Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
SECTION I: PROCESS FOR DEVELOPING STANDARDS Consistent with Section 12(d) of the National Technology Transfer and Advancement Act (PL 104 – 113) and the Office of Management and Budget Circular A-119, EPA Recommendations give preference to Voluntary Consensus Standards (VCS) (defined below). Other standards may be considered in cases where VCS are inconsistent with law or otherwise impractical (e.g. in cases where VCS do not exist, a VCS does not address a particular environmental or human health impact, or a VCS would not be as effective at meeting the criteria outlined in Section II).			
I.1	L	The standard is a voluntary consensus standard as defined by OMB A119 Section 4.[2] 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.	-ANS Document # -Other (to be determined by EPA)
I.2	B	The SDO actively sought participation[3] from directly and materially affected stakeholders including producers, users, public interest groups, locally affected groups/persons, and others. *Addresses the following Draft Guideline(s):* *I.1 Open Participation* *I.4 Progress/Updates are communicated*	-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.

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

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

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

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I.3	B	Key standard setting activities[4] were announced in suitable media[5] in order to encourage participation in standards development activities by stakeholders directly and materially affected by the standard. *Addresses the following Draft Guideline(s):* *I.4 Progress/Updates are communicated*	-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.
I.4	B	Timely and adequate[6] notice was made to generate stakeholder participation in key standard setting activities. *Addresses the following Draft Guideline(s):* *I.4 Progress/Updates are communicated*	-Schedule of notifications published on key standards activities and deadlines imposed for participation. -Notifications of key standards activities indicating when posted. -For example, time periods prescribed are 30-days for comment on draft standards. Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.
I.5	B	Directly and materially affected stakeholders – including producers, users, public interest groups, locally affected groups/persons, and others – were able to participate in the standard development process in a timely manner[7] including by accessing draft standards documents, providing input to draft standards documents, receiving meaningful written response regarding how their input is acted on or not acted on, and where voting/balloting is used, having their input made available to the voting members and considered before a final vote is taken on the standard. Note: Participation does not necessarily include a voting role, but goes beyond public notification that a draft exists. *Addresses the following Draft Guideline(s):* *I.1 Open Participation* *I.5 Transparent*	-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.

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

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

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

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

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		I.6 Consideration of all viewpoints	
I.6	B	Minutes of all committee and decision-making body meetings, comments and responses thereto, and complaints and appeals made during the standard development process were available to stakeholders for inspection in a timely manner. *Addresses the following Draft Guideline(s):* *I.4 Progress/Updates are communicated* *I.5 Transparent*	-Instructions for accessing information on key activities. -Policy on posting meeting minutes, comments & responses, complaints & appeals. -Meeting minutes of decision making body with documentation of prompt date of posting. -Complaints and appeals made. -Comments and responses thereto posted publicly to the SDO/standards website. Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.
I.7	B	A procedure or a policy ensures fair and equitable consideration of timely stakeholder input during the standard-development process[8]. Input on the standard received was documented, adjudicated[9], and responded to by the SDO in accordance with its procedures. *Addresses the following Draft Guideline(s):* *I.5 Transparent* *I.6 Consideration of all viewpoints*	-Policy/ procedure for ensuring stakeholder input during standards development process are fairly considered. -Access to all, but for assessment, review a sample of stakeholder comments and responses to comments on draft documents – direct responses to individuals or general responses to key themes. -Other evidence of stakeholder participation as supplied by SDO
I.8	L	Option 1: There was no 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. *Addresses the following Draft Guideline(s):* *I.1 Open Participation.*	-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)
I.9	L	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 engaging diverse expertise shall be considered reasonable restrictions. *Addresses the following Draft Guideline(s):* *I.3 Reasonable voting qualifications*	-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.

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

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1.10	L	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. [10] *Addresses the following Draft Guideline(s):* *I.7 Diversity of Interests*	-Guidelines/Policy for balance of interest in forming decision-making body parallel with ANSI Essential Requirements 1.3 and 2.3. -Documentation that no more than 1/3 of decision-making body is from one interest category, or 40% if there are only 3 interest categories.
I.11	B	Decision making procedures/guidance ensured that no single interest category or organization can dominate[11] resolutions made by the decision-making body. *Addresses the following Draft Guideline(s):* *1.x Lack of Dominance [SUBMITTED FROM GC MEMBER ON V2.0]*	-Guidelines/procedures that reflect that no interest category or organization can dominate decision-making. -Evidence that no directly and materially affected party has submitted a written complaint about dominance (see ANSI Essential Procedures Section 2.2) -Evidence that guidance/ procedure was followed; e.g. voting records on key decisions. -Policy references or parallels ANSI Essential Requirements "Lack of Dominance" criteria at 1.2 and 2.2: "The standards development process shall not be dominated by any single interest category, individual or organization. Dominance means a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints."
I.12	B	Standards Development Organization has a conflicts of interest[12] policy or procedure that addresses potential conflicts of interest and in particular, that funding sources for standards development are fully disclosed. If significant external funding is made by one or more parties to support standard development, the SDO shall put in place supplemental procedures to ensure that no domination occurs and balance of interests is respected in the standard development process. "Significant funding" shall mean more than $10,000 or its in-	-Documentation of policy or procedure on conflicts of interest. -Original sources of funding for standards development are disclosed to stakeholders throughout the process. -Formal policy separating functions of organization if there is a potential conflict of interest. -Potential conflicts of interest are disclosed at the stakeholder outreach stage so that parties with competing or adverse interests can be invited to participate in the standard development process and the integrity of balance requirements is maintained.

