ADDENDUM: Changes in the 2022 Update of the United States Environmental Protection Agency's Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing

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ADDENDUM: Changes in the 2022 Update of EPA's Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing

Comparison of 2016 Pilot Framework and 2022 Updated Framework

This document summarizes the changes made to the 2016 Pilot Framework to assess ecolabels and standards for Recommendations to Federal Agencies. The two versions of the Framework compared are:

- OLD (formerly known as the Guidelines): EPP Pilot to Assess Standards and Ecolabels for EPA's Recommendations to Federal Agencies - Final PILOT Assessment Guidelines12-29-2016.pdf
- NEW: Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing (updated 2022).

The changes were made following the pilot assessments, with input from EPA's Standards Executive and Environmentally Preferable Purchasing Program, the Department of Commerce National Institute of Standards and Technology (NIST), and as a result of extensive discussion with and feedback from the 2016 pilot community:[1]

- Standards development organizations, ecolabel programs, and certification entities that volunteered for assessment as part of the pilot process
- Governance Committee members
- Product Category and Service Sector panelists
- The independent assessment entity (Industrial Economics, Inc)

For more information on the history of the Framework and its development, please visit EPA's Framework website.

Summary of global changes made

The following changes were made that affect the Framework that are not specific to a particular criterion.

- The name of the document has been changed to "Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing." The term "Framework" replaces the term "Guidelines" throughout the document.
- Short headings were written for each criterion, shown in bold.
- The following information was moved from the Framework document to a submission template that accompanies the Framework. This included:
    - General scoping information.
    - The description of how any confidential business information would be handled.
- Footnote text containing definitions were incorporated into the Framework directly; and/or moved to the new Definitions Appendix B.
- Added a list of Acronyms to Appendix B.
- Criteria within each Section were re-ordered:
    - All Baseline criteria are shown first in each section, followed by Leadership criteria.

[1] The organizations that participated in the pilot product category panels and governance committee are listed here: https://www.epa.gov/greenerproducts/framework-development-overview

  - Criteria were re-organized within sections to better group concepts.
- "Informational" criteria were either deleted or turned into leadership criteria (as noted in the table below).
- Criteria for which responses are required for the assessment are shaded peach.
- Descriptions for which type(s) of organization should respond were added to the start of each Section.
- Information regarding how each section would be used by EPA to determine inclusion in the *Recommendations for Specifications, Standards, and Ecolabels for Federal Purchasing* was added to the start of each Section.
- The "Example Sources of Evidence" column was re-named "Sources of Evidence and Decision Parameters". This column now includes specific descriptions on when "not applicable" and attestations (in lieu of evidence) are acceptable responses for applications.
- Decision parameters for EPA assessors, as agreed-to during the pilot, were integrated into the "Sources of evidence/ Decision parameters" column.
- Sources of evidence were edited for each criterion to make it clear what must be submitted, and what can optionally be submitted by the applicant.
- Scoping Questions
  - New eligibility criteria regarding product availability and a registry of conforming products have been added to support implementation of a federal purchasing program. However, standards/ecolabels not yet meeting these eligibility criteria are still welcome to participate in the assessment and have the potential to be recognized by EPA as conforming to other sections of the Framework.
  - Questions were added to assist federal agencies in understanding if/how a private sector standard/ecolabel would assist in meeting purchase category-applicable federal purchasing statutory requirements for energy efficiency, recovered content, biobased content, and ozone depleting substances.
- Section I – Standards Development Process
  - Revisions were made to ensure alignment with the updated OMB A-119 Circular (January 2016); including the addition of three new criteria (as shown in table below).
  - Revised criterion I.1 to better align with the requirements for VCSs as stated in OMB Circular A119.
  - Reworded to be past tense (to assess what happened at the time of developing the standard).
  - Criterion that recognizes existing ANS accreditation was moved as the first criterion in the Section.
  - Eliminated the attestation option as evidence for standards developed prior to 2013.
- Section II – Environmental Effectiveness of the Standard
  - Reworded to accommodate service sector standards.
  - Product Category-specific criteria, developed for flooring, furniture, and paints/coatings for the pilot assessments, were removed from the Framework. Criterion II.2 - Hotspots were changed to provide a framework to apply to any type of product or service category.
  - Two criteria were changed from Leadership to be either Baseline or Leadership depending on if chemical substances of concern is a key hotspot for the purchase category. For these criteria, II.3 and II.4, EPA added general reference to developmental toxicants, acute mammalian toxicants, repeated dose toxicants, and respiratory sensitizers as additional chemical substances of concern categories.
  - Acceptable lists of chemical substances of concern moved from the example sources of evidence column to a new *Appendix A. Reference Lists for Chemical Substances of Concern Criteria*.

    - Augmented the Globally Harmonized System (GHS) categories referenced in Appendix A, consistent with the pilot community agreed upon criteria for credible lists.
- Section III – Conformity Assessment
    - Demonstrating that there is a competent certification program – either via accreditation or the alternative pathway provided in Section III – will become a requirement for inclusion in EPA's Recommendations as of December 2023.
    - Criterion that recognizes existing CAB accreditation was moved as the first criterion in the Section.
    - Provided cross reference between Sections III and IV to reduce duplication in cases where same applicant answers both sections for select criteria.
- Section IV – Ecolabel Program Management
    - Provided cross reference between Sections III and IV to reduce redundancy for applicants responding to both sections (for select criteria).

The remainder of this document compares and describes the specific changes made to the December 2016 version of the Framework (OLD) in comparison to the 2022 version of the Framework (NEW) per criterion. Changes made to the "sources of evidence" are also noted in the "changes" column.

Explanation of criterion-specific changes

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
SECTION I: PROCESS FOR DEVELOPING STANDARDS			SECTION I: PROCESS FOR DEVELOPING STANDARDS Applicants responsible for developing the standard/ecolabel criteria should complete this section. It is required to provide a response for criterion I.1 indicated in peach. If I.1 is not met, responses to other criteria in Section I are encouraged to inform potential federal users and other interested parties about the standard's development process. EPA notes when a standard is not a Voluntary Consensus Standard (VCS) in the Recommendations. Section I allows two different ways to demonstrate if your standard is a VCS. 1) Per criterion I.1, the standard is an ANSI approved American National Standard (ANS) AND meets baseline criterion I.1.5 (balance of interest in decision making body) or 2) Meets all baseline criteria I.1.1 to I.1.14. Applicants are encouraged to respond to Leadership criteria I.2-I.8.				
I.1	L	The standard is a voluntary consensus standard as defined by OMB A119 Section 4.[3] If a standard is an ANSI approved American National Standard, then the standard is considered a voluntary consensus standard and the SDO does not need to provide additional information per the remaining Section I criteria. Other organization's standards development processes may also meet the OMB A-119 definition of voluntary consensus standard. *Footnote 3:* Per the revised OMB Circular A119 Section 5b, there is a preference for the use of voluntary consensus standards. The Circular does not preclude the use of other standards in rulemaking, procurement, or other program activities in cases where voluntary consensus standards do not exist or use of existing voluntary consensus standards would be inconsistent with law or otherwise impractical, including where use of a voluntary consensus standard would not be as effective at meeting the agency's regulatory, procurement or program needs. EPA has determined that American National Standards meet the definition	I.1	B	**Voluntary consensus standard.** The standard is a VCS as defined by OMB A-119 Section 4. If a standard is an ANSI approved American National Standard (ANS) AND meets criterion I.1.5, then the standard is considered a VCS. OR, if interested and applicable, instead demonstrate that the standard is a VCS by submitting responses to the following criteria I.1.1 to I.1.14, which are consistent with the requirements of internationally accepted protocols for standards development organizations. *Notes: Other organizations' standards development processes may also meet this definition and may be added in the future. Per the revised OMB Circular A-119 Section 5b, there is a preference for the use of VCSs. The Circular does not preclude the use of standards not built via a voluntary consensus-based process in federal rulemaking, procurement, or other program activities in cases where VCSs do not exist or use of existing VCSs would be inconsistent with law or otherwise impractical, including where use of a VCS would not be as effective at meeting the agency's regulatory, procurement, or program needs.*	*Criterion:* Revised criterion I.1 to state a standard is considered a VCS if it is ANSI approved AND meets criterion I.1.5. This change is to better align with the requirements for VCSs as stated in OMB Circular A119. Clarification that the rest of the Section I *baseline* criteria are not applicable if this criterion is met. Updated to align with revised OMB A-119 Circular (Jan. 2016). Incorporated footnote into criterion.

