

## Template for comments and responses

Date: 6/4/24

Ballot Document: NSF/ANSI  
498:2023

Group (JC name): Sustainability  
Program Document for Architectural  
Coatings

| Line # | Commenter name  | Section (ex: 3.1)   | Paragraph, Figure, or Table (ex: Table 4.1) | Type of comment <sup>1</sup> (ge, te, ed) | Comments  | Proposed change  | Response to comment   |
|--------|-----------------|---------------------|---|---|---|--|---|
| 1      | Bill Le Roy     | Forward             | 3 <sup>rd</sup> , second bullet             | Ge,te                                     | Most environmental declarations produced for use in the marketplace are now involve third party verification – self-declared are not as reliable or comparable with the same product types. | Consider revision to only allow third party verified labelling and declarations. Note LEED v5 – calls for Type III EPDs for example.                   | The forward is not part of the standard under JC review.  |
| 2      | Kristi Brown    | 1.1                 | Bullet #4                                   | ed  | Change “carpet” to “coating”  | Change “carpet” to “coating”   | 6/17/24 – JC – See comment 3  |
| 3      | Urvi Talaty     | 1.1                 | Bullet 4                                    | ed  | Typo in the fourth bullet point   | - educate and instruct all stakeholders in the <del>carpet</del> architectural coatings supply chain;  | 6/17/24 – JC - Agree  |
| 4      | Mary CHERVENA K | 1.1                 |   | ed  | I believe the wrong word is used in the sentence “...educate and instruct all stakeholders in the <del>carpet</del> supply chain;”  | Propose that “carpet” be changed to “coatings”   | 6/17/24 – JC – See comment 3  |
| 5      | Bill Le Roy     | Normative Reference | BS EN 16516                                 | Te  | Consider discussion around continued inclusion of this reference standard as NA standards continue to evolve and apply more directly to US marketplace.                                     | Consider updated to include +A1:2020 – and or reference standard applicable to NA EPA Rule Sec 183 (e) (NAAQS) – if more restrictive                   | 6/17/24 – JC – Everyone needs to review this addendum and talk about it next meeting.<br>2/3/25 - Should reference DIN 16516 and the current version is 2020. |
| 6      | Bill Le Roy     | Normative Reference | LEED v4.1                                   | Ge  | This is soon to be replaced   | Consider noting update to LEED v5  | 6/17/24 – JC – Can't reference it until it comes out.   |
| 7      | Kristi Brown    | 3                   | 3.9   | te  | Add definition for chalking   | - Chalking - the development of loose, removable powder (pigment) at the surface of an organic coating, usually caused by weathering                   | 6/17/24 – JC - Agreed   |
| 8      | Bill Le Roy     | 3 Definitions       | 3.16  | Ge  | Ecoinvent offers a (proprietary) life cycle database...   | Consider inclusion that this is a non-publicly available set of data. Also consider inclusion of publicly available data sets (ie Federal LCA Commons) | 6/17/24 – JC – Remove ‘ecoinvent’ since it is not in the standard anywhere.   |
| 9      | Urvi Talaty     | 3.23                | N/A   | Ge  | GaBi is now LCA for Experts. Not sure if we need this definition as it does not appear  | <del>GaBi: Created by PE INTERNATIONAL GaBi Databases are LCA databases</del>  | 6/17/24 – JC – Remove ‘GaBi’ since it is not in the standard anywhere.  |

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|        |                 |                   |   |   | 10anywhere in the text of the sta11ndard.  | that contain ready to use Life Cycle Inventory profiles.  |   |
| 10     | Mary CHERVENA K | 3.25              |   | Ge  | The de12finition of a “high-risk supplier” is13 never formally stated in the paraprap14h: “ <b>high risk supplier</b> : Under t15he Dodd-Frank Act of 2010, <sup>15</sup> ma16nufacturers are required to document17 their use of the following four minera18ls: tantalum, tin, tungsten, and go19ld (3TG). “Congress enacted Sectio20n 1502 of the Act because of concerns that the exploitation and trade of conflict minerals by armed groups is helping to finance conflict in the DRC region and is contributing to an emergency humanitarian crisis.” (1) In addition to 3TG, a number of other minerals used by the paints and coatings industry have come under suspicion for a high-risk of corruption in their supply chain, including, but not limited to, mica, cobalt, and copper. (2) These minerals are frequently used as important pigments in paints and coatings. Given their high-risk situation, they must be sourced with caution. | Propose that the following sentence be added to the beginning of the 3.25 definition: A high-risk supplier is a vendor that poses a significant threat to business continuity, quality, reputation, compliance, or profitability. | 6/17/24 – JC – Defer until we get to section 12.4. What is in the definition is not a definition and word for word what is in section 12.4.<br><br>5/5/25 – JC – After reviewing section 12.4 and the lack of changes suggested the JC decided to leave this definition as it is. |
| 11     | Urvi Talaty     | 3.38              | N/A   | Ge  | Current definition not quite accurate  | Post-consumer recycled content: Percentage of a product composed of material that was collected post consumer use and repurposed into other products.   | 6/17/24 – JC – Rachel will show the indent this.<br><br>2/3/25 – Group agreed to the change and indent.   |

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| 12     | Urvi Talaty    | 3.39                 | N/A   | ed  | Current definition not quite accurate   | Pre-consumer recycled content: Percentage of a product composed of material that, for whatever reason, did not meet specifications to be sold and was repurposed into other products                        | 6/17/24 – JC – Answered in comment 11  |
| 13     | Bill Le Roy    | 3 Definitions        | 3.39  | Ed  | Preconsumer recycled content as defined.  | Consider classifying this term as: Post-industrial – Materials diverted from the waste stream during manufacturing (not surplus manufacturing materials).   | 6/17/24 – JC – Rachel will show the indented version at the next meeting.<br><br>2/3/25 – Group agreed to the change and indent.           |
| 14     | Kristi Brown   | 5.3                  | 1   | ge  | Overall scoring to be updated as I believe this was agreed upon, but wanted to make sure it was noted in the process          | - NSF/ACA to update the scoring. Companies without CSR programs should not be excluded from earning certification. We will need guidance on how to begin updating the scoring.                              | 6/17/24 – JC – This will get worked out after all the comments are reviewed.   |
| 15     | Sarah Sanzo    | 5.3                  | 1   | ge  | Overall scoring to be updated but I believe this is already agreed upon but wanted to make sure it was noted in this process. | NSF / ACA to update scoring. Companies without CSR programs should not be excluded from earning certification. I am not familiar on how to propose new weighting and scores so will need guidance to begin. | 6/17/24 – JC – This will get worked out after all the comments are reviewed.   |
| 16     | Bill Le Roy    | 6 Performance        | n/a   | ed  | “It is further documented that <i>they</i> longer <i>they</i> beautify and protect...”  | Consider clarifying this sentence.  | 6/17/24 – JC – It is further documented that <i>they</i> longer <i>they</i> beautify and protect...”<br><br>***Superseded by comment 19*** |

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| 17     | ACA Task Force | 6                    |   | te  | The product performance section should be amended to align with the ACA/NSF PCR for EPDs, which is a more credible and reliable source of information and guidance for the architectural coatings industry.  | - Amend the charts in Chapter 6 to align with ACA's PCR for Architectural Coatings. | 6/17/24 – JC – Suzanne will send the PCR to Rachel and she will update the standard. |
| 18     | ACA Task Force | 6                    |   | te  | One of the major problems with the ANSI 498 standard is the drastic difference between the product performance thresholds set for Section 6 and those used by the ACA/NSF PCR for EPDs referenced in the Life Cycle Analysis (LCA) Section 7. According to the ANSI 498 standard, the product performance section evaluates the durability of architectural coatings based on various criteria, such as scrub resistance, gloss retention, and erosion resistance. The standard assigns different performance levels (low, | - Amend the charts in Chapter 6 to align with ACA's PCR for Architectural Coatings. | 6/17/24 – JC – Suzanne will send the PCR to Rachel and she will update the standard. |

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|        |                |                      |   |   | medium and high) to each criterion and awards credits based on the level achieved. However, the performance levels used in Section 6 are much higher and stricter than those used by the ACA/NSF PCR for EPDs, which is a widely accepted and internationally recognized method for reporting the environmental impacts of architectural coatings. Moreover, the ACA/NSF PCR for EPDs uses a design life rating system that classifies architectural coatings into three categories (low, medium or high quality) based on their expected service life and maintenance requirements. The design life rating system is based on extensive research and industry consensus, and, most importantly, it reflects the actual performance and durability of architectural coatings in real-world conditions. As shown in Tables |                 |                     |

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|        |                |                      |   |   | <p>1, 2 and 3, there are significant discrepancies between the performance levels of the ANSI 498 standard and the design life ratings of the ACA/NSF PCR for EPDs for interior paints, exterior paints and stains, respectively. For example, an interior coating that has a high-quality design life rating according to the ACA/NSF PCR for EPDs may be rated as a low-quality product in the ANSI 498 Product Performance chapter (Table 1) and earn no credits toward certification. As summarized in Table 3, architectural stains rated as high quality according to the AC PCR for EPDs could fail to meet the low quality prerequisite of the ANSI 498 product performance section and, therefore, be considered noncompliant with the standard.</p> <p>See Tables 1, 2, and 3 attached as Appendix 1</p> |                 |                     |

