NSF Standard(s) Impacted: 426-2017
Background: Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.
<b>Section 5.5.1 Optional – Energy efficient supply chains</b> makes reference to the "Korea SEP (KSEP)" program as an option for third party certification. This program has since changed its name to the "Korean Superior Energy Management System (Superior EnMS)" program, which should be reflected in the standard to avoid confusion.
Recommendation: Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.
Page 21: Replace "Korea SEP (KSEP) program" with "Korea Superior Energy Management System (Superior EnMS) program"
Supplementary Materials (photographs, diagrams, reports, etc.):  If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.  I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.
Signature*: U.S. Department of Energy
Telephone Number: (202)586-7234 E-mail: Paul.Scheihing@ee.doe.gov Is this a revision of a previous Issue Paper (if yes put original issue number):
Submission Date: Dec 21, 2017
Please submit to: Joint Committee Secretariat, Jessica Slomka at <u>jslomka@nsf.org</u> or to standards@nsf.org

\*Type written name will suffice as signature

Item No.\_\_\_\_\_ (For NSF International internal use)

NSF Standard(s) Impacted: 426-2017
Background: Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.
<b>Section 5.5.1 Optional – Energy efficient supply chains</b> makes reference to achieving certification to the US DOE's Superior Energy Performance (SEP) program "at the Silver level or higher." Since the publication of this standard, SEP has removed this qualification from its certifications. This should be reflected in the standard to avoid confusion.
Recommendation: Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting of underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.
Page 22 (top):  - A nationally equivalent program—at the Silver level or higher. An equivalent program shall meet the requirements of the US DOE SEP program.
Page 22 (bottom):  - Documentation of current U.S. DOE SEP program Silver level or higher certification, o certification(s) to a nationally equivalent SEP program.
Supplementary Materials (photographs, diagrams, reports, etc.):  If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.
I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive royalty free rights in copyright; in this item and I understand that I acquire no rights in an publication of NSF International in which this item in this or another similar or analogous form is used.
$\bigcirc$ 0 $\bigcirc$ Q $\bigcirc$ Q $\bigcirc$
Signature*:
Company: U.S. Department of Energy Telephone Number: (202)586-7234 E-mail: Paul.Scheihing@ee.doe.gov
Is this a revision of a previous Issue Paper (if yes put original issue number):
Submission Date: Dec 21, 2017
Please submit to: Joint Committee Secretariat, Jessica Slomka at <u>islomka@nsf.org</u> or to standards@nsf.org
*Type written name will suffice as signature

Item No.\_\_\_\_ (For NSF International internal use) 12/2017

NSF Standard(s) Impacted:	NSF/ANSI 426-2017	

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

NSF 426 cites IAF accreditation in several criteria, including 7.1.3, 5.5.1, 12.2.1 and 12.4.2. See the attached document, "IAF-Certification Body Language," with excerpts from these criteria. The reference to IAF in criteria 7.1.3 is not consistent with IAF accreditation. Certification bodies are not IAF signatories/members. Accreditation bodies (that accredit certification bodies) are IAF signatories.

Current language in 7.1.3:

Certification shall be by a certification body that is a signatory to the International Accreditation Forum (IAF) Multilateral Recognition Arrangement for the scope of accreditation for ISO/IEC 17065.

# Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

The criterion text should be modified for consistency with IAF program structure. Two options for modification are shown below. These options are consistent with other references to IAF in NSF 426 standard. The Submitter has no preference.

#### Option 1:

Certification shall be by a certification body that is accredited by a signatory to the an International Accreditation Forum (IAF) Multilateral Recognition Arrangement member accreditation body for the scope of accreditation for to certify to ISO/IEC 17065.

### Option 2:

Certification shall be by a certification body that is accredited by a signatory to the International Accreditation Forum (IAF) Multilateral Recognition Arrangement for the whose scope of accreditation for includes ISO/IEC 17065.

## Supplementary Materials (photographs, diagrams, reports, etc.):

See "IAF-Certification body language.docx" for summary of language in other criteria.

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*: _	Patricia Dillon					
Company:	Green Electronics Council					
Telephone N	umber: <u>1-978-346-8476</u> E-mail:	pdillon@greenelectronicscouncil.org				
Please submit to	o the Secretariat	<del></del>				
of the Joint	Committee on:	NSF 426				

Email completed form to the Standards Department: standards@nsf.org.