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		of voluntary consensus standards per the revised OMB A119 available at https://www.whitehouse.gov/wp-content/uploads/2020/07/revised_circular_a-119_as_of_1_22.pdf *[link updated]* Other organization's standards development processes may also meet this definition; EPA would update this criterion and sources of evidence accordingly.				*Evidence:* Added to further instructions for ANSI accredited SDOs to provide ANS document number.
I.2	B	The SDO actively sought participation[4] from directly and materially affected stakeholders including producers, users, public interest groups, locally affected groups/persons, and others. *Footnote 4:* Active outreach may include but are not limited to identifying and contacting stakeholders, inviting participation, and maintaining appropriate communications with stakeholders.	I.4	L	**Interested party participation: active outreach.** The SDO actively sought participation from interested parties. *Note: Active outreach may include but is not limited to identifying and contacting interested parties, inviting participation, and maintaining appropriate communications with interested parties.*	*Criterion:* Changed "directly and materially affected stakeholders…" to "interested parties." Changed from baseline to leadership. Updated to align with revised OMB A-119 Circular (Jan. 2016). *Evidence:* Outreach plan must show the plan to identify and contact a diverse set of interested parties. Removed attestation option for standards more than 5 years old.
I.3	B	Key standard setting activities[5] were announced in suitable media[6] in order to encourage participation in standards development activities by stakeholders directly and materially affected by the standard. *Footnote 5:* Key standard setting activities represent the significant stages of the standard's development,	I.1.3	B	**Announcements.** Key standard development activities were announced publicly. *Note: Key standard development activities refers to the significant stages of the standard's creation, revision, reaffirmation, or withdrawal, including:*	*Criterion:* Changed text to refer to announcements being made publicly instead of to stakeholders Removed "suitable media" as it was not a useful

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		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. *Footnote 6:* Suitable media should match up to the methods utilized and available to materially affected persons (including public interest groups, affected local and indigenous persons). Suitable media could include (but are not limited to): maintenance of an open email subscription list/ list serve throughout the SD process, email notifications, publication of press releases, online publication, newsletters, use of social media (such as Linked-in announcements and updates), posting of notifications in external standards' or trade media bulletins and news-services such as ANSI's "Standards Action". Note: A posting on a website to check back for more information and updates periodically is not considered sufficient.			1. *Initiation of standards development activity – including announcement of scope (purchase category(ies) and anticipated environmental/human health categories to be addressed; call for members/participation (voting, observing, and/or commenting)* 2. *convening of a decision-making body* 3. *availability of drafts/proposals for comment and/or vote* 4. *reconciliation of comments - responses to comments shared* 5. *adjudication of complaints and/or appeals* *final approval/publication*	distinction in the pilot assessment. Defined the list of key standard development activities to enable consistent assessment. *Evidence:* Clarified evidence must include examples of announcements for key standard activities 1, 3 and 6 (at least)

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I.4	B	Timely and adequate[7] notice was made to generate stakeholder participation in key standard setting activities. *Footnote 7:* Sufficient time varies by key standard activity but is generally defined as keeping stakeholders up to date and engaged in the standard setting activities and providing sufficient time for response from stakeholders. For example, ANSI essential requirements stipulates 30-day comment periods for proposals 5 pages or less in length, 45-days for readily available proposals (available within 1-day of a request to receive it), or 60-days if the above 2 options are not applicable.	I.1.7	B	**Timely and adequate notice to participate.** Timely and adequate public notice was provided to generate participation by interested parties in key standard setting development activities (as defined in I.1.3). *Note: Timely and adequate notice is generally described as keeping interested parties or decision-making body(ies) (as applicable) up to date and engaged in key standard development activities and providing sufficient time for response.* For purposes of these criteria, SDOs must follow the ANSI essential requirements or provide a minimum of 30-day notice. 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.	*Criterion:* Clarified definition of "stakeholders" to be the public; and notice to participate must be given to "interested parties". Incorporated footnote into guideline. *Evidence:* Listed information the public notice should include.
I.5 / I.6	B	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[8]including by accessing draft standards documents, providing input to draft standards documents, receiving meaningful written response regarding how their input is acted on or not acted on, and where voting/balloting is used, having their input made available to the voting members and considered before a final vote is taken on the standard. Note: Participation does not necessarily include a voting role but goes beyond public notification that a draft exists. I.6. Minutes of all committee and decision-making body meetings, comments and responses thereto, and complaints and appeals made during the	I.1.8	B	**Timely and adequate notice to participate - Decision-making body(ies).** Timely and adequate notice (as defined in I.1.7) was provided to members of decision-making body(ies) to participate in the standard development process including by: - Accessing draft standards documents - Providing input to draft standards documents and supporting documents - Reviewing minutes of all meetings, comments and responses thereto, and the results of complaints and appeals made during the standard development process - Providing access to agendas with meeting times/locations.	*Criterion:* Combined I.5 and I.6 and changed to I.5 to be specific to the decision-making body(ies) rather than all stakeholders, as all stakeholders are addressed in I.1.7 (previously I.4). Moved sub-criterion in I.5 (about a final vote) to I.1.9. *Evidence:* Applicants must provide evidence of announcements for at least three announcements made to decision-making bodies, and that they show that

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		standard development process were available to stakeholders for inspection in a timely manner. *Footnote 8:* Timely manner is defined as keeping stakeholders up to date and engaged in the standard setting activities and providing sufficient time for response from stakeholders.				timely and adequate notice was given.
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.	I.5	L	**Transparency of activities.** Minutes of all decision-making body(ies) meetings, comments and responses thereto, and complaints and appeals made during key standard development activities were available to interested parties for inspection with timely and adequate notice (as defined in I.1.7).	*Criterion:* Changed "directly and materially affected stakeholders…" to "interested parties." Changed "timely manner" to "timely and adequate notice" to align language with other criteria. Changed "standard development process" to "key standard development activities" per I.1.3. Changed from baseline to leadership. *Evidence:* Applicants must submit at least 2 forms of evidence from a list provided.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
I.7	B	A procedure or a policy ensures fair and equitable consideration of timely stakeholder input during the standard-development process[9]. Input on the standard received was documented, adjudicated[10], and responded to by the SDO in accordance with its procedures. *Footnote 9:* The standard setting process includes key steps starting with the announcement of a new standard or review of an existing standard and ending with the publication of the standard and all activities between. *Footnote 10* Adjudicate - make a formal judgment or decision about a problem or disputed matter. (from Google)	I.1.9	B	**Consideration of interested party input.** Fair and equitable consideration of input on key standard development activities (as defined in I.1.3) received by the designated due date from interested parties was documented, adjudicated, and responded to by the SDO in accordance with its procedures. Where voting/balloting was used, input was made available to the voting members and considered before a final vote was taken on the standard.	*Criterion:* Subject of criterion was changed from policy to practice (policy can be used as evidence). Moved sentence "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" from (old) I.5 to I.1.9. *Evidence:* Applicants should submit a procedure (not the standard) Added that policy must include "continuous maintenance" in addition to the schedule for revising/re-affirming the standard.
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.	I.6	L	**Interested party participation: fees and travel.** There was no fee or travel requirement to participate in key standard development activities. OR, if there was a fee, it was minimal or offset by a sliding scale for hardship parties, including individual/NGO/academic members of the decision-making body(ies). The SDO provided travel funds to hardship parties without financial means to attend in-person meetings, virtual access to	*Criterion:* Minor wording changes. *Evidence:* Minor wording changes. Added option to submit a travel funds policy that shows funds being available to interested parties