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| 19     | Mary<br>CHERVENA<br>K | 6                    |   | ed  | It is further documented that <del>they</del><br><del>longer they beautify and protect</del><br><del>the substrate to which they are</del><br><del>applied, this has potential to reduce</del><br><del>customer dissatisfaction and the</del><br><del>environmental burdens associated</del><br><del>with the additional paint,</del><br><del>transportation, and labor of</del><br><del>recoating.</del> | Propose fixing grammatical error:<br>"...documented that the longer<br>they beautify and protect the<br>substrate to which they are<br>applied, the more likely customer<br>dissatisfaction and the<br>environmental burdens<br>associated with the additional<br>paint, transportation, and labor of<br>recoating will be reduced." | 6/17/24 – JC – Going with this version<br>which supersedes Bill's comment above.   |
| 20     | Mary<br>CHERVENA<br>K | 6.1                  |   | ed  | Low-quality criteria is a<br>prerequisite to achieve certification<br>to this standard.   | Propose adding "Meeting low-<br>quality criteria..."   | 6/17/24 – JC – Agreed (ed)   |
| 21     | Bill Le Roy           | Section 6.1          | Tables  | Te  | Testing and Substrates  | ACA PCR Committee to consider/ensure<br>testing and substrates are coordinated in<br>the updated PCR where needed.   | 6/17/24 – JC – Suzanne will send the PCR<br>to Rachel and she will update the<br>standard.<br>05-2-25 – The table was updated per the<br>PCR |
| 22     | Bill Le Roy           | Sec 6.1              | Table 6.1.1   | Ed  | Coord with ACA PCR committee on scrub<br>and washability testing is to be in triplicate<br>in the updated version (presume yes) but<br>want to confirm  | n/a  | 6/17/24 – JC – Suzanne will send the PCR<br>to Rachel and she will update the<br>standard.<br>05-2-25 – The table was updated per the<br>PCR |
| 23     | ACA Task<br>Force     | 6.1.1                |   | te  | There is a need to soften the<br>impact of ASTM 2486 scrub<br>resistance testing on product<br>quality classification. A product<br>that passes more 400 cycles for<br>ASTM scrub is not low quality.<br>The Green Seal minimum   | - Amend the charts in Chapter 6 to<br>align with ACA's PCR for<br>Architectural Coatings.  | 6/17/24 – JC – Suzanne will send the PCR<br>to Rachel and she will update the<br>standard.<br>05-2-25 – The table was updated per the<br>PCR |

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|        |                |                      |   |   | requirement of 400 cycles is a good reference. ASTM D2486 scrub testing does not translate to any practical interior paint attributes because it is essentially a wet abrasion test so its use should be limited or put in proper context when it comes to interior wall paints. MPI (Master Painters Institute) for example uses a less severe and more practical version of the test. |  |  |
| 23     | ACA Task Force | 6.1.1                |   | te/ed   | There should be an option to substitute another durability attribute if it can be shown that it is more practical, and if that attribute has been or can be tested through a third-party lab.   | <ul style="list-style-type: none"> <li>- Add another category "Additional Durability Attribute" section as 6.2.3 and the added language "If product has another durability attribute that has been tested through a third-party lab, product can receive one extra credit point."</li> </ul> | 6/17/24 – JC – This is something that can be addressed via an issue paper if new attributes are developed.                                       |
| 24     | ACA Task Force | 6.1.2                |   |   | The reference to ASTM D1006 for the exposure test conditions is helpful, but not enough as it leaves too much room for discretionary ratings and  | <ul style="list-style-type: none"> <li>- Add language that will specify regions for regional claims and for a national claim.</li> <li>- Add masonry or another equivalents substrate, as another option.</li> </ul>   | 7/15/24 – JC – Heidi will create a draft and present it at the August meeting.<br>05-2-25 – The table was updated per the PCR and Heidi's draft. |

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|        |                |                      |   |   | interpretation. There is a need to specify regions for regional claims, and for a national claim (how many regions). Also, there is a need to add masonry or an equivalent substrate as another option. Finally, there is a need for general appearance rating after exposure to capture miscellaneous and important attributes such as fade/chalking, etc.   | - Add general appearance rating after exposure to capture miscellaneous and important attributes such as fade/chalking. |  |
| 25     | ACA Task Force | 6.1.2                |   |   | ASTM D1006 has the following: for exposure over wood and wood composites: 4.2 (excerpt) "Exposures in several locations with different climates which represent a broad range of anticipated service conditions are recommended. 4.2.1 Because of year-to-year climatological variations, results from a single exposure test cannot be used to predict the absolute rate at which a material degrades. Several years of repeat exposures are | Same comment as above   | 7/15/27 – JC – This was confirmed to be the same comment as line 24. |

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|        |                       |                      |   |   | needed to get an “average” test result for a given location."  |  |   |
| 26     | Kristi Brown          | 6.1.2                | Test type<br>Table                                      | te  | Issue with “no erosion” after 14 months as some sort of erosion will happen over time<br>Chalking is considered a form of erosion; can not say there is no erosion, it also depends of the type of environment (20 mil at 14 months is no where near to having failure of the product)<br><br>What is considered true failure? | There needs to be a clarification of no erosion present as chalking is considered a form of erosion<br><br>-                             | 7/15/24 – JC – Kristi will work with Heidi to draft this section. Edja commented that since ASTM G155 and 154 is accelerated so there needs to be a time limit. He will also work with them to create language.<br>05-2-25 – The table was updated per the PCR and Heidi’s draft. |
| 27     | Kristi Brown          | 6.1.2                | Test type<br>Table                                      | te  | Add ASTM G155 Testing – Standard Practice for Operating Xenon Arc Lamp Apparatus for Exposure of Materials   | Add ASTM G155 Testing – Standard Practice for Operating Xenon Arc Lamp Apparatus for Exposure of Materials                               | 7/15/24 – JC –See line 26   |
| 28     | Kristi Brown          | 6.1.2                | Test type<br>Table                                      | te  | Add ASTM G154 Testing – Standard Practice for Operating Fluorescent Ultraviolet (UV) Lamp Apparatus for Exposure of Materials  | Add ASTM G154 Testing – Standard Practice for Operating Fluorescent Ultraviolet (UV) Lamp Apparatus for Exposure of Materials            | 7/15/24 – JC – See line 26  |
| 29     | Mary<br>CHERVENA<br>K | 6.1.2                | 6.1.2   | ed  | After 14 <del>mo</del> of exposure there shall be no blistering present  | Propose adding "MO" (as an abbreviation for months) to the Acronyms and Abbreviations Section -- Section 4                               | 7/15/24 – JC – Rachel will add this.<br><br>***This is in the standard abbreviation list that is included in all NSF standards.***  |
| 30     | ACA Task<br>Force     | 6.1.3                |   | Te/ed   | Peeling/flaking resistance should also be included and considered for exterior stains durability assessment. Also,   | - Add Peeling/flaking resistance to durability assessment.<br>- Reconsider erosion ratings.<br>- Change 6.1.3 title to “Exterior Stains” | 7/15/24 – JC – Heidi and Paul Doll will work on this. It will replace erosion with peeling/flaking.<br>05-2-25 – The table was updated per the PCR and Heidi’s draft.   |

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|        |  |                |                      |   |   | erosion is not always a negative when assessed versus peeling and flaking. Erosion should be rated more favorably than peeling and flaking because it is much easier to re-stain a surface that has an eroded stain than a surface that has peeling and flaking stain. Also, need to specify that this is for exterior stains. |                 |                     |

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| 31     | ACA Task Force | 6.1.3                |   |   | Transparent and semi-transparent stains soak into wood substrates, unlike solid-hide (opaque) stains. Solid-hide stains behave more like a traditional paint, coating the surface of the substrate. While a sold-hide stain can crack, blister, and erode over time, a penetrative wood stain has different modes of failure. Transparent and semi-transparent wood stains may lift off the substrate if the substrate ( <i>i. e.</i> peel, rather than blister) moisture content is too high. Substrate decay can also occur under these conditions. | There should be recognition that there are differing types of stains and these different stains can fail in different ways. May need to include specific section for transparent and semi-transparent stains and another section for solid-hide stains. | 7/15/24 – JC – Heidi and Paul will work on this with line 30.<br>05-2-25 – The table was updated per the PCR and Heidi's draft.   |
| 32     | Mary CHERVENAK | 6.1.4                | 6.1.4   | ed  | 120 h humidity  | Propose adding "H" (as an abbreviation for hours) to the Acronyms and Abbreviations Section -- Section 4  | 7/15/24 – JC – Rachel will check on this and if it isn't in the list she will add it.<br><br>***This is in the standard abbreviation list that is included in all NSF standards.*** |
| 33     | ACA Task Force | 6.1.4                |   | te  | The document is not acceptable as written. Recommend that the document is changed to testing multi-layer coating systems, as  | Change the language of ISO 12944 to state the category rather than the hours, i.e., C3 Med, C3 High, and C5 High, respectively. For QUV, specify QUV-A340, ASTM D4587 Cycle 2, with the number of   | 7/15/24 – JC – Kristen Blankenship & Kristi Brown volunteered to draft this table. Suggested 'apply per manufacturer's instruction'   |

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|        |                |                      |   |   | recommended by the manufacturer for both test types in the table below. Change the language of ISO 12944 to state the category rather than the hours, i.e., C3 Med, C3 High, and C5 High, respectively. For QUV, specify QUV-A340, ASTM D4587 Cycle 2, with the number of hours given, and require ISO 4268-1 rating of 0-2. For example, a urethane topcoat should be tested with the recommended primer. The same goes for the QUV testing. A primer isn't typically designed to be used alone and won't typically pass QUV by itself. Another option is to add language to exclude primers from the weathering testing. | hours given, and require ISO 4268-1 rating of 0-   | Ralph shared in the chat, 'ASTM D1006 "Paint must be applied according to manufacturer recommendations. Some manufacturers specify spread rate, others, paint dry film thickness (DFT) and number of coats." ' and 'Prior to exposure, it is recommended to check actual DFT for selected samples using appropriate ASTM standards (Guide <a href="#">D5237</a> or, if applicable due to wood surface texture, Test Method <a href="#">D6132</a> ).'<br><br>05-2-25 – The table was updated per the PCR and Heidi's draft. |
| 34     | ACA Task Force | 6.1.4                |   | te  | As a general comment, ISO 12944 is segmented according to corrosive environment. A coating system designed for use in a coastal environment will need enhanced corrosion   | - It should be noted that different performance characteristics are required for different corrosive environments and the table adjusted so as not to disadvantage a coating in a less corrosive environment | 7/15/24 – JC – See line 33   |

