



## Joint Committee on Sustainability Program Document for Architectural Coatings

May 19, 2025

### **Proposed revision to NSF/ANSI 498 – Sustainability Program Document for Architectural Coatings (498i8r1)**

Revision 1 of NSF/ANSI 498, issue 8, is being forwarded to the Joint Committee for consideration. Please review the proposal and **submit your ballot by June 9, 2025** via the [NSF Online Workspace](#).

Please review all ballot materials. When adding comments, please include the section number applicable to your comment and add all comments under one comment number whenever possible. If you need additional space, please use the attached blank comment template in the reference documents and upload online via the browse function.

### **Purpose**

The proposed revision will update Sections 12, 13, & 14.

### **Background**

A straw ballot was conducted in May 2024 to collect comments on NSF/ANSI 498: 2023. Numerous JC meetings were held to review each comment. This ballot and a few others are the outcome of those discussions.

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

A handwritten signature in black ink, appearing to read "Ralph M. Paroli".

Ralph Paroli, Chair, Joint Committee on Sustainability Program Document for Architectural Coatings  
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[Note – the recommended changes to the standard which include the current text of the relevant section(s) indicate deletions by use of ~~strikeout~~ and additions by **grey highlighting**. Rationale Statements are in *italics* and only used to add clarity; these statements will NOT be in the finished publication.]

## NSF/ANSI Standard for Sustainability–

# Sustainability Program Document for Architectural Coatings

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## 12 Manufacturing and supply chain management (6 5 points)

This standard was developed by the ACA with aims to reduce the paints and coatings industry's impact on the natural environment. This chapter in particular is focused on doing so through continuous improvement of the manufacturing and supply chain.

### 12.1 Supply chain code of conduct

Achievement level	Achievement requirement	Supporting references
prerequisite	supply chain code of conduct	
1 point	manufacturer details the screening process / method it shall use to determine whether a supplier complies with the established code of conduct	12.1
1 point	manufacturer screens all suppliers and documents their compliance status with the code of conduct	12.2
1 point	coating manufacturer is able to demonstrate that 100% of its suppliers are in compliance with the code of conduct	12.3
NOTE — Points are cumulative.		

#### 12.1.1 Prerequisite – Supply code of conduct

The paints and coatings manufacturer shall establish a supply chain code of conduct and develop a means of assessment for its suppliers. The supply chain code of conduct shall address at minimum:

- no child / forced / bonded labor;
- health and safety procedures and training;

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- right of freedom of association;
- nondiscrimination;
- discipline / harassment and grievance procedures;
- fair working hours and compensation; and
- anti-corruption and bribery.

## **12.2 12.1.2 Supplier assessment**

As described in the prerequisite above, each paints and coatings manufacturer shall establish a supply chain code of conduct as a means of assessing the sustainability of their supply chain. For this credit, manufacturers shall screen all suppliers and document their compliance status with the code of conduct. conduct a supplier assessment to document their supplier's compliance with the established supply chain code of conduct. in order to receive credit for this section, a manufacturer must demonstrate that all suppliers have been assessed and that their responses are documented. A maximum of 1 credit can be obtained in this section.

## **12.3 12.1.3 Supplier compliance**

After conducting the supplier assessment, if the coating manufacturer is able to demonstrate that 40080% of its suppliers are in compliance with the supply chain code of conduct, they will receive an additional credit. A maximum of 1 credit can be obtained in this section.

## **12.2 Supplier risk assessment**

Achievement level	Achievement requirement	Supporting references
prerequisite	supply chain code of conduct	
1 point	Manufacturer determines and documents which of its suppliers are considered "high-risk" based on, but not limited to, the raw materials they supply, the country of manufacture, industry type, and annual spend.	
1 point	Manufacturer replaces all possible high-risk suppliers and implements extra checks and balances for those that cannot be replaced.	
NOTE — Points are cumulative.		

## **12.4 12.2.1 High-risk supplier assessment**

Under the Dodd-Frank Act of 2010, <sup>Error! Bookmark not defined.</sup> manufacturers are required to document their use of the following four minerals: tantalum, tin, tungsten, and gold (3TG). "Congress enacted Section 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."<sup>1</sup> 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

<sup>1</sup> <[www.sec.gov/opa/Article/2012-2012-163htm---related-materials.html](http://www.sec.gov/opa/Article/2012-2012-163htm---related-materials.html)>

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copper.<sup>2</sup> These minerals are frequently used as important pigments in paints and coatings. Given their high-risk situation, they shall be sourced with caution. In order for a manufacturer to earn credit in this section, they shall show due diligence in assuring their supply chain does not contribute to these global issues.

#### ~~12.5~~ **12.2.2 High-risk supplier replacement**

After conducting the supplier assessment, if the coating manufacturer can demonstrate that all high-risk suppliers were replaced / removed, they will receive an additional credit. A maximum of 1 credit can be obtained in this section.

