

IBEL Content – Work Group Packet

February 9, 2010



This document has been developed for use during the Feb 9th, IBEL workgroup call, scheduled from 12-2 PM Eastern. To participate, please use the following call-in information. Thanks.

(218) 936-1100 Access Code #105445.

-- Jack

IBEL Content- Working Menu

The following is a working list of potential IBEL content. Entries in the table indicate proposed categories and the associated IBEL metric(s) to be measured or reported. Please note: Not all metrics will necessarily apply to all products. This list will evolve through the decisions of work groups, and will be updated after each work group meeting to reflect the most recent status. When completed, this list will constitute a **MENU** of metrics against which product data can be reported. Individual metrics will be selected from this menu to assemble the product label content for each product category in future calls. **Shaded entries in the table are to be considered on the February 9, 2010 work group call.**

Human Health & Environmental

Category	Reportable IBEL Metric	Status
Asthmagen content		
Acute Chemical Concern - Oral		
Acute Chemical Concern - Inhalation		
Acute Chemical Concern - Dermal		
Corrosivity to Skin		
Skin Sensitizer		
Product Absorption via Skin		
Volatile Organic Compound Content		
Chronic Chemical Concern - Oral		
Chronic Chemical Concern - Inhalation		
Chronic Chemical Concern - Dermal		
Phosphorus Eutrophication		
Biodegradable Content – Aquatic		
Bioaccumulating content		
Toxicity to Aquatic Life		
Product Embodied Energy		
Product Embodied Water		

Product Performance

Category	Reportable IBEL Metric	Status
Product Performance (specific to product type)		
Product Duration		
Energy Efficiency		
Water Efficiency		
Product Efficiency - General		

Additional Product/Packaging

Category	Reportable IBEL Metric	Status
Prohibited Product Content		
Trace contaminants – CMRs (unintentionally added)		
Chem Prod Concentrates		
Fragrance		
Color and dyes		
Combustibility		
Recycled/Reclaimed Material content (packaging only))	Recycled/Reclaimed Packaging content (%)	WG Call - Feb 9
Renewable /Biobased Material content (Includes product and packaging)	Renew/Biobased Product Content (%) Renew/Biobased Packaging content (%) Certifications such as USDA Biopreferred, FSC, or SFI (yes/no)	WG Call - Feb 9
Recyclable Product Content (packaging only)	% of Product Recyclable	WG Call - Feb 9
EOL – Product Takeback		
EOL- Biodegradable/compostable Content – Land disposal		
Labeling content		
Product Certifications Obtained		

Corporate Performance Categories

Category	Reportable IBEL Metric	Status
Sustainability Reporting		
Environmental Mgmt program		
Supply Chain mgmt program		
Sustainable Energy Use		

IBEL Post-Consumer Content (Packaging)

IBEL Proposed Metric(s)–

(Note: This proposed metric is initially focused only on chemical-based products. We will take up non-chemical products in another month or so.)

1. Post-Consumer Content- Packaging

- **Reported Value** – percent of PC content in package
 - **Method for Reporting /Measurement**– total of PC-sourced content in product packaging divided by the total weight of the packaging. Calculation includes all primary and secondary packaging, bags, and films.
 - **Verification** – The following documentation must be provided by manufacturer, if requested, to prove conformance with reported value(s).
 - o Manufacturer declaration of all primary and secondary packaging materials for product registered in IBEL, and the overall weight and level of PC-content for each material. In the form of a supplier letter.
 - o Letter or other documentation from supplier that clearly states the percentage of recycled content in packaging material supplied. Letter must clearly stipulate content as Post-consumer sourced.
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Definition of Post-Consumer Content

1. Product or packaging content that is obtained from post-consumer or post- industrial sources. It does not include byproducts of an industrial process that can be, and regularly are, used in either the same process, or in a different process, except that proportion which originated as post-consumer material and pre-consumer material [Source: Ecologo CCD-146 – slightly paraphrased from definition for recycled]
2. Material that would otherwise be destined for solid waste disposal, having completed its intended end-use and product life cycle. Post-consumer material does not include materials and by-products generated from, and commonly reused within, an original manufacturing and fabrication process. [Source: GS-37 Definition of Post-consumer]

Misc Information:

- Many standards contain requirements for post-consumer content, many with an identical approach to that listed above.
- All preference PC-content, though some acknowledge Post-industrial content as viable, though often discounted (only counts for half of overall percent...e.g. 50% PI counted as 25% PC content)

Established Criteria - The following products have established minimum criteria.

1) U.S. EPA’s Comprehensive Procurement Guidelines. Recommended recovered fiber content levels for paperboard and packaging products

- Corrugated Container <300psi – 25-50%
- Corrugated Container >300psi – 25-30%
- Solid Fiber boxes – 40%
- Folding cartons – 40-80%
- Others

2) Ecologo CCD-146 – Packaging shall be recyclable, refillable, or contain a minimum of 25% post consumer material.

3) Green Seal GS-37 – The primary package, for materials other than plastic, shall contain at least 25% post-consumer material or demonstrate that efforts were made to use the maximum available post-consumer material in the package

(Please note: we are not establishing thresholds, only how a metric will be measured and reported. The above are listed for context purposes.)

Strawman & Comments

The following is a subsection of the original IBEL strawman and all comments submitted for each relevant metric under discussion during this call.