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|--------|----------------|----------------------|---|---|--|--|----------------------------|
|        |                |                      |   |   | resistance. A coating used for a rural environment won't. It isn't clear why a coating system designed for a rural environment should be penalized.  |  |                            |
| 35     | Kristi Brown   | 6.1.4                | Table   | te  | The quality standards listed in this table should be more clearly defined according to the ISO 12944 standard. Corrosivity categories within the standard are named C1-C5 and CX. Durability ranges (Low, Medium, High, and Very High) must also be taken into account when using performance testing of 12944. The current testing listed does no account for the other elements of the testing regimen, such as pre- and post-test adhesion. Listing the corrosivity categories with durability ranges incorporates that testing into the PCR. | Low-quality = C1 Very Low to C2 High<br>Mid-quality = C3 Low to C5 Medium<br>(C2 Very High testing is covered within this range)<br>- High Quality = C5 High to CX | 7/15/24 – JC – See line 33 |
| 36     | Sarah Sanzo    | 6.1.4                | 1   | Te  | The quality standards listed in this table should be more clearly defined according to the ISO 12944 standard. Corrosivity categories within the standard are  | Low-quality = C1 Very Low to C2 High<br>Mid-quality = C3 Low to C5 Medium<br>(C2 Very High testing is covered within this range)                                   | 7/15/24 – JC – See line 33 |

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|        |                |                      |   |   | named C1-C5 and CX. Durability ranges (Low, Medium, High, and Very High) must also be taken into account when using performance testing of 12944. The current testing listed does no account for the other elements of the testing regimen, such as pre- and post-test adhesion. Listing the corrosivity categories with durability ranges incorporates that testing into the PCR. | - High Quality = C5 High to CX   |  |
| 37     | ACA Task Force | 6.2                  |   | Te  | Need to add more elective attributes and/or leave it open subject to scientific substantiation.  | - Add another category "Additional Durability Attribute" section as 6.2.3 and the added language "If product has another durability attribute that has been tested through a third-party lab, product can receive one extra credit point." | 7/15/24 – JC – The group agreed to remove 6.2.1. Rachel asked the group if there were any other attributes they wanted included since just saying 'additional durability attributes' was deemed to wide. None were voiced. |
| 38     | ACA Task Force | 6.2.2                |   | ge  | This is fine for coatings that help reduce and control existing odors and odor sources; additional clarification is needed for claims about odor absorption for odors in the air over the life of the coating.   | - Ask JC if "odor absorption" would be included in this extra credit point. If so, add language to clarify.<br>- Suggested language: "This does not include odor absorbing products"   | 7/15/24 – JC – Remove 6.2.2  |

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|--------|----------------|----------------------|---|---|---|---|-----------------------------|
| 39     | ACA Task Force | 6.2.2                |   | te  | Ammonia/ammonium hydroxide is a significant contributor to odor in architectural paints, and is not classified as a VOC. The American Association of Railroads states most people can smell ammonia between 0.04 to 20 ppm. OSHA places the Odor Threshold for ammonia between 5 and 50 ppm. Gas Chromatography may be necessary to adequately quantify the concentration of ammonia ( <a href="https://pubs.acs.org/doi/10.1021/acsenergylett.0c02219#">https://pubs.acs.org/doi/10.1021/acsenergylett.0c02219#</a> ). | - Consider adding "Ammonia/ammonium hydroxide" as a target compound in 6.2.2.   | 7/15/24 – JC – Remove 6.2.2 |
| 40     | Mary CHERVENAK | 6.2.2                |   | te  | If product reduces odor as per ISO 16000-23 and ISO 16000-24 <sup>21</sup> the product shall receive one extra credit point. Target compounds include formaldehyde, isovaleric acid, pyridine, and methane sulfide, at a minimum.   | Ammonium hydroxide is a primary contributor to odor in coatings. Because ammonium hydroxide is not a VOC, it will not be considered under the ISO standards. Should odor from ammonium hydroxide be addressed? If so, then propose adding "Reduction of ammonium hydroxide or substitution of ammonium hydroxide with a low odor buffer or amine shall receive one extra credit point." | 7/15/24 – JC – Remove 6.2.2 |

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| 41     | Bill Le Roy    | 6.11/6.12/6.13/6.14 | Tables                                      | te  | ASTM and ISO Standards   | Consider reference year of latest edition(s)  | 7/15/24 – JC – Think he means 6.1.1/6.1.2/6.1.3/6.1.4. Rachel explained that if there is no date in the normative references (section 2) it means that it is calling out the most recent edition. If there is a date it is calling out that specific date. The group decided to leave it as is. |
| 42     | Bill Le Roy    | Sec 7               | Table Footnote 1                            | Ge  | Confirm USETox is not in conflict with ISO Stds for developing LCA.  | n/a   | 7/15/24 – JC – Heidi volunteered to make sure this is in alignment with the PCR.<br><br>05-02-25 – Rachel reviewed the PCR and USETox was included.   |
| 43     | Bill Le Roy    | Sec. 7              | Table                                       | Te  | Achievement Requirement Prerequisite (1 <sup>st</sup> row) – What needs to be disclosed? Is it up to the mfr for the pre-requisite?  | Internal – Self declared (type II) EPDs shall be of one product from one manufacturer.  | 7/15/24 – JC – The group felt that this section was clearly written. The commenter was on the call but will be given this comment file via the NOW.   |
| 44     | Bill Le Roy    | Sec 7               | Table                                       | Te  | Achievement Requirement – 4 point (2 <sup>nd</sup> row)- suggest combine EPD requirements with – 4 point (3 <sup>rd</sup> row). Formal Lifecycle Impact Reduction Action Plan per LEED v4.1 as its own line (2 <sup>nd</sup> row) – need to confirm this was not retained in the current draft of LEED v5. | EPDs (type III) shall be of one product from one manufacturer and shall disclose GWP 100. Include language per LEED v5 Prerequisite – Assess Embodied Carbon)   | 08/19/24 – JC – The group decided to leave the rows as they are.  |
| 45     | Bill Le Roy    | Sec 7               | Table                                       | Te  | Achievement Requirement - 4 points (4 <sup>th</sup> row) -   | Suggest the EPD (type III) include GWP 100 – plus Ozone Depletion Potential (ODP) – Acidification Potential (AP) – Smog Potential (SP) – Eutrophication Potential (EP) – these will be updated in the ACA | 08/19/24 – JC – After some discussion it was decided to leave this requirement as it is other than removing 'and/or' with just or.  |

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|--------|----------------|----------------------|---|---|--|---|---|
|        |                |                      |   |   |  | PCR per ISO 21930 – verify with NSF Program Operator.   |   |
| 46     | Bill Le Roy    | Sec 7                | Table   | Te  | Retain (5 <sup>th</sup> row) as previous – allow to be updated per LEED v5   | Described by LEED v5? This was not retained in the new draft. LEED v5 (Assess, and Reduce Embodied Carbon is new Pre-requisite and Credit)  | 08/18/19 – JC – The group agreed to define “active LEED” (definition below) and anywhere LEED is called out it will change to ‘active LEED’.<br><br>Limited to versions of LEED for which USGBC is still registering applications.  |
| 47     | Bill Le Roy    | Sec 7                | Table   | Te  | 6 <sup>th</sup> row – decreased GWP 100 via reformulation or supply chain improvement, plus EPD (type III) per ISO 21930 (and ACA PCR)   | Company decreased GWP 100 compared to baseline – or disclosed reformulation and/or supply chain improvements – (consider requirements for disclosing the improvements comparable to a baseline)   | 08/19/24 – JC – The group agreed to leave the requirements as it is but with the editorial change below.<br><br>Editorial change of last sentence: Additionally, the company shall make publicly available how the improvement to GWP was achieved.   |
| 48     | ACA Task Force | 7                    |   | ed  | NSF ANSI 498 should allow awarding of credit for EPDs through any accredited EPD publisher that follows an internationally recognized PCR instead of limiting compliance to the ACA/NSF PCR.<br><br>The revisions outlined above would improve the fact-based credibility of the ANSI 498 standard, as well as provide a clear and consistent framework for sustainable architectural coatings. By using the already | - Modify language in 7.1 Chart, second box in achievement requirement to say the following, “Product has published EPD which has been third-party validated and is conformant <i>with or equivalent to</i> ACA’s PCR for Architectural Coatings or Resinous Floor Coatings <i>and/or</i> ISO 14071. | 08/19/24 – JC –<br><br>Product has published EPD which has been third-party validated to be conformant with ACA’s PCR for Architectural Coatings or an equivalent nationally or internationally accredited document in the country where product will be sold, Resinous Floor Coatings, or ISO 14071.<br><br>Worst case scenario, what if there is an inferior PCR published to subvert the requirements of the ACA PCR |