#### ~~12.6~~ **Optimized sourcing and raw material selection program**

~~Optimized raw material sourcing and selection is an important component of sustainability that paints and coatings manufacturers have a great ability to impact. Under this credit, manufacturers earn credit by creating and implementing an optimized sourcing and raw material selection program. This program shall address, at a minimum, a supplier's energy consumption, material efficiency, waste reduction, water consumption, air emissions, and transportation. In order for manufacturers to gain full credit under this section, they shall be able to show preferential selection of raw materials that have achieved recognition in one of these six environmental impact categories without negatively impacting any other category.~~

Achievement level	Achievement requirement	Supporting references
prerequisite	supply chain code of conduct	
1-point	Manufacturer creates and documents an optimized sourcing and raw material selection program for all new suppliers.	
NOTE — Points are cumulative.		

### **13 Corporate sustainability** (30 ~~29~~ points are available, but a max of 15 points is allowed to be counted towards the end score)

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#### **13.1 Sustainability reporting**

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<sup>2</sup> <[www.oecd.org/corporate/mne/mining.htm](http://www.oecd.org/corporate/mne/mining.htm)>

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Achievement level	Achievement requirement	Supporting references
Prerequisite 1 point	Company shall <del>publish</del> develop a sustainability report conformant with at least GRI Core requirements or equivalent. <del>, Scope 1 and 2 carbon emissions, and information regarding community involvement.</del>	
1 point	Coating manufacturer <del>annually</del> at least every two yr publishes their sustainability report as defined above in the prerequisite.	
2 1 points	Coating manufacturer utilizes ESG reporting (SASB or equivalent) in their sustainability report, annual report, and/or as a stand-alone document.	
1 point	<del>Coating manufacturer has a documented supplier assessment tool (which may be a self-assessment tool) to assess supplier's sustainability reporting before sourcing from them.</del>	
1 point	Coating manufacturer requires sustainability reporting information from suppliers who constitute at least 10% of their spend.	
1 point	Coating manufacturer requires sustainability reporting from suppliers and has formal audit program for results.	
NOTE — Points are cumulative.		

## 13.2 Climate change programs

Climate programs shall conform to the following:

- company should use carbon disclosure program for its reporting, given its general global acceptance. If another framework is used, the company shall state in their reporting why a different framework was selected;
- company may publish its CDP disclosures on its website, but is not required as the information is available through the CDP website. If another program is selected, the full disclosure shall be made publicly available on the company's website; and
- ~~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 through an LCA or recognized external tool; and~~
- consideration of supplier climate programs can be done either through an internal program or through an external platform.

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Achievement level	Achievement requirement	Supporting references
prerequisite	N/A	
1 point	Coating manufacturer collects <del>and publishes</del> Scopes 1 and 2 information publicly through <del>their website or other recognized and external climate program such as CDP.</del>	
1 point	Coating manufacturer has short-term ( $\leq 5$ y) goals around climate change performance.	
1 point	Coating manufacturer has long-term ( $> 5$ y) goals around climate change performance.	
1 point	Company has program to assess climate impacts of raw material suppliers or coating manufacturer collects <del>and publishes</del> Scopes 1, <del>and 2, and 3</del> information publicly through <del>their website or a program such as CDP.</del> In addition, company shall already have climate goals as described in Tiers 2 <del>and 3</del> .	
1 point	Coating manufacturer requires climate reporting information from suppliers and incorporates results into sourcing decisions. Or coating manufacturer has a goal meeting science-based targets, as defined by the science-based target initiative <sup>a</sup> (SBTi) <del>and/or 2 degree scenarios.</del>	
NOTE — Points are cumulative.		
<sup>a</sup> < <a href="http://www.sciencebasedtargets.org">www.sciencebasedtargets.org</a> >		

### 13.3 Water programs

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— goals around water may include wash water reuse, water consumption minimization, ~~and/or~~ water depletion minimization.

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### 13.4 Waste programs

Waste programs shall conform to the following:

— company shall ~~publish~~ collect waste metrics each year, including, at a minimum, nonhazardous and hazardous waste metrics to be eligible in this area ~~and make them publicly available:~~

— hazardous and nonhazardous waste shall be defined based on regulatory definitions for the region(s) in which the company operates; and

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— if desired, the company can break waste metrics up based off solid vs. liquid or other physical attributes.

— waste goals can include minimizing waste, increasing material reuse, and/or increasing recycling efforts.

Achievement level	Achievement requirement	Supporting references
prerequisite	N/A	
1 point	Coating manufacturer collects and publishes waste consumption information publicly through their website.	
1 point	Coating manufacturer has short-term ( $\leq 5$ y) goals around waste performance.	
1 point	Coating manufacturer has long-term ( $> 5$ y) goals around waste performance.	
NOTE — Points are cumulative.		

### 13.5 Board diversity

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Achievement level	Achievement requirement	Supporting references
prerequisite	N/A	
1 point	Board has diverse set of directors ( $> 30\%$ women and/or minority).	
NOTE — Points are cumulative.		

