



**CRITERIA FOR CERTIFICATION
PRODUCT ENVIRONMENTAL INNOVATION, GS-20 Edition 2.0
Sub-Category: Chemical Dispensing Systems**

APPLICANT INFORMATION:	
Company:	3M
Product Name:	3M™ Chemical Management Systems: (1) 3M™ Twist ‘n Fill™ Chemical Management System (2) 3M™ Flow Control Chemical Management Systems (Locking Cabinet) (3) 3M™ Flow Control Chemical Management Systems (Portable)
Website:	www.3M.com/facility

Introduction. Green Seal’s Environmental Innovation Standard (GS-20) provides a framework for the certification of environmental innovations. This certification demonstrates that an independent third party has verified the innovative aspect(s) of a product results in a significant reduction of human health and environmental impacts compared to products of the same functional class, achieving innovations not previously demonstrated within a product category. Certification neither constitutes the development of a product category standard or benchmark, nor does it require competitors within a product category to use the same innovation strategies in their approach to claiming innovation.

Certification of Environmental Innovation. Conformance to the requirements in this document will result in the applicant noted above receiving the Green Seal Certification of Environmental Innovation.

Innovation Claim. The applicant claims that this product differs from others on the market because they achieve significantly improved dilution accuracy, which over time results in reduced water quality degradation and reduced risk to aquatic life.

Disclaimer. This Certification is not intended to identify all possible negative impacts and cannot rule out any unknown negative consequences from the use of this product.

Public Comment. A public comment period was held in June 2019. A Response to Comment Document is available at greenseal.org/green-seal-standards/gs-20.

OVERVIEW

1.0 Eligibility

3M™ Chemical Management Systems by the company 3M are eligible to be certified under the Environmental Innovation Standard (GS-20, Edition 2.0), because the products are:

- Commercially available
- Existing within a market that has comparable options that achieve the same function, and
- Have lifecycle phases for which published health and environmental impact information from credible sources exist.

Product Function

3M™ Chemical Management Systems by the company 3M, when used as intended, provide the following functions:

- 1) Automatic chemical dispensing that safely and accurately dilutes chemical concentrates to create ready-to-use cleaning products for industrial, institutional, and commercial facilities.
- 2) Dispenses multiple chemical solutions from a single device to create ready-to-use cleaning products.

Comparable Alternatives

Comparable products on the market include similar automatic chemical dispensers. At least five competitor products exist for both wall mounted and portable chemical management systems.

Legal Compliance

Manufacturer shall not be in violation of any applicable environmental regulations or laws, nor any applicable regulations under the authority of the U.S. Federal Trade Commission, U.S. Food and Drug Administration, or the U.S. Environmental Protection Agency.

During the Certification Evaluation, manufacturer shall provide a statement that it has not violated any applicable environmental regulations or laws and regulations under the authority of the U.S. Federal Trade Commission, the U.S. Food and Drug Administration, or the U.S. Environmental Protection Agency in the past two years. Statement shall be signed and dated on company letterhead.

2.0 Product Lifecycle Impact Review

This section documents the anticipated human health and environmental lifecycle impacts associated with chemical management systems, noting the most significant (i.e., greatest in negative effect) impact, and includes a detailed technical summary to support the findings in Annex A.

Summary of Lifecycle Impact Review – Chemical Dispensing Systems

Lifecycle Phase	Impacts Identified
Resource Extraction	No significant impacts identified.
Manufacturing	No significant impacts identified.
Use	Water quality degradation and risk to aquatic life. Worker exposure to cleaning chemicals.
Waste Management and Disposal	No significant impacts identified.

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Resources and Manufacture Phases

No significant impacts identified. The applicant's chemical dispensers are made primarily of polypropylene plastic, 300 series stainless steel, brass fittings, nylon braided hose, and EPDM Seals – similar in resource use and environmental impact to alternative systems.

Use Phase

Industrial, institutional, and commercial chemical-based cleaning solutions can create impacts to worker health from ongoing exposure, and may end up in wastewater or pose risks to aquatic life.