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|--------|----------------|----------------------|---|---|--|---|--|
|        |                |                      |   |   | established, well-supported ACA/NSF PCR for architectural coatings as the official guide for durable product performance, the architectural coatings industry would be able to meet the increasing demand for sustainability and reduce its environmental impact. Furthermore, this revision would also benefit the smaller manufacturers and painter firms, who may otherwise be disadvantaged by the high and unrealistic performance thresholds of the ANSI 498 standard. |   |  |
| 49     | Kristi Brown   | 7.1                  | Table 1   | ge  | Remove EPD as a prerequisite   | Vote was affirmative to remove EPDs as a prerequisite   | 08/19/24 – JC – Remove this prereq               |
| 50     | Urvi Talaty    | 7.1                  | Paragraph 1   | te  | The distinction between an LCA and EPD is not accurately represented.  | Through use of these PCRs, a more formal and consistent LCA can be completed, <del>known as</del> based on which an EPD can be generated. | 08/19/24 – JC – Agreed to this suggested change. |
| 51     | Urvi Talaty    | 7.1                  | Table   | ed  | Row 5, Colum 2 – The use of a and b in superscript for indicating table notes is inconsistent with   | Company has incorporated elements of potential  | Editorial  |

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|        |                |                   |   |   | numbers 1 and 2 used to explain table notes.   | social and/or toxicological impacts of the product in its EPD while still meeting the requirements of ACA's PCR. <sup>a,b</sup> 1,2 This EPD shall also be externally validated per ISO 14071. |   |
| 52     | Bill Le Roy    | Sec 7.1           | 1 <sup>st</sup> Para                        | Ed  | An EPD is not directly an LCA. But a report generated from an LCA following PCR guidance as a separate step. | Through use of PCRs an LCA can be conducted with results specific to a product via EPDs in accordance with ISO 14025.  | 9/16/24 – JC – Answered in comment #50  |
| 53     | Sarah Sanzo    | 7.1               | Table 1                                     | ge  | Remove EPD as prerequisite   | I believe the JC agreed to remove this as a prerequisite, if this no longer stands then we should brainstorm on other options.   | 9/16/24 – JC – Answered in comment #49  |
| 54     | Sarah Sanzo    | 7.2               | EPD action plan requirements                | ge  | Will need to be updated based on changes made to 7.1   | TBD  | 9/16/24 – JC – Set up a TG to edit 7.2 and 7.3. Jessica Slomka, Sarah Sanzo, Kristi Brown, Molly Burns, Heidi<br><br>05-02-25 – The TG's suggested changes were discussed at the 03-17-25 JC meeting. The JC reviewed the changes and agreed to remove the phrase "as a whole or as a part" from the GWP reduction criteria, focusing solely on GWP but agreed with the rest of the suggested changes. (See 03/17/25 meeting summary) |
| 55     | Kristi Brown   | 7.2               | EPD action plan requirements                | ge  | Update based on 7.1 as needed  | TBD  | 9/16/24 – JC – Answered in comment #54  |
| 56     | Bill Le Roy    | Sec 7.2           | Para 1                                      | Ed  | EPD Action Plan Requirements   | if intent is to track along with LEED(v5) - Suggest revision to Assess and Reduce Embodied Carbon – revise section to align with new pre-req and credit  | 9/16/24 – JC – Answered in comment #54  |

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|--------|------------------|-------------------|---|---|---|--|---|
| 57     | Bill Le Roy      | Sec 7.3           | Para 4                                      | te  | LCIA trade offs from GWP 100 optimization   | All impact categories (GWP 100, ODP, AP, EP, ODP) shall be included. Per Table 5 of ISO 21930.                     | 9/16/24 – JC – Answered in comment #54  |
| 58     | Kristi Brown     | 7.3               | EPD optimization requirements               | ge  | Update based on 7.1 as needed   | TBD  | 9/16/24 – JC – Answered in comment #54  |
| 59     | Sarah Sanzo      | 7.3               | EPD optimization requirements               | ge  | Will need to be updated based on changes made to 7.1 & 7.2  | TBD  | 9/16/24 – JC – Answered in comment #54  |
| 60     | Jennifer Costley | 8.1               | 1   | te  | Paragraph starting with “All products seeking recognition under this program...” is a prerequisite. | Move to table as Prerequisite  | 9/30/24 – JC – Dwayne will draft a new sentence.  |
| 61     | Jennifer Costley | 8.1               | table                                       | ge  | Inconsistent use of “Meets” and “Product meets”   | Make consistent i.e. “Product meets”   | 9/30/24 – JC – Agreed   |
| 62     | Kristi Brown     | 8.1               | Table                                       | ge  | Each achievement requirement should be different they are currently the same.                       | “Meets VOC emission limits...”<br>“Meets VOC content limits...”  | 9/30/24 – JC – First one should be “Product Meets VOC emission limits...” and the second should be “Product Meets VOC content limits...” and change numbering of VOC content to 8.1.2 |
| 63     | Sarah Sanzo      | 8.1               | 1   | Ge  | The two descriptions within this table appear to be identical.                                      | If they are not, I would suggest adding language provide clarity to the difference.                                | 9/30/24 – JC – see comment 62   |
| 64     | Bill Le Roy      | Sec 8.1           | Para 1 and 2                                | Ed  | Revise to match LEED v5 IAQ credits   | The CARB SCM version stated in the currently applicable version of LEED v5   | 9/30/24 – JC – LEED v5 doesn't exist yet. Do need to add 2007 to CARB reference.  |
| 65     | Bill Le Roy      | Sec 8.1.1         | Para 1                                      | Ed  | Revise to match LEED v5 IAQ credits   | The CARB SCM version stated in the currently applicable version of LEED v5   | 9/30/24 – JC – LEED v5 doesn't exist yet. Do need to add 2007 to CARB reference.  |
| 66     | Bill Le Roy      | Sec 8.1.1.2       | Para 1                                      | Ge  | Option 2 – is built around 2015 German emissions scheme – but 8.1.1.3 notes the at the VOC          | Revise to reflect NA VOC Standard primarily – also reference - BS EN 16516:2017+A1:2020 (as recommended by the JC) | 09/30/24 – JC – Everyone agreed to leave 8.1.1.3 (8.1.2) as it is but to update 8.1.1.2 reference to EN 16516:2020  |

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|        |                |                      |   |   | content evaluation must comply with NA applicable standard  |  |  |
| 67     | Kristi Brown   | 8.2                  | 3 <sup>rd</sup> paragraph                               | ge  | Remove third party certification on an annual basis; do not make this an additional expense for companies   | Remove annual testing as a requirement as long as the certificate is not expired. (i.e. UL does testing and Greenguard Gold certificates are good for several years) | 9/16/24 – JC – Dwyane Fulhage will submit a suggested change.  |
| 68     | ACA Task Force | 8.2                  |   | ge  | The Residential and Classroom/Office Scenario refers to “product categories” for VOC emissions; this is not specific to “house paints” or “industrial maintenance paints.”                              | DELETE “FOR HOUSE PAINTS” AND “FOR INDUSTRIAL MAINTENANCE PAINTS”  | 9/16/24 – JC – Edja will take the action item to talk with Alfred and come up with new language for the 9/30 Meeting. Please make sure to see 1.2 appendix B<br><br>10/14/24 – JC – The group agreed to:<br>— the product’s emissions are evaluated using a <del>more restrictive</del> scenario compliant with either the CDPH/EHLB Standard Method v1.2 <del>Error! Bookmark not defined.</del> residential scenario for house paints or the CDPH/EHLB Standard Method v1.2 classroom <del>and</del> office scenarios for industrial maintenance paints; |
| 69     | Sarah Sanzo    | 8.2                  | 3   | Ge  | Renewal of CDPH testing on an annual basis, or even bi-annual basis is extremely cost prohibitive to manufacturers of coatings, who often have a significant amount of products used for LEED and Clean | Suggest aligning with LEED v4.1 requirements that CDPH testing be performed every 3 years.   | 9/16/24 – JC – See comment #67   |

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|        |                  |                      |   |   | Room type environments that require CDPH testing. Each CDPH test can cost anywhere from \$2000 - \$3000 per product. For a manufacturer with 100 products, it's a hard cost of \$200k + soft costs of the application and manufacture of material to submit to the testing lab. For small manufacturers, this severely limits their ability to conform to the PCR. |   |  |
| 70     | ACA Task Force   | 9                    |   | ge  | Need to define “low impact materials” and add to definitions section   | - Develop and include a definition for low impact materials.  | 9/16/24 – JC – Heidi will come back with a definition suggestion on 9/30<br><br>10/14/24 – JC – Group agreed to the definition below:<br>Materials developed by use of production techniques and supply chain that minimize carbon emissions across the supply chain and reduce the extraction of non-renewable resources. |
| 71     | Mary CHERVENAK   | 9                    |   | ed  | "... <del>specialy</del> single-use packaging, to help reduce the amount of waste generated by our industry."  | Replace “specialy” with “specialty.”<br>"... <del>specialy</del> specialty single-use packaging, to help reduce the amount of waste generated by our industry." | 9/16/24 – JC – Agreed  |
| 72     | Jennifer Costley | 9.1.1                | 1   | ed  | “A product” is ambiguous   | Change to “The product”   | 9/16/24 – JC – editorial   |

