CRITERIA FOR CERTIFICATION

ENVIRONMENTAL INNOVATION: PRODUCTS, SERVICES, PROCESSES, AND TECHNOLOGIES, GS-20 Edition 1.0 (July 12, 2013)

Sub-Category: Floor Pads – Designed for Significantly Improved Durability and Initial & Mid-Life Performance

APPLICATION INFORMATION:	
Company:	3M™ Company
Product Names:	**Floor Finish Removal Pads:** 3M™ High Productivity Pad 7300 3M™ Black Stripper Pad 7200 Scotch-Brite™ Surface Preparation Pad Scotch-Brite™ Surface Preparation Pad Plus Niagara™ High Performance Stripping Pad 7400N Niagara™ Black Stripping Pad 7200N Niagara™ Deep Scrubbing Pad **Deep Scrubbing Pads:** Niagara™ Blue Cleaning Pad 5300N 3M™ Blue Cleaner Pad 5300 **Cleaning and Shining Pad:** Scotch-Brite™ Clean & Shine Pad **Burnishing Pad:** 3M™ Sky Blue Hi-Performance Burnish Pad 3050 **Floor Cleaning and Polishing Pad:** Scotch-Brite™ Purple Diamond Floor Pad Plus **Cleaning Pads** 3M™ Topline Autoscrubber Pad 5000 3M™ Red Buffer Pad 5100 Niagara Red Buffer Pad 5100N
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.

The products listed below have undergone Criteria Development for GS-20 Certification:

Floor Finish Removal Pads:
3M™ High Productivity Pad 7300
3M™ Black Stripper Pad 7200
Scotch-Brite™ Surface Preparation Pad
Scotch-Brite™ Surface Preparation Pad Plus
Niagara™ High Performance Stripping Pad 7400N
Niagara™ Black Stripping Pad 7200N
Niagara™ Deep Scrubbing Pad

Deep Scrubbing Pads:
Niagara™ Blue Cleaning Pad 5300N
3M™ Blue Cleaner Pad 5300

Cleaning and Shining Pad:
Scotch-Brite™ Clean & Shine Pad

Burnishing Pad:
3M™ Sky Blue Hi-Performance Burnish Pad 3050

Floor Cleaning and Polishing Pad:
Scotch-Brite™ Purple Diamond Floor Pad Plus

Cleaning Pads
3M™ Topline Autoscrubber Pad 5000
3M™ Red Buffer Pad 5100
Niagara Red Buffer Pad 5100N

Certification Based on Improved Performance Claims
The products above are expected to meet Green Seal's GS-20 Criteria, Ed. 1.0, based on the following category of claim: "provide significantly better performance" "for the same human health or environmental impact" (GS-20, Edition 1.0, Section 2.3.2.2, July 12, 2013). In summary, these products demonstrate significantly improved performance than others on the market that provide the same function, thus reducing solid waste generation, and are not expected to pose any new or additional health and environmental drawbacks.

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.

Claim Validation:
Seven of these products are making one or two additional claims: water-based resins and 50% recycled content fibers. During the Certification Process (GS-20, Edition 1.0, July 12, 2013, Stage II), these claims will be validated.

Environmental Innovation: If the products can demonstrate conformance with the criteria in Section A, then they can be recognized by Green Seal for Environmental Innovation.

Statement of Basis for Certification. Statements for each product are listed at the end of this document in Annex A.

Section A: Certification Criteria

1.0 Criteria for Evaluation for the following products types:
Floor Finish Removal Pads, Deep Scrubbing Pads, Cleaning and Shining Pads, Burnishing Pads, Floor Cleaning and Polishing Pads

1.1 Significantly Improved Functional Performance. The products shall meet the requirements specified below to demonstrate conformance with GS-20, Edition 1.0 (2013), Section 2.2.1.2 for Technical Efficiency.

1.1.1 Performance Areas. All products shall demonstrate an improvement of at least 30% for one key performance area, or at least a 20% improvement for at least two key performance areas according to the testing methodology listed in Annex B: Testing Methods by Functional Class. All products shall be evaluated according to a reproducible test procedure conducted on vinyl composite tile (VCT) or bare concrete (when more appropriate) with three coats of acrylic floor finish and shall be tested against at least three competing products of the same functional class. No liquid floorcare products shall be used during the evaluation process.

Key performance areas include:

- Initial Performance
- Midlife Performance
- Durability

The table below shows the improved performance claims, by key performance area, of each applicant product.