Advancements in the chemical industry have led to the proliferation of concentrated cleaning chemicals that are diluted and dispensed on site. Among other benefits, diluting chemicals on site allows for the avoidance of transporting water necessary for ready-to-use products, reducing greenhouse gas emissions associated with transportation. For example, for every 100 miles¹ cleaning products travel for shipping and distribution, concentrated cleaning products save 4.3 MTCO₂e, avoiding the equivalent of over 10,000 miles driven by an average passenger vehicle.

While there are benefits to diluting and dispensing concentrated cleaning chemicals on-site, the process poses considerations regarding concentration (i.e., dilution) accuracy that must be addressed to minimize exposure risks to worker health and the environment.

Cleaning solutions that are too highly concentrated may unnecessarily increase chemical use, cause surface damage, increase worker exposure to cleaning chemicals, pose possible increases in hazard profiles, and result in higher amounts of cleaning chemicals in wastewater and groundwater, which pose risks to local water quality and aquatic life.

Cleaning solutions that are less concentrated than the target dilution may require more time and effort for cleaning and create an incentive for workers to tamper with the dispensing system. Disinfecting solutions that are overly diluted may not be effective in meeting the necessary kill ratios, potentially leading to increased infections or outbreaks. If the facilities are not cleaned and disinfected as required due to low concentrations of active ingredients, additional cleaning will be required, causing more use of product, additional exposure of workers, and more polluting chemicals added to the waste and water streams unnecessarily.

In addition, increased accuracy of the dilution can help reduce a number of environmental and health problems; some of them can also influence costs. Chemical dispensing systems with high dispensing accuracy can provide a reduction in environmental and human health impact. Higher accuracy leads to better control of the concentrations of active ingredients in the final product, which in turn is expected to lead to the reduced use of water and cleaning chemicals and more reliable soil removal and microbial control.

Cleaning solutions that are delivered with less consistent concentrations may cause workers to set higher target concentrations in order ensure expected cleaning performance, or to over-dilute the final product which results in a cleaning solution that is not effective – leading to lower hygiene or the need for repeated cleanings, thereby using more water and cleaning chemicals than are necessary.

¹ On average, semi-trucks have a fuel economy of 6.5mpg. ([Source](#)) Driving 100 miles would require about 15 gallons of gas. 32 trucks driving 100 miles would require 480 gallons of gas. Using the [EPA's Greenhouse Gas Calculator](#), 480 gallons of gas produces 4.3 MTCO₂e. This is the savings gained from shipping concentrated formulations, rather than trucking 32 trucks worth of ready-to-use product increments of 100 miles.

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Waste Management and Disposal Phases

No issues were identified for this life-cycle phase.

CERTIFICATION REQUIREMENTS

3.0 Environmental Innovation Review

This section details the applicant's proposed innovation claims, including

- Innovation Summary: describes how the applicant claims their product differs from comparable products on the market,
- An Impact Reduction Statement: describes how the applicant claims their product's innovation results in reductions of significant lifecycle impacts identified in the Product Lifecycle Impact Review,
- Market Analysis: describes the parameters for the applicant to demonstrate their claim that the product is the first and only product of its type to achieve this innovation during the Certification Phase, and
- Drawbacks Analysis: a summary of any potential drawbacks that Green Seal has identified and mitigations necessary.

The applicant has opted to demonstrate innovation through *Improved Function*, which states:

Demonstrate an improved functional output of the product through industry standard functional performance indicators for the product category. This improved function shall result in a reduction of the significant human health and environmental impacts. Functional performance shall show at least 30% improvement for one performance area, or 20% improvement for each of two or more performance areas.

3.1 Product Differentiation. The innovation shall distinguish the product from products of the same function available on the market.

Innovation Summary – How does this product differ from others on the market?

The applicant claims their Chemical Management Systems differ from others on the market because they achieve significantly higher dilution accuracy in typical and ideal PSI ranges for buildings (i.e., 30-80 PSI).²³

Measured average dilution accuracies of each Chemical Management System shall measure at least 30% more accurate when compared with the measured average dilution accuracies of five leading systems on the market, following the testing requirements described in Section 4.0.

The applicant states that they have achieved improved dilution accuracy in part through the design of the applicant's proportioning valve and the metering orifice (with no moving parts), and the introduction of a new metering orifice (with each package of concentrated cleaning product). The applicant states that this design approach allows for higher dilution accuracy of the systems without the need for maintenance or servicing.