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					meetings, fee waivers, and/or other mechanism to retain their ability to participate in standards activities.	without other financial means to participate. Removed attestation option for standards more than 5 years old.
I.9	L	Membership of any decision-making body/bodies was not unreasonably restricted on the basis of technical qualifications or other such requirements (e.g., membership in an organization). Restrictions for the purposes of achieving a predefined target size of the body, achieving a balance of stakeholders, and engaging diverse expertise shall be considered reasonable restrictions.	I.1.4	B	**Selection of membership of decision-making body(ies).** Processes and procedures for selecting members of all decision-making body(ies) was transparent and non-discriminatory. Membership of any decision-making body/bodies was not unreasonably restricted on the basis of technical qualifications or other such requirements (e.g., membership in an organization). Reasonable restrictions include achieving a predefined target size of the body, achieving a balance of interests, and engaging diverse expertise.	*Criterion:* Re-worded first sentence to align with updated OMB A-119 Circular. Changed from leadership to baseline to align with updated OMB A-119 Circular (Jan. 2016)
I.10	L	The SDO achieved a balance of interest in any decision- making body/bodies by ensuring that no single interest category constituted more than a one-third (33%) of the membership of that body if there are 4 or more interest categories, or 40% of the membership if there are 3 designated interest categories.[11] *Footnote 11:* Per OMB A119 sect 2e(ii), "The standards development process should be balanced. Specifically, there should be meaningful involvement from a broad range of parties, with no single interest dominating the decision-making." Definition of "balance of interest" may also be informed by ANSI Essential Requirements (2015), which defines and "balance" as "a) no single interest category constitutes more than one-third of the membership of a consensus body dealing with safety-related	I.1.5	B	**Balance of interest in decision-making body(ies).** The SDO achieved a balance of interest in decision-making body(ies) by ensuring that no single interest category constituted more than a one-third (33%) of the membership of that body if there were 4 or more interest categories, or 40% of the membership if there were 3 designated interest categories. *Note: Per OMB A-119 sect 2e(ii), "The standards development process should be balanced. Specifically, there should be meaningful involvement from a broad range of parties." Definition of "balance of interest" may also be informed by ANSI essential requirements (2015), which defines "balance" as "a) no single interest category constitutes more than one-third of the membership of a consensus body dealing with safety-related standards or b) no single interest category constitutes a majority of the membership of a consensus body dealing with other than safety-related standards. Additional steps have been taken by a number of SDOs to further ensure a balance of diverse interests (e.g. limiting number of votes per organization, confirming*	*Criterion:* Changed from leadership to baseline to align with updated OMB A-119 Circular (Jan. 2016) Incorporated footnote into criterion. *Evidence:* Clarified that SDOs must submit policy that was active at time decision making body was formed. Policy document should align with ANSI essential requirements 1.3 and 2.3 for balance of interest.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
		standards or b) no single interest category constitutes a majority of the membership of a consensus body dealing with other than safety-related standards. Additional steps have been taken by a number of SDOs to further ensure a balance of diverse interests (e.g. limiting number of votes per organization, confirming accuracy of affiliations, actively recruiting additional members from other stakeholder categories).			*accuracy of affiliations, actively recruiting additional members from other interest categories).*	Added requirement to attest that policy was followed. Added requirement to submit roster of voting members for all decision-making bodies that demonstrates membership by interest category, and that a balance of interests was met. Removed attestation option for standards more than 5 years old.
I.11	B	Decision making procedures/guidance ensured that no single interest category or organization can dominate[12] resolutions made by the decision-making body. *Footnote 12:* ANSI Essential Requirements 1.2 defines "dominate" as "to take a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints."	I.1.6	B	**Lack of dominance in decision-making body(ies).** Decision making procedures/guidance ensured that no single interest category or organization could dominate the decision-making body(ies). *Note: Per OMB A-119 sect 2e(ii), there should be "no single interest dominating the decision-making." 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."*	*Criterion:* Minor wording changes only. Incorporated footnote into criterion. *Evidence:* Moved reference to ANSI essential requirements from evidence to criterion. Removed option to show evidence that no complaints about dominance were received. Added attestation that policy was followed. Added option to show that written complaints and

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						appeals about dominance, were resolved satisfactorily. Added option for attestation that no interested party submitted a written complaint about dominance. Removed attestation option for standards more than 5 years old.
I.12	B	Standards Development Organization has a conflicts of interest[13] policy or procedure that addresses potential conflicts of interest and in particular, that funding sources for standards development are fully disclosed. If significant external funding is made by one or more parties to support standard development, the SDO shall put in place supplemental procedures to ensure that no domination occurs and balance of interests is respected in the standard development process. "Significant funding" shall mean more than $10,000 or its in- kind equivalent, or 20% or more of the anticipated funding needs of the SDO for standard development. *Footnote 13:* Conflict of interest – a situation in which a person or organization is in a position to derive personal benefit from actions or decisions made in their official capacity. (from Google)	I.1.1	B	**Conflicts of interest.** The SDO addressed potential conflicts of interest during the standard's development and fully disclosed funding sources for management of the development of the standard to interested parties. If significant external funding was made by one or more parties to support the standard's development, the SDO had or put in place supplemental procedures to ensure that no conflict of interest occurred in administration of the standard development process. "Significant funding" is defined as more than $10,000 or its in-kind equivalent, or 20% or more of the anticipated funding needs of the SDO for standard development.	*Criterion:* Reworded to be past tense (what happened at the time of developing the standard). *Evidence:* Applicants must submit the policy in use when the standard was developed. Stipulated what the policy should cover. Added attestation that the policy was followed. Removed option to provide disclosure statement about COI in standard, Refined wording to make option clearer to attest that no external funding was received. Added option to provide supplemental procedures to ensure that

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						no COI occurred in cases where significant external funding was received.
I.13	B	Reasonable efforts to achieve consensus[14] are made by the decision-making body and SDO. *Footnote 14:* Per OMB A119 Section 2e(v) "Consensus is defined as general agreement, but not necessarily unanimity. During the development of consensus, comments and objections are considered using fair, impartial, open, and transparent processes."	I.1.11	B	**Consensus effort.** Reasonable efforts to achieve consensus were made by the decision-making body(ies) with procedures to ensure that comments and objections from interested parties were considered using fair, impartial, and open processes. *Note: Per OMB A-119 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."*	*Criterion:* The sub-criterion about comments and objections was moved to I.1.12. *Evidence:* Minor wording changes for consistent terminology. Added attestation that the decision-making policy was followed. Added that voting records could be demonstrated by "letter balloting" (if used). Removed other examples of potential documentation.
I.14	B	Objections regarding procedures received during the standard setting process are documented and made available to interested parties in a timely manner by the standard development organization. Objectors are advised as to their right of appeal. If an objection is made in writing, the SDO makes a timely and meaningful response to the objection, which response is in writing and made available. If an objection is continuing and is not resolved in the development process, objectors are ultimately advised as to their right and scope of appeal.	I.1.12	B	**Technical/substantive comments and/or objections.** Comments/objections regarding the standard received in writing during the standard development process were documented and made available to the decision-making body. The SDO made a meaningful written response to the comment/objection and/or made a responsive change to the standard prior to the decision-making body(ies) moving forward. If a comment/objection was not resolved in the development process, commenters/objectors were advised as to their right and scope of appeal.	*Criterion:* Changed *criterion* to refer to comments and objections, rather than only objections. Changed criterion to refer to technical comments/objections regarding the standard's criteria, rather than regarding procedures (which is addressed in I.I.13).

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Changed "timely" response to "prior to the decision-making body(ies) moving forward." *Evidence:* Specified what the policy/procedure should cover to ensure comments/objections were documented, made available, and responded to. Clarified documentation to submit showing evidence of comments/objections and that they were provided to decision-making body prior to a decision. Added attestation that no comments/objections were received or sustained; or if they were received, they were not sustained. Removed attestation option for standards more than 5 years old.
I.15 / I.16	B	I.15. A documented appeals mechanism is published to address procedural appeals following the final decision. I.16. The process for initiating the appeal is straightforward, requires simple notice (articulation) of the basis for the appeal, and does not impose	I.1.13	B	**Procedural appeals mechanism.** A documented appeals mechanism was published before initiation of the standard's development to address procedural objections. The body handling procedural appeals is separate and independent from the body handling technical/substantive comments/objections.	*Criterion:* Combined I.15 and I.16 into one *criterion* on appeals. Incorporated the pilot decision parameter that "the body handling procedural appeals is

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		redundant or unnecessary costs, paperwork or documentary requirements. A reasonable time[15] is offered from the time of the final vote to the deadline for lodging notice of appeal *Footnote 15:* A reasonable time to file a notice of appeal, as long as the paperwork and documentation burden is limited, is generally considered to be at least 15 days from the date of the final vote.			The process for initiating an 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 is offered between the deadline to lodge a notice of appeal and the time of the final vote/decision. A reasonable time to file an appeal is at least 15 days prior to the date of the final vote.	separate and independent…," which previously was only included in the sources of evidence. *Evidence:* Combined evidence from I.15 and I.16. Stipulated that policy/procedure for appeals was public/available to interested parties; that the policy has clear process defined in straightforward language; that appeals be submitted to an impartial body; and that a reasonable time period to lodge an appeal is provided. Added definition of an impartial body to received appeals. Added attestation that policy was followed. Removed attestation option for standards more than 5 years old.

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Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
I.17	L	At the outset of the standard development process the SDO identified existing standards that may be in conflict or incompatible with the draft standard and demonstrated effort to coordinate and/or resolve conflicts/incompatibilities with those standards, or merge standards, as appropriate.	I.3	L	**Existing standards.** At the outset of the standard development process, the SDO identified existing standards that may have been in conflict, incompatible, or overlapping in content with the draft standard and demonstrated effort to coordinate and/or resolve conflicts/incompatibilities with those standards, or merge or achieve interoperability between standards, as appropriate. Once established, the SDO continues to monitor for new standards that may overlap and seeks to coordinate or resolve any conflicts or incompatibilities.	*Criterion:* Added "that may have been overlapping in content with the draft standard" and "or achieve interoperability between" *Evidence:* Added option to attest that SDO identified existing standards at outset of standard development process. Added option to attest that SDO continues to monitor new standards. Removed option to provide evidence that SDO sought to merge efforts (if existing standard was found). Removed attestation option for standards more than 5 years old
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.	I.8	L	**Standard updates.** Standard has been opened for either revision, continuous maintenance or reaffirmation at least every five years. For a younger standard, it is scheduled to be revised or reaffirmed at least every 5 years.	*Criterion:* Changed from baseline to leadership to align with updated OMB A-119 Circular (Jan. 2016)