<sup>\*</sup>Type written name will suffice as signature

NSF Standard(s) Impacted:	NSF/ANSI 426-2017	

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

- 1) In criterion 12.4.3, the timeframe in which SA8000 and EICC audit reports is not clear and/or contradictory.
  - a. For SA8000, on page 66, paragraph 1, the criterion states that "certification shall be no older than three years." In verification requirement a)i), it states, "certificate to SA8000 2 years prior to product declaration...."
    - These statements are contradictory. The language in the criterion should be carried into the verification requirement. This would be consistent with SA8000 certification being valid for 3 years.
  - b. For EICC, verification requirement a) ii) is not clear. The verification requirement states "each certificate must be issued within 2 years of product declaration or product verification." "Within 2 years" is vague as it could be 2 years prior or 2 years after. The criterion text states "no older than 2 years." The intent of the JC was that the certificate was issued <u>prior</u> to declaration or verification. Please clarify as shown in the recommendation.
- 2) The Electronics Industry Citizen Coalition (EICC) changed its name to Responsible Business Association (RBA). See www.responsiblebusiness.org The standard should be updated to reflect this change.

### Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

- 1) Clarify the text in verification requirements:
  - a. Verification requirement a) i) should read:
    - i. Certificate to SA8000 issued within 3 2-years prior.....
  - b. Verification requirement a) ii) should read:
    - ii. ....Each certificate must be issued within 2 years prior to product declaration or product verification...
- 2) Throughout the standard, change Electronics Industry Citizen Coalition (EICC) to Responsible Business Association (RBA).

Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	Patricia Dillon				
Company:	Green Electronic	s Coun	cil		
Telephone N	umber: 1-988-346	-8476	E-mail:	pdillon@greenelectronicscouncil.org	
Please submit to the Secretariat					
of the Joint	Committee on: _	NSI	F 426		

Email completed form to the Standards Department: standards@nsf.org.

<sup>\*</sup>Type written name will suffice as signature

NSF Standard(s) Impacted:	NSF/ANSI 426-2017	

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

In criterion 12.5.3, the verification requirements do not align with the criterion text. As written, the verification requirements allow the manufacturer to demonstrate "one of the following." The second verification option (ii) does not include public disclosure of summary results and progress towards meeting established goals, which are required in the criterion text shown below (p. 69, paragraph 2 & 3.)

A summary of results for absolute freight GHG emissions (e.g., annual tonnes of CO<sub>2</sub>e) and normalized GHG emissions (e.g. grams of CO<sub>2</sub>e per tonne-km) for each mode (road, air, rail, inland waterways and sea) shall be publicly disclosed and shall indicate what framework or mode-specific approaches were used and where third-party verification applies.

Manufacturers shall also develop a transport supply chain greenhouse gas emission reduction goal and publicly report progress towards meeting this goal annually.

### Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

The verification requirements should be modified to remove "one of the following" and "or" as shown below.

#### **Verification Requirements:**

- a) demonstration of one of the following:
  - i. the location where the summary of results, the transport supply chain greenhouse gas reduction emission goal and progress report towards the goal are publicly posted (e.g. manufacturer URL, Corporate Sustainability Report (CSR) report or program URL), or
  - ii. if applicable, third-party verification in conformance with the applicable modes in the GLEC Framework or other mode-specific approaches described above. Document shall include credentials and contact information of third party verifier.

### Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature\*: Patricia Dillon

Company: Green Electronics Council

Telephone Number: 1-978-346-8476 E-mail:pdillon@greenelectronicscouncil.org

Please submit to the Secretariat

of the Joint Committee on: NSF 426

Email completed form to the Standards Department: standards@nsf.org.