² Both the International Plumbing Code (Section 604.8) and the Uniform Plumbing Code (Section 608.2) cite 80 PSI as the maximum allowable PSI, and require regulation if PSI is over 80. In addition, UPC (Section 608.1) requires regulation of the system when minimum water pressure is below 15 PSI. Currently, 47 states require conformance to either IPC or UPC, though auditing of building water systems shows that water pressure can vary significantly outside typical regulated range. Water pressure variables include (but not limited to): building design & size, placement of dispenser (floor/level), water source pressure, distance from water source, capacity of plumbing system types, elevation, and age of plumbing systems.

³ The applicant products are specifically designed to deliver dilution accuracy at very low (< 30 PSI) and very high (80+ PSI) ranges that can be present in buildings when water pressure is tested. Initial test data does not include very low and very high ranges; applicant may submit data within these ranges for third-party review and verification of these claims.

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During the Certification Phase, Green Seal will verify these claims through a technical review.

- 3.2 Reduces Impacts.** The innovation shall reduce significant environmental and human health impacts compared to products of the same function, as established in the Product Lifecycle Impact Review.

Impact Reduction Summary – How does the innovation result in impact reduction?

The applicant claims that greater accuracy of the applicant dispensing systems can be reasonably expected to reduce human health and environmental impacts associated with the use phase when compared to systems with less dilution accuracy by providing users with a more reliable concentration of active ingredients in the final product.

Providing greater dilution accuracy avoids the need to dial in higher concentrations to ensure that the resulting solution will be able to perform its intended function. This limits worker exposure to chemicals within the systems to a minimum.

Over time, greater dilution accuracy will result in less excess chemicals in draining systems and entering local waterways, where they cause risk to aquatic life and contribute toward overall water quality degradation.

Greater accuracy dilution also reduces the likelihood that a solution may not have enough active ingredients to perform adequately. Greater consistency in cleaning solutions will provide a commensurate increase in the consistency of cleaning and disinfection.

During the Certification Phase, Green Seal will verify these claims through a technical review.

- 3.3 First to Market.** The product shall be the first and only within its functional class sold on the North American market to claim this innovation.

Market Analysis – How unique is this innovation?

During the Certification Phase, applicant shall provide evidence that demonstrates the applicant products are the first and only dispensers on the market to achieve dispensing accuracies at least 30% better than five comparable alternatives.

Green Seal will verify the results of this analysis through stakeholder engagement, market research, and through review of test data.

- 3.4 Mitigates Burden Shifting.** The applicant shall implement mitigation requirements, as determined by Green Seal, to account for *burden shifting* that results from the innovation.

Drawbacks Analysis – Has burden shifting occurred?

Green Seal has identified no drawbacks or burden shifting versus comparable alternatives.

Green Seal has determined that no mitigation is necessary. Stakeholder engagement did not identify burdens that must be mitigated.

- 4.0 Evaluation of Functional Performance and Fitness for Purpose**

Applicant shall meet the requirements in this section to demonstrate the product achieves a dilution accuracy at least 30% better than five nationally recognized or market-leading product of its type. Green Seal shall approve five competitor systems included in the test.

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Test Methods

The applicant shall use objective, scientifically validated methods conducted under controlled and reproducible laboratory conditions to test dilution error, dilution accuracy, and relative improvement in accuracy, as described below.

Short Description of Test.

Four commonly used⁴ chemical products are tested to document dilution accuracy across range of water pressures. Variables are limited whenever possible. Water pressure ranges measured represent ideal water pressure within typical buildings (i.e., 30-80 PSI).

Applicant dispensing systems and five competitor systems are primed and used, the flow rates and chemical concentrations are recorded, and dilution accuracies are calculated at various pressures.

One set of data is produced:

- Dilution accuracy as tested using PSIs within competitor products stated ranges (typically 30-80 PSI).

Purpose and Scope of Test.

The purpose of the test is to understand consistency in system performance⁵ for chemical dispensing systems available in the market in 2019, as well as trends in relative improvement of dilution accuracy when comparing chemical dispensing systems.

