	<p>- 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.²⁵ - The accreditation body has been evaluated in conformance to ISO/IEC 17011.</p>	<p>Nominated CAB(s) must be linked to a standard being assessed as part of the pilot.</p> <p>If CAB is a separate entity to the SDO being assessed, applicant must show that the CABs they use are accredited to these standards.</p> <p>If CAB is the same entity as the applicant, they must show that they themselves are accredited to these standards or a recognized accreditation body.</p> <p>If the CAB is submitting their own assessment (and not the Scheme Owner) they must show that they are accredited to these standards or</p>	<p>No changes recommended at this time.</p>

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			<p>by one of these recognized bodies (ANSI etc)</p> <p>The member body accrediting the CAB(s) must be clearly designated/ named.</p> <p>The member body must be a member of ILAC or IAF</p> <p>Accreditation standards cited must be relevant to the type of CA service the CAB offers for the standard (e.g. lab testing accreditation is not relevant if no lab tests required by standard)</p> <p>NO: If they “follow” or require CABs to “follow” ISO 17065(or other), this is insufficient (e.g. Nordic ecolabelling). They actually need to be accredited by an internationally recognized accreditation body.</p> <p>Where one CAB is accredited for the standard but not others > only the CAB that is accredited can be considered a YES. If they use other CABs, need to .respond to III.8.1-20.</p> <p>If there are no accreditation programs in the country (e.g. see ECNZ response) check that is true. Even if true, does not meet III.8.> they have to demonstrate conformance to the rest (III.8.1-20)</p> <p>17021 can be used for a system certification.</p>	
III.8.1	<p>Objective & Impartial Structure.</p> <p>Organizational chart and management system of the CAB reflect impartiality of decision making on conformity assessment.</p> <p>Reflects ISO/IEC 17065 - 5.1.1</p>	<p>- Policy on management system.</p> <p>- Policy/ procedures showing independence.</p>	<p>Policy, org. chart, procedure or quality manual were all sufficient evidence to meet criteria. Needed to demonstrate clear separation of certification from other business</p>	<p>No changes recommended at this time.</p>

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			activities (if any) and structures (such as reporting, or separation of roles) to ensure impartiality of certification decisions.	
III.8.2	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.	It is OK for a CAB to point to the standard itself, but it should also provide a documented procedure(s) that outlines its decision making process. Decision process described should apply to the standard in question, not general rules that could apply to any standard	Could relax rule about decision process relating to the specific standard and or about needing to provide a procedure outside of the standard (in cases where the standard itself provides sufficient guidance on certification decision making).
III.8.3	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.	Does not need to specifically mention "undue influence" so long as it is clear that a process is in place to protect from pressure on certification/ assessment decision making. Need to have a policy or process that clearly describes risks and safeguards against them.	No changes recommended at this time.
III.8.4	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.	Needs to have a specific policy that mentions a two year period.	No changes recommended at this time.
III.8.5	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.	Procedures should be for CABs, not for manufacturers.	No changes recommended at this time.
III.8.6	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 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.	Procedures should be stated and provided as their own document; clearly indicating that CABs need to take all necessary steps to determine conformance. Not sufficient to refer to the standard	No changes recommended at this time.