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|--------|----------------|----------------------|---|---|--|---|--|
| 73     | ACA Task Force | 9.1                  |   | ed  | bio-based products/materials are already defined, by addition additional definitions here we created ambiguity – move to definitions section and conform.  | <ul style="list-style-type: none"> <li>- Define as follows: The USDA defines a <i>bio-based product</i> as “a product that is composed, in whole or in significant part, of biological products, including renewable domestic agricultural materials, renewable chemicals, and forestry materials... Bio-based products are derived from raw materials such as plants and other renewable agricultural, marine, and forestry materials. Biobased products generally provide an alternative to conventional petroleum derived products.</li> </ul> | <p>9/16/24 – JC – Suzanne will research if there is a difference in these terms in this field. She will bring the research back to the 9/30 meeting.</p> <p>10/14/24 – JC – The group agreed to:</p> <p><b>9.1 Bio-based materials use</b></p> <p><u>The purpose of this Section is to allow manufacturers to receive credit for using renewable resources such as bio-based materials as a potential means to reduce environmental impact.</u> In order to receive credit for this section, a manufacturer shall use one of the three testing options listed in Sections 9.1.1, 9.1.2, or 9.1.3 to show compliance to the table listed below.</p> |
| 74     | ACA Task Force | 9.1                  |   | ge  | This section considers that "bio-based" is generally superior to "traditional" methods of production. Is there any consideration to an analysis of whether production of a "bio-based" materials results in more | <ul style="list-style-type: none"> <li>- Should there be an analysis of whether use of bio-based materials results in lower overall emissions?</li> <li>- Should there be an analysis of whether use of recycled content materials results in lower overall emissions.</li> </ul>   | <p>9/16/24 – JC – This is one section that a company can get points. The lower carbon foot print receives points from different sections so that will counter these points if that specific bio-based products/materials produce higher emissions. Since these are all evaluated independently the JC agreed to leave this section as it is.</p>   |

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|--------|------------------|----------------------|---|---|--|---|---|
|        |                  |                      |   |   | overall emissions than traditional processing? This question would also apply to section 9.2 "recycled content use" in a similar manner.   |   |   |
| 75     | ACA Task Force   | 9.1                  |   | te  | Are the percentages based on total coating weight or the weight of the dried film?   | - Question for clarification                              | 9/16/24 – JC – %BCC is what the three test methods provided in this section use. This is defined in the test methods that are listed. It is dried film but this is defined in those required test methods.  |
| 76     | Urvi Talaty      | 9.3                  | Title   | ed  | This section seems to refer more to raw material transparency/traceability rather than actually quantifying what low impact means. I would be uncomfortable calling this section “Low Impact Materials” because this is misleading when we aren’t actually comparing the product raw materials against a set metric. Recommend changing the title to Raw Material Transparency or something similar. | <b>9.3 Low impact suppliers Raw Material Transparency</b> | 9/16/24 – JC – Suggested also is: Supply chain transparency. Heidi is going to edit this section and come back on 9/30 with suggestions. This could impact the title.<br><br>10/14/24 – JC – We had enough time to introduce Heidi’s suggested change but not to discuss it fully. Will start here on the 10/21 meeting.<br><br>10/21/24 – JC – Group agreed with the suggested changes. Housed in meeting folder 10/14/24. |
| 77     | Jennifer Costley | 9.3                  | subsection title  | ge  | The title “Low Impact Suppliers” is inaccurate. There is no obligation under this section to use low impact suppliers.   | Change to “Supplier Impact Program” or similar            | 9/16/24 – JC – See #76  |

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| 78     | ACA Task Force | 9.3               |   | ge  | How is “low impact” determined for each and every kind of supplier?  | - See suggested language below   | 9/16/24 – JC – See #76   |
| 79     | ACA Task Force | 9.3               |   | ge  | How does this section determine whether a manufacturer's supply base is utilizing "low-impact" suppliers? This appears to only indicate that a manufacturer has the data on file from their supply-base - it does not make any indication of the "quality" of that data - and what is required for a supplier to qualify as "low-impact" | - New language:<br>The use of low impact material suppliers helps to facilitate the sustainability of the paints and coatings as well as the supply chain. A number of different metrics can be used to evaluate a supplier's potential environmental impact. For this section, a coatings manufacturer shall develop metrics to evaluate the potential environmental impact of raw material suppliers that should include at least three of the following: water use, energy usage, carbon footprint, and waste reduction efforts. Additional credits can be earned if coatings manufacturers can assemble additional information such as a supplier's use of low impact materials, participation in sustainability programs and other similar information. | 9/16/24 – JC – See #76   |
| 80     | Urvi Talaty    | 9.4               | Table                                       | te  | In the table, it isn't immediately clear if the “Achievement requirement” section refers to the specific products that were tested in the Product Performance section or if they refer to the coating manufacturer generally. Recommend adding some more specificity there. What makes more sense to the committee?                      | Question to be answered before recommendation can be made.   | 9/16/24 – JC – Rachel will look in other sections to see how it is worded before the 9/30 meeting.<br><br>9/18/24 – Rachel Note – Looking at this section as well as section 9.1 this is on the product itself and not the manufacturer as a whole.<br><br>10/21/24 – JC –The group agreed that it was clear as written that this section is on the product. |

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| 81     | Urvi Talaty      | 9.4               | Table                                       | te  | In the table, in the “Achievement requirement” section – how do we measure the percent reduction?   | Question to be answered before recommendation can be made.  | 10/21/24 – JC – Rachel will research this and come back before the next meeting.<br><br>5/5/25 – JC – A straw ballot was opened to determine if 9.4 should remain. An attendee mentioned that the industry does not consider paint cans as single-use packaging but rather as storage, and there are existing regulations around packaging. A few agreed with him, noting that packaging is already regulated and should not be included in the scope of the standard. Brooker reminded everyone to go and vote by 5/15. |
| 82     | Jennifer Costley | 9.4               | entire subsection                           | te  | The first sentence refers to “product’s impact” but the table refers to “products” (plural). Unclear if this provision applies to the product or a broader set of products. The scope of the standard is product performance (1.2), so any provisions that have a broader scope need to be clearly indicated. | Clarify the language by including a sentence such as “The use of “products” in this section refers to all architectural coating products certified by the manufacturer to this standard, collectively.” | 10/21/24 – JC – Group agreed to (for all in this table): Coating manufacturer is able to demonstrate a reduction of single-use packaging for the product of at least 5%.   |
| 83     | Kristi Brown     | 9.4               | Entire paragraph                            | ge  | In 1.2 Scope, the 4 <sup>th</sup> paragraph of this section states “This standard does not apply to the packaging of sustainable architectural coating products...”, yet the 9.4 section provides points based on packaging.  | Either change the scope or remove 9.4.  | 10/21/24 – JC – Rachel will open a ballot on the NOW for the members to decide if they want to keep 9.4 and remove the statement in the scope or remove 9.4.   |

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| 84     | ACA Task Force | 9.4               |   | ge  | Do you need to get the points before you can get the extra credit, or it is possible to earn the extra credit only?  | - Clarification needed   | 10/21/24 – JC – Extra credit points are all individual and can be achieved without needing to earn the rest of the points. |
| 85     | ACA Task Force | 9.4               |   | ed  | Sustainable packaging - the standard states that it does not apply to the packaging of sustainable architectural products (section 1.2). however, section 9.4 (packaging). (low impact materials addresses points for low impact packaging). Please revise to avoid confusion. | - Make the following change in Section 1.2: "This standard does not apply to the packaging of <del>sustainable architectural coatings products</del> or to the products used in the application of architectural coatings products."   |  |
| 86     | ACA Task Force | 9.4               |   | ed  | Single-Use packaging is not defined. This need to be update to relate only to the specific product being evaluated, not to all of the manufacturers packaging.   | <ul style="list-style-type: none"> <li>- Add "Single Use packaging" definition to section 3.</li> <li>- Modify all language in box to add "...% of product being certified." To clarify that packaging reduction is only for product being certified and not entire company/manufacturer.</li> <li>- New language for 9.4: Delete "Responsibly sourced" and delete "and reduce the need for additional resource consumption". Add" can be useful strategies to support"</li> </ul> |  |

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| 87     | Jennifer Costley | 9.5               | entire subsection                           | te  | The scope of the standard is product performance (1.2). The title and first paragraph refers to “product stewardship” but the table refers to percentages of “product lines.” The table should be clarified to ensure the product being considered is included. | Change the table to state “x% of its product lines including the product being certified to this standard.” Example:<br>Existing:<br>Coating manufacturer implements an end-of-life product stewardship program for 5% of its product lines.<br>Changed:<br>Coating manufacturer implements an end-of-life product stewardship program for 5% of its product lines <b>including the product being certified to this standard.</b>                 | 10/21/24 – JC – See comment #88  |
| 88     | ACA Task Force   | 9.5               |   | ge  | Need to clarify whether participation in ACA's PaintCare is enough for full program achievement; and if PaintCare is not enough then the specific steps needed should be outlined as to whether this is about recycling and/or safe disposal.                   | <ul style="list-style-type: none"> <li>- Delete first sentence.</li> <li>- Add: “for architectural paint in 11 states” at end of second sentence.</li> <li>- PaintCare section needs to be rewritten and updated.</li> <li>- Change text in box to “Coatings Manufacturer participates in product stewardship program”</li> <li>- Delete all other boxes as does not make sense and penalizes companies that make industrial products.</li> </ul> | <p>10/21/24 – JC –</p> <ul style="list-style-type: none"> <li>- Agreed to delete first sentence.</li> <li>- Heidi will draft language for the 2<sup>nd</sup> sentence.</li> <li>- Heidi will draft PaintCare section</li> <li>- Agreed to: Coatings Manufacturer participates in product stewardship program for 5% of its architectural coating product lines including the product being certified to this standard.</li> <li>- Not sure what the ‘other boxes’ were but there are no boxes in this section that the JC wanted to delete.</li> </ul> <p>There was a lot of discussion on if this could be done for industrial coatings. There were some that supported that industrial could have a program but it was stated that the narrative in the beginning is</p> |