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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.	I.2	L	**Analysis of environmental/human health impacts available to participants.** The SDO encouraged decision-making body(ies) members to compile and share analyses conducted and made available to the decision-making body(ies) members any analysis conducted of the environmental and human health issues associated with the product/service category, including those that address life cycle stages, environmental and/or human health hotspots, and/or chemicals of concern under consideration. Such analysis or information provided or shared also demonstrates the methodologies that were utilized. This *criterion* is applicable to both multi- and single- attribute standards. *Note: Standards developers should use the most appropriate types of assessment methods for the determination of the impacts or attributes addressed in the standard. Impact assessment methodologies for issues of toxicity, land use, biodiversity, water use and other spatially explicit impacts are nascent in life cycle assessment (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 LCA databases on these impact areas, even if new methods exist, the results of the studies cannot be relied upon to determine importance.*	*Criterion:* Changed "stakeholders" to "decision-making body(ies) members." Removed "any participant shall be given the opportunity to provide supplementary information if they wish." Incorporated footnote 16 (from old criterion II.3) into criterion as examples of methodologies that should be made available to decision-making bodies. *Evidence:* Changed so applicant submits the documentation showing the analyses/ methodologies used and evidence that the analyses/methodologies were shared; or that such analyses/methodologies were encouraged to be shared.
-	-	-	I.1.2	B	**Transparency of participation procedures.** The procedures or processes for participating in developing the standard were publicly available.	*Criterion:* New *criterion* to reflect updated OMB A-119 Circular (Jan. 2016) Evidence:

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Specified the information that the website should provide (procedures, descriptions of how to participate). Added option for SDOs to provide evidence in cases where they no longer develop standards. Added attestation procedures for participation were transparent/publicly available at the time the standard was developed.
-	-	-	I.1.10	B	**Policies for patented technology.** Standards that include patented technology are governed by Intellectual Property Rights (IPR) policies, which include provisions requiring that owners of the patented technology incorporated into a standard make that IP available to implementers of the standard on nondiscriminatory and royalty-free or reasonable royalty terms (and to bind subsequent owners of standards essential patents to the same terms). The IPR policies should be easily accessible, set out clear rules governing the disclosure and licensing of the relevant intellectual property, and take into account the interests of all parties, including the IP holders and those seeking to implement and assess the standard.	*Criterion:* New c*riterion* to reflect updated OMB A-119 Circular (Jan. 2016) *Evidence:* Added option to attest that standard contains no patented technologies. Added detail on information that patent/ IPR policy should contain.
-	-	-	I.7	L	**Selection of leadership of decision-making body(ies).** Selecting of leadership for decision-making body(ies) was based on fair, impartial and open processes, and transparent to the decision-making body(ies) members.	*Criterion:* New *criterion* to reflect updated OMB A-119 Circular (Jan. 2016) *Evidence:*

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Added detail on information policy should show (impartial and open process such as voting or ballots). Attestation that this procedure was followed during standard development and provided to decision-making body(ies) members.
SECTION II: ENVIRONMENTAL EFFECTIVENESS OF THE STANDARD			SECTION II: ENVIRONMENTAL EFFECTIVENESS OF THE STANDARD Applicants responsible for developing and maintaining the content of the standard should complete Section II. It is required to provide responses for criteria II.1, II.2, as well as II.3 and II.4 when chemical substances of concern are a key hotspot for the purchase category (the four criteria are indicated in peach). The results of the baseline criteria assessment will determine inclusion in EPA's Recommendations and, if multi-attribute or single attribute, potential tiering/preference. Responses to criteria II.4-II.8 are encouraged to inform potential federal users and other interested parties about the standard's approach to addressing environmental impacts and performance opportunities.			Added description of the type of entity that should respond to the section and clarified for which criteria responses are required.
II.1		RELEVANT HOTSPOTS II.1.1 For standards claiming to address the pre-extraction and raw materials sourcing stages, the standard meaningfully and measurably addresses: Flooring & Furniture: [NOT ASSESSED AT THIS TIME FOR FLOORING AND FURNITURE.] Paints/Coatings: • L - Percent recycled, renewable and/or bio-based content • L - Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions	II.2	B/L	**Hotspots/specific lifecycle stage impacts.** Standards shall strive to address all hotspots across the life cycle of the product/service or clearly indicate if they are intentionally only addressing one hotspot or a limited number of hotspots for a product/service. Pollution prevention approaches to addressing climate, toxic chemicals, and materials management are preferred. **II.2.1** For standards claiming to address the pre-extraction and raw materials sourcing stages, the standard meaningfully and measurably addresses the hotspots for the applicable product	*Criterion:* Revised language to include products and service categories. Noted that pollution prevention approaches to addressing key environmental challenges are preferred. *Evidence:*

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
		And II.1.2 For standards claiming to address the manufacturing stage, the standard meaningfully and measurably addresses: Flooring & Furniture: • B - Energy use, fossil fuel use, global warming potential, and/or greenhouse gas emissions • L - Ozone depletion potential			/service category(ies). AND **II.2.2** For standards claiming to address the manufacturing stage, the standard meaningfully and measurably addresses the hotspots for the applicable product / service category(ies). AND **II.2.3** For standards claiming to address the installation/use stages, the standard incorporates by reference or aligns with the standards for the applicable product / service category(ies). AND **II.2.4** For standards claiming to address the end of life stage, the standard meaningfully and measurably addresses the hotspots for the applicable product category(ies). *Note: chemicals substances of concern may also be identified as a hotspot. However, these issues are addressed in criteria II.3, II.4, and II.5.*	Clarification provided that a written justification is to be submitted for each of the key impact categories claimed to be meaningfully and measurably addressed in the standard. Clarification provided that management plan approaches are generally not acceptable for baseline hotpots. Added note that where applicants reference other standards, the referenced standard must meet *criterion* II.2. Added instruction that international equivalencies will be accepted if the applicant can demonstrate equivalence to US standard(s). Deleted category-specific instructions used in the pilot. Deleted evidence needed to meet II.1.5 (now covered in criteria II.3, III.4 and III.5 with detail provided in Appendix A).

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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.	II.7	L	**Trade-offs.** The standard and/or supplementary materials that accompany the standard clearly identifies any known trade-offs among approaches to address multiple impact areas. *Note: Trade-offs should be between different environmental impact areas, not between environmental impacts and non-environmental concerns. Trade-offs may include requirements that proposed environmental criteria identify trade-offs, even if the standard being evaluated does not identify specific trade-offs itself. Simply addressing multiple environmental impacts is not likely to be considered trade-offs.*	*Criterion:* Added definition "trade offs" into *criterion*. *Evidence:* Moved decision parameter about what is sufficient/ insufficient and how to define trade-offs into *criterion* as a note. Added that applicant provides documentation (in the standard and/or supplementary materials that accompany the standard) addressing trade-offs among impacts. Deleted example of documents that may include relevant information.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
II.3	I	**Informational:** Please provide information regarding the research and assessment methods used to determine the approach to addressing impacts. Note: EPA is interested in the environmental and/or human health criteria in the standard being based on recent available research (at the time the standard was developed) that was peer-reviewed and available for stakeholder review. Additionally, standards developers should use the most appropriate types of assessment methods for the determination of the impacts or attributes. *Footnote 16:* Impact assessment methodologies for issues of toxicity, land use, biodiversity, water use and other spatially explicit impacts are nascent in LCA and there is not sufficient scientific evidence to reflect their effectiveness. For those impact areas, LCA is not sufficient in determining relative importance and other methods (e.g., traditional toxicity risk assessment studies, hazard identification, biodiversity surveys/IUCN redlist threats, peer-reviewed scientific literature) should be utilized in making these determinations. Given the vast data gaps in life cycle assessment databases on these impact areas, even if new methods exist, the results of the studies cannot be relied upon to determine importance.	n/a	n/a		*Criterion:* Deleted c*riterion* from Section II as it was directed to SDOs when they set the standard and was difficult to assess as written. Moved key concept of disclosing the methodologies used to establish the standard into (new) c*riterion* I.8 and incorporated footnote 16 text into definition. *Evidence:* N/A (was provided as "optional to be determined by SDO")