Recycled/Reclaimed Material content – Product &Packaging	- Recycled/Reclaimed Product content (%) - Recycled/Reclaimed Packaging content (%)	Post consumer material given full credit, Post industrial half credit is typical of other labeling options.
COMMENTS: Mark K -DOT Regs prevent the use of PCRC. Let’s not forget differentiating between the benefits of what may be very dangerous/corrosive products. Don V- Need specific definitions for this to be actionable.		

IBEL Recyclable Packaging

IBEL Proposed Metric(s)–

(Note: This proposed metric is initially focused only on chemical-based products. We will take up non-chemical products in another month or so.)

2. Product Packaging Recyclable?

- **Reported Value** – percent of product packaging content recyclable through widely available and existing recycling programs.
- **Method for Reporting /Measurement**– total of readily recyclable product packaging content divided by the total weight of the packaging. Calculation includes all primary and secondary packaging, bags, and films.
- **Verification** – The following documentation must be provided by manufacturer, if requested, to prove conformance with reported value(s).
 - o Manufacturer declaration of all primary and secondary packaging materials for product registered in IBEL, and the overall weight and level of PC-content for each material. In the form of a supplier letter.
 - o Documentation that all plastic materials are clearly marked with easily observable recycling system classification.

Question- What about reusable packaging? Should this metric be combined with reusable packaging as a yes/no?

Definition of Recyclable

The package can be collected in a substantial majority of communities, separated or recovered from the solid waste stream and used again, or reused in the manufacture or assembly of another package or product through an established recycling program. [GS-37 Definition]

Misc Information:

- Most standards/sources distinguish between recyclable and readily recyclable through existing recycling programs without significant disassembly or materials separation issues.

Established Criteria - The following products have established minimum criteria.

- 1) Ecologo CCD-146 – Packaging shall be recyclable, refillable, or contain a minimum of 25% post consumer material.
- 2) Green Seal GS-37 – A plastic primary package shall be recyclable, a refillable package, a source-reduced package, or contain at least 25% post-consumer material. The package must be

clearly marked with the appropriate Society of the Plastics Industry symbol to identify the type of plastic for recycling.

(Please note: we are not establishing thresholds, only how a metric will be measured and reported. The above are listed for context purposes.)

Strawman & Comments

The following is a subsection of the original IBEL strawman and all comments submitted for each relevant metric under discussion during this call.

EOL -Recyclable content	- Recyclable content (%)	Non-chemical products. Includes content that can be readily separated and disposed in local or municipal collection and recycling systems without further processing. Includes type 1 and 2 designation plastics and uncoated paper content?
COMMENTS: None Submitted		

IBEL - Product Biobased Content

IBEL Proposed Metric(s)–

3. Product Biobased Content

- **Reported Value** – percent of biobased content in product and package combined
 - **Method for Reporting /Measurement**– Results of testing by ASTM Method D6866, “Standard Test Methods for Determining the Biobased Content of Natural Range Materials Using Radiocarbon and Isotope Ratio Mass Spectrometry Analysis.”
 - **Verification** – The following documentation must be provided by manufacturer, if requested, to prove conformance with reported value(s).
 - o If testing of product registered in IBEL, a report from independent laboratory testing using the appropriate ASTM test methods of findings.
 - o If testing of identical product (sold under another brand name) , a report of findings from independent laboratory testing using the appropriate ASTM methods, AND manufacturer statement of product conformance.
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Definition of Biobased Product

A product determined by the U.S. Secretary of Agriculture to be a commercial or industrial product (other than food or feed) that is composed, in whole or in significant part, of biological products or renewable domestic agricultural materials (including plant, animal, and marine materials) or forestry materials.

(Source: Federal Biobased Product Preferred Provider Program FB4P)

Misc Information

- *Biobased products* are commercial or industrial products whose main ingredients are renewable plant or animal materials.
- *Section 9002* of the 2002 Farm Bill requires Federal government officials and their contractors to purchase biobased products as often as possible.
- *Federal procurement preference* requires the U.S. Federal Government to buy products that meet certain standards, such as being biobased.
- **The US Biopreferred Labeling Program** has established minimum biobased contents for several products in the Jan/San Marketplace including several types of cleaners. (*see attached chart*)

Determination of Biobased Content

1. **US Biopreferred Program Requirements**- Specifies determination by testing using ASTM Method D6866, “Standard Test Methods for Determining the Biobased Content of Natural Range Materials Using Radiocarbon and Isotope Ratio Mass Spectrometry Analysis.” Also, testing must be performed by ISO 9001 certified testing lab. Note:

Identical products marketed under different names do not require separate testing.
(Source: **7 CFR Part 2904**)

Established Criteria

The following products have established minimum criteria in the US Biopreferred program. Other may be shown on Attached page.

- Bathroom Cleaners – 74%
- Glass Cleaners – 49%
- General Purpose – 39%
- Multipurpose cleaners – 56%
- Unclassified – 51%

(Please note: we are not establishing thresholds, only how a metric will be measured and reported. The above are listed for context purposes.)

Strawman & Comments

The following is a subsection of the original IBEL strawman and all comments submitted for each relevant metric under discussion during this call.

Renewable /Biobased Material content – Product and Packaging	<ul style="list-style-type: none">- Renew/Biobased Product Content (%)- Renew/Biobased Packaging content (%)- USDA Biopreferred Certified (yes/no)- FSC Certified (yes/no)- SFI Certified, Etc (yes/no)	Determined for both product and packaging. Applies to both chemical and non-chemical products. Seeking existing guidance on qualifications on claiming content,...
COMMENTS: Don V - Need specific definitions for this to be actionable.		