



MEMORANDUM

TO: NSF Joint Committee on Environmental Leadership and Corporate Social Responsibility Assessment of Servers

FROM: Jennifer Costley, Chairperson of the Joint Committee

DATE: July 31, 2018

SUBJECT: Proposed Revision to NSF/ANSI 426 – 2017 *Environmental Leadership and Corporate Social Responsibility Assessment of Servers* (426i7r1)

Draft 1 of NSF/ANSI 426, issue 7 is being forwarded to the Joint Committee for consideration. Please review the changes proposed to this standard and **submit your vote by the ballot due date of August 30, 2018** via the NSF online workspace (<http://standards.nsf.org>).

Each Joint Committee member will vote *affirmative*, *abstain*, or *negative with comment*. Each negative vote **must** be justified in the comment section. Please include exactly why you oppose and what changes must be made in order for you to support the proposed draft.

When adding comments, please identify the section number/name for your comment and add all comments under one comment number whenever possible. If you need additional space, please upload a word or pdf version of your comments online via the browse function.

A copy of the NSF International Standard Development and Maintenance Policies are available [here](#) for further information on the process.

Purpose

The purpose of this ballot is to vote and comment on proposed revisions to NSF/ANSI 426 criterion 12.4.3 to introduce a risk-based approach when determining what facilities to audit.

Background

A proposal was submitted to modify the language in criterion 12.4.3 to introduce a risk-based approach when determining what facilities to audit. The issue paper proposed 2 options for achieving this. This issue was presented at the June 19, 2018 JC meeting and it was decided to form a small task group to review option B and provide a recommendation for moving forward.

The issue paper, research and recommendation from the small task group, to support the adoption of option B (with revisions) that revised the current language to address the inclusion of a risk-based approach, were presented at the July 17, 2018 JC meeting and the committee voted in favor of balloting the proposed revisions. Please see the original issue paper (2018 NSF 426 Issue Paper 19) and the June 19 and July 17, 2018 JC meeting summary under the referenced items for additional information.

Public Health Impact

The proposed revisions to the standard intend to have a positive impact on public health.

If you have any questions about the technical content of the ballot, you may contact me in care of:



NSF International

Joint Committee Correspondence

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Joint Committee on Environmental Leadership and Corporate Social Responsibility Assessment of Servers
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Note - Provided below are two versions of the criterion revisions.

- 1) The first version below is the OFFICIAL ballot showing the proposed revisions in using ~~strikeout~~ for proposed removal of existing text and grey highlights to indicate the proposed new text. Only the revisions for this NSF Ballot (426i7r1) are shown.
- 2) The second version, provided within the RED BOX is for informational purposes only and is not part of this official ballot. The revisions for this ballot merged with the revisions NSF Ballots 426i3r1 and 426i5r1 are shown for clarity. NSF Ballots 426i3r1 and 426i5r1 revisions are shown in red text are NOT included in this ballot.

NSF/ANSI Standard
for Sustainability –

Environmental Leadership and Corporate Social Responsibility Assessment of Servers

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12.4.3 Optional - Certification to social responsibility performance standard (corporate)

Manufacturer shall ensure that all facilities of three of its 6 top suppliers (by annual spend, fiscal or calendar) that manufacture each of three main components (principal storage device(s); processor(s) (CPU); and printed circuit board(s)), if applicable, for the product are:

— certified by accredited certification bodies to Social Accountability (SA) 8000³⁹. Certification bodies shall be accredited by an authorized accreditation body to certify to the SA8000. The certification shall be no older than three years. (2 points)

Optional points shall only be awarded for SA8000 certification if all facilities designated above are certified to SA8000. If there are fewer than three suppliers for a component type named above, every supplier for that component shall conform to this criterion;

Or

— audited to the EICC/RBA Code of Conduct¹⁵ using the Validated Audit Process (VAP). (1 point)

Optional point shall only be awarded for VAP audits if a certificate has been issued by the VAP Operations Management Team to verify that for each facility:

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— initial validated audit reports contained no major or priority non-conformance findings. ~~as defined by the EICC VAP and shall be no older than two years.~~ If the facility was determined to be Low Risk¹ as defined by the EICC/RBA VAP, the initial report shall be no older than four years. If the facility was determined to be Medium or High Risk² as defined by the EICC/RBA VAP, the initial report shall be no older than two years.