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

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

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

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		kind equivalent, or 20% or more of the anticipated funding needs of the SDO for standard development. *Addresses the following Draft Guideline(s):* *I.5 Transparent* *1.x Lack of Dominance [SUBMITTED FROM GC MEMBER ON V2.0]*	
I.13	B	Reasonable efforts to achieve consensus are made by the decision-making body and SDO.[13] *Addresses the following Draft Guideline(s):* *I.9 Consensus effort*	-Policy/ procedure that lays out decision making process and consensus definition including: applicable definition of what constitutes consensus, how it is reached, and that the standard setting process includes procedures for registering comments. -Policy/procedure shows an adequate process for resolving objections; objectors are each advised as to the reasons why the objection was resolved or not resolved; and the members of the decision making body are able to change their votes after reviewing the comments. -Agenda and/or minutes of key meetings showing that efforts towards consensus were on the agenda, and appropriate time was given to reach decisions and reach consensus. Examples include: • Documentation reflects that key development committees selected their own chairmen from the relevant stakeholder group and chairmen were not "selected" by administrators in the NGO. • Documentation reflects frequent straw votes were made at the committee, work group, and technical committee levels. • Documentation shows that where straw votes suggested significant disagreement, additional discussion was scheduled (see agenda and/or minutes) • Proceedings reflect a lack of written criticism, complaint, or "no votes" in straw or final voting • Proceedings reflect that where disagreement was sustained, the SDO made efforts to bring in a third party mediator, changed the chairmanship, changed committee composition, referred the matter back to a technical or development committee, or otherwise offered mediation/dispute resolution assistance to resolve the disagreement.
I.14	B	Objections regarding procedures received during the standard setting process are documented and made available to interested parties in a timely manner by the standard development organization. Objectors are advised as to their right of appeal. If an objection is made in writing, the SDO makes a timely and meaningful response to the objection, which response	-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.

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

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		is in writing and made available. If an objection is continuing and is not resolved in the development process, objectors are ultimately advised as to their right and scope of appeal. *Addresses the following Draft Guideline(s):* *I.5 Transparent* *I.9 Consensus effort* *I.10 Efforts to Resolve Objections*	Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.
I.15	B	A documented appeals mechanism is published to address procedural appeals following the final decision. *Addresses the following Draft Guideline(s):* *I.11 Appeals mechanism*	-Proof that the relevant policy/procedure was made public and or available to participants before the standard development process (e.g. website posting, email, etc.) Or, where documentation cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.
I.16	B	The process for initiating the appeal is straightforward, requires simple notice (articulation) of the basis for the appeal, and does not impose redundant or unnecessary costs, paperwork or documentary requirements. A reasonable time[14] is offered from the time of the final vote to the deadline for lodging notice of appeal *Addresses the following Draft Guideline(s):* *I.11 Appeals mechanism* *I.12 Appeals Open*	-Appeals policy and procedures available (easy to find with a clear process defined in straightforward language). -Documentation of policy and/or disclosure of any financial imposition made on stakeholders undertaking an appeal.
I.17	B	At the outset of the standard development process the SDO identified existing standards that may be in conflict or incompatible with the draft standard and demonstrated effort to coordinate and/or resolve conflicts/incompatibilities with those standards, or merge standards, as appropriate. *Addresses the following Draft Guideline(s):* *I.13 Good faith on conflicts*	-SDO documents that at the outset of the standard development process, it searched for potentially conflicting / incompatible standards in existence or under development. -If standards identified as conflicting/incompatible, documentation of outreach to other standards developer and effort to resolve issue. -Evidence may be that the SDOs sought to merge efforts. Evidence may also be that a request was made to a critical stakeholder or an accreditation body to help lead discussions to align or merge efforts. Or -Rationale for why an existing standard was not approached, including, for example, because of an insufficient level of protection or fundamental geographical factors or fundamental technological problems. Or, where documentation of outreach to other standards developers cannot be located for standards developed prior to 2012, attestation by the SDO indicating the criteria was met.

