



## **CALL FOR COMMENTS**

### **PROPOSED REVISION TO CRITERIA FOR ENVIRONMENTAL INNOVATION (GS-20)**

As of November 11, Green Seal® is inviting feedback on proposed revisions to the GS-20 standard for Environmental Innovation. Green Seal is proposing to modify the criteria to require quantification of health and environmental impact reductions for all innovations and address limitations in market transformation. We are seeking comments from all stakeholders, including industry experts, public health researchers, product designers, raw material suppliers, product testing laboratories, purchasers, end users, and the general public.

## Document Guide:

- Instructions for Comment Submission
- Revision Proposal Summary
- Rationale for Proposed Changes
- Tracked Changes of Proposed Revisions in Green Seal Standards

## Instructions for Submitting Comments:

The Proposed Standard Revisions are open for comment until December 16, 2020, 11:59 PM ET.

Please submit all comments to [standards@greenseal.org](mailto:standards@greenseal.org) using the subject line:

- “Comments on Proposed Revisions, Environmental Innovation.”

For questions about this process or proposal, or requests for extensions, please contact:

- Brie Welzer, Standards Program Manager, [bwelzer@greenseal.org](mailto:bwelzer@greenseal.org).

*Green Seal® is the leading U.S. ecolabel, symbolizing transparency, integrity, and proven environmental leadership.*

*We develop life-cycle-based standards and certify products and services that can prove they meet our strict criteria for human health, reduced environmental impacts, and effective performance. Operating as a nonprofit since its founding in 1989, Green Seal has certified thousands of products and services in over 450 categories, and is specified by countless schools, government agencies, businesses and institutions.*

## Standard Revision Proposal Summary

### Scope of Proposed Revision:

- All products seeking certification under GS-20, Environmental Innovation

### Revisions are Proposed in the Following Green Seal Standards

- GS-20 Environmental Innovation

## Rationale for Proposed Revisions

Revisions achieve two key improvements:

1. Breadth - Expand the program's ability to promote market transformation
2. Depth - Promote greater impact reductions by strengthening the requirements for product innovations that achieve impact reduction through performance improvements.

To expand the potential for market transformation, we are proposing to exempt products from the requirement to first achieve certification to existing Green Seal standards if one exists for its product category when the product demonstrates impact reduction above the applicable standard and when this impact reduction was achieved through product innovation that is the first of its kind in the North American market.

Removing the limitation that products first must earn certification to an existing Green Seal product category standard allows Green Seal to review a larger volume of applications from products which are designed with human health and the environment in mind. This approach is also designed to incentivize advances in industry research that could inform revisions to existing standards.

All innovations utilizing this proposed exemption would have the following in their individual criteria documents:

- Documentation regarding the exemption
- Justification for the exemption
- Mitigation requirements to account for burden shifting under **3.4 Mitigates Burden Shifting**

Green Seal is also proposing to modify the First to Market criteria within the Innovation Standard to expand opportunities for earning Green Seal certification to products which employ innovations that are new to the market rather than the first and only to market, even if others later also employed the innovation. This eliminates the requirement that a product is the only one in the market with the innovation at the time of certification, and rewards producers who are the

first to raise the bar for environmental innovation in their product categories, even if others followed. This also provides greater value to existing participants by opening the door to longer certification terms.

Green Seal's intent with the Environmental Innovation Program was for it to serve as a critical tool to drive market transformation. By limiting participation to only companies that are the first and only with a particular innovation, we limit the potential impact we can have in driving market transformation. Innovators in a market are the first movers. Thus, we are proposing to redefine how we qualify "innovative" to be able to maximize the program's impact as a market transformation tool.

Lastly, we are proposing that all innovative products be required to quantify their health and/or environmental impact reductions, including those that achieve impact reductions through improved functional performance. Previously, product innovations that achieved impact reductions through improved functional performance demonstrated this through a quantification of the performance improvement, not the health and/or environmental impact reduction.

The shift to quantify the environmental and human health impact reductions from performance improvements will require producers to identify the meaningful health and environmental improvements achieved by the innovation in order to earn market recognition for them. The goal of Green Seal's Environmental Innovation Standard is to recognize innovations to help transform the market to improve the environment and human health. Thus, we propose to require all innovations meet the percentage improvement thresholds in terms of environmental and human health impacts.