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
II.4	B	If a weighting scheme is used, the standard, website, meeting minutes, and/or other supplementary materials that accompany the standard fully and transparently explains the weighting methodologies/point allocations, including identification of the number of points or credits associated with each attribute and a clear explanation of how these points are determined.[17] This criterion is only applicable to environmental and human health attributes. *Footnote 17:* There are a number of potential concerns surrounding weighting and aggregating of impacts. Weighting and aggregation of impacts introduces levels of subjectivity above and beyond the inherent uncertainty in any given impact indicator result. Therefore, such approaches run the risk of reducing transparency—diminishing the opportunity to improve purchasers' environmental literacy and hiding potential environmental and/or human health trade-offs	II.1	B	**Weighting methodologies.** If a weighting scheme is used, the standard, and/or other supplementary materials that accompany the standard and are available to the public, fully and transparently explains the weighting methodologies/point allocations, including identification of the number of points or credits associated with each attribute and a clear explanation of how these points were determined. *Note: Care should be taken to ensure that weighting and aggregating of impacts do not introduce a level of subjectivity above and beyond the inherent uncertainty in any given impact indicator. 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.*	*Criterion:* Added that the information must be publicly available (a decision parameter that was previously only captured in the sources of evidence). Moved the footnote into the *criterion* with minor edits. *Evidence:* Revised evidence to be a URL to webpage (providing information on the number of points or credits associated with each attribute) Added that a clear explanation of how points were determined. Deleted "N/A" alternative to claim that all criteria have equal value, as *criterion* asked for explanation of how any approach was determined, including those standards using equal weightings.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
II.5	L	The standard includes environmental and human health protection criteria to decrease the toxicological hazard[18] of the product through one or more of the following: alternatives assessment; safer substitution; reduction or elimination of hazardous substance(s); or alternative design approaches. Chemical substances of concern include carcinogens, mutagens, Persistent, Bioaccumulative, Toxics (PBTs), reproductive toxicants, and chemicals on the complete and current EPA Toxics Release Inventory (TRI). The standard fully and transparently explains its methodology for the criteria. Alternatives assessment criteria are in accordance with the National Academy of Sciences (NAS) Framework to Guide Selection of Chemical Alternatives. *Footnote 18:* An intrinsic hazard is the potential for harm based on the chemical structure and properties that define its ability to interact with biological molecules. A hazard-based approach, grounded in Green Chemistry principles, can reduce the use of hazardous substances, and lower overall risk to people and the environment. While intrinsic hazard assessment may be the most cautious approach to identifying potential chemicals of concern, intrinsic hazard assessment does not necessarily reflect the overall safety/risk of the product and it does not represent the findings of a comprehensive risk assessment, as it does not consider possible or probable exposure pathways. As such, the results of such an assessment do not necessarily reflect product safety nor the potential trade-offs associated with alternatives/substitutes elsewhere in a product's lifecycle nor impacts on the functional ("fitness for	II.3	B/L	**Reducing Toxicological Hazards.** The standard includes environmental and human health protection criteria to decrease the toxicological hazard of the product through one or more of the following methods: substitution of chemicals of concern for safer alternatives; reduction or elimination of chemical substance(s) of concern; or alternative design approaches. *Note: Chemical substances of concern include carcinogens, mutagens, Persistent Bioaccumulative Toxics (PBTs), reproductive and developmental toxicants, acute mammalian toxicants, repeated dose toxicants, respiratory sensitizers, and chemicals on the complete and current EPA Toxics Release Inventory (TRI) identified as PBTs or other chemicals per Appendix A.*	*Criterion:* Changed from a Leadership criterion to be either Baseline or Leadership depending on if chemicals of concern is a key hotspot for the purchase category. Within the criterion note, added general reference to developmental toxicants, acute mammalian toxicants, repeated dose toxicants, and respiratory sensitizers as additional chemical substances of concern categories. Acceptable lists of chemical substances of concern moved from the example sources of evidence column to a new Appendix A. Augmented the Globally Harmonized System (GHS) categories referenced in Appendix A, consistent with the pilot community agreed upon criteria for credible lists. The pilot assessments indicated it is too challenging to try to determine "equivalent" lists

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
		use") performance of the product. Finally, hazard assessments may not distinguish between hazardous raw materials versus post-reacted and finished products.				or to define a "reputable" list. Have removed reference to the National Academies of Science (NAS) National Research Council 2014 "A Framework to Guide Selection of Chemical Alternatives" as the only acceptable alternative assessment approach. The pilot indicated it was too challenging to determine if an alternative assessment criterion was aligned with the NAS approach. Instead a standard would receive credit in the Framework for incentivizing manufacturers to publicly disclose their alternative assessments (II.6). *Evidence:* Added to evidence that the standard must fully and transparently explains its methodology for the criteria; and must specify at least 1 of the 3 methods listed in the *criterion*. Added need to indicate source(s) consulted in developing criteria to

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						address chemical substances of concern. Added that acceptable source(s) are found in Appendix A, and that sources must be one or more of the lists provided in Appendix A of the Framework.
II.6	L	The standard includes criteria to require or incentivize disclosure (either publicly or to a third party) of all intentionally added chemical substances present in each homogenous material in the final product at 1000 parts per million (.1%) or greater. Note: If the standard is a process and production method (PPM) standard, this Guideline is not applicable, and will not be used in scoring.[19] *Footnote 19:* PPM standards address unfinished (not final) products and have a more limited focus on performance issues related to specific aspects of production or preproduction, such as (for example) extraction or transport.	II.5	L	**Disclosure of all added chemicals: 0.1%.** The standard requires or incentivizes 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 (0.1%) or greater. This guideline is not applicable to process and production method (PPM) standards, which do not address the environmental or human health performance of a finished product. 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.	*Criterion:* Incorporated footnote into *criterion*. *Evidence*: Deleted option of providing an additional source of evidence (outside of those provided in Appendix A) as determining reputability of additional sources is beyond the scope of the IAE assessment task.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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).	II.4	B/L	**Disclosure of chemical substances of concern: 0.01%.** The standard requires or incentivizes *public* disclosure of all intentionally added chemical substances of concern present in each homogenous material in the final product at 100 parts per million (0.01%) or greater. *Note: Chemical substances of concern include carcinogens, mutagens, Persistent Bioaccumulative Toxics (PBTs), reproductive and developmental toxicants, acute mammalian toxicants, repeated dose toxicants, respiratory sensitizers, and chemicals on the complete and current EPA Toxics Release Inventory (TRI) identified as PBTs or other chemicals per Appendix A.* This *criterion* is not applicable to process and production method standards, which do not address the environmental or human health performance of a finished product. Process and production method 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.	*Guideline:* Changed from a Leadership criterion to be either Baseline or Leadership depending on if chemicals of concern is a key hotspot for the purchase category. Incorporated footnotes into guideline. Within the criterion note, added general reference to developmental toxicants, acute mammalian toxicants, repeated dose toxicants, and respiratory sensitizers as additional chemical substances of concern categories. *Evidence:* Deleted option of providing an additional source of evidence (outside of those provided in Appendix A) as determining reputability of additional sources is beyond the scope of the IAE assessment task. Re-worded and simplified option to claim "N/A" by being a process and production method standard reflecting

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						definition given in the criterion text.
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	II.6	L	**Impact assessment disclosure.** The standard requires or incentivizes the manufacturer to *publicly* disclose any of the following (where they may exist): - the results of existing life cycle assessments (LCAs), - an Environmental Product Declaration (EPD) pursuant to ISO standards; - the results of a chemical alternatives assessment; and/or - the results of other environmental and/or human health impact assessments.	*Criterion:* Added disclosure of "the results of chemicals assessments" conducted, which had been included in II.5 (now II.3). *Evidence:* Provided detail that standard must reference at least 1 of the types of assessments listed in the *criterion*. Deleted instruction for IAE to search standard for specific terms (LCA, EPD, life cycle, etc.)
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.	II.8	L	**Innovation**. The standard meaningfully and measurably addresses additional environmental and/or human health impacts beyond those identified in the Section II criteria.	*Criterion:* Minor wording changes. Further explanation of decision parameters provided in Sources of

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						evidence/decision parameter column. *Evidence:* Evidence must include specific text in standard that is claimed as innovative. Provided examples listing types of innovation so easier for applicant to nominate the type of innovation claimed and IAE to assess. Added explanation of what is not generally considered to be innovative: attributes claimed as hotspots in II.2, and generic "innovative credits" that are not specified by the standard.
II.10	I	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.				*Criterion:* Deleted from the Framework as no pilot SDOs provided a response and determining what is an "industry average" environmental/human health performance is currently difficult to measure and assess. *Evidence:*

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						N/A (was provided as "optional to be determined by SDO")
II.11	I	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.				*Criterion:* Deleted from the Framework as no pilot SDOs provided a response and defining quantitative versus qualitative measures was not instructive. *Evidence:* N/A (was provided as "optional to be determined by SDO")

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
SECTION III: CONFORMITY ASSESSMENT			SECTION III: CONFORMITY ASSESSMENT Applicants responsible for conducting conformity assessment or setting rules for those who conduct conformity assessments to the standard, should complete Section III. It is required to provide a response for criterion III.1 (indicated in peach). Applicants (and/or their partner conformity assessment bodies) need to meet criterion III.1 OR criteria III.1.1 to I.1.21 in order to be considered an accredited or conforming certification body for the purposes of the Framework. **Applicants have until December 2023 to demonstrate conformance to this Section of the Framework, at which point, conformance will be required for inclusion in EPA's Recommendations.** *Note: Section III of EPA's Framework provides a mechanism to demonstrate that a CAB is competent to assess conformance with the standard and follows general good practice specific to conformity assessment for environmental performance standards. An alternative method to demonstrate that a CAB is competent to assess conformance to a standard is proof of accreditation by an accreditation body that is a signatory to the International Accreditation Forum Multilateral Recognition Arrangement (IAF MLA) for a scope including ISO/IEC 17065 and this applicable standard. Guidance on Federal Conformity Assessment (15 CFR Part 287) directs federal agencies to identify appropriate private sector conformity assessment practices and programs (including third-party certification) and consider the results of such practices and/or programs as appropriate in procurement activities. The Guidance stresses that responsibility for the determination of appropriateness rests with each agency.*		
III.1	B	The CAB is defined and is independent from the organization whose products/services are being assessed for conformity.	III.1.2	B	**Independence.** The CAB(s) are defined and are independent from the organization whose products/services are being assessed for conformity.	*Criterion:* Changed "CAB" to "CAB(s)" to reflect cases where there is more than one CAB. *Evidence:* Added as option to provide evidence organizational chart showing independence of CAB(s).