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

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I.18	B	Standard has been opened for either revision or reaffirmation at least every five years. For a younger standard, it is scheduled to be revised or reaffirmed at least every 5 years. *Addresses the following Draft Guideline(s):* *I.14 Standards Updated* *II.3 Data Quality and Reliability*	-Policy or standard text stating schedule for expected revision or re-affirmation of the standard. -Text supplied shows that standard is scheduled to be revised/ reaffirmed every 5 years or less from the date of the last standard version.
I.19	L	The SDO shall make available to the participating stakeholders an analysis of the environmental and human health hotspots affecting the product category and for the life cycle stages under consideration. Such analysis shall utilize documented hotspot methodologies for identifying and analyzing such hotspots. Any participant shall be given the opportunity to provide supplementary information if they wish.	- Documented hotspots (or related) methods and findings. - Evidence that these findings were shared or made available to stakeholder as part of standard development process. – Procedure or policy indicating that stakeholders were able to introduce supplementary information.

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SECTION II: ENVIRONMENTAL EFFECTIVENESS OF THE STANDARD			
II.1		**Meaningfully and Measurably addresses relevant HOTSPOTS** *Addresses the following Draft Guidelines:* *II.1 Align with Relevant Standards* *II.2 Measurability and Significant Measurable Difference* *II.4 Performance-Based* *II.5 Hotspots* *II.6 Multiple Environmental Impacts* *II.7 Lifecycle Stages* ***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).*** II.1.1 For standards claiming to address the <u>pre-extraction and raw materials sourcing stages</u>, the standard meaningfully and measurably addresses: Flooring & Furniture: • B – Land use change, ecosystem services loss, and habitat degradation • B- Biodiversity/endangered species, • B-Soil health, compaction & erosion (carbon, siltation, eutrophication, biodiversity of soil fauna) • L-Sustainable yield • L-Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • L-Criteria air pollutants, air toxics, and photochemical smog • L-Pollution discharges to water Paints/Coatings: • L-Percent recycled, renewable and/or bio-based content • L- Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions And II.1.2 For standards claiming to address <u>the manufacturing stage,</u> the standard meaningfully and measurably addresses: Flooring & Furniture: • B- Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • L- Ozone depletion potential • L-Criteria air pollutants, air toxics, and photochemical smog	-Text of the standard provides a clear protocol for measuring whether a product has achieved the standard's target level(s) of performance for the hotspot(s) addressed -SDO justification for each of the impact categories claimed to be meaningfully and measurably addressed. - For baseline credit, minimally, the text of the standard requires a management plan approach to addressing the hotspot -For Leadership credit, the text of the standard requires specific approaches and/or measures to demonstrate performance outcomes are achieved per the hotspot -Note that both performance criteria and prescriptive criteria may appear in the same standard. -Unacceptably vague criteria for a hotspot would include those stating that an entity should "be involved in" or "promote" an activity, approach, or philosophy without specifying resulting performance or prescriptive outcomes.

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		• L-Pollution discharges to water • L-Water use • L-Solid waste generation *Note that chemicals of concern have also been identified as a potential hotspot in the manufacturing stage. These issues are addressed in criteria II.5, II.6, and II.7.* Paints/Coatings: • None identified - LCAs *indicate that the manufacturing stage is a minor contributer to the overall impacts of paints/coatings* *Note that chemicals of concern have also been identified as a potential hotspot in the manufacturing stage. These issues are addressed in criteria II.5, II.6, and II.7.* And II.1.3 For standards claiming to address human health impacts of the product in the installation/use stages, the standard incorporates by reference or aligns with: Flooring: • B - "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1" (2010) (CDPH Standard Method 1.1-2010) (This is the emission testing method for California Specification 01350.) *Note that chemicals of concern have also been identified as a potential hotspot in the installation/use stage. These issues are addressed in criteria II.5, II.6, and II.7.* Furniture: • B - ANSI/BIFMA X7.1 Standard for Formaldehyde and TVOC Emissions. • L - "Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1" (2010) (CDPH Standard Method 1.1-2010) (This is the emission testing method for California Specification 01350.) (Note that if this VOC leadership criterion is met, ANSI/BIFMA X7.1 Standard does not need to be incorporated by reference.) • L- California's furniture flammability standard (Technical Bulletin 117-2013) and requires products to be labeled as not containing flame retardant chemicals consistent with the manner described in Section 19094 of the California Business and Professions Code *Note that additional chemicals of concern have also been identified as potential hotspots in the installation/use stage. These issues are addressed in criteria II.5, II.6, and II.7.*	

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		Paints/Coatings: • B -California Air Resources Board's (CARB) Suggested Control Measures (SCM) 2007 for VOC content for Paints/Coatings. • 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.) • L- South Coast Air Quality Management District (SCAQMD) Rule 1113 for VOC content *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.* And II.1.4 For standards claiming to address the end of life stage, the standard meaningfully and measurably addresses: For all sectors: • B - Solid waste generation (e.g., design for disassembly, product take-back programs, remanufactured/repurpose capabilities, or minimizing disposal impacts). *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.*	
II.2	L	The standard and/or supplementary materials that accompany the standard clearly identifies any known trade-offs among approaches to address multiple impact areas. *Addresses the following Draft Guideline(s):* *II.6 Multiple Environmental Impacts*	-Text of standard, supplementary materials that accompany the standard addressing trade-offs among impacts (if applicable, as determined by the SDO).