<sup>\*</sup>Type written name will suffice as signature



NNSF Standard(s) Impacted:	NSF/ANSI 426 - 2017
relevant to public health, public unders	ndicating the cause and nature of concern, the impacts identified standing, etc, and any other reason why the issue should be as appropriate any specific section(s) of the standard(s) that are
On page 26 of the standard, Section 6.1.	4, reads:
Plastic parts exceeding 25 g shall not conbromine <sup>51</sup> , in accordance with Table 6.1,	ntain greater than 1000 ppm chlorine or greater than 1000 ppm with the following exception:
apply to this subject section. Either the i	There is a footnote 51 on page 31 but it is clear that it does not missing footnote must be added to page 26 and all the remaining reference could be removed from page 26, or corrected to read e but already used on page 25.
This change is necessary to avoid confu with Section 6.1.4.	usion by certifiers and those manufacturers attempting to comply
text of the relevant section(s) indicating	., recommended changes to the standard(s) including the current g deletions by use of <del>strike-out</del> and additions by highlighting or to a Task Group for detailed consideration; etc.
The quickest and easiest solution is to si the previous page 25. The proposed cha	mply change the footnote reference on page 26 to footnote 50 on ange is shown below
Plastic parts exceeding 25 g shall not conbromine 5450, in accordance with Table 6.2	ntain greater than 1000 ppm chlorine or greater than 1000 ppm 1, with the following exception:
Supplementary Materials (photograph of not provided electronically, the submit committee members.	hs, diagrams, reports, etc.): itter will be responsible to have sufficient copies to distribute to
royalty free rights in copyright; in t	non-exclusive, royalty free rights, including non-exclusive, this item and I understand that I acquire no rights in any hich this item in this or another similar or analogous form is
Signature*: Richard Krock Company: The Vinyl Inst	titute
Telephone Number: 202-765-2287 Is this a revision of a previous Issue	7 E-mail: rkrock@vinylinfo.orgue Paper (if yes put original issue number):

Submission Date: January19, 2018\_

jslomka@nsf.org or to standards@nsf.org

Please submit to: Joint Committee Secretariat, Jessica Slomka at

Item No.\_\_\_\_ (For NSF International internal use) 12/2017 \*Type written name will suffice as signature

NSF Standard(s) Impacted: NSF 426
Background: Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.
There is an inconsistency with the "not applicable" statement in criterion 7.1.3. The "not applicable" statement does not align with criterion; it is also inconsistent with the "not applicable" statement in criterion 7.1.1.
Specifically, the "not applicable" statement in 7.1.3 currently applies only to "individual plastic parts weighing greater than 25 g" For consistency, it should read "individual plastic parts weighing greater than $\underline{\text{or equal to}}$ 25 g"
Recommendation: Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.  Change "not applicable" statement in criterion 7.1.3 on page 37 to read:
"For products that do not contain individual plastic parts weighing greater than <u>or equal to</u> 25 g, the manufacturer may declare 'Not Applicable' for this criterion."
Supplementary Materials (photographs, diagrams, reports, etc.):  If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.
I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.
Signature*: Patricia Dillon Company: Green Electronics Council Telephone Number: 978 346-8476 E-mail: pdillon@greenelectronicscouncil.org
Is this a revision of a previous Issue Paper (if yes put original issue number):  Submission Date:  March 5, 2018

Please submit to: Joint Committee Secretariat, Jessica Slomka at <u>islomka@nsf.org</u> or to standards@nsf.org

<sup>\*</sup>Type written name will suffice as signature



NSF Standard(s) Impacted: NSF 426
-----------------------------------

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

#### Criterion 6.3.1

In the second bullet, the criterion requires either "a GHG reduction goal or maintains year-to-year GHG emissions reduction activities" as shown below.

— a GHG emissions reduction goal, or maintains year-to-year GHG emissions reduction activities, and publicly reports progress toward this goal, on an annual basis. The reduction goal may include other GHG emission sources, but shall at least include direct process F-GHG emissions from the semiconductor manufacturing process. Process F-GHG's are defined as SF<sub>6</sub>, NF<sub>3</sub>, PFCs and HFCs. Examples of F-GHGs include, but are not limited to, CF<sub>4</sub>, C<sub>2</sub>F<sub>6</sub>, C<sub>3</sub>F<sub>8</sub>, c-C<sub>4</sub>F<sub>8</sub>, C<sub>4</sub>F<sub>6</sub>, C<sub>4</sub>F<sub>8</sub>O, CHF<sub>3</sub>, CH<sub>2</sub>F<sub>2</sub>, CH<sub>3</sub>F, NF<sub>3</sub>, and SF<sub>6</sub>.

The "year-to-year GHG emission reduction activities" are not referenced elsewhere in the criterion, and therefore, unclear:

- 1) How public reporting on an annual basis applies;
- 2) Verification requirements.

### Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

Two potential options for JC consideration:

Option #1 – If the intention was to only allow for emission reduction goals, and the phrase "or maintains year-to-year GHG emissions reduction activities" is an editing remnant, strike the phrase as shown below.