	Product Name	Significantly Improved Initial Performance	Significantly Improved Mid-Life Performance	Significantly Improved Durability
Floor Finish Removal Pads				
1.	3M High Productivity Pad 7300	●		●
2.	3M™ Black Stripper Pad 7200	●	●	
3.	Niagara™ Black Stripping Pad 7200N	●	●	
4.	Niagara™ High Performance Stripping Pad 7400N	●	●	
5.	Scotch-Brite™ Surface Preparation Pad Plus		●	
6.	Scotch-Brite™ Surface Preparation Pad		●	
7.	Niagara™ Deep Scrubbing Pad		●	
Burnishing Pads				
8.	3M™ Sky Blue Hi-Performance Burnish Pad 3050			●
Cleaning and Shining Pads				
9.	Scotch-Brite™ Clean & Shine Pad	●		
Floor Cleaning and Polishing Pads				
10.	Scotch-Brite™ Purple Diamond Floor Pad Plus	●		
Deep Scrubbing Pads				
11.	Niagara™ Blue Cleaning Pad 5300N	●	●	
12.	3M™ Blue Cleaner Pad 5300	●	●	
Cleaning Pads				
13.	3M™ Topline Autoscrubber Pad 5000	●	●	
14.	3M™ Red Buffer Pad 5100	●	●	
15.	Niagara Red Buffer Pad 5100N	●	●	

1.2 Human and Environmental Health

1.2.1 Claim Validation. If 3M demonstrates that the floor pad is made with water-based resin, then Green Seal will validate the following claim: “Made with water-based resin.”

1.3 Reducing the use of limited resources (energy, water, land, etc.)

1.3.1 Claim Validation. If 3M demonstrates that the floor pad is made of at least 50% post-consumer recycled fiber, then Green Seal will validate the following claim: “Made from 50% post-consumer recycled fiber.”

1.3.2 Packaging. All floor pad packaging shall be recyclable and made from 100% recovered material.[1]

2.0 Environmental Innovation

The applicant shall demonstrate that the floor pads provide more value or output, compared to competing floor pads on the US market, with the same or fewer resources and the same or lower impacts.

3.0 Statement for Basis of Certification (to accompany the Certification Mark)

See Annex A.

[1] Requirements have been updated to reflect forthcoming requirements in GS-20, Edition 2.0, to allow for consistent documentation to be provided.

Section B: Analysis of Claims

1.0 Performance/Function/Purpose

1.1 Main function: Six functional categories are: Floor Finish Removal, Deep Scrubbing, Cleaning, Cleaning and Shining, Burnishing, and Floor Cleaning & Polishing.

1.2 Secondary function: None.

1.3 Alternatives for providing the same function. Other floor pads with the same functions exist on the market.

1.4 Additional performance issues. The floor pads can be used with or without chemical-mixture floor care products. For significantly better performance as claimed in this Criteria Document, no chemical-mixture floor care product is required.

1.5 Comparison of performance parameters for the product and the alternatives. The floor pads achieve **significantly improved durability and initial and mid-life performance** when tested against others available on the US market.

1.6 Quality Management. The floor pads are manufactured in a facility that is ISO 9001 certified.

2.0 Environment/Health

2.1 Life cycle health and environment benefits of the product compared to alternatives

2.1.1 Resources and Manufacture Phases:

2.1.1.1 Water-Based Resins. Resins are agents used in floor pad manufacturing to bind a product together and allow for functional use of the product. The liquefying agents in resins are water-based or solvent-based.[2] Using water-based resins in floor pads provide a less hazardous alternative to conventional solvent-based resins. For example, waste materials from water-based resins are not classified as hazardous materials and do not require separate disposal. Using water-based resins reduces the environmental and health concerns associated with the manufacture, use, and disposal of products.

2.1.1.2 At Least 50% Post-Consumer Recycled Content. The floor pads are made from at least 50% post-consumer recycled polyester fiber. Demand for synthetic fiber is increasingly met through recycling of used and discarded plastic products, which are diverted away from landfills and converted into the primary raw material inputs for products such as floor pads. This process provides a variety of environmental benefits. For example, studies have indicated that it takes significantly less energy to recycle polyester back into a raw material than it does to produce virgin polyester.[3] Incorporating at least 50% post-consumer recycled content into the floor pads turns waste into a resource, reduces the burden on non-renewable resources, and reduces the volume of waste in landfills.