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CRITERIA #	CRITERIA	EXAMPLE SOURCES OF EVIDENCE	IAE COMMENT ON EVIDENCE/ DECISION RULE	IAE SUGGESTIONS FOR PILOT SCORING ADJUSTMENTS
			only, or a generic audit or assessment approach that might apply to any standard.	
III.8.7	Role separation. The CAB demonstrates that the process for making conformity decisions includes an independent review that the product has met the specified requirements. Reflects ISO/IEC 17065 7.6	- Policy/Procedure describing the evaluation process and who makes the CA review and decision. - Procedure for quality management system. - Policy / procedure documenting staffing roles for the CA process.	Evidence for a different standard is not sufficient.	All those using decision rule as noted may meet requirement if evidence for procedures relating to a different standard are allowed.
III.8.8	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	Can be general, not specific to a standard. Not requiring a policy on communication.	No changes recommended at this time.
III.8.9	In the event that non-conformity is substantiated, the CAB has a procedure that considers and decides on appropriate action such as increased surveillance, reduction in the scope of the certification to remove non-conforming products, suspension of the certification or withdrawal of the certification. Reflects ISO/IEC 17065 - 7.11.1	- Policy / procedure on appropriate actions in cases of non-conformity.	Evidence for a different standard is not sufficient. Needed to show a procedure or description of steps taken - not just a statement about if non-conformance is found then they withdraw the certification.	All those using decision rule as noted may meet requirement if evidence for procedures relating to a different standard are allowed.
III.8.10	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.		No changes recommended at this time.
III.8.11	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.		No changes recommended at this time.
III.8.12	Traceability Procedures. The CAB has traceability or chain-of-custody procedures where this is necessary to ensure qualified products meet the standard.	- Policy/ procedures for traceability/chain of custody by CAB demonstrating conformance with the criteria. OR justification of how this is not applicable.	Traceability/ chain of custody relates to the product in question or components therein, if relevant to that product category. Traceability/ chain of custody does not relate to protection of the CAB or ecolabels marks. Allow not applicable responses if case made that traceability/ chain of custody is not relevant to standard (e.g. for single attribute standards	No changes recommended at this time.

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			on IAQ)	
III.8.13	Periodic evaluation of marked products. When continuing use of a conformity-assurance mark on a product is authorized, the CAB periodically conducts surveillance of marked products to ensure ongoing validity of continued conformance. Reflects ISO/IEC 17065 - 7.9.3	- Policy/procedures on how long products can display the certification mark demonstrating conformance. - Policy/procedure indicating surveillance activities. - Copy of market surveillance report.		No changes recommended at this time.
III.8.14	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.	Accepted evidence if information was in more than one document.	No changes recommended at this time.
III.8.15	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 unauthorized 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.	For Scheme Owners submitting, evidence provided should be in reference to the CAB's marks & the CABs protection of the mark.	No changes recommended at this time.
III.8.16	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.		No changes recommended at this time.
III.8.17	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	Information on training is not sufficient to meet this criterion. Needs to describe procedures to hire and train enough staff to do CA to the standard (not in general).	No changes recommended at this time.
III.8.18	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.	Attestation that they don't require testing is sufficient to gain an N/A	No changes recommended at this time.
III.8.19	Transparent Process.	- Documentation of appropriate and timely information	Need to provide information about	No changes recommended at this

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	<p>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</p>	<p>disclosed publicly or available on request about the CAB certification processes.</p>	<p>the conformity assessment process, not just information on how to get certified. Can be met by either the CAB or the Scheme Owner</p>	<p>time.</p>
<p>III.8.20</p>	<p>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</p>	<p>- Example communication to applicants that includes information on fees.</p>	<p>They should describe types of fees, and when and how this is disclosed, at the minimum. The criteria applies to fees for certification services, not other fees such as for licensing or application to the ecolabel program. If all one fee that is OK so long as explained and otherwise meets criteria on disclosure. Dollar amounts were not required to pass this criteria.</p>	<p>No changes recommended at this time.</p>
<p>IV.1</p>	<p>The ecolabel program has a documented commitment to fulfilling quality objectives and/or an established quality management system that is implemented in the organization. Addresses the following Draft Guideline(s): IV.1 Document Commitment to Quality</p>	<p>- Policy / procedure indicating commitment to quality. - Evidence of a documented Quality management system documentation.</p>	<p>- Documentation is required (attestation is not sufficient). - Documentation must make clear reference to organizational quality objectives and/or quality management system. - Quality objectives or requirements must apply to the ecolabel program itself, not just to CABs.</p>	<p>No changes recommended.</p>
<p>IV.2</p>	<p>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</p>	<p>- 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 code29.</p>	<p>- Credit surveys (showing which optional credits are being used) and market uptake surveys are not sufficient. Evaluations must address the environmental and/or human health impacts of the standard. - Standard-setting procedures are not applicable; criterion requires a methodology and procedure to evaluate standards once they have</p>	<p>Change from Baseline to Leadership status. In the future, clarify that criterion is not concerned with standard-setting process.</p>