— a GHG emissions reduction goal, or maintains year to year GHG emissions reduction activities, and publicly reports progress toward this goal, on an annual basis. The reduction goal may include other GHG emission sources, but shall at least include direct process F-GHG emissions from the semiconductor manufacturing process. Process F-GHG's are defined as SF<sub>6</sub>, NF<sub>3</sub>, PFCs and HFCs. Examples of F-GHGs include, but are not limited to, CF<sub>4</sub>, C<sub>2</sub>F<sub>6</sub>, C<sub>3</sub>F<sub>8</sub>, c-C<sub>4</sub>F<sub>8</sub>, C<sub>4</sub>F<sub>6</sub>, C<sub>4</sub>F<sub>8</sub>O, CHF<sub>3</sub>, CH<sub>2</sub>F<sub>2</sub>, CH<sub>3</sub>F, NF<sub>3</sub>, and SF<sub>6</sub>.

Option #2 - If the intention was to allow both options - emission reduction activities or goals, incorporate the option for GHG emissions reduction activities throughout the criterion as shown below.

## 6.3 Manufacturing chemicals

6.3.1 Optional - Mitigation and inventory of process fluorinated greenhouse gas emissions resulting from semiconductor manufacturing

At least one supplier of central processing units (CPUs), dynamic random-access memory (DRAM), and or accelerators used in the product shall have:

- developed a process F-GHG emissions inventory using one of the following methods:
- the most recent IPCC Tier 2a, 2b, or Tier 3 methodology, or
- methods included in the U.S. EPA GHG Reporting Rule, Subpart I.

If the emissions inventory is not already publicly available, the supplier shall make the process F-GHG emissions inventory available to the manufacturer for the following categories of process F-GHGs: SF6, NF3, PFCs, and HFCs.

— a GHG emissions reduction goal, or maintains year-to-year GHG emissions reduction activities, and publicly reports progress toward this goal <u>or on emission reduction activities</u>, on an annual basis. The reduction goal <u>and activities</u> may include other GHG emission sources, but shall at least include direct process F-GHG emissions from the semiconductor manufacturing process. Process F-GHG's are defined as SF<sub>6</sub>, NF<sub>3</sub>, PFCs and HFCs. Examples of F-GHGs include, but are not limited to, CF<sub>4</sub>, C<sub>2</sub>F<sub>6</sub>, C<sub>3</sub>F<sub>8</sub>, c-C<sub>4</sub>F<sub>8</sub>, C<sub>4</sub>F<sub>6</sub>, C<sub>4</sub>F<sub>8</sub>O, CHF<sub>3</sub>, CH<sub>2</sub>F<sub>2</sub>, CH<sub>3</sub>F, NF<sub>3</sub>, and SF<sub>6</sub>.

This criterion applies to fabrication facilities associated with products covered under this Standard. It is acceptable if only a portion of the supplier fabrication facilities is associated with the products covered under this Standard.

Points shall be awarded according to Table 6.4.

Table 6.4

GHG Emissions Activity	Total Points
F-GHG emissions inventory	1
F-GHG emissions inventory AND GHG emissions reduction goal or emission reduction activities	2

Point value: 2 maximum

**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) for F-GHG emissions inventory:
  - i. documentation of process F-GHG emissions inventory and reporting using one of the following:
    - latest IPCC Tier 2a, 2b, or Tier 3 methodology, or
    - subpart I of the U.S. EPA GHG Reporting Rule.

If the emissions inventory is not already publicly available, documentation that the supplier has made the process F-GHG emissions inventory available to the manufacturer for the following categories of process F-GHGs: SF6, NF3, PFCs, and HFCs.

- ii. unless specified already in verification a)i), reporting of:
  - specification of the method used in a)i) to estimate F-GHG emissions.
  - specification of the method used to estimate DREs of abatement equipment (e.g. facility-specific measurements or IPCC defaults).
- b) For GHG emission reduction goal or emission reduction activities:
  - i. supplier documentation that states emissions reduction goal <u>or emission reduction activities</u> and describes progress toward goal <u>or progress made due to emission reduction activities</u>, made publicly available for example on a website.
  - ii. if not already included in verification b)i), supplier letter that includes:
    - definition of baseline year for process F-GHG emissions reduction goal <u>or emission reduction</u> activities.
    - description of the method(s) implemented to reduce process F-GHG emissions. This may include any one or a combination of, but not limited to, the pollution prevention approaches outlined below, as applicable:
      - Process Recipe Optimization
      - Greenhouse gas replacement
      - Point of Use (POU) abatement
      - Remote Plasma Clean