All tests must use brand new dispensers and chemical concentrate bottles, purchased as close to the beginning of testing as feasible. Common wear & tear on the dispensing units/bottles was not considered. All tests performed in corporate R&D laboratory by technical personnel, thus not factoring in common user error and wear & tear on the dispensing units/bottles.

New dispensers delivered by the manufacturer and distributor provides a procurement and delivery method similar to that of a typical customer. All new dispensers are to be used and installed per manufacturer directions and void of defects and malfunctions at the time of testing. Any observed leaks, defects, or other malfunction is grounds for removing the unit from testing and replacing with a new properly functioning dispenser. A complete data set shall be gathered from a dispenser free of defects and malfunctions.

Terminology.

- **Dilution Accuracy:** the reliability (expressed as a percent) that the concentration of active ingredients is dispensed in the final product exactly as intended.
- **Dilution Error:** calculated as the absolute value of the difference between the intended concentration as listed on the product label and the actual concentration achieved by each test system, expressed as a percentage of the intended concentration.
- **Average Dilution Error:** a calculation of [the difference between dilution error of the applicant's dispenser and each benchmark product], divided by [the dilution error of the benchmark product].⁶

⁴ A 2014 study by Kline, *Janitorial and Housekeeping Cleaning Products USA: Market Analysis and Opportunities*, 8th Edition, cites (1) General Purpose Cleaners, (2) Disinfectants & Sanitizers, (3) Glass Cleaners, and (4) Floor Cleaners as the most commonly used chemicals relevant to this application.

⁵ Defined as dilution accuracy and dilution error.

⁶ The theoretical maximum improvement would be 100%, which would be the case if the dilution error for the applicant's dispenser were zero.

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$$\text{Improvement} = \frac{\% \text{Err}_{\text{benchmark}} - \% \text{Err}_{\text{Applicant}}}{\% \text{Err}_{\text{benchmark}}}$$

For the purposes of this evaluation, competing products on the market are used for benchmark products.

Personnel.

One technical FTE is necessary to conduct the test. Test measurements and readings shall be performed by qualified Laboratory personnel.

Facilities.

All testing is completed within one 3M R&D laboratory under standard operating conditions:

- 72F
- 30-50% relative humidity
- Water temperature at standard cold line input, 40°F to 70°F

Equipment.

The following equipment is necessary to conduct the tests:

- Pressure testing device: capable of providing 20-100psi of dynamic pressure and 0-6 gallons per minute flow rate.
- Balance capable of recording up to 5 pounds of material accurate to 2 decimal points.
- Balance capable of recording up to 25 pounds of material accurate to 1 decimal point.
- Two chemical management systems as provided by each manufacturer.
- Stopwatch.
- 1-liter bottle.
- 5-gallon bucket.

Test, Control, and Reference Substrates.

The applicant shall follow the process outlined below to test and calculate Dilution Accuracy⁷ and Dilution Error⁸ for each system. Conclusions determined from the test results must be statistically significant at the 95% confidence interval.

To ensure test repeatability,⁹ applicant shall hold as many factors constant as possible when conducting the test. In this application, constants shall include:

- the laboratory where tests are conducted,
- the qualified technician conducting the tests,
- the days on which the tests are conducted (i.e., over the course of as few days as possible),
- the instruments used (see Equipment),
- the chemicals tested (see below),
- the water pressures tested (see below), and
- whether the chemicals are dispensed into a bottle or bucket.¹⁰

⁷ Dilution Accuracy is the reliability (expressed as a percent) that the concentration of active ingredients is dispensed in the final product exactly as intended.

⁸ Dilution Error is calculated as the absolute value of the difference between the intended concentration as listed on the product label and the actual concentration achieved by each test system, expressed as a percentage of the intended concentration.

⁹ This approach is consistent with the principles of a Repeatability (r) Test defined in ISO 5725-1: Accuracy (Trueness and Precision) of Measurement Methods and Results – Part 1: General Principles and Definitions (1994), where variables are limited and constants are maximized.

¹⁰ Each chemical shall be filled in the proper container per its typical/common use. For example, floor cleaning chemicals should be filled in a bucket whereas hard surface cleaners should be filled in a bottle.

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Applicant shall include the latest model of five competitor Chemical Dispensing Systems in the test group, in addition to its own systems. Applicant shall test two dispensers for its own system and each identified competitor system.