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			been developed.	
IV.3	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.	- Evaluations that have not been completed (i.e., that are in process) are not sufficient. - An actual evaluation must have been completed; a documented requirement to conduct an evaluation, on its own, is not sufficient. - Only evaluations of the standard under consideration count for this criterion.	No changes recommended. This is a leadership criterion and a reasonable bar to set.
IV.4	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.	- Ecolabel programs can only get credit for IV.4 if they also meet IV.3.	No changes recommended. This is a leadership criterion and a reasonable bar to set.
IV.5	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.	- 'Publicly available' includes website. Information available to the public upon request is considered 'publicly available'.	No changes recommended at this time.
IV.6	The ecolabel program makes publicly available the stakeholders 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.	- 'Publicly available' includes website. Information available to the public upon request is considered 'publicly available'. A submitted list of board of director members is sufficient to meet the criterion.	No changes recommended at this time.
IV.7	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.	- Any pre-existing, documented policy/procedure is sufficient to meet the criterion unless it seems notably weak.	No changes recommended at this time.
IV.8	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):	- 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	- 'Publicly available' includes website. Information available to the public upon request is considered 'publicly available'.	No changes recommended at this time.

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	IV.8 Information on Financial Support	accessed.		
IV.9	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).	- Fee info does not need to be public so long as it is provided to applicants.	No changes recommended at this time.
IV. 10	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.	- 'Publicly available' includes website. Information available to the public upon request is considered 'publicly available'. Reasonable cost is defined as anything less than \$250.	No changes recommended at this time.
IV. 11	The ecolabel program grants the label, mark, or registration if the product is demonstrated to be in conformance with the applicable standard, and the applicant meets the administrative and technical requirements of the program (such as paying fees, and accepting license agreements). 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.	- Attestation ("Declaration") by the applicant that they do this is sufficient to meet this criterion.	No changes recommended at this time.
IV. 12	The ecolabel program has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product meets the standard. Procedures describe actions to take for incorrect, misleading, or unauthorized 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.		No changes recommended at this time.
IV. 13	The ecolabel program has established procedures to periodically conduct market surveillance to check for incorrect, unauthorized use of its licenses, certificates, and marks of conformity, and is responsive to complaints of misuse or misinterpretation in the marketplace. Addresses the following Draft Guideline(s): IV.12 Suitable Action for Misuse	- Policy / procedure requiring market surveillance by ecolabel program and/or the CAB. - Statement of which organization conducts these activities – the ecolabel program, CAB, or both. - Procedure or resource for receiving complaints of misuse or trademark violations - Example of a market surveillance report.	- Documentation of an established procedure is required (attestation is not sufficient). - Periodic auditing of certified products is not sufficient; ecolabel program must also have a procedure or policy regarding market surveillance more broadly. - A process to respond to complaints of misuse, without any proactive market surveillance, is also not sufficient.	No changes recommended. This is a leadership criterion and a reasonable bar to set.

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IV. 14	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.	- Response must include some evidence of differences between ecolabels for different standards/certifications. If ecolabel program includes multiple, similar standards/certifications, response should address all of these, not just a subset.	No changes recommended. This is a leadership criterion and a reasonable bar to set.
IV. 15	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.		No changes recommended.
IV. 16	The ecolabel program makes publically available a directory of conformant products and their brand owner. The directory is up to date, and/or has been updated in the last 6 months. 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.	- 'Publicly available' includes website. Information available to the public upon request is considered 'publicly available'. Providing the expiration date of certifications is sufficient to meet this criterion. Attestations to update frequency is also sufficient.	No changes recommended.
IV. 17	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.		Combine criterion with IV.16 as IV.17 is easy to pass if IV.16 is met.
Informational	Informational: To further EPA's understanding in this area, we are seeking information from ecolabel programs on if/how they provide regional information regarding labeled products (e.g., information on the location of suppliers; national or sub-national regions where products are available on the market.)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).		
Informational	Informational: To further EPA's understanding in this area, we are seeking information from ecolabel programs on 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	- Example of analysis of marketplace uptake of the ecolabel products including market share, recognition in institutional procurement guidelines of the ecolabel or standard, or other indicators of the ecolabel's presence. - Example of market report published.		

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Informational	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	<ul style="list-style-type: none"> - Definition of interest/stakeholder categories relevant to the ecolabel program. - Documentation of formal rules and procedures for ensuring balance of interest. 		

Draft