[2] https://www.uscoatings.com/blog/water-based-coating-vs-solvent-based-coating/
[3] https://www.scribd.com/document/53024872/Cotton-Hemp-Polyester-study-SEI-and-Bioregional-and-WWF-Wales

2.1.1.3 Packaging. The applicant claims that the packaging is made of at least 50% post-consumer recycled content. This floor pad product ranges in sizes from 10" to 28" in diameter, which demonstrates a substantial amount of cardboard packaging is required to surround and protect the product during its transportation from the production facility, to any intermediate storage, to the user's location. By incorporating recycled content into the cardboard packaging, fewer virgin resources are consumed during the production of the floor pad packaging. Additionally, ensuring recycled content in packaging provides a commercial demand for this material, incentivizing the collection and re-processing of cardboard and other paper-based materials.

2.1.2 Use Phase. The product is used in the same way as other cleaning and buffing floor pads.

2.1.2.1 Significantly Improved Functional Performance as an Environmental Benefit. Use of the floor pads will result in significant environmental benefits through improved performance and durability, producing more output per floor pad, over time and for each floor care task. According to the manufacturer,

> *"...the floor pads are engineered to help reduce the cost of cleaning and maximize the effectiveness of a floor care program, while keeping waste to a minimum. Each type of floor pad has been developed specifically to accomplish a particular floor maintenance task, improving the performance of each product and extending the useful life of the product to complete designated tasks."*[4]

According to the manufacturer, thin, conformable fibers are uniformly coated with tough, water-based resins throughout the pad (not just on the surface), which maximizes pad-to-floor contact. This increases efficiency and efficacy of each floor pad, resulting in fewer labor hours dedicated to each floor care task and less time and energy consumption from running machines for shorter periods (addresses GS-20, Edition 1.0 (2013), Section 2.2.1.2).

Additionally, some floor pads have been engineered to reduce the ongoing maintenance requirements associated with floor care. For example, floor pad fibers are individually separated and coated to maximize their useful life and produce consistent, high quality results. Longer lasting, high performance floor pads demand fewer resources—such as plastic fibers and resins—per floor care task and over the life of the floor pads (addresses GS-20, Edition 1.0 (2013), Section 2.2.1.2).

Finally, these floor pads are developed to provide effective performance without any required application of floor care chemicals. This option, high floor care performance without floor care chemicals, reduces chemical exposure risks for custodial staff, reduces the need for protective equipment, and is expected to result in fewer job-related injuries from chemical handling. Using fewer floor care chemicals to complete floor care tasks also reduces the total amount of chemicals entering the environment and local waterways (addresses GS-20, Edition 1.0 (2013), Section 2.2.1.3).

According to the manufacturer, these floor pads maintain their effectiveness significantly longer than competitive floor pads and need to be replaced less often.[5] Because of the superior performance of the floor pads, less material is used to create new floor pads and less waste is generated for the same cleaning efficacy (addresses GS-20, Edition 1.0 (2013), Section 2.3.2.2. In cleaning scenarios, this

[4] https://multimedia.3m.com/mws/media/232701O/3mtm-floor-pads.pdf

[5] 3M scientists test the performance of 3M floor pads against competing products in controlled laboratory conditions. 3M floor pads significantly outperform competitive pads in durability, aggressiveness and deep scrubbing. http://multimedia.3m.com/mws/media/232701O/3mtm-floor-pads.pdf

translates to resource efficiency by running machines for shorter durations (and time and energy saved), using fewer resources per floor care task (including plastic fibers and resins), and less waste ending up in landfills (from replacing the floor pad less often). Additionally, these floor pads require the same amount of resources be consumed in order to manufacture them, and do not pose new or increased environmental and health impacts through their production and use, as stated by the manufacturer. In summary, these products are designed to achieve significantly improved durability and initial and mid-life performance than others on the market that provide the same function and are not expected to pose any new or additional health and environmental drawbacks.

2.1.3 Waste Management and Disposal Phases.

2.1.3.1 Less Waste Per Floor Care Task Due to Significantly Improved Functional Performance. Because of the superior performance and durability of the floor pads, less waste is generated for the same cleaning efficacy (addresses GS-20, Edition 1.0 (2013), Section 2.3.2.2).

2.1.3.2 Packaging. The large cardboard package is recyclable, therefore allowing users to divert a significant volume of waste away from landfills and allow for reprocessing and re-use.

2.2 Life cycle health and environment drawbacks of the product compared to alternatives

2.2.1 Major concerns: None.
2.2.2 Secondary concerns. None.
2.2.3 Mitigation of concerns: N/A.

3.0 Comments on the performance of the product vs. the alternatives. The product functions significantly better than a benchmark product; the product works 30% better for one key performance aspect or 20% better for two or more key performance aspects.