### References and details:

World Semiconductor Council Best Practice Guidance of PFC Emission Reduction, 2012.<sup>1</sup> Semiconductor Industry Association Post-2010 voluntary PFC emissions reduction goal.<sup>2</sup>

Supplementary Materials (photographs, diagrams, reports, etc.):

<sup>&</sup>lt;sup>1</sup> World Semiconductor Council <a href="http://www.semiconductorcouncil.org">http://www.semiconductorcouncil.org</a>

<sup>&</sup>lt;sup>2</sup> Semiconductor Industry Association 1101 K Street NWSuite 450Washington, DC 20005 <a href="https://www.semiconductors.org">https://www.semiconductors.org</a>

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	Patri	icia Dillon		
Company:	Green Elec	tronics Council		
Telephone N	lumber: 978 346-84	76 E-mail:	pdillon@greenelectronicsco	ouncil.org
ls this a revis	sion of a previous Is	ssue Paper (if yes	s put original issue number	):
Submission I	Date:	March 13, 2018	8 (rev May 8 to reference c	riterion # in
background	text per request of (	Chair)	•	

Please submit to: Joint Committee Secretariat, Jessica Slomka at <u>islomka@nsf.org</u> or to standards@nsf.org

<sup>\*</sup>Type written name will suffice as signature



NSF Standard(s) Impacted:
1101 Otanuaru(5) iiripacteu.

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

In criterion 11.1.2 the criterion text and the verification requirements do not align. It is my recollection that the Joint Task Group modified the criterion text to be less prescriptive and to align with criterion 11.1.1. It would appear that the Verification Requirements in 11.1.2 were not modified to align with the criterion text. Below is the relevant text from both criteria. (Note: 11.1.1 has one additional sentence in the product criterion that is not in 11.1.2. This does not impact the VR.)

## 11.1.2 Optional - Manufacturer take-back service for de-installed servers (corporate)

## **Criterion text**

Manufacturer shall inform customers in product promotional materials (e.g., web-based sales information, product specifications) of the availability of the take back service for de-installed servers, and make available information describing the product take-back service, including how to utilize the service, on the manufacturer's public website.

## **Verification Requirement**

 evidence of notification of the take-back service for de-installed servers, including how to utilize the service(s), in sales information and product documentation, including website-based sales information and user manuals in formats provided to customers (e.g., website, compact disc, hard copy) at the time of purchase/lease.

### 11.1.1 Required – Provision of product take-back service (corporate)

# **Criterion text**

Manufacturer shall inform customers in product promotional materials (e.g., web-based sales information, product specifications) of the availability of the take back service, and make available information describing the product take-back service, including how to utilize the service, on the manufacturer's public website. The URL for the manufacturer's public website describing the product take-back service shall be provided during product registration, certification or self-declaration, and made publicly available.

# **Relevant Verification Requirement**

- b) in jurisdictions within a country or region where the product is declared to conform to this Standard and where there are no existing laws/and or regulations which establish a program for the collection and recycling of products declared to conform to this Standard, the following shall apply:
- demonstration that product take-back service is provided for products declared and formerly declared to conform to this Standard;
- URL for the manufacturer's public website that describes the product take-back service, including how to utilize the service;

 evidence that customers are informed of the product take-back service in product promotional materials, and

### Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

Modify Verification Requirement a) in 11.1.1 to be consistent with the criterion's requirements and 11.1.2 as follows:

a) evidence of notification that customers are informed of servers, including how to utilize the service(s), in sales information and product promotional materials, and the URL for the manufacturer's public website that describes the product take back service, including how to utilize the service—documentation, including website-based sales information and user manuals in formats provided to customers (e.g., website, compact disc, hard copy) at the time of purchase/lease.

# Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	Patricia Dillon	
Company:	Green Electroni	cs Council
Telephone N	umber: 978 346-8476	E-mail: pdillon@greenelectronicscouncil.org
ls this a revis	sion of a previous Issue	Paper (if yes put original issue number):
Submission I	Date: March 13	8, 2018

Please submit to: Joint Committee Secretariat, Jessica Slomka at islomka@nsf.org or to standards@nsf.org

\*Type written name will suffice as signature

NSF	Standard(s) Impacted: NSF/ANSI 426-201	7

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

Criterion 11.2.1 (page 53) includes a reference to the "IEEE-NSF Joint Task Group on the Environmental Leadership Standard for Servers". The standard title is now "Environmental Leadership and Corporate Responsibility Assessment of Servers" and the IEEE-NSF Joint Task Group is no longer convened, this reference needs to be updated.

## Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

The criterion text should be updated as shown below.

Qualified Electronics Recycling Standard: A Qualified Electronics Recycling Standard shall be publicly available and meet minimum technical requirements a) through g) below. The EEE-NSF 426 Joint Committee Task Group on the Environmental Leadership and Corporate Responsibility Assessment of Standard for Servers through the NSF Continuous Maintenance process will establish a Standards Qualification Panel to review and qualify Standards against Minimum Technical Requirements a) through g).

# <u>Supplementary Materials (photographs, diagrams, reports, etc.):</u>

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	Pamela Brody-Heine
Company:	Green Electronics Council
Telephone N	lumber: 541-633-7254 E-mail: pbrodyheine@greenelectronicscouncil.org
ls this a revis	sion of a previous Issue Paper (if yes put original issue number):No
Submission	Date: March 30, 2018

Please submit to: Joint Committee Secretariat, Jessica Slomka at <u>islomka@nsf.org</u> or to standards@nsf.org

<sup>\*</sup>Type written name will suffice as signature

NSF Standard(s) Impacted:	426

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

Criterion 11.2.2 contains conflicting references within the body of the criterion.

"If equipment and components collected pursuant to 11.1.1 and 11.2.1..."

And ... "Manufacturer is considered conformant with this criterion if equipment and components collected pursuant to 11.1.1 and 11.1.2..."

Criteria which reference the provision of a take-back service:

11.1.1 Required – Provision of product take-back service (corporate)

11.1.2 Optional - Manufacturer take-back service for de-installed servers (corporate)

Criteria which describes specific requirements of those (mfr/agent) providing take-back services: 11.2.1 Required - End-of-life processing requirements (corporate)

So, the reference to 11.1.2 is correct, but the reference to 11.2.1 is incorrect.

### Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

In criterion 11.2.2, Paragraph 1, Sentence 1:

"If equipment and components collected pursuant to criteria 11.1.1 and 11.2.1 11.1.2 and materials derived from them are transported..."

## Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	<b>Abbey</b>	Burns		
Company:	Cisco	Systems, Inc.		
Telephone Number:		(408)525-5580	E-mail:	abburns@cisco.com
Is this a revision of a	a previo	ous Issue Paper	(if yes put origina	l issue number):_No
Submission Date:		4/23/18		, <u></u>

Please submit to: Joint Committee Secretariat or to standards@nsf.org

<sup>\*</sup>Type written name will suffice as signature

NSF Standard(s) Impacted: _	NSF 426
., .	

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

The verification requirements in criterion 12.3.2 do not completely align with the requirements listed in the body of the criterion.

The last sentence in the second paragraph states "A brief description of the due diligence inquiry and the determination shall be publicly disclosed."

The verification requirements do not call out for "public disclosure"

## Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

I propose adding the following text (in RED) into the Verification Requirements

### **Verification requirements:**

- a) the URL to the manufacturer's public website that contains the following:
  - I. description of due diligence inquiry and determination.
  - II. if claiming "conflict free," copy of the independent private sector audit report, as specified in the criterion, verifying the manufacturer's determination of conflict-free sourcing.

## Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	Derek Hellar		
Company:	<b>Hewlett Packard Enterp</b>	rise	
Telephone Number:	916-785-6526	E-mail:	derek.hellar@hpe.com
Is this a revision of a	a previous Issue Paper (	if yes put ori	ginal issue number):No
Submission Date:	4/26/2018		

Please submit to: Joint Committee Secretariat or to standards@nsf.org

<sup>\*</sup>Type written name will suffice as signature

NSF Standard(s) Impacted: NSF 426	
-----------------------------------	--

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

Criterion 11.2.3, Publicly available record of reuse/recycling achievement, includes two undefined terms in the verification requirements:

- Initial certified reuse operator
- Initial certified treatment operator

It is unclear: 1) what certifications these two types of operators need to have for conformance to this criterion; and 2) what "initial" references.

The standard defines 3 related terms:

- **initial service providers**: Companies who contract directly with manufacturers or companies who contract with an agent acting on behalf of the manufacturer to provide one or more of the following take-back services: preparation for reuse or treatment of product/equipment/components.
- reuse operator: The entity responsible for preparing equipment or components for reuse.
- **treatment operator:** The entity responsible for the treatment of equipment or components.