Wall mounted systems shall be tested against five competitor wall mounted systems; portable systems shall be tested against five competitor portable systems.

Applicant shall conduct tests on the following chemicals¹¹ for each Chemical Dispensing System:

- General Purpose Cleaner
- Disinfectant
- Glass Cleaner
- Floor Cleaner

Applicant shall test each dispenser for each chemical at the following PSIs:

- 30
- 50
- 80

Applicant shall complete the following steps to conduct tests on each dispenser:

1. Set up the dispensing system according to manufacturer's instructions
2. Attach chemical bottle(s) to dispensing system according to manufacturer's instructions
3. Prime the dispensing system, if necessary, by running the dispenser until the chemical lines are filled, in the case that the dispenser holds more than one chemical, use the selector to prime each chemical individually.
4. Begin dispensing and adjust the dynamic pressure on the pressure stand to 30 PSI. Stop dispensing.
5. Disconnect the chemical concentrate bottle, place it on the balance, and zero the balance.
6. Place an empty bottle or bucket (depending on the test) on a separate balance and zero the balance.
7. Reconnect the chemical bottle to the dispensing unit and dispense the chemical to be tested into the empty bottle or bucket – for the bottle dispense, fill the bottle as full as possible without spilling any liquid or foam; for the bucket tests, dispense the product for approximately 60 seconds.
8. While the unit is dispensing, take note of the flow rate on the pressure stand. Record this value after the dispensing has finished.
9. Stop dispensing.
10. Disconnect and weigh the subject concentrate bottle (zero balance after each trial). Record.
11. Weigh the bottle or bucket containing the dispensed product. Record. Also take note of the amount of foam in the bottle or bucket.
12. Empty the bottle or bucket containing the dispensed product and reconnect the chemical concentrate bottle to the unit.

¹¹ A 2014 study by Kline, *Janitorial and Housekeeping Cleaning Products USA: Market Analysis and Opportunities*, 8th Edition, cites (1) General Purpose Cleaners, (2) Disinfectants & Sanitizers, (3) Glass Cleaners, and (4) Floor Cleaners as the most commonly used chemicals relevant to this application. Note: if a system does not have an available chemical in a category, simply note 'chemical unavailable' for that particular system.

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13. Repeat steps 4-12 for each pressure (i.e., 30, 50, 80) forty (40) times to collect 40 data points for each set of constant conditions.

Test Results.

Results shall be calculated and interpreted adhering to the following reference standards:

- ASTM 2586: Standard for Calculating and Using Basic Statistics
- ASTM E456-13a: Standard Terminology Relating to Quality and Statistics
- ASTM E178: Standard Practice for Dealing With Outlying Observations

Conclusions from test results for improved functional performance for Dilution Accuracy, Dilution Error, and Relative Improvement in Accuracy must be statistically significant at the 95% confidence interval.

Records and Reports

During Certification, applicant shall submit test reports to Green Seal. All test reports shall include:

- Description of test;
- List of cited standard processes, test methods, reference products, etc.;
- Name of the product(s) tested;
- Date(s) or timeframe of the test;
- Laboratory name, address, and contact person;
- Complete set of raw data collected from the tests, including calculated outlier observations¹²;
- Summarized test results, organized by chemical tested, that includes:
 - the High/Low/Average Dilution Accuracy of 40 data points at each tested PSI for each chemical product per dispensing system tested,
 - the % improved dilution accuracy at each tested PSI for each 3M Chemical Dispensing System relative to the competitor systems,
 - the average % improved dilution accuracy across pressures, per each chemical tested, for each 3M Chemical Dispensing System relative to the competitor systems

Quality Assurance and Quality Control.

During Certification, applicant shall provide documentation of their quality assurance and quality control procedures to Green Seal.

5.0 Environmental and Human Health Requirements

This section describes the Environmental and Human Health requirements with which the

¹² Outlying Observations are defined as *an extreme observation in either direction that appears to deviate markedly in value from other members of the sample in which it appears*, as listed in ASTM E456-13a, Standard Terminology Relating to Quality and Statistics, and calculated by following ASTM E178 Standard Practice for Dealing With Outlying Observations.