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|        |                |                      |   |   |   |                     | <p>confusing the table so this will be discussed again when Heidi provides a new draft.</p> <p>11-18-24 – JC – The group agreed with Heidi's new draft. It was suggested to make the website point a requirement but it was decided to leave it as a point for now and consider in a future edition to make it a pre-req.</p> |
| 89     | ACA Task Force | 9.5                  |   | ge  | With PaintCare currently only operating in 11 states and participation mandatory for coating manufacturers, what level of achievement does this fulfill since the achievement requirement is %product lines not % availability of a program | - See above comment | 10/21/24 – JC – See comment #88   |
| 90     | ACA Task Force | 9.5                  |   | ge  | If PaintCare is not present in a state, there should other examples of what qualifies to meet these criteria.   | - See comment above | 10/21/24 – JC – See comment #88   |
| 91     | ACA Task Force | 9.5                  |   | ge  | End-of-life product stewardship - Eliminate since this is only referencing the paint and there is no way to measure other products. This is also a macro measurement and not product-specific. Who determines                               | - Same as above.    | 10/21/24 – JC – See comment #88   |

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|        |                |                   |   |   | whether the “end-of-life product stewardship program” is satisfactory? Very subjective in any case and likely to create issues and disputes.   |  |   |
| 92     | ACA Task Force | 9.6               |   | ge  | For companies with multiple manufacturing locations what would be the point for which you measure this if a particular product is made across multiple facilities?   | <ul style="list-style-type: none"> <li>- Need additional discussion as to whether this criteria makes sense</li> <li>- Suggestion - Refine it to “any one raw material”</li> </ul> | <p>10/21/24 – JC -</p> <p>Change title to Regionally sourced materials</p> <p>Will continue this conversation at the 11/4 meeting.</p> <p>11/18/24 – JC – It was decided that this would be extremely hard if not impossible to achieve. It was discussed to possibly make it extra credit but it was decided to remove section 9.6 completely.</p> |
| 93     | ACA Task Force | 9.6               |   | ge  | additionally, the distances noted would be impossible for any manufacturer to achieve as it is highly unlikely that everything used within the product is manufactured within 100 to 500 miles of a single location. | <ul style="list-style-type: none"> <li>- See comment above</li> </ul>  | 11/18/24 – JC – Answered in #92   |
| 94     | ACA Task Force | 9.6               |   | ge  | if the manufacturer receives the material from a local distributor within the 100 miles but if it is actually manufactured across  | <ul style="list-style-type: none"> <li>- Distributors are very common in coatings and chemical industries. Distribution should be the focus.</li> </ul>                            | 11/18/24 – JC – Answered in #92   |

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|        |                |                   |   |   | the globe, does that meet the criteria?   |  |                                 |
| 95     | ACA Task Force | 9.6               |   | Ge/te                                     | Having to source "all" raw materials locally is an extremely tall task since a paint can have a lot of ingredients. Could require instead a % by weight whereby the higher the local content % the higher the program achievement level.  | - Consider % by weight instead of all raw materials. | 11/18/24 – JC – Answered in #92 |
| 96     | ACA Task Force | 9.6               |   |   | This section assumes that all production methods for manufacturing similar products are, essentially, equal in terms of emissions. This should be viewed as a "total emissions output" of the supply chain in bringing in a raw material - of which only a portion is the inbound transportation. | See comments above                                   | 11/18/24 – JC – Answered in #92 |
| 97     | ACA Task Force | 9.6               |   | ge  | Eliminate or needs much more detail. How much of the product needs to be purchased  | - See comment above                                  | 11/18/24 – JC – Answered in #92 |

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|        |                |                   |   |   | regionally? There are many loopholes here.   |   |                                 |
| 98     | ACA Task Force | 9.6               |   | ed  | Why do the second and third achievement boxes use “implements” and the first does not – this should be deleted should any portion of this measurement continue to be used.   | - Delete “implements” from boxes 3 and 4 in the chart in section 9.6.   | 11/18/24 – JC – Answered in #92 |
| 99     | ACA Task Force | 10                |   | ed  | First sentence should be changed to be product-specific.   | - Amend as follows “This section pertains to adopting <del>company chemical management policies</del> <i>product-specific policies</i> to reduce potential health, safety and environmental risks associated with new products, existing products, and the manufacturing value chain. | 11/18/24 – JC – Agreed          |
| 100    | ACA Task Force | 10.3              |   | ed  | Revise to be product specific or delete per last comment below. Change first sentence to “ <b>Document product safety compliance with key federal and state chemical safety, risk and hazard communication requirements.</b> ” | - Change first sentence in 10.3 to read as follows: “Document <del>corporate programs to comply</del> <i>product safety compliance</i> with key federal and state chemical safety, risk and hazard communication requirements:  | 11/18/24 – JC – Agreed          |

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| 101    | ACA Task Force   | 10.3                 |   |   | Is this saying you get a point if you can show that you comply with applicable law? That seems unnecessary/inappropriate, since that is legally required anyway.                 | Clarification requested.  | 11/18/24 – JC – You do not get a point. It is a pre-req that you must comply with federal and state laws.  |
| 102    | Jennifer Costley | 10.3                 | entire subsection                                       | te  | This section is at the corporate level. Does the documentation need to be provided for every product or can there be one submission referenced for all products being certified? | Add language to indicate that documentation provided for products certified within the prior year can be used for verification (annual updates – see below ). | 11/4/24 – JC – The JC felt that this was up to the CB if they wanted to ask for this documentation again or if they will accept it from the previous product cert. Leave it has is.<br><br>The group discussed if the language should be changed to include non US authorities (authority in jurisdiction). It was noted that NSF Sustainability standards are state and federal focused. Brooker noted that in HS it is stated 'regulations and laws in local jurisdiction'. The group agreed to this change.<br><br>***Brooker reviewed other NSF Sustainability standards and found that they included "all applicable laws and regulations promulgated by authorities having jurisdiction regarding". To keep consistent with sustainability standards she changed the wording to this throughout the standard.*** |
| 103    | Jennifer Costley | 10.3                 | entire subsection                                       | te  | How is ongoing compliance ensured?   | Add language to require the manufacturer to provide a written statement regarding ongoing   | 11/4/24 – JC – Cert will be every 3 years which needs to be added to section 1.  |

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|--------|------------------|-------------------|---|---|--|---|---|
|        |                  |                   |   |   |  | compliance with this section and that documentation will be updated annually.   | ***This was added to section 5***   |
| 104    | Jennifer Costley | 10.4              | entire subsection                           | te  | This section is at the corporate level. Does the documentation need to be provided for every product or can there be one submission referenced for all products being certified? | Add language to indicate that documentation provided for products certified within the prior year can be used for verification (annual updates – see below              | 11/4/24 – JC – The JC felt that this was up to the CB if they wanted to ask for this documentation again or if they will accept it from the previous product cert. Leave it has is. |
| 105    | Jennifer Costley | 10.4              | entire subsection                           | te  | How is ongoing compliance ensured?   | Add language to require the manufacturer to provide a written statement regarding ongoing compliance with this section and that documentation will be updated annually. | 11/4/24 – JC – Cert will be every 3 years which needs to be added to section 1.<br><br>***This was added to section 5***  |
| 106    | Jennifer Costley | 10.5              | entire subsection                           | te  | This section is at the corporate level. Does the documentation need to be provided for every product or can there be one submission referenced for all products being certified? | Add language to indicate that documentation provided for products certified within the prior year can be used for verification (annual updates – see below              | 11/4/24 – JC – The JC felt that this was up to the CB if they wanted to ask for this documentation again or if they will accept it from the previous product cert. Leave it has is. |
| 107    | Jennifer Costley | 10.5              | entire subsection                           | te  | How is ongoing compliance ensured?   | Add language to require the manufacturer to provide a written statement regarding ongoing compliance with this section and that documentation will be updated annually. | 11/4/24 – JC – Cert will be every 3 years which needs to be added to section 1.<br><br>***This was added to section 5***  |
| 108    | Sarah Sanzo      | 10.6              | Target chemical elimination                 | ge  | As an industry do we want to point out chemicals for elimination?  | I would like to hear pros from the JC so I can better understand risk.  | Answered in #110  |
| 109    | Mary CHERVENAK   | 10.6.1            |   | ed  | Develop, implement, and demonstrate improvement in a written targeted chemical   | A comma is needed: As an alternative showing evidence that chemicals were chosen based upon a better performing profile,  | Editorial   |

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|--------|------------------|-------------------|---|---|---|---|--|
|        |                  |                   |   |   | elimination program. As an alternative showing evidence that chemicals were chosen based upon a better performing profile based on a comparative hazard assessment of alternatives, and equal or better life cycle impacts. | based on a comparative hazard assessment of alternatives, and equal or better life cycle impacts.   |  |
| 110    | Jennifer Costley | 10.6.2            | entire subsection                           | te  | Does the product line where partial credit is given need to include the product being certified? In other words, if the product being certified contains hazardous chemicals but is not part of the program, is that OK?    | <p>Clarify to indicate that the product being certified must be included to receive full credit:</p> <p>– partial credit: at least 80% of the bases by volume in <del>one product line</del> <b>that is in two or more product lines that are</b> covered by this sustainability program/standard are reformulated to remove at least one eligible chemical in the five- year window beginning in 2016;</p> <p>– full credit: 1) at least 80% of the bases by volume in three or more product-lines that <b>is are</b> covered by this sustainability program/standard are reformulated to remove at least one eligible chemical in the five-year window beginning in 2016 <b>and 2) (where applicable) the product being certified to this sustainability standard has been reformulated to remove at least one eligible chemical.</b></p> | <p>11/4/24 – JC – Change ‘bases’ to ‘products’.</p> <p>Rachel will rewrite this section to be based the product being certified. Need to check if there is a section that gives points to ‘green’ product.</p> <p>A TG will be formed to create the list of chemicals for elimination. Those who volunteered are:<br/>Mike Zalich<br/>Kristi Brown<br/>Kyle Frakes<br/>Molly Burns<br/>Heidi<br/>Jessica S<br/>Dale M</p> <p>01/28/25 – TG – TG met and made changes including making an informative annex. Please see the TG meeting summary for notes.</p> |