ADDENDUM: Changes in the 2022 Update of EPA's Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
III.2	L	The standard, ecolabel and/or SDO are neutral as to the specific CAB entity being used; any accredited/registered CAB can assess conformance to the standard.[22] Reference: ISO/IEC 17007 *Footnote 22:* Note that the revenue from conformity assessment is often necessary to offset the significant investment in standards development and, to address any issues (perceived or real) related to conflicts of interest, organizations should separate the management and operations of conformity assessment and standards development.	III.2	L	**Neutrality.** The standard, ecolabel and/or SDO are neutral as to the specific CAB entity being used; any accredited/ approved CAB can assess conformance to the standard. Reference: ISO/IEC 17007 *Note: 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.*	*Criterion:* Incorporated footnote into *criterion*. Changed 'registered' to 'approved'.
III.3	B	The CAB periodically reviews risks to its impartiality and takes appropriate steps to mitigate identified risks.	III.1.4	B	**Impartiality risks.** Periodically review risks to their impartiality and take appropriate steps to mitigate identified risks.	Minor wording changes
III.4	L	The CAB offers a sliding scale of conformity assessment fees or other means to be accessible to small businesses.	III.4	L	**Fees.** A sliding scale of conformity assessment fees or other means to be accessible to small businesses is offered.	Minor wording changes
III.5 / IV.10	B	III.5. The CAB or SDO publicly discloses the scoring methodology and levels achieved by products that conform to the standard; and describes how the public can access this information. (N/A for pass/fail standards, and if products have not yet been certified to the standard) IV.10. The ecolabel program makes publicly available (free of charge or for a reasonable cost) the criteria and/or standard.	I.1.14	B	**Publicly available criteria.** The SDO makes publicly available (free of charge or for a reasonable cost) the criteria and/or standard.	*Criterion:* Combined into one *criterion* and moved to Section I (previously covered in both Sections III and IV) as this *criterion* is more likely to be met by the SDO rather than the CAB or ecolabel program.

ADDENDUM: Changes in the 2022 Update of EPA's Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
III.6	L	The CAB or SDO publicly discloses the credits achieved by products that conform to the standard; and describes how the public can access this information. (N/A for pass/fail standards, and if products have not yet been certified to the standard)	IV.12	L	**Disclosure of tiers achieved.** The ecolabel program's public directory of conformant products/services and their brand owner (as covered in IV.6) discloses the credits achieved by products/services that conform to the standard in cases where there are tiered results and optional credits. This *criterion* is not applicable to standards that are "pass/fail".	*Criterion:* Moved this *criterion* from section III to Section IV, as the disclosure of credits achieved would likely be done by the ecolabel program rather than the CAB.
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	III.3	L	**Information on financial support.** Public access to, or disclosure of, up-to-date information on the means by which they obtain financial support is provided. *Note: Reflects ISO/IEC 17065 - 4.6*	Minor wording changes

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
III.8	B	The CAB demonstrates (through accreditation by a member body to ILAC or IAF)[23] conformance to relevant standards within the ISO/IEC 17000 series, e.g., ISO/IEC 17065 {for the ecolabeling certification program scope in accordance with (ISO 17020)}; 17025 (testing); 17024 (personnel); 17020 (inspection). OR Apply the evaluation factors below, which are consistent with the requirements of internationally accepted standards for operations of a conformity assessment body. *Footnote 23:* Examples of US-based members to ILAC and/or IAF include ANSI; A2LA; IAS; LAB; NVLAP.	III.1	B	**Accreditation.** Demonstrate conformance to relevant standards within the ISO/IEC 17000 series, e.g., ISO/IEC 17065 (for the ecolabeling certification program scope in accordance with (ISO 17020)); 17025 (testing); 17024 (personnel); 17020 (inspection). Accreditation body must be a member of the International Laboratory Accreditation Cooperation (ILAC) or International Accreditation Forum (IAF). OR, the following criteria apply: III.1.1 – III.1.21, which are consistent with the requirements of internationally accepted standards for operations of conformity assessment body(ies).	*Criterion:* Moved to start of Section III. Clarified which criteria applicants need to meet (i.e. III.1.1-III.1.21) if they are not accredited per III.1. Incorporated footnote into introduction to Section III. *Evidence:* Added option to attest that CAB(s) follow the same procedures for the standard/ecolabel being assessed as for the accreditation. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*. Clarified that stated accreditation body must be a member body to ILAC or IAF.
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	III.1.3	B	**Impartiality of decision-making.** Organizational chart and management system of the CAB(s) reflect impartiality of decision-making on conformity assessment. *Note: Reflects ISO/IEC 17065 - 5.1.1*	*Criterion:* Changed "CAB" to "CAB(s)" to reflect cases where there is more than one CAB. *Evidence:*

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
III.8.2	B	Formal decision-making procedures and thresholds are documented demonstrating rules for when conformance or nonconformance is determined by the CAB.	III.1.13	B	**Documented procedures: standard-specific.** Formal decision-making procedures and thresholds are documented demonstrating rules for when conformance or nonconformance is determined, and this information is publicly available.	*Criterion:* Added the requirement for this information to be publicly available in place of former *criterion* III.8.19. *Evidence:* Added that procedures must be disclosed publicly or available upon request. Added that verification protocols may be submitted as evidence. Clarified that standard text can be used evidence in cases where the standard includes verification protocols. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
III.8.3	B	Free from Undue Pressures. The CAB does not allow commercial, financial or other pressures to compromise impartiality, including ensuring that personnel (management and staff) are	III.1.5	B	**Free from undue pressures.** Commercial, financial or other pressures are not allowed to compromise impartiality, including ensuring that personnel (management and staff) are free from such pressures.	*Criterion:* Minor wording changes *Evidence:*