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applicant product must demonstrate compliance. Green Seal uses the following factors to determine requirements for this section:

- **Product Form:** the applicant product is an assembly of solid parts, including polypropylene plastic, 300 series stainless steel, brass fittings, nylon braided hose, and EPDM Seals.
- **Potential for Direct Human Exposure:** through regular handling and use of the product, there is no potential for inhalation, ingestion, or absorption exposures.
- **Potential for Environmental Releases:** through regular handling and use of the product, there is no potential for environmental releases and exposures from product assembly components.

5.1 Disclosure

Applicant shall disclose all product parts through a Bill of Materials, including the part name, type (e.g., raw material, assembly, sub-assembly, component), part function, and material type (e.g., steel, aluminum, resin, nylon, etc.).

5.2 - 5.20

Product parts, evaluated in their solid form as used, present no potential for exposure associated with the requirements below. Therefore, the requirements is GS-20, Edition 2.0, Sections 5.2-5.20 do not apply.

5.21 Product-Specific Requirements

Applicant shall demonstrate that each product shall have a backflow prevention device or mechanism that conform to ANSI/ASSE 1055B, *Performance Requirements for Chemical Dispensing Systems* for high hazard backflow prevention.

6.0 Packaging Requirements

Applicant shall meet the following packaging requirements as applicable.

Primary and Secondary Packaging

Primary and secondary packaging shall meet the following requirements, based on the packaging material type:

- Packaging made from paper or paperboard shall be recyclable and made from 100% recovered material.
- Packaging made from containerboard (corrugated cardboard) shall be recyclable and made from at least 30% recovered material.
- Packaging made from plastic shall be recyclable, or source-reduced by 20%, or shall contain 25% recovered material content (pre- or post-consumer material).

Plastic Labeling

Plastic packaging shall be marked with the appropriate Resin Identification Code.

Concentrated Product Packaging

This requirement is not applicable.

Heavy Metal Restrictions

The heavy metals lead, mercury, cadmium, and hexavalent chromium shall not be *intentionally introduced*. Further, the sum of the concentration levels of these metals shall not exceed 100 ppm; an exception is allowed for *refillable packages* or packages that would not exceed this maximum level but for the addition of *post-consumer material*.

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Other Restrictions

Phthalates, bisphenol A, and chlorinated packaging material are prohibited from being intentionally introduced to plastic packaging; an exception is allowed for packages that would not have added phthalates, bisphenol A, or chlorinated packaging material but for the addition of post-consumer material.

7.0 Certification and Labeling Requirements

Applicant shall meet all certification requirements described herein.

Legal Compliance

The applicant shall provide attestation of compliance with all legal requirements (e.g., laws, regulations, etc.) relevant to the product, and comply with all environmental, labor, and safety legal requirements.

Site Visit

The applicant shall undergo a site audit of product manufacturing facilities that includes verifying product characteristics and quality manufacturing processes.

Label Language

This requirement is not applicable.

Label Dilution or Dosage Directions for Concentrates

This requirement is not applicable.

Label Use and Disposal Directions

This requirement is not applicable.

Ingredient Line

This requirement is not applicable.

Fragrance and Allergen Labeling

This requirement is not applicable.

Certification Term

The initial Certification Term shall be 4 years. After the Certification Term, the applicant has the option to undergo Recertification.

Certification Mark

The Green Seal® Certification Mark may appear on the product, packaging, secondary documents, and promotional materials, only in conjunction with the certified product. Use of the Mark must be in accordance with Rules Governing the Use of the Green Seal Certification Mark.

The Green Seal Certification Mark shall not be used in conjunction with any modifying terms, phrases, or graphic images that might mislead consumers as to the extent or nature of the certification.

Green Seal must review all uses of the Certification Mark prior to printing or publishing.

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Use With Other Claims

The Green Seal Certification Mark shall not appear in conjunction with any human health or environmental claims unless verified and approved in writing by Green Seal.

Statement of Basis for Certification

Wherever the Green Seal Certification Mark appears, it shall be accompanied by a description of the basis for certification. The description shall be in a location, style, and typeface that are easily readable. If online space is limited, a link to the basis of certification may be used. A statement of basis for certification shall be developed for each product.