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|--------|------------------|-------------------|---|---|--|---|--|
| 111    | ACA Task Force   | 10.6.2            |   | Ed/ge                                     | Shouldn't this be a different timeframe since the 5-year window is already passed. How would anyone comply?  | - Reconsider the date (2016) used in this section.  | 11/4/24 – JC – See comment #110  |
| 112    | Jennifer Costley | 11                | entire section                              | te  | This section is at the corporate level. Does the documentation need to be provided for every product or can there be one submission referenced for all products being certified? | Add language to indicate that documentation provided for products certified within the prior year can be used for verification (annual updates – see below)   | 11/4/24 – JC – The JC felt that this was up to the CB if they wanted to ask for this documentation again or if they will accept it from the previous product cert. Leave it has is.  |
| 113    | Jennifer Costley | 11                | entire section                              | te  | How is ongoing compliance ensured?   | Add language to require the manufacturer to provide a written statement regarding ongoing compliance with this section and that documentation will be updated annually.   | 11/4/24 – JC – Cert will be every 3 years which needs to be added to section 1.<br><br>***This was added to section 5***   |
| 114    | Sarah Sanzo      | 11.1              | Table 1                                     | ge  | Is the prerequisite required to be publicly reported?  | Understand if sharing OSHA information with the auditor is sufficient or does it need to be public info in a report or website?   | 11/18/24 – JC – It does not require public reporting   |
| 115    | Kristi Brown     | 11.1.2.2          | Full implementation of the policy           | ge  | Remove this requirement  | OSHA already reports data in high hazard industries on its website which already makes it publicly available. If the company is not considered to be in a high hazard industry, there is no need to make this publicly available based on OSHA's requirements.<br><a href="https://www.osha.gov/news/news-releases/national/07172023">https://www.osha.gov/news/news-releases/national/07172023</a> | 11/4/24 – JC – The group agreed to remove 11.1.2.2 because they did not want to the 'publicly available' portion. This section will now only be worth 1 point and Rachel will move the language from 11.1.2.1 into 11.1.2. |
| 116    | Jennifer Costley | 12                | entire section                              | te  | This section is at the corporate level. Does the documentation   | Add language to indicate that documentation provided for  | 11/4/24 – JC – The JC felt that this was up to the CB if they wanted to ask for this   |

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|--------|------------------|----------------------|---|---|---|--|--|
|        |                  |                      |   |   | need to be provided for every product or can there be one submission referenced for all products being certified?   | products certified within the prior year can be used for verification (annual updates – see below  | documentation again or if they will accept it from the previous product cert. Leave it has is.   |
| 117    | Jennifer Costley | 12                   | entire section  | te  | How is ongoing compliance ensured?  | Add language to require the manufacturer to provide a written statement regarding ongoing compliance with this section and that documentation will be updated annually.        | 11/4/24 – JC – Cert will be every 3 years which needs to be added to section 1.<br><br>***This was added to section 5***   |
| 118    | ACA              | 12                   |   | ed  | Modify first sentence of Section 12.  | - Modify first sentence to read as follows: “This standard was developed by the ACA with aims to reduce the paints and coatings industry’s impact on the natural environment.” | 11/18/24 – JC – Agreed to the pre-req and the points in the table but Rachel needs to re-write section 12.2 to better reflect the points statements in the table above. The group agreed with Heidi’s suggested changes in the document she presented and will be shared in the meeting folder for this meeting. |
| 119    | ACA Task Force   | 12                   |   | ge  | Achievement requirement - Clarify supplier? is it a raw material supplier, packaging supplier, all the above, etc.? | - Clarify that it can be supplier of raw materials or packaging.   | 11/18/24 – JC – See comment #118   |
| 120    | ACA Task Force   | 12                   |   | ge  | Ingredient supplier: Should consider specifying all tier 1 suppliers, % of tier 2 etc.                              | - Consider focus on suppliers of specific types of raw materials   | 11/18/24 – JC – See comment #118   |
| 121    | ACA              | 12.1                 |   | ed  | Modify first sentence of prerequisite.  | - Modify first sentence of prerequisite to read as follows: “The paints and coatings manufacturer shall establish a supply chain code of conduct and                           | 11/18/24 – JC – See comment #118   |

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|--------|----------------|----------------------|---|---|---|---|---|
|        |                |                      |   |   |   | develop a means of assessment for its suppliers.”   |   |
| 122    | ACA            | 12.2                 |   | ed  | Modify first sentence of section 12.2   | - Modify first sentence to read as follows: “ <del>As described in the prerequisite above,</del> Each paints and coatings manufacturer shall establish a supply chain code of conduct as a means of assessing the sustainability of their supply chain. | 11/18/24 – JC – See comment #118                    |
| 123    | ACA Task Force | 12.2                 |   | ge  | Clarification of “all suppliers” needed. “ALL” would be impossible. consider tier 1 suppliers etc.  | - Modify section to specify to refine the volume, number or percentage of suppliers.  | 11/18/24 – JC – See comment #118                    |
| 124    | ACA            | 12.3                 |   | Ge/ed   | Remove 100% and align with tiered supplier approach.  | - Remove 100% from the first sentence and align language based on outcomes of the tiered supplier approach, as previous comments mention.   | 11/18/24 – JC – Group agreed to change 100% to 80%. |
| 125    | ACA Task Force | 12.6                 |   | ge  | Is compliance with this section based on selection of "raw materials" that achieved recognition (as stated) or upon Suppliers that achieved recognition in one of the six categories? | - Delete this section as duplicative. Same as 9.3 Low Impact Suppliers  | 12/02/24 – JC – Remove 12.6                         |
| 126    | ACA Task Force | 12.6                 |   | ge  | Note recognition by whom?   | - Provide clarity on who is giving the recognition laid out in this sentence. After discussion,   | 12/02/24 – JC – See #125                            |

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|        |                  |                   |   |   |  | modify the language to provide clarify.<br>- Delete as duplicative; see prior comment  |   |
| 127    | Jennifer Costley | 12.6              | entire subsection                           | te  | Is this applicable at the product level, the product line level, or the corporate level? The scope of the standard is product performance (1.2).                                 | Clarify the language by including a sentence such as "The use of suppliers in this section refers to the suppliers for the product being certified under this standard." | 12/02/24 – JC – See #125  |
|        | Jennifer Costley | 13                | entire section                              | te  | This section is at the corporate level. Does the documentation need to be provided for every product or can there be one submission referenced for all products being certified? | Add language to indicate that documentation provided for products certified within the prior year can be used for verification (annual updates – see below               | 12/02/24 – JC – Cert will be every 3 years which needs to be added to section 1.<br><br>***This was added to section 5*** |
| 128    | Jennifer Costley | 13                | entire section                              | te  | How is ongoing compliance ensured?   | Add language to require the manufacturer to provide a written statement regarding ongoing compliance with this section and that documentation will be updated annually.  | 12/02/24 – JC – Cert will be every 3 years which needs to be added to section 1.<br><br>***This was added to section 5*** |
| 129    | Jennifer Costley | 13.1              | table                                       | ge  | Should this be "Company" throughout or is there a distinction between the Corporate Level and the Coating Manufacturer division?   | Change to "Company" if needed.   | 12/02/24 – JC – Please see the red line draft of section 13.1 in meeting folder 12/02/24                                  |
| 130    | Sarah Sanzo      | 13.1              | Table 1                                     | ge  | Remove public sustainability report prerequisite   | Brainstorm with JC on other prerequisite options.  | 12/02/24 – JC – See #129  |
| 131    | Kristi Brown     | 13.1              | Table 1                                     | ge  | Remove public sustainability report prerequisite   | Brainstorm with Joint Committee on alternative prerequisites   | 12/02/24 – JC – See #129  |
| 132    | ACA              | 13.1              | Table                                       | Ge/Ed                                     | Modify the table to reflect the suggested changes such as  | - In the first achievement level box, replace the word prerequisite with 'one point'. In the first   | 12/02/24 – JC – See #129  |

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|--------|----------------|----------------------|---|---|---|---|--|
|        |                |                      |   |   | removing the prerequisite, removing the requirement to publish publicly and remove Scope 1 & 2 emissions reporting. These changes are better aligned with requirements laid out by other voluntary multi-attribute sustainability standards. See ACA redline version for clarifications, if needed. | <p>Achievement requirement box modify the language to read as follows: "Company shall develop a sustainability report conformant with at least GRI Core requirements." Add 'GRI Core Requirements' to the first Supporting References box.</p> <ul style="list-style-type: none"> <li>- Modify second box in Achievement Requirement box to read "Coating manufacturer annually publishes their sustainability report."</li> <li>- Modify third Achievement level box to read "1 point"</li> <li>- Modify fourth Achievement Requirement box to read "Coating manufacturer requires sustainability reporting information from suppliers."</li> <li>- Modify fifth Achievement Requirement box to read as follows: "Coatings Manufacturer has formal audit program for results."</li> <li>- Delete text in fourth box regarding documented supplier assessment tool</li> </ul> |  |
| 133    | ACA            | 13.2                 |   | Ed  | Remove the suggested language and modify the table in section 13.2 to remove language that implies the information needs to be published publicly.  | <ul style="list-style-type: none"> <li>- Remove "given the complexity of Scope 3 emissions reporting, not all Scope 3 areas shall be reported to achieve credit. However, at least 50% of total expected emissions from Scope 3 shall be reported to achieve credit in Tier 4. Expected Scope 3 emissions may be determined</li> </ul>  | <p>12/02/24 – JC - Please see the red line draft of section 13.2 in meeting folder 12/02/24</p> <p>It was also discussed that there needs to be definitions for 'Scopes 1 and 2' Scope 1 carbon emissions are direct emissions from sources owned or</p> |