### 13.6 Community engagement

Community engagement programs shall conform to the following:

— community engagement programs, policies, metrics, etc., may be described in the company's sustainability reporting, GRI disclosure, and/or ESG reporting;

— reporting may be qualitative, but it should be clear to reviewers that dedicated programs and/or personnel exist for community engagement; and

— consideration of supplier community engagement programs may be done either through an internal program or through an external platform or website.

To facilitate sustainability activities and engage the community, manufacturers can develop policies and create plans that foster this process. Community engagement examples include, but are not limited to, open houses, hosting community events, or encouraging community participation among employees. This section covers the social aspect of sustainability relating to the community where the facility or corporate headquarters are located.

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Achievement level	Achievement requirement	Supporting references
prerequisite	<del>Company publishes information regarding its impacts (positive and/or negative through public communications or disclosures) on local communities in which it operates.</del> Company has policies to manage impacts on communities in areas affected by activities as well as description of procedures to address this issue, including monitoring systems and results.	
1 point	<del>Company collects and uses and publishes</del> information pertaining to environmental impact assessments or social impact assessments that evaluate, manage, and mitigate risks.	
1 point	<del>Continued and active engagement with local communities through community advisory panels or equivalent channels.</del> Company has a policy that requires community engagement activities at its facilities where the product is being manufactured or its corporate headquarters are located that is reported to employees an updated annually.	
1 point	Formal implementation of Responsible Care or an equivalent program geared towards community impacts.	
1 point	Formal implementation of Responsible Care or an equivalent program for both company assets and contractor employees.	
1 point	Formal implementation of Responsible Care or an equivalent program for suppliers as well as company-controlled and contracted assets.	
NOTE — Points are cumulative.		

### 13.7 Life cycle thinking

Life Cycle Thinking programs shall conform to the following:

- company shall share how it considers impacts from each life cycle phase (raw materials, manufacturing, transportation, packaging, use, and disposal) in its product development and technical organizations and make it publicly available; this could be reported as a policy, program, and/or metric.
- company may either share the percentage of products it manufactures (either by volume or sales) that have undergone an LCA and/or percentage of products developed in the past year that incorporated elements of life cycle thinking to achieve this tier and make it publicly available.

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## 14 Social responsibility (5 points)

### 14.1 Social Responsibility Policy

Company shall develop and disclose a company-wide Social Responsibility Policy and make it publicly available. Company shall comply and fully implement the prerequisites and points are awarded based on compliance with tiers as outlined in the table below.

Achievement level	Achievement requirement	Supporting references
prerequisite	<p><del>Compliance with all federal and state laws and development and disclosure of a company-wide Social Responsibility Policy.</del></p> <p>Company shall have a company-wide Social Responsibility Policy that is in compliance with all applicable laws and regulations promulgated by authorities having jurisdiction.</p>	
1 point	<del>Full implementation of policy containing a Labor and Human Rights Policy section.</del>	
1 point	<del>Full implementation of policy containing a Diversity and Inclusiveness Policy section.</del>	
1 point	<del>Full implementation of policy containing an Outreach and Engagement Policy section.</del>	
1 point	<del>Full implementation of policy containing a Corporate Contributions and Employee Volunteering Programs Policy section.</del>	
1 point	Company receives external recognition for their work in a socially sustainable area such as one of the following: diversity and inclusion awards, volunteering award, community outreach award, and/or charitable giving award.	
NOTE — Points are cumulative.		

#### 14.1.1 Prerequisite

The policy shall conform to both the letter and the spirit of all laws and regulations pertaining to labor and human rights in employment. Company shall comply with child labor laws and shall not tolerate any sexual or other unlawful harassment of its employees. Company should implement this policy as outlined in the chart above.

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#### **14.1.2 Labor and human rights**

~~Every employee has the right to a safe work environment. Company shall develop an internal Labor and Human Rights Policy that outlines additional, company specific labor policies that aim to further protect and respect the rights of human resources at the local, national, and global levels. The policy shall conform with both the letter and the spirit of all laws and regulations pertaining to labor and human rights in employment. Company shall comply with child labor laws and shall not tolerate any sexual or other unlawful harassment of its employees. Company should implement this policy as outlined in the chart above.~~

Every employee has the right to a safe work environment. Company shall develop an internal Labor and Human Rights Policy that outlines company-specific labor policies that aim to protect and respect the rights of human resources at the local, national, and global levels. The policy shall be shared with the workforce.

#### **14.1.3 Diversity and inclusiveness**

Company shall develop a company-wide Diversity and Inclusiveness Policy and make it publicly available.

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#### **14.1.5 Corporate contributions and employee volunteering programs**

Company demonstrates good corporate citizenship via volunteer, in-kind and/or financial contributions. Company shall work to develop an employee volunteer program that promotes employee volunteering in the community by either creating opportunities on company time or providing paid time off for employees to volunteer their time to benefit the local community. Company should implement this policy as outlined in the chart above.

#### **14.1.6 Recognition of excellence (external awards)**

Company receives external recognition for their work in a socially sustainable area such as one of the following: diversity and inclusion awards, volunteering award, community outreach award, and/or charitable giving award. A maximum of 1 point can be received for meeting this requirement.

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