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II.3	B	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 determination of the impacts or attributes.[15] *Addresses the following Draft Guideline(s):* *II.3 Data Quality and Reliability*	-SDO documentation of example information sources used in developing the environmental and/or human health performance criteria in the standard, including peer review panel statement, dates of oldest and most recent sources cited, identity of any independent experts consulted as part of the research, and, if applicable, SDO documentation of life cycle assessment data reviewed. -If any life cycle assessment was conducted as the basis of the criteria, it is consistent with ISO 14040 and ISO 14044, complying with the critical review process. -Alternatives assessment criteria are in accordance with the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives.
II.4	B	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.[16] *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.
II.5	L	The standard includes environmental and human health protection criteria to decrease the toxicological hazard[17] of	-Text of standard: criteria require hazard reduction through one or more of the approaches listed.

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

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

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

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		the product through one or more of the following: alternatives assessment; safer substitution; reduction or elimination of hazardous substance(s); or alternative design approaches. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI). The SDO used reputable information sources in identifying chemicals of concern. The standard fully and transparently explains its methodology for the criteria. Alternatives assessment criteria are in accordance with the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives. *Addresses the following Draft Guideline(s):* *II.9 Intrinsic Hazards*	-SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted and provide evidence that source (s) are reputable. For a hazard list to be considered 'reputable' it shall be based on scientific evidence, be peer-reviewed, and be developed by experts free of any conflicts of interest regarding the outcome of the assessments. Hazard lists should also be constructed through an open-stakeholder process. To provide transparency, formal documentation on the methodology used to compile the list, including key assumptions, shall be publicly available. The standard shall include a formal mechanism to consider form-specific (e.g. respirable dust vs. liquid vs. solid) hazards (such as titanium dioxide). Carcinogens •Listed by the International Agency for Research on Cancer as: -Group 1: carcinogenic to humans -Group 2A: probably carcinogenic to humans •Listed by the National Toxicology Program as: -Known human carcinogen -Reasonably anticipated human carcinogen •Meet the criteria under the Globally Harmonized System of Classification and Labeling (GHS) for the carcinogenicity hazard class (codes H350, H351) Mutagens •Globally Harmonized System of Classification and Labeling (GHS) -Category 1A: Chemicals known to induce heritable mutations in germ cells of humans -Category 1B: Chemicals which should be regarded as if they induce heritable mutations in the germ cells of humans -Category 2: Chemicals which cause concern for humans owing to the possibility that they may induce heritable mutations in the germ cells of humans Reproductive toxicants •Listed under the State of California Safe Drinking Water and Toxic Enforcement Act (Prop 65) for reproductive or developmental toxicity •Meet the criteria under the Globally Harmonized System of Classification and Labeling (GHS) for the

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			Reproductive Toxicity hazard class (codes H360 Categories 1A and 1B, H361, H362) PBT substances •Stockholm Convention Persistent Organic Pollutants U.S. – Canada Binational Toxics •Toxics Release Inventory (TRI) PBT chemicals •Chemicals listed in 40 CFR 372.28 due to their PBT characteristics •RCRA Waste Minimization Priority Chemicals EPA TRI complete, current list (also at 40 CFR 372.65): http://www2.epa.gov/sites/production/files/2015-11/tri_chemical_list_for_ry15_11_5_2015_1.xlsx Others sources used could include, but are not limited to: •The Toxic Substance Control Act Test Submission Database (TSCATS): http://www.ntis.gov/products/ots.aspx and http://yosemite.epa.gov/oppts/epatscat8.nsf/ReportSearch?OpenForm •Hazardous Substances Data Bank (HSDB): http://toxnet.nlm.nih.gov/ •Integrated Risk Information System (IRIS): http://www.epa.gov/IRIS/ •The National Toxicology Program (NTP): http://ntp.niehs.nih.gov/ •US EPA HPV Challenge Program: http://www.epa.gov/hpv/ •The Distributed Structure-Searchable Toxicity Database Network (DSSTox): http://www.epa.gov/ncct/dsstox/ •Acute Exposure Guideline Levels (AEGLS): http://www.epa.gov/oppt/aegl/pubs/chemlist.htm •The Agency for Toxic Substances & Disease Registry (ATSDR) Toxic Substances Portal: http://www.atsdr.cdc.gov/substances/index.asp •US EPA: Public Databases Routinely Searched for Hazard Information: http://www.epa.gov/hpvis/hazardinfo.htm •U.S. Environmental Protection Agency's (EPA) Design for the Environment Program (DfE)—DfE's Alternatives Assessment Criteria: http://www.epa.gov/dfe/alternative_assessments.html •U.S. Environmental Protection Agency's (EPA) TRACI - The Tool for the Reduction and Assessment of Chemical and other environmental Impacts
II.6	L	The standard includes criteria to require or incentivize disclosure (either publicly or to a third party) of all	-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