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|--------|----------------|----------------------|---|---|--|---|--|
|        |                |                      |   |   | See ACA redline version for clarifications, if needed.   | <p>through an LCA or recognized external tool; and"</p> <ul style="list-style-type: none"> <li>- Modify the language in the second Achievement Requirement box to read as follows: "Coating manufacturer collects <del>and publishes</del> Scopes 1 and 2 information publicly through their website or other recognized and external climate program such as CDP.</li> <li>- Modify the language in the 4<sup>th</sup> Achievement Requirement box to read as follows: "Company has program to assess climate impacts of raw material suppliers or coating manufacturer collects <del>and publishes</del> Scopes 1, 2, <del>and 3</del> information publicly through their website or a program such as CDP. In addition, company shall already have climate goals as described in Tiers 2 <u>and</u> 3."</li> </ul> | controlled by a company, like fuel burned in company vehicles, while Scope 2 emissions are indirect emissions from purchased energy, such as electricity used by the company |
| 134    | ACA            | 13.2 & 13.3          |   | ed  | Remove language implying information needs to be shared publicly. See ACA redline version for clarifications, if needed. | <ul style="list-style-type: none"> <li>- Modify the second bullet to read as follows: "company may publish its CDP disclosures on its website but is not required as the information is available through the CDP website. <del>If another program is selected, the full disclosure shall be made publicly available on the company's website;</del>"</li> <li>- Modify the second Achievement requirement box to read as follows: "Coating manufacturer collects <del>and publishes</del> water</li> </ul>   | 12/16/24 – JC – JC agreed  |

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|--------|------------------|----------------------|---|---|---|---|--|
|        |                  |                      |   |   |   | consumption information publicly<br><del>through their website</del> or a<br>program such as CDP.   |  |
| 135    | Jennifer Costley | 13.2                 | table   | ge  | Should this be "Company" throughout or is there a distinction between the Corporate Level and the Coating Manufacturer division?          | Change to "Company" if needed.  | 12/16/24 – JC – JC decided to leave it as it is and see if once it is in use if there are questions about it.  |
| 136    | Jennifer Costley | 13.3                 | table   | ge  | Should this be "Company" throughout or is there a distinction between the Corporate Level and the Coating Manufacturer division?          | Change to "Company" if needed.  | 12/16/24 – JC – JC decided to leave it as it is and see if once it is in use if there are questions about it.  |
| 137    | ACA Task Force   | 13.3                 |   | ge  | This section should only pertain to reporting water usage in water challenged locations.  | - Ask JC consider this request.   | 12/16/24 – JC – Due to difficulties of needing two points systems if it changed to water challenged locations the JC decided to leave this section as it is written. |
| 138    | Jennifer Costley | 13.4                 | table   | ge  | Should this be "Company" throughout or is there a distinction between the Corporate Level and the Coating Manufacturer division?          | Change to "Company" if needed.  | 12/16/24 – JC – JC decided to leave it as it is and see if once it is in use if there are questions about it.  |
| 139    | ACA              | 13.4                 |   | ed  | Modify the section to remove requirements for publishing the information publicly. See ACA redline version for clarifications, if needed. | <ul style="list-style-type: none"> <li>- Modify language in first bullet to read as follows: "company shall <del>publish</del> <i>collect</i> waste metrics each year, including, at a minimum, nonhazardous and hazardous waste metrics to be eligible in this area <del>and make them publicly available.</del>"</li> <li>- In second Achievement Requirement box, modify the language to read as follows: "Coating manufacturer collects <del>and publishes</del> waste</li> </ul> | 12/16/24 – JC - Agreed   |

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|--------|----------------|----------------------|---|---|--|--|---|
|        |                |                      |   |   |  | consumption information publicly<br>through their website."  |   |
| 140    | Kristi Brown   | 13.5                 | Board<br>Diversity                                      | ge  | Remove all together or at a<br>minimum the public disclosure of<br>diversity metrics   | Brainstorm with Joint Committee<br>on how to proceed   | 12/16/24 – JC – Rachel will open this as a<br>ballot to keep or remove.<br><br>***Ballot was opened to members 3/5/25-<br>3/28/25<br>3 – Remove<br>5 – Keep<br>2 – Abstain<br><br>The chair declared this a majority vote so<br>board diversity will remain but will continue<br>to be monitored and an issue paper can<br>be submitted at any time.*** |
| 142    | ACA            | 13.5                 |   | Ge/Ed   | Remove this section to better<br>align with requirements laid out<br>by other voluntary multi-attribute<br>sustainability standards. | - Remove all language and tables<br>in Section 13.5  | 12/16/24 – JC – See #140  |
| 143    | Sarah Sanzo    | 13.5                 | Board<br>diversity                                      | ge  | Remove all together or at minimum<br>the public disclosure of diversity<br>metrics   | Brainstorm with JC on how to proceed.  | 12/16/24 – JC – See #140  |
| 144    | Sarah Sanzo    | 13.6                 | Community<br>engagemen<br>t                             | ge  | Remove prerequisite  | Brainstorm with JC on other prerequisite<br>options or perhaps share with auditor but<br>does not need to be public. | 12/16/24 – JC – Rachel will look at other<br>NSF sustainability standards and draft<br>new requirements one that is vague and 1<br>or 2 that are more stretch points.   |
| /145   | ACA            | 13.6                 |   | Ge/ed   | Remove this section to better<br>align with requirements laid out<br>by other voluntary multi-attribute<br>sustainability standards. | - Remove all language and tables<br>in section 13.6  | 12/16/24 – JC – See #144  |

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|--------|------------------|-------------------|---|---|--|--|---|
| 146    | Kristi Brown     | 13.6              | Community Engagement                        | ge  | Remove prerequisite  | Brainstorm with Joint Committee on other prerequisites options or perhaps share with auditor but does not need to be public  | 12/16/24 – JC – See #144  |
| 147    | ACA              | 13.7              |   | Ed  | Modify section 13.7 to be 13.5, since previous sections were removed.  | - Modify section 13.7 to be 13.5, since previous sections were removed.  | 12/16/24 – JC – formatting issue  |
| 148    | Jennifer Costley | 13.8              | table                                       | te  | Do sites that manufacture the product being registered need to be certified to a management system? In other words, even though the scope of the standard is product performance, if the product being certified is under a management system, is that OK? | Clarify to indicate that a site manufacturing the product being certified must be included to receive credit by adding:<br><b>Prerequisite: at least one site manufacturing the product being certified must be certified to a management system dealing with sustainability (such as ISO 14001 or equivalent external program).</b> | 12/16/24 – JC – The JC decided to leave 13.8 as it is written. Keeping it as a point provides an incentive without making it a barrier.                       |
| 149    | ACA              | 14.1              |   |   | Modify this section to focus on development of a company-wide Social Responsibility Policy   | - Delete and replace with the following: Company shall develop a company-wide Social Responsibility Policy.  | 2/3/25 – JC – Compliance with all federal and state laws and <del>development and disclosure of</del> shall have a company-wide Social Responsibility Policy. |
| 150    | ACA              | 14.1              |   |   | Modify Achievement requirement Box 1 to delete “and disclosure”  | - Delete “and disclosure” in box 1   | 2/3/25 – JC – JC agreed   |
| 151    | ACA              | 14.1              |   |   | Modify Achievement requirement to eliminate “Full implementation”  | - Delete “Full” in boxes 2, 3, 4, and 5  | 2/3/25 – JC – JC agreed   |
| 152    | Kristi Brown     | 14.1              | Social responsibility policy                | ge  | Remove stipulation that policy needs to be publicly available  | Update prerequisite that policy does not have to be public   | 2/3/25 – JC – JC agreed   |

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|--------|----------------|----------------------|---|---|--|--|---|
|        |                |                      | paragraph 1<br>and Table  |   |  |  |   |
| 153    | Sarah Sanzo    | 14.1                 | Social<br>responsibilit<br>y policy<br>paragraph 1<br>and table | ge  | Remove stipulation that policy<br>needs to be publicly available.  | Update prerequisite that policy<br>does not have to be public  | 2/3/25 – JC – JC agreed   |
| 154    | ACA            | 14.1.1               |   |   | Modify to eliminate descriptive<br>words that add uncertainty and<br>confusion   | - Delete words “additional” and<br>“further” in the first sentence   | 2/3/25 – JC – Please see the 2/3/25<br>meeting summary for JC resolution. |
| 155    | ACA            | 14.1.2               |   |   | Delete requirement to publish  | - Delete “and make it publicly<br>available”   | 2/3/25 – JC – JC agreed   |
| 156    | Urvi Talaty    | All                  | N/A   | ge  | There is currently a mismatch<br>between Sections in that it is not<br>clear if the final product of going<br>through the certification process is<br>a certified product or a certified<br>company. If the committee agrees<br>that we want this to be a<br>sustainability standard focused on<br>certifying a company, then I would<br>recommend redoing the product<br>focused sections to include a<br>threshold % of total products made<br>by the company to comply with a<br>particular requirement. One<br>example provided for the LCA<br>section. We can get creative with<br>this one though. | 10% of products have published a<br>publicly available EPD which has been<br>internally validated or self-declared as<br>consistent with ACA's PCR for<br>Architectural Coatings or Resinous Floor<br>Coatings<br>- and ISO 14071. | ****This section was removed per a<br>previous comment.****               |

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