Or

— closure audit report confirming that all major ~~and~~ priority non-conformance corrective actions resulting from previous VAP audits were remedied within time frame specified by the EICC/RBA (i.e. RBA VAP Gold Recognition Certificate). The initial audit report shall be no older than two years.

Or

— closure audit report confirms that all non-conformance corrective actions resulting from previous VAP audits were remedied within the time frame specified by the EICC/RBA (i.e. RBA VAP Platinum Recognition Certificate). The initial audit report shall be no older than four years.

Optional point shall be awarded for EICC/RBA VAP audits if all facilities designated above meet the VAP audit requirements or facilities meet a combination of VAP audits and SA8000 certification.

If there are fewer than three suppliers for a component type named above, every supplier for that component shall conform to this criterion.

Point value: 1 or 2

Geographic applicability: This criterion shall be declared the same in all countries or regions for which the product is declared to conform to this Standard. The approach used to conform to this criterion may vary by country or region.

Verification requirements:

a) demonstration of certification to SA8000 or EICC/RBA VAP audits for all facilities of 3 of its 6 top suppliers that manufacture the 3 components listed above, if applicable, for the product declared to conform to this criterion, including either:

i. certificate to SA8000 2 years prior to product declaration or product verification for all facilities of 3 largest suppliers that manufacture the 3 components; or

ii. certificate issued by the EICC/RBA VAP Operations Management Team for facilities of 3 of its 6 top suppliers that manufacture the 3 components listed above for the product declared to conform to this criterion. Initial audit reports must be issued within the timeframes specified below and Each certificate must be issued within 2 years of product declaration or product verification and verify that:

¹ Currently defined by EICC/RBA as ≥ 180 of 200 points

² Currently defined by EICC/RBA as < 180 of 200 points

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— the initial validated audit report contained no major or priority non-conformance findings. If the facility was determined to be Low Risk, the initial report must be issued within 4 years of product declaration or product verification. If the facility was determined to be Medium or High Risk, the initial report must be issued within 2 years of product declaration or product verification.

or

— the closure audit report confirms that all major and/or priority non-conformance corrective actions were remedied within the time frame specified by the VAP EICC/RBA (i.e. RBA VAP Gold Recognition Certificate). The initial audit report must be issued within 2 years of product declaration or product verification.

or

— the closure audit report confirms that all non-conformance corrective actions were remedied within the time frame specified by the EICC/RBA (i.e. RBA VAP Platinum Recognition Certificate). The initial audit report must be issued within 4 years of product declaration or product verification.

b) if the manufacturer has fewer than 3 suppliers of components listed in a), a signed statement from a company official stating the number of suppliers the company has for the product declared to the criterion.

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Clarification ONLY: Information provided within the red text box is not officially part of the ballot and is provided for clarity ONLY. NSF currently has two other ballots open (NSF Ballots 426i3r1 and 426i5r1) to address additional revisions to this criterion. For reference purposes only, we have merged the revisions from these ballots above for clarity and included the combined language below; however, please note that this is for informational purposes only. All RED text is for clarification ONLY and not a part of the official ballot. The official balloted language you are voting on is provided outside the text box.