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		intentionally added chemical substances present in each homogenous material in the final product at 1000 parts per million (.1%) or greater. Note: If the standard is a process and production method (PPM) standard, this Guideline is not applicable, and will not be used in scoring.[18] *Addresses the following Draft Guideline(s):* *II.10 Ingredient Disclosure*	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")
II.7	L	The standard includes criteria to require or incentivize public disclosure of the intentionally added chemical substances of concern present in each homogenous material in the final product at 100 parts per million (0.01%) or greater. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI). The SDO used reputable information sources in identifying chemicals of concern. *Addresses the following Draft Guideline(s):* *II.10 Ingredient Disclosure*	-Text of standard requires chemical disclosure at the specified threshold(s). -SDOs indication of the source(s) consulted in developing criteria to address chemicals of concern. If SDO does not cite any of the sources listed below, it must provide documentation of source(s) consulted and evidence that source (s) are reputable. (See II.5 Sources of Evidence "Lists of Lists")
II.8	L	Where they may exist, standard incentivizes the manufacturer to publicly disclose any of the following: -the results of existing LCAs, -an Environmental Product Declaration (EPD) pursuant to ISO standards; and/or -the results of other environmental and human health impact assessments *Addresses the following Draft Guideline(s):* *II.11 Impact Assessment Disclosure*	-Text of standard: standard requires or gives credit for public disclosure of results of existing LCAs and/or other existing assessments of environmental and human health impacts.
II.9	L	Innovation. The standard meaningfully and measurably addresses environmental and/or human health impacts in some way not already recognized in the above criteria.	-Text of criteria and explanation of how the approach is innovative and how it results in improved environmental and/or human health performance.
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from SDOs on how to determine whether the environmental and/or human health protection criteria in the standard result in products that exceed the industry average level of environmental and/or human health performance for this product category. *Addresses the following Draft Guideline(s):* *II.2 Measurability and Significant Measurable Difference*	Optional, to be determined by the SDO
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from SDOs on how and when the environmental and/or human health protection criteria	Optional, to be determined by the SDO

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

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
		in the standard uses quantitative vs qualitative measures. *Addresses the following Draft Guideline(s):* *II.2 Measurability and Significant Measurable Difference*	

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
SECTION III: CONFORMITY ASSESSMENT[19]			
III.1	B	The CAB is defined and is independent from the organization whose products/services are being assessed for conformity. *Addresses the following Draft Guideline(s):* *III.2 Independence*	-Accreditation certificate (as supplied in III: 1) -Declaration that the CAB is independent from the producer. -Organizational structure/chart of CAB entity showing independence from producers. -Ownership structure of CAB explained/declared.
III.2	L	The standard, ecolabel and/or SDO are neutral as to the specific CAB entity being used; and more than one CAB can assess conformance to the standard.[20] Reference: ISO/IEC 17007 *Addresses the following Draft Guideline(s):* *III.2 Independence*	-Relevant text from policy/procedure on CAB entities showing independence from the SDO. -Accreditation requirements and or /screening procedure for determining independent CAB. -Declaration that the CAB is independent from the SDO -Demonstration that more than one CAB can provide CA services to the standard, e.g. with public information.
III.3	B	The CAB periodically reviews risks to its impartiality, and takes appropriate steps to mitigate identified risks.	-Quality procedures, advisory body minutes, management meeting minutes -Results of reviews and actions taken.
III.4	L	The CAB offers a sliding scale of conformity assessment fees or other means to be accessible to small businesses. *Addresses the following Draft Guideline(s):* *III.3 Sliding fee scale*	-Documentation of sliding fee scale (does not need to be publicly accessible). Demonstration of accessibility to small businesses.
III.5	B	The CAB publicly discloses the scoring methodology and levels achieved by products that conform to the standard; and describes how the public can access this information. *Addresses the following Draft Guideline(s):* *III.x Information on Scoring [New Guideline SUBMITTED FROM GC MEMBER ON V2.0]*	-Documentation of scoring and levels achieved by products that conform to the standard. -Description of where and how this information is made publically available.
III.6	L	The CAB publicly discloses the credits achieved by products that conform to the standard; and describes how the public can access this information. *Addresses the following Draft Guideline(s):* *III.x Information on Scoring [New Guideline SUBMITTED FROM GC MEMBER ON V2.0]*	-Documentation of credits/criteria achieved by products that conform to the standard. -Description of where and how this information is made publically available.