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
		free from such pressures. Reflects ISO 17065/IEC - 4.2.2			*Note: Reflects ISO 17065/IEC - 4.2.2*	Added that policy/procedure must clearly describe risks and safeguards against them. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
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	III.1.6	B	**Conflict of interest policy.** Procedure or policy in place 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. *Note: Reflects ISO/IEC 17065 4.2 AND 5.2*	*Criterion:* Minor wording changes. *Evidence:* Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
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	III.1.12	B	**Documented procedures: general.** Procedures are documented for conformity assessment 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. *Note: Reflects ISO/IEC 17065 - 8.1*	*Criterion:* Clarified that the c*riterion* applies to general CAB procedures. Minor wording changes. *Evidence*: Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
III.8.6	B	Take All Necessary Steps to Evaluate Conformance. The CAB demonstrates that it takes all steps necessary to determine conformance with the standard, following the principles of ISO 17000: 2004 [24]. Reflects ISO/IEC 17065 – 7.4.1; 7.1.2; 7.2, 7.3, 7.4, 7.5, 7.6 *Footnote 24:* ISO 17000: 2004: Vocabulary and General Principles. See: https://www.iso.org/standard/29316.html *[link updated]*	III.1.14	B	**Take all necessary steps to evaluate conformance.** Demonstrate that they take all steps necessary to determine conformance with the standard.	*Criterion:* Deleted "following the principles of ISO 17000: 2004". *Evidence:* Emphasized that evidence must be specific to the particular standard submitted for assessment, rather than general procedures for any standard. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
III.8.7	B	Role separation. The CAB demonstrates that the process for making conformity decisions includes an independent review that the product has met the specified requirements. Reflects ISO/IEC 17065 7.6	III.1.11	B	**Role separation.** The process for making conformity decisions includes an independent review that the product/service has met the specified requirements. *Note: Reflects ISO/IEC 17065 7.6*	*Criterion:* Minor wording changes. *Evidence:* Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
III.8.8	B	Certification Conditions Specified. The CAB demonstrates that it documents how and when conformance is maintained, extended or suspended or withdrawn. Reflects ISO/IEC 17065 - 7.6.2	III.1.16	B	**Certification conditions specified.** Documentation of how and when conformance is maintained, extended, suspended or withdrawn is publicly available. *Note: Reflects ISO/IEC 17065 - 7.6.2*	*Criterion:* Minor wording changes. Added the requirement for this information to be publicly available in place of former *criterion* III.8.19.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Evidence: Added that policy/procedure should also cover certifications being withdrawn. Added that the policy/procedure is disclosed publicly or available upon request. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
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	III.1.19	B	**Non-conformity procedure.** In the event that non-conformity is substantiated, a procedure is established that considers and decides on appropriate action such as increased surveillance, reduction in the scope of the certification to remove non-conforming products/services, suspension of the certification or withdrawal of the certification. *Note: Reflects ISO/IEC 17065 - 7.11.1*	*Criterion:* Minor wording changes. *Evidence:* Emphasized that evidence must be specific to the particular standard submitted for assessment, rather than general procedures for any standard. Clarified that procedure must be publicly available. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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	III.1.10	B	**Records management.** Procedures for ensuring documents are identified, stored, protected, retrieved and retained and disposed of to ensure the protection of confidential information. *Note: Reflects ISO/IEC 17065 - 8.4.1*	*Criterion:* Changed "CAB" to "CAB(s)" to reflect cases where there is more than one CAB. *Evidence:* Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
III.8.11	B	Dispute Resolution Procedures. The CAB has a documented policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals. (N/A if CAB does not address complaints and appeals. This is addressed for SDOs in Section IV.) Reflects ISO/IEC 17065 - - 7.13.1 (ISO/IEC 17065 takes out term "disputes").	III.1.21	B	**Dispute resolution procedures.** A documented and publicly available policy/procedure for receiving, evaluating, resolving, and documenting complaints and appeals is in place. This c*riterion* is not applicable if the CAB does not address complaints and appeals. (This is addressed for ecolabel programs in Section IV.) *Note: Reflects ISO/IEC 17065 - - 7.13.1*	*Criterion:* Changed "CAB" to "CAB(s)" to reflect cases where there is more than one CAB. Clarified when N/A is appropriate. Provided cross reference to Section IV to reduce duplication in cases where same applicant answers Sections III and IV. *Evidence:* Removed option to provide sample records of complaints and appeals. Added option to attest that the CAB does not address complaints and appeals, with an indication of the entity that addresses this activity.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
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.	III.1.15	B	**Traceability procedures.** Traceability or chain-of-custody procedures are in place where this is necessary to ensure qualified products/services meet the standard. This *criterion* may not be applicable to all standards.	*Criterion:* Minor wording changes. Clarified when N/A is appropriate. *Evidence:* Minor wording changes.
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	III.1.18	B	**Periodic evaluation of marked products/services.** When continuing use of a conformity assurance mark on a product/service is authorized, the CAB(s) periodically conduct surveillance of marked products/services to ensure ongoing validity of continued conformance. This *criterion* is not applicable if the CAB(s) do not conduct market surveillance. (This is addressed for ecolabel programs in Section IV.) *Note: Reflects ISO/IEC 17065 - 7.9.3*	*Criterion:* Changed "CAB" to "CAB(s)" to reflect cases where there is more than one CAB. Minor wording changes. Clarified when N/A is appropriate. *Evidence:* Added option to attest that the CAB(s) do not conduct market surveillance; attestation to indicate the entity that addresses this activity. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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	III.1.17	B	**Content of declarations of conformity.** Provide declarations of conformity that clearly convey information on: the name and address of the CAB; the date conformity assurance is granted; name and address of the client; the scope of the conformity assurance; the term or expiration date of conformity assurance; the signature or other defined authorization of the person(s) of the CAB assigned such responsibility. *Note: Reflects ISO/IEC 17065 - 7.7.1 & 7.7.2*	*Criterion:* Minor wording changes. *Evidence:* Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
III.8.15	B	Suitable Action for Misuse. The CAB has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product is conformant, including market surveillance. Procedures describe actions to take for incorrect, misleading or un-authorized use of its mark and licenses. (N/A if CAB does not address misuse of marks or licenses. This is addressed for SDOs in Section IV.) Reflects ISO/IEC 17065 - 4.1.3.1, 7.11.1, 7.9.3 and 7.9.4	III.1.20	B	**Suitable action for misuse.** Established procedures to control the use of their licenses, certificates, marks of conformity, and any other mechanisms for indicating a product/service is conformant. 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. This *criterion* is not applicable if the CAB does not address misuse of marks or licenses. (This is addressed for ecolabel programs in Section IV.) *Note: Reflects ISO/IEC 17065 - 4.1.3.1, 7.11.1, 7.9.3 and 7.9.4*	*Criterion:* Minor wording changes. Clarified when N/A is appropriate. *Evidence*: Added to attestation the need to indicate the entity that addresses this activity. Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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.	III.1.9	B	**Quality objectives.** Documented commitment to fulfilling quality objectives and/or an established quality management system that is implemented in the CAB(s)'s organization. Reflects ISO/IEC 17065 - 8.2.1. *Note: 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 Glossary, https://asq.org/quality-resources/quality-glossary/q). An example of a standard for quality management systems is ISO 9000, see: https://www.iso.org/iso-9001-quality-management.html.*	*Criterion:* Clarified when N/A is appropriate. Incorporated footnote into *criterion*; added references. *Evidence:* Specified that quality document submitted should be a quality management system manual and/or internal audit and management report for CAB(s). Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
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	III.1.7	B	**Sufficient personnel.** Process to ensure that CAB(s) have sufficient personnel with the education, training, technical knowledge and experience necessary for performing conformity assessment functions. *Note: Reflects 17065/IEC - 6.1.1.1*	*Criterion:* Changed "CAB" to "CAB(s)" to reflect cases where there is more than one CAB. *Evidence:* Added requirement for CAB(s) to describe how they ensure that they have enough staff to conduct certifications and that staff is qualified for conformity assessment activities.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*.
III.8.18	B	Adequate Facilities & Equipment. The CAB has all the facilities and equipment needed to carry out its work; if testing is required by the standard, competent and/or accredited laboratories are utilized. (N/A if testing is not required.) Broadly reflects ISO/IEC 17065 - 7.3.1	III.1.8	B	**Adequate facilities & equipment.** All the facilities and equipment needed to carry out their work are in place; if testing is required by the standard, competent and/or accredited laboratories are utilized. This *criterion* is only applicable if testing is required by the standard. *Note: Broadly reflects ISO/IEC 17065 - 7.3.1*	*Criterion:* Changed "CAB" to "CAB(s)" to reflect cases where there is more than one CAB. Clarified when N/A is appropriate. *Evidence*: Added as option to include ecolabel program requirements for CABs to utilize laboratories accredited to ISO 17025 or equivalent standard.
III.8.19	B	Transparent Process. The CAB or SDO maintains through publications, electronic media or other means, and makes available upon request, information about the conformity assessment process including the rules and procedures for granting, maintaining, extending, reducing the scope of, suspending, withdrawing or refusing conformity assurance. Reflects ISO/IEC 17065 - 4.6	-	-	-	*Criterion:* Incorporated into III.1.13 and III.1.16. *Evidence:* Incorporated into III.1.13 and III.1.16.
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	III.1.1	B	**Information on fees.** Provide general information on fees to those seeking certification and clients. *Note: Reflects ISO/IEC 17065 - 4.6*	*Criterion:* Clarified who the information should be available to (those seeking certification).

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Evidence: Clarified that ecolabel programs with multiple CABs can provide evidence of their requirements for CABs to meet *criterion*. Clarified that evidence should show example communications to those seeking certification.
SECTION IV: MANAGEMENT OF ECOLABELING PROGRAMS [25] Footnote *25:* The Management of Ecolabeling Programs criteria would not apply to product environmental standards that are not associated with an ecolabel.			SECTION IV: MANAGEMENT OF ECOLABELING PROGRAMS Applicants responsible for ongoing management of the ecolabel program should complete Section IV. It is not required to respond to this section. Where applicable, responses to this section are encouraged to inform potential federal users and other interested parties about the governance and implementation of the ecolabel.			
IV.1	B	The ecolabel program has a documented commitment to fulfilling quality objectives and/or an established quality management system[26] that is implemented in the organization. *Footnote 26:* A quality management system is a formalized system that documents the structure, responsibilities, and procedures required to achieve effective quality management. American Society for Quality (ASQ) Quality Glossary. Accessed online 12/3/2015 at https://asq.org/quality-resources/quality-glossary/q. An example of a standard for quality management system is ISO 9000, see https://www.iso.org/iso-9001-quality-management.html *[link updated]*.	IV.3	B	**Quality objectives.** The ecolabel program has a documented commitment to fulfilling quality objectives and/or an established quality management system that is implemented in the organization. *Note: 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 Glossary, https://asq.org/quality-resources/quality-glossary/q). An example of a standard for quality management systems is ISO 9000, see https://www.iso.org/iso-9001-quality-management.html [link updated].*	*Criterion:* Minor wording changes. Incorporated footnote into *criterion*. *Evidence:* Added instruction that "at least one" of the forms of evidence must be submitted. No other change made to evidence.
IV.2 / IV.3 / IV.4	L	IV.2. 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.	IV.16	L	**Evaluate effectiveness.** 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. The ecolabel program, or a third party,	*Criterion:* Combined three criteria that addressed the same