4.0 Comments on the health and environment aspects of the product relative to alternatives
Certain products incorporate water-based resins, in place of the more hazardous solvent-based resins. Certain products are made from at least 50% post-consumer recycled fiber. The product's packaging is made of at least 50% recycled content and is recyclable, which result in the re-purposing of waste and less waste being landfilled.

5.0 Innovation

Once all criteria listed are met and evidence for innovation is verified, **Green Seal will be able to certify these products as Environmentally Innovative**, under the category of:

- **Improved technical or environmental efficiency.** Functions with fewer resources or less environmental impact, or provide better technical performance. These also include innovations that enable users to do things that were not possible previously.[6]

[6] As stated in GS-20, Edition 1.0, Criteria 2.2 and 2.2.1.2, July 12, 2013.

Annex A

Statements of Basis for Certification

The Statement of Basis for Certification will accompany the Green Seal Certification Mark.[7]

	Product Name	Significantly Improved Initial Performance	Significantly Improved Mid-Life Performance	Significantly Improved Durability	Water-Based Resins	50% Recycled Content Fiber
Floor Finish Removal Pads						
1.	3M High Productivity Pad 7300	●		●		
2.	3M™ Black Stripper Pad 7200	●	●		●	
3.	Niagara™ Black Stripping Pad 7200N	●	●		●	
4.	Niagara™ High Performance Stripping Pad 7400N	●	●		●	
5.	Scotch-Brite™ Surface Preparation Pad Plus		●		●	
6.	Scotch-Brite™ Surface Preparation Pad		●		●	
7.	Niagara™ Deep Scrubbing Pad		●		●	
Burnishing Pads						
8.	3M™ Sky Blue Hi-Performance Burnish Pad 3050			●	●	
Cleaning and Shining Pads						
9.	Scotch-Brite™ Clean & Shine Pad	●			●	
Floor Cleaning and Polishing Pads						
10.	Scotch-Brite™ Purple Diamond Floor Pad Plus	●			●	●
Deep Scrubbing Pads						
11.	Niagara™ Blue Cleaning Pad 5300N	●	●		●	
12.	3M™ Blue Cleaner Pad 5300	●	●		●	
Cleaning Pads						
13.	3M™ Topline Autoscrubber Pad 5000	●	●			
14.	3M™ Red Buffer Pad 5100	●	●			
15.	Niagara Red Buffer Pad 5100N	●	●			

Floor Finish Removal Pads

3M™ High Productivity Pad 7300 is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

[7] An alternative version of the below statements may be submitted for Green Seal's approval.

3M™ Black Stripper Pad 7200 is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

Niagara™ Black Stripping Pad 7200 is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Niagara™ High Performance Stripping Pad 7400N is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

Scotch-Brite™ Surface Preparation Pad Plus is certified by Green Seal® for Environmental Innovation based on a design for significantly improved mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

Scotch-Brite™ Surface Preparation Pad is certified by Green Seal® for Environmental Innovation based on a design for significantly improved mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

Burnishing Pads

3M™ Sky Blue Hi-Performance Burnish Pad 3050 is certified by Green Seal® for Environmental Innovation based on a design for significantly improved durability compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

Cleaning and Shining Pads

Scotch-Brite™ Clean & Shine Pad is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

Cleaning and Polishing Pads

Scotch-Brite™ Purple Diamond Floor Pad Plus is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claims: Produced with a minimum of 50% recycled PET fiber and a water-based resin system.

Deep Scrubbing Pads

Niagara™ Blue Cleaning Pad 5300N is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pads and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

Niagara™ Deep Scrubbing Pad is certified by Green Seal® for Environmental Innovation based on a design for significantly improved mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

3M™ Blue Cleaner Pad 5300 is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Green Seal® has validated the following claim: Manufactured with a water-based resin system.

3M™ Topline Autoscrubber Pad 5000 is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

3M™ Red Buffer Pad 5100 is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Niagara Red Buffer Pad 5100N is certified by Green Seal® for Environmental Innovation based on a design for significantly improved initial and mid-life performance compared to competitive products, extending the useful life of the floor pad and reducing solid waste generation.