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

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

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
III. 7	L	The CAB provides public access to or disclosure of up to date information on the means by which it obtains financial support. Reflects ISO/IEC 17065 - 4.6	-Example description of means of CAB financial support -Description of where and how this information can be accessed.
III.8	B	The CAB demonstrates (through accreditation by a member body to ILAC or IAF)[21] conformance to relevant standards within the ISO/IEC 17000 series, e.g., ISO/IEC 17065 {for the ecolabeling certification program scope in accordance with (ISO 14020)}; 17025 (testing); 17024 (personnel); 17020 (inspection). **OR** Apply the evaluation factors below, which are consistent with the requirements of internationally accepted standards for operations of a conformity assessment body. *Addresses the following Draft Guideline(s):* *III.1 Follow relevant conformity assessment standards* *III.4 Accreditation*	-Accreditation certificate from a recognized accreditation body meeting ISO/IEC 17011. -The accreditation body meets international norms for accreditation. -SDO criteria showing requirements for CAB. -Copy of current certificate and scope of accreditation by CAB. - CAB is accredited by a signatory of an international peer evaluation organization.[22] -The accreditation body has been evaluated in conformance to ISO/IEC 17011.
III. 8.1	B	**Objective & Impartial Structure.** Organizational chart and management system of the CAB reflect impartiality of decision making on conformity assessment. Reflects ISO/IEC 17065 - 5.1.1	-Policy on management system. -Policy/ procedures showing independence.
III. 8.2	B	Formal decision-making procedures and thresholds are documented demonstrating rules for when conformance or nonconformance is determined by the CAB.	-Procedures showing thresholds for determining conformance.
III. 8.3	B	**Free from Undue Pressures.** The CAB does not allow commercial, financial or other pressures to compromise impartiality, including ensuring that personnel (management and staff) are free from such pressures. Reflects ISO 17065/IEC - 4.2.2	-Policy / procedure demonstrating that staff and management remain impartial in their CA work and are not subject to undue pressure.
III. 8.4	B	The CAB has a procedure or policy to ensure that the personnel conducting conformity assessment have not had a professional relationship in the past two years nor on-going financial connection with the organization to which they are providing their services. Reflects ISO/IEC 17065 4.2 AND 5.2	-Policy / procedure for managing conflicts of interest of staff. -Policy that cover past and present relationships specific to the CA being undertaken.

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

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
III. 8.5	B	**Documented Procedures.** Procedures are documented for CAB processes. For example, procedures may be documented through a quality management system that provides general management system documentation (e.g. manual, policies, and definition of responsibilities); control of documents; control of records; management review; internal audit; corrective actions; preventive actions. Reflects ISO/IEC 17065 - 8.1	-List of documented relevant policies and procedures. -Documentation of quality management system, including a copy of the internal audit and management review, log of complaints and comments, and corrective actions taken. -Other relevant documentation of procedures for conducting CA.
III. 8.6	B	**Take All Necessary Steps to Evaluate Conformance.** The CAB demonstrates that it takes all steps necessary to determine conformance with the standard, following the principles of ISO 17000: 2004[23]. Reflects ISO/IEC 17065 – 7.4.1; 7.1.2; 7.2, 7.3, 7.4, 7.5, 7.6	-Policy/procedure used to evaluate the product/process. -Copy of an application to demonstrate all required information is contained. -Document describing application review process. -Record that demonstrates that certification decisions were adequately justified.
III. 8.7	B	**Role separation.** The CAB demonstrates that the process for making conformity decisions includes an independent review that the product has met the specified requirements. Reflects ISO/IEC 17065 7.6	-Policy/Procedure describing the evaluation process and who makes the CA review and decision. -Procedure for quality management system. -Policy / procedure documenting staffing roles for the CA process.
III. 8.8	B	**Certification Conditions Specified.** The CAB demonstrates that it documents how and when conformance is granted, maintained, extended or suspended or withdrawn. Reflects ISO/IEC 17065 - 7.6.2	-Policy/procedure on how and when conformance is granted, maintained, extended or suspended; AND policy on communication of this information
III. 8.9	B	In the event that non-conformity is substantiated, the CAB has a procedure that considers and decides on appropriate action such as increased surveillance, reduction in the scope of the certification to remove non-conforming products, 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.
III. 8.10	B	**Records Management.** The CAB has procedures for ensuring documents are identified, stored, protected, retrieved and retained and disposed of to ensure the protection of confidential information. Reflects ISO/IEC 17065 - 8.4.1	-Policy/procedure for document control and retention policy. -Policy/ procedure to protect client confidentiality. -Evidence of quality management system covering document management and client confidentiality.