Criterion 11.2.1 defines certification requirements for "initial service providers" however, reuse operators and/or treatment operators may not have contracts directly with manufacturers.

## Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

Modify VR b) in one of two ways:

**Option A**: change "initial certified reuse operator" and "initial certified treatment operator" to "initial service provider"

**Option B**: allow for either initial service providers or reuse/recycling operators to provide statements of achievement.

Option A maintains consistency across the criteria in Section 11. However, Option B allows for statements of reuse and recycling to be provided by reuse operators and/or treatment operators who do not have contracts directly with manufacturers (and therefore not meet the definition of initial service provider).

# Option A:

- b) statements of:
  - reuse from the initial service provider certified reuse operator (percentage by weight to the mass of input equipment and, or components received for the preparation of reuse);

ii.	recycling from the initial	service provider	certified treatment operator	(percentage by	weight to
	the		mass		of
	end-of-life equipment ar	nd, or component	ts received); and		

iii.	recovery from the initial	service provider	certified treatment operator	(percentage by v	veight to
	the		mass		0
	end-of-life equipment ar	nd, or component	s received).		

## Option B:

- c) statements of:
  - iv. reuse from the initial service provider or certified reuse operator (percentage by weight to the mass of input equipment and, or components received for the preparation of reuse);
  - v. recycling from the initial service provider or certified treatment operator (percentage by weight to the mass of end-of-life equipment and, or components received); and
  - vi. recovery from the initial service provider or certified treatment operator (percentage by weight to mass of end-of-life equipment and, or components received).

# Supplementary Materials (photographs, diagrams, reports, etc.):

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	Patricia Dillon
Company:	Green Electronics Council
Telephone Numbe	r: 978 346 8476 E-mail: pdillon@greenelectronicscouncil.org
Is this a revision of	a previous Issue Paper (if yes put original issue number):
Submission Date:	June 14, 2018

Please submit to: Joint Committee Secretariat or to standards@nsf.org

<sup>\*</sup>Type written name will suffice as signature

NSF Standard(s) Impacted: 426 — Servers

## Background:

Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

The U.S. Department of Energy recently rebranded its Superior Energy Performance™ program to reflect the relationship between the program and the ISO 50001 energy management standard. Relevant to NSF 426 are the terms "Superior Energy Performance™" and "SEP". Changes in terminology are:

- "Superior Energy Performance™" is now "50001 Superior Energy Performance™"
- "SEP" is now "50001 SEP".

### Recommendation:

Clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

Update references to the Department of Energy's 50001 Superior Energy Performance program at all instances in which "Superior Energy Performance" and "SEP" appear:

### 2 Normative References (page 6)

U.S. Department of Energy 50001 Superior Energy Performance (50001 SEP)<sup>45</sup>

### 5.5.1 Optional – Energy efficient supply chains (pages 21-23)

- b) Third party certification to one of the following:
- the U.S. DOE <u>50001</u> Superior Energy Performance<sup>™</sup> (<u>50001</u> SEP) program by an ANAB-accredited <u>50001</u> SEP verification body(ies); or
- Korea SEP (KSEP) program, or
- a nationally equivalent program at the Silver level or higher. An equivalent program shall meet the requirements of the US DOE 50001 SEP program<sup>45</sup>.

### and, under Verification requirements:

- ii. for Part b):
- documentation of current U.S. DOE <u>50001</u> SEP program <u>Silver level or higher [SP1]</u>certification, or certification(s) to a nationally equivalent <u>50001</u> SEP program.
- national program meets U.S. DOE <u>50001</u> SEP program equivalency, if an equivalent <u>50001</u> SEP program is used.

Supplementary Materials (photographs, diagrams, reports, etc.): None

If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature*:	Vestal Tutterow	
Company:	Lawrence Berkeley National Lab	poratory
Telephone N	lumber: 703-346-3533	E-mail: vtutterow@lbl.gov_
Is this a revision of a previous Issue Paper (if yes put original issue number):		
Submission I	Date: July 13, 2018	
	· · · · · · · · · · · · · · · · · · ·	

Please submit to: Joint Committee Secretariat, Jessica Slomka at <u>islomka@nsf.org</u> or to standards@nsf.org

<sup>\*</sup>Type written name will suffice as signature