Merged Language for Informational Purposes Only:

12.4.3 Optional - Certification to social responsibility performance standard (corporate)

Manufacturer shall ensure that all **supplier owned or operated** facilities of three of its 6 top suppliers (by annual spend, fiscal or calendar) that manufacture each of three main components (principal storage device(s); processor(s) (CPU); and printed circuit board(s)), if applicable, for the product are:

— certified by accredited certification bodies to Social Accountability (SA) 8000³⁹. Certification bodies shall be accredited by an authorized accreditation body to certify to the SA8000. The certification shall be no older than three years. (2 points)

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Optional points shall only be awarded for SA8000 certification if all facilities designated above are certified to SA8000. If there are fewer than three suppliers for a component type named above, every supplier for that component shall conform to this criterion;

Or

- audited to the EICC/RBA Code of Conduct¹⁵ using the Validated Audit Process (VAP). (1 point)

Optional point shall only be awarded for VAP audits if a certificate has been issued by the VAP Operations Management Team to verify that for each facility:

- initial validated audit reports contained no major or priority non-conformance findings. ~~as defined by the EICC VAP and shall be no older than two years.~~ If the facility was determined to be Low Risk³ as defined by the EICC/RBA VAP, the initial report shall be no older than four years. If the facility was determined to be Medium or High Risk⁴ as defined by the EICC/RBA VAP, the initial report shall be no older than two years.

Or

- closure audit report confirming that all major ~~or~~ priority non-conformance corrective actions resulting from previous VAP audits were remedied within time frame specified by the EICC/RBA (i.e. RBA VAP Gold Recognition Certificate). The initial audit report shall be no older than two years.

Or

- closure audit report confirms that all non-conformance corrective actions resulting from previous VAP audits were remedied within the time frame specified by the EICC/RBA (i.e. RBA VAP Platinum Recognition Certificate). The initial audit report shall be no older than four years.

Optional point shall be awarded for EICC/RBA VAP audits if all facilities designated above meet the VAP audit requirements or facilities meet a combination of VAP audits and SA8000 certification.

If there are fewer than three suppliers for a component type named above, every supplier for that component shall conform to this criterion.

NOTE — For the purpose of this criterion “facility” is defined as a manufacturing site that is majority owned or operated by one of the suppliers within the scope of this criterion.

Point value: 1 or 2

Geographic applicability: This criterion shall be declared the same in all countries or regions for which the product is declared to conform to this Standard. The approach used to conform to this criterion may vary by country or region.

³ Currently defined by EICC/RBA as ≥ 180 of 200 points

⁴ Currently defined by EICC/RBA as < 180 of 200 points

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Verification requirements:

- a) demonstration of certification to SA8000 or EICC/RBA VAP audits for all **supplier owned or operated** facilities of 3 of its 6 top suppliers that manufacture the 3 components listed above, if applicable, for the product declared to conform to this criterion, including either:
- i. certificate to SA8000 **issued within 32** years prior to product declaration or product verification for all **supplier owned or operated** facilities of 3 largest suppliers that manufacture the 3 components; or
 - ii. certificate issued by the EICC/RBA VAP Operations Management Team for all **supplier owned or operated** facilities of 3 of its 6 top suppliers that manufacture the 3 components listed above for the product declared to conform to this criterion. Initial audit reports must be issued within the timeframes specified below and ~~Each certificate must be issued within 2 years prior to of product declaration or product verification and~~ verify that:
 - the initial validated audit report contained no major or priority non-conformance findings. If the facility was determined to be Low Risk, the initial report must be issued within 4 years of product declaration or product verification. If the facility was determined to be Medium or High Risk, the initial report must be issued within 2 years of product declaration or product verification.
- or
- the closure audit report confirms that all major ~~and~~ priority non-conformance corrective actions were remedied within the time frame specified by the VAP EICC/RBA (i.e. RBA VAP Gold Recognition Certificate). The initial audit report must be issued within 2 years of product declaration or product verification.
- or
- the closure audit report confirms that all non-conformance corrective actions were remedied within the time frame specified by the EICC/RBA (i.e. RBA VAP Platinum Recognition Certificate). The initial audit report must be issued within 4 years of product declaration or product verification.
- b) if the manufacturer has fewer than 3 suppliers of components listed in a), a signed statement from a company official stating the number of suppliers the company has for the product declared to the criterion.