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

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
III. 8.11	B	**Dispute Resolution Procedures.** The CAB has a documented policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals. Reflects ISO/IEC 17065 - - 7.13.1 (ISO/IEC 17065 takes out term "disputes").	-Policy/procedure for complaints and appeals. -Sample records of complaints, and or appeals and corrective actions taken.
III. 8.12	B	**Traceability Procedures.** The CAB has traceability or chain-of-custody procedures where this is necessary to ensure qualified products meet the standard.	-Policy/ procedures for traceability/chain of custody by CAB demonstrating conformance with the criteria. OR justification of how this is not applicable.
III. 8.13	B	**Periodic evaluation of marked products.** When continuing use of a conformity-assurance mark on a product 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.
III. 8.14	B	**Content of Declarations of Conformity.** The CAB provides declarations of conformity that clearly conveys information on: the name and address of the CAB; the date conformity assurance is granted (if applicable); name and address of the client; the scope of the conformity assurance; the term or expiration date of conformity assurance (if applicable); the signature or other defined authorization of the person(s) of the CAB assigned such responsibility. Reflects ISO/IEC 17065 - 7.7.1 & 7.7.2	-Example declaration of conformity meeting criteria listed.
III. 8.15	B	**Suitable Action for Misuse.** The CAB has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is conformant, including market surveillance. Procedures describe actions to take for incorrect, misleading or un-authorized use of its mark and licenses. Reflects ISO/IEC 17065 - 4.1.3.1, 7.11.1, 7.9.3 and 7.9.4	-Policy / procedure to take action on incorrect, misleading, or unauthorized use of marks or licenses.
III. 8.16	B	**Quality Objectives.** The CAB has a documented commitment to fulfilling quality objectives and/or an established quality management system that is implemented in the CAB's organization. Reflects ISO/IEC 17065 - 8.2.1.	-Policy / procedure indicating commitment to quality -Quality management system documentation.

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
III. 8.17	B	**Sufficient Personnel.** The CAB has a process to ensure that they have sufficient personnel with the education, training, technical knowledge and experience necessary for performing conformity assessment functions. Reflects 17065/IEC - 6.1.1.1	-Description by CAB on how it ensures that its staff is qualified for CA activities. -Description of staffing requirements. -Qualifications stated in job advertisements for certification staff. -Records/ CVs of personnel reflecting required qualifications
III. 8.18	B	**Adequate Facilities & Equipment.** The CAB has all the facilities and equipment needed to carry out its work; if testing is required by the standard, competent and/or accredited laboratories are utilized. Broadly reflects ISO/IEC 17065 - 7.3.1	-Description of facility and equipment required to conduct certification. -If testing is required for certification, laboratories are in conformance with ISO 17025 or equivalent standard.
III. 8.19	B	**Transparent Process.** The CAB maintains through publications, electronic media or other means, and makes available upon request, information about the conformity assessment process including the rules and procedures for granting maintaining, extending, reducing the scope of, suspending, withdrawing or refusing conformity assurance. Reflects ISO/IEC 17065 - 4.6	-Documentation of appropriate and timely information disclosed publicly or available on request about the CAB certification processes.
III. 8.20	B	**Information on Fees.** The CAB provides general information on fees, and/or makes this information available to applicants and clients. Reflects ISO/IEC 17065 - 4.6	-Example communication to applicants that includes information on fees.

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
SECTION IV: MANAGEMENT OF ECOLABELING PROGRAMS[24]			
IV.1	B	The ecolabel program has a documented commitment to fulfilling quality objectives and/or an established quality management system[25] that is implemented in the organization. *Addresses the following Draft Guideline(s):* *IV.1 Document Commitment to Quality*	-Policy / procedure indicating commitment to quality. -Evidence of a documented Quality management system documentation.
IV.2	B	The ecolabel program has established a methodology and procedure to evaluate the effectiveness of addressing environmental and/or human health impacts covered by its standard. *Addresses the following Draft Guideline(s):* *IV.2 Evaluate Effectiveness*	-Procedure for completing the evaluation including a discussion of impact categories addressed, methods, data sources, indicators, time line. -Description of the methodology selected; including any methodology standards or norms referenced such as impact evaluation or the ISEAL Impacts code[26].
IV.3	L	An evaluation, by the ecolabel program or a third-party, of the effectiveness of a standard in reducing environmental and/or human health impacts has been completed within the previous 5 years. *Addresses the following Draft Guideline(s):* *IV.2 Evaluate Effectiveness*	-Copy of completed report and publication date. -Description of methods and data sources used.
IV.4	L	Results of the evaluation are publicly available. *Addresses the following Draft Guideline(s):* *IV.2 Evaluate Effectiveness*	-Evidence that evaluation reports are publicly available; for example, publication of report online, website link, or statement that report available on request.
IV.5	B	The ecolabel program has a documented and publicly available policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals concerning the management of the ecolabel program. *Addresses the following Draft Guideline(s):* *IV.3 Dispute Resolution Process*	-Policy/procedure for complaints and appeals. -Sample records of complaints, and/or sample of appeals and corrective actions taken. -Public website address for complaints and appeals.
IV.6	B	The ecolabel program makes publicly available the stakeholders[27] 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.
IV.7	B	The ecolabel program does not allow commercial, financial or other pressures to compromise the confidentiality, objectivity or impartiality of its operations and decisions that affect awarding the mark or registration, including ensuring that personnel (management and staff) are free from such pressures. *Addresses the following Draft Guideline(s):*	-Policy / procedure demonstrating that staff and management are able to remain impartial in its decisions concerning the ecolabel program.