Annex B
Testing Methods by Functional Class

Functional Class	Initial Performance Testing	Mid-Life Performance Testing	Durability Testing
Floor Finish Remover Pads	**Finish removal**: Cut aggressiveness as measured by a standard and replicable internal 3M test method with a new pad, conducted on vinyl composite tile (VCT) with three coats of acrylic floor finish. No liquid floorcare products shall be used during the evaluation process. -- Applicant shall demonstrate that the floor pad performs 20% better at initial performance than at least 3 leading competitor products of the same functional class. -- When innovation claims are based on mid-life performance only, applicant shall demonstrate that the floor pads perform at least as well at initial performance as at least 3 leading competitor products of the same functional class.	**Finish removal:** Cut aggressiveness as measured by a standard and replicable internal 3M test method with a worn pad conducted on vinyl composite tile (VCT) with three coats of acrylic floor finish. No liquid floorcare products shall be used during the evaluation process. Pad wear completed via 25 passes over reference standard 3M™ Safety-Walk™ Slip Resistant Treads 610 with a swing machine. -- Applicant shall demonstrate that the floor pad performs 20% better at mid-life than at least 3 leading competitor products of the same functional class when also demonstrating significantly improved initial performance. -- Applicant shall demonstrate that the floor pads performs 30% better at mid-life than at least 3 leading competitor products of the same functional class when mid-life performance is the only basis of environmental innovation.	NA
Deep Scrubbing Pads	**Cleaning ability**: number of passes with electric swing machine required to remove six rubber black marks on finished VCT with a new pad. No liquid floorcare products shall be used during the evaluation process. Applicant shall demonstrate that the floor pad performs 20% better at initial performance than at least 3 leading competitor products of the same functional class.	**Cleaning ability**: number of passes with electric swing machine required to remove six rubber black marks on finished VCT when worn. Pad wear completed via 25 passes over reference standard 3M™ Safety-Walk™ Slip Resistant Treads 610 with a swing machine. No liquid floorcare products shall be used during the evaluation process. Applicant shall demonstrate that the floor pad performs 20% better at mid-life than at least 3 leading competitor products of the same functional class.	N/A
Cleaning and Shining Pads	**Cleaning ability**: number of passes with electric swing machine required to remove six rubber black marks on finished VCT with a new pad. **Shine increase**: Gloss and Distinctiveness of Image (DOI) increase of finished VCT (4 coats of leading acrylic finish) as measured with gloss/DOI meter with a new pad after 32 passes under an autoscrubber. No liquid floorcare products shall be used during the	**N/A**	**N/A**

	evaluation process. Applicant shall demonstrate that the floor pad performs 30% better than at least 3 leading competitor products of the same functional class.		
Burnishing Pads	**Gloss increase**: Gloss increase of worn floor finishes in burnishing application as measured with gloss meter with a new pad. Minimum effective performance is to provide any amount of gloss increase (actual amount of gloss increase is highly variable dependent on finish type, burnishing equipment, # of passes, etc.). No liquid floorcare products shall be used during the evaluation process. Applicant shall demonstrate that the floor pad performs at least as well at initial performance as at least 3 leading competitor products of the same functional class.	N/A	**Floor pad weight.** All pads weighed before burnishing. After burnishing 90,000[8] square feet of vinyl composite tile (VCT) with three coats of acrylic floor finish, pads were weighed and weight difference was recorded. No liquid floorcare products shall be used during the evaluation process. Applicant shall demonstrate that the floor pad is at least 30% more durable than at least 3 leading competitor products of the same functional class.
Floor Cleaning and Polishing Pads	**Shine Increase**: Gloss and Distinctiveness of Image (DOI) increase of bare concrete and good initial condition stone floors measured with gloss/DOI meter with a new pad after 6 passes under an autoscrubber. No liquid floorcare products shall be used during the evaluation process. Applicant shall demonstrate that the floor pad performs 30% better at initial performance than at least 3 leading competitor products of the same functional class.	N/A	NA
Floor Cleaning Pads	**Cleaning ability**: number of passes with electric swing machine required to remove six rubber black marks on finished VCT with a new pad. No liquid floorcare products shall be used during the evaluation process. Applicant shall demonstrate that the floor pad performs at least as well at initial performance as at least 3 leading competitor products of the same functional class.	**Cleaning ability**: number of passes with electric swing machine required to remove six rubber black marks on finished VCT when worn. Pad wear completed via 25 passes over reference standard 3M™ Safety-Walk™ Slip Resistant Treads 610 with a swing machine. No liquid floorcare products shall be used during the evaluation process. Applicant shall demonstrate that the floor pad performs 20% better at mid-life than at least 3 leading competitor products of the same functional class.	NA

[8] This number has been adjusted from 350,000 square feet in previous versions to 90,000 square feet to account for competitor floor pads falling apart at 90,000 square feet, and needing to stop the test at that point.