Environmental and human health impacts will be assessed and quantified in the following lifecycle phases:

- Resource extraction
- Manufacturing
- Use
- Waste Management and Disposal

## Proposed Revisions to Standards

Green Seal proposes the following revisions to the standards listed above:

- In the Eligibility Requirements: an exemption for compliance with existing Green Seal Standards will be added.
- In the Environmental Innovation Review:
  - A modification to the product environmental innovation quantification requirement.
  - A clarification on the disclosure for product differentiation will be added.
  - A modification to the First to Market criterion.
- Removal of Annex B (Performance Testing Requirements) and associated references.

Text in the boxes below show the details of the proposed revisions.

The **red text** shows proposed additions. The text ~~with strikethrough lines~~ are proposed deletions.

**Compliance with Existing Green Seal Standards.** Products for which a Green Seal standard exists shall be certified under the requirements for that standard before attempting certification under GS-20, **except when Green Seal determines the product innovation demonstrates impact reduction above the applicable standard and is the first of its kind in the North American market.**

### 3.0 ENVIRONMENTAL INNOVATION REVIEW

The applicant shall ~~use one of the following options to demonstrate~~ **that a product is an environmentally innovative one via the following process: the applicant shall provide evidence demonstrating a specific new approach to the product results in reductions of significant health or environmental impacts with at least**

~~Option 1: Improved Design. Demonstrate a minimum of 30% reduction of one or 20% in each of two or more significant environmental or human health impacts, as identified in Section 2.0, as compared to available alternatives.~~

~~Option 2: Improved Function. Demonstrate an improved functional output of the product through functional performance indicators that are widely referenced by the industry for the product category. This improved function shall result in a reduction of the significant human health and environmental impacts that were identified in Section 2.0. 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 applicant product from products that provide the same function and are available on the North American Market, **and applicants must disclose in the Final Criteria Document how the innovation is differentiated.**

**3.2 Reduces Impacts.** The innovation shall reduce significant environmental and human health impacts compared to products that provide the same function, as established in the Product Lifecycle Impact Review (Section 2.0, herein).

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

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

**4.1 Test Methods.** If available for the product category, test methods shall comply with relevant industry standards, American National Standards, ASTM standards, ISO standards, or other equivalent methodology.

Alternatively, if unavailable, another objective, scientifically validated method conducted under controlled and reproducible laboratory conditions may be used, subject to Green Seal approval. Test methodology and results must be documented in sufficient detail for this determination to be made.

~~Applicants pursuing Section 3.0, Option 2 (Improved Function) shall meet the testing methods disclosure requirements in Annex B.~~

#### **~~ANNEX B (Performance Testing Requirements)~~**

~~Applicant shall disclose the following information to Green Seal for each test conducted to demonstrate 30% improvement for one performance area or 20% improvement for each of two or more performance areas.~~

~~Purpose and Scope of Test. Applicant shall provide a description of what this test method is designed to measure, identify the real-world scenarios that are being modeled, the scenarios that were not modeled, yet this product is expected to exist and be used, the assumptions that resulted in the existing model, the known or possible variables that exist in situ that were not included and the justification for excluding those variables.~~

~~Short Description of Test. Applicant shall describe the general process of the test.~~

~~Terminology. Applicant shall list terms and definitions referenced in the test, including relevant industry standard citations.~~

~~Personnel. Applicant shall provide the number of people to conduct the required test and their function(s).~~

~~Facilities. Applicant shall describe the facility within which the test is conducted, and relevant conditions controlled for test purposes.~~

~~Equipment. Applicant shall list all equipment used during the test, including manufacturer and item model number.~~

~~If specific manufacturer and item model number are not provided, disclose the equipment attributes and function for the purpose of the test.~~

~~Test, Control, and Reference Substrates. Applicant shall provide all standard specifications referenced in the test, including all reference products, chemicals, substances, and substrates.~~

~~If no industry standard reference products are available, list all product attributes and their values against which percent improvement is calculated.~~

~~Applicant shall provide step by step instructions to conduct the test, including sample preparation, controls and citations to relevant industry standard processes.~~

~~Applicant shall disclose the number of times the test is repeated to validate the results or determine relevant averages.~~

~~Records and Reports. Applicant shall provide reports for each test conducted, that include at least the following:~~

~~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;~~

~~Test results;~~

~~Laboratory name, address, and contact person.~~

~~Quality Assurance and Quality Control. Applicant shall provide documentation of their quality assurance and quality control procedures.~~