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

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

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

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

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
		IV.6 Free from Undue Pressures	
IV.8	L	The ecolabel program provides public access to, or disclosure of, up- to-date information on the types of financial support received for administering the ecolabel program. *Addresses the following Draft Guideline(s):* *IV.8 Information on Financial Support*	-Description of the types and sources financial support the ecolabel program relies on to support its work, such as application fees, license fees, royalties, membership fees, grants, sale of other goods and services, etc. -Description of where and how this information can be accessed.
IV.9	B	The ecolabel program provides general information on fees, and makes this information available to applicants. *Addresses the following Draft Guideline(s):* *IV.9 Information on Fees*	-Fee schedule information OR -Process by which stakeholders and applicants can request information on fees (from ecolabel program, CAB or both).
IV. 10	B	The ecolabel program makes publicly available (free of charge or for a reasonable cost) the criteria and/or standard. *Addresses the following Draft Guideline(s):* *IV.10 Publicly Available Criteria*	-Internal URL for accessing the criteria and/or standard and how interested parties can access the standard.
IV. 11	B	The ecolabel program grants the label, mark, or registration if the product is demonstrated to be in conformance with the applicable standard, and the applicant meets the administrative and technical requirements of the program (such as paying fees, and accepting license agreements). *Addresses the following Draft Guideline(s):* *IV.11 Grant the Use of the Mark*	-Declaration that no other conditions or limits are placed on products or applicants in granting the use of the mark beyond those required by the standard and or administrative or technical requirements of the program. -Policy or procedure stating the conditions by which the label/mark/declaration will be granted and an explanation as to its purpose and why they are reasonable. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both.
IV. 12	B	The ecolabel program has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product meets the standard. Procedures describe actions to take for incorrect, misleading, or un-authorized use of its mark and licenses including suspension or removal of the mark if warranted. *Addresses the following Draft Guideline(s):* *IV.12 Suitable Action for Misuse*	-Policy / procedure to take action on incorrect, misleading, or unauthorized use of marks or licenses. -Statement of which organization conducts these activities – the ecolabel program, CAB, or both.
IV. 13	L	The ecolabel program has established procedures to periodically conduct market surveillance to check for incorrect, unauthorized use of its licenses, certificates, and 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.
IV. 14	L	If an ecolabel is associated with more than one standard/certification, those ecolabels are markedly different from each other in application as not to confuse the marketplace or inflate a sense of compliance.	-Consumer testing to make sure ecolabels associated with more than one standard are clearly interpreted as to the differences.

Criter -ia #	B/L/I	Proposed Final Assessment Criteria	Example Sources of Evidence (one may be sufficient subject to IAE review)[1]
IV. 15	L	Ecolabel programs participate in mutual recognition activities such as equivalency assessments; formal mutual recognition of standards; and/or technical, administrative, or CA procedures. *Addresses the following Draft Guideline(s):* *IV.13 Mutual Recognition*	-Documentation of participation in associations and fora such as ISO, ISEAL Alliance, Global Ecolabelling Network, ASTM, etc. -Documentation of public statement in which ecolabel programs and or standards are mutually recognized and on what grounds.
IV. 16	L	The ecolabel program makes publically available a 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.
IV. 17	L	The ecolabel program's directory of conformant products and their brand owner can be searched so that users can find conforming products and suppliers *Addresses the following Draft Guideline(s):* *IV.16 Searchable Directory*	-Explanation or demonstration of how the directory is able to be searched. -Note that "searched" is not meant to imply a full online database. Search functions are also found in commonly used tools such as MS Word, MS Excel and Adobe PDF.
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs on if/how they provide regional information regarding labeled products (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).
	I	**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.
	I	**Informational:** To further EPA's understanding in this area, we are seeking information from ecolabel programs regarding rules and procedures that aim to ensure a balance of interests among stakeholders in the program's governance. *Addresses the following Draft Guideline(s):* *IV.5 Balance of Interests*	-Definition of interest/stakeholder categories relevant to the ecolabel program. -Documentation of formal rules and procedures for ensuring balance of interest.