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
		IV.3. An evaluation, by the ecolabel program or a third-party, of the effectiveness of the standard in reducing environmental and/or human health impacts has been completed within the previous 5 years. IV.4. Results of the evaluation are publicly available. *Footnote 27 (in sources of evidence column):* The ISEAL Code of Good Practice for Assessing the Impacts of Social and Environmental Standards (Impacts Code). https://www.isealalliance.org/defining-credible-practice/iseal-codes-good-practice.			has completed an evaluation within the previous five years, and the evaluation is publicly available.	concept into one (prev. IV.2 IV.3 and IV.4). *Evidence:* Combined evidence required from previous three criteria. Listed evidence that must be included (policy/procedure, methodology, report, data sources; URL to report and/or attestation that report is available on request)
IV.5	B	The ecolabel program has a documented and publicly available policy or procedures for receiving, evaluating, resolving, and documenting complaints and appeals concerning the management of the ecolabel program.	IV.9	B	**Dispute resolution procedures.** The ecolabel program has a documented and publicly available policy/procedure for receiving, evaluating, resolving, and documenting complaints and appeals concerning the management of the ecolabel program.	*Criterion:* Other than adding a title to the criterion, no changes. *Evidence:* Deleted need to provide sample of records of complaints and corrective actions as this covered further in c*riterion* III.1.21. Deleted need to provide website address for complaints and appeals as URL's used at time likely out of date.

ADDENDUM: Changes in the 2022 Update of EPA's Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
IV.6	B	The ecolabel program makes publicly available the stakeholders[28] who are involved in the ongoing governance and/or operations of the ecolabel program. *Footnote 28:* Stakeholders are defined as those organizations or individuals directly and materially affected by the ecolabel program and who have an ongoing relationship with the program and are involved in either its governance and/or operations.	IV.4	B	**Disclose governance.** The ecolabel program makes publicly available the names and organizations of people who are involved in the ongoing governance and/or operations of the ecolabel program *Note: For example, this may include board members, funders, and members of technical committees associated with the ecolabel program.*	*Criterion:* Incorporated footnote into *criterion*. *Evidence:* Specified that names and organizations involved in ongoing organizations should be listed on website provided and in information about the program.
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.	IV.2	B	**Free from undue pressures.** The ecolabel program does not allow commercial, financial or other pressures to compromise impartiality, including ensuring that personnel (management and staff) are free from such pressures.	*Criterion:* Reworded for consistency with III.1.5. *Evidence:* Described information sought in policy/procedure (governance structure, risks, and safeguards).
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.	IV.10	L	**Information on financial support.** The ecolabel program provides public access to, or disclosure of, up-to-date information on significant funding received for administering the ecolabel program. *Note: "Significant funding" is defined as more than $10,000 or its in-kind equivalent, or 20% or more of the anticipated funding needs for administering the ecolabel program.*	*Criterion:* Incorporated footnote into *criterion* *Evidence:* Clarified that need to disclose significant funding sources only (as defined in *criterion*)
IV.9	B	The ecolabel program provides general information on fees, and makes this information available to applicants.	IV.1	B	**Information on fees.** The ecolabel program provides general information on fees and makes this information available to those seeking to use the ecolabel.	*Criterion:* Minor wording changes. *Evidence:*

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
						Listed type of evidence required – webpage with fee information, and process by which fee information can be requested.
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).	IV.5	B	**Grant the use of the mark.** The ecolabel program grants the label, mark, or registration if the product/service is demonstrated to be in conformance with the applicable standard, and the organization seeking to use the label, mark, or registration meets the administrative and technical requirements of the program (such as paying fees and accepting license agreements). This *criterion* is not applicable if the ecolabel program does not grant the use of the mark. (This is addressed for CABs in Section III.)	*Criterion:* Provided clarification of when N/A is appropriate – cross reference to Section III for applicants answering both sections to reduce redundancy. *Evidence:* Replaced "declaration" with "attestation".
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.	IV.8	B	**Suitable action for misuse.** The ecolabel program has established procedures to control the use of its licenses, certificates, marks of conformity, and any other mechanisms for indicating a product/service meets the standard. Procedures describe actions to take for incorrect, misleading, or un-authorized use of its mark and licenses including suspension or removal of the mark if warranted. This *criterion* is not applicable if the ecolabel program does not address misuse of marks or licenses. (This is addressed for CABs in Section III.)	*Criterion:* Provided clarification of when N/A is appropriate – cross reference to Section III for applicants answering both sections to reduce redundancy. *Evidence:* Added alternative to attest that program does not address misuse of marks or licenses. If used, attestation must indicate the entity that addresses this activity.

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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.	IV.7	B	**Periodic evaluation of marked products/services.** When continuing use of a conformity assurance mark on a product/service is authorized, the ecolabel program periodically conducts surveillance of marked products/services to ensure ongoing validity of continued conformance. This *criterion* is not applicable if the ecolabel program does not conduct market surveillance. (This is addressed for CABs in Section III.)	*Criterion:* Changed from leadership to baseline and reworded for consistency with III.1.18. Provided clarification of when N/A is appropriate – cross reference to Section III for applicants answering both sections to reduce redundancy. *Evidence:* Specified that policy/ procedures show indicate how long products/services can display the certification mark demonstrating conformance; and should describe surveillance activities. Deleted need to submit market surveillance report. Added alternative to attest that program does not conduct market surveillance. If used, attestation must indicate the entity that addresses this activity.

ADDENDUM: Changes in the 2022 Update of EPA's Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
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.	IV.15	L	**Ecolabel differentiation.** 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.	*Criterion:* Other than adding a title to the criterion, no changes. *Evidence:* Minor wording change.
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.	IV.11	L	**Mutual recognition.** The ecolabel program participates in mutual recognition activities such as equivalency assessments; formal mutual recognition of standards; and/or technical, administrative, or CA procedures.	*Criterion:* Minor wording changes. Evidence: Deleted option to use as evidence organizations' participation in for example ISO, ISEAL Alliance, Global Ecolabelling Network, ASTM, etc. as participation in these organizations does not necessarily ensure mutual recognition activities.
IV.16 / IV.17 / III.5	L	IV.16 The ecolabel program makes publicly 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. 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 III.5. The CAB or SDO publicly discloses the scoring methodology and levels achieved by products that conform to the standard; and describes how the public can access this information.	IV.6	B	**Publicly available and current directory.** The ecolabel program makes publicly available a directory of conformant products/services and their brand owner. The directory is up to date, and/or has been updated in the last 3 months. The directory can be searched so that users can find conforming products/services and suppliers. For tiered standards (e.g. gold, silver, bronze, etc.), the directory identifies levels achieved by products/services that conform to the standard.	*Criterion:* Changed from leadership to baseline as this *criterion* was met by most of the pilot submissions. Changed the minimum period that the directory be updated to the last 3 months (from 6 months). Added requirement that the directory can be searched, which was previously in IV.17

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
		(N/A for pass/fail standards, and if products have not yet been certified to the standard)				Added requirement to identify levels achieved, which was previously in III.5. *Evidence:* Deleted need to provide instructions to public on accessing directory. Added need to explain or demonstrate how the directory is searchable. Added that directory must identify levels achieved by products/services or show that standard does not result in tiers.
IV.18	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.)	IV.13	L	**Regional information in directory.** The ecolabel program's public directory of conformant products/services and their brand owner (as covered in IV.6) provides information on the regions where these products are available (e.g., information on the location of suppliers; national or sub-national regions where products/services are available on the market).	*Criterion:* Changed from informational to leadership *Evidence:* Added that directory must show supplier addresses/location information; and where products/services are available (e.g. country, state, other sub-national region).
IV.19	I	Informational: To further EPA's understanding in this area, we are seeking information from ecolabel programs on if/how the ecolabel program conducts	IV.17	L	**Market uptake.** The ecolabel program conducts or participates in periodic analyses and/or publishes the uptake of the ecolabel in the marketplace.	*Criterion:* Changed from informational to leadership

Old #	Old B/L	Old Criteria	New #	New B/L	New Criteria	Changes
		or participates in a periodic analysis and/or publishes the uptake of the ecolabel in the marketplace				*Evidence*: Minor wording change made.
IV.20	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.	IV.18	L	**Balance of interests.** The ecolabel program has rules and procedures that aim to ensure a balance of interests among people who are involved in the ongoing governance and/or operations of the ecolabel program.	*Criterion:* Changed from informational to leadership *Evidence*: Minor working change made.
-	-	-	IV.14	L	**Machine readable directory.** The ecolabel program's public directory of conformant products/services and their brand owner (as covered in IV.6) provides the directory in such a way that other programs can efficiently access the information, and the data are "machine readable".	*Criterion:* Added new *criterion* as a follow on to IV.6, to reflect current trend in the market for online, machine-readable information increasing the quantity and quality of information available to purchasers. *Evidence*: Added that applicants should submit a description of the technical infrastructure used to enable machine-readability, e.g., use of an application program interface (API).