

Q&A: 'Recognised – Environmental Credentials Scheme'

Q: What is the 'Recognised – Environmental Credentials Scheme'?

A: 'Recognised – Environmental Credentials Scheme' is a voluntary, multiple-criteria based, third-party accreditation scheme for commercial cleaning products, developed by industry body Accord.

The Scheme identifies **environmentally preferable commercial cleaning products** through science-based criteria. Products that are independently assessed as meeting these criteria can obtain a licence to bear the 'Recognised – Environmental Credentials Scheme' logo, and be listed on the Scheme's online Licenced Products Register.

This scheme consists of two parts:

- **Rigorous** technical criteria (*Standard Criteria*, available at <http://accord.asn.au/sustainability/recognised/recognised-documents/>) defining the characteristics of environmentally preferable commercial cleaning products; and,
- **Independent third-party scientific assessment** to determine whether products meet the criteria.

Q: Who developed the scheme?

A: The 'Recognised – environmental credentials scheme' was developed by industry body Accord.

Accord is the national industry association for manufacturers and suppliers of all types of cleaning, hygiene, disinfectant and specialty products, including those used in commercial, institutional and industrial applications. www.accord.asn.au

The *Standard Criteria*, which define the characteristics of environmentally preferable commercial cleaning products, were developed by a working group of chemists and technical specialists from industry over an 18-month period. In developing the criteria, a survey of major international eco-labels and programs was undertaken.

The *Standard Criteria* were reviewed by an independent Panel of Australian expert toxicologists ("Expert Panel") as being "sound and robust". The Expert Panel comprised Professor Barry Hart, Director, Water Science Pty Ltd and Monash University; Professor Michael R. Moore, University of Queensland, Water Quality Research Australia; and Dr Margaret Hartley, formerly Director, Office of Chemical Safety and Principal Scientific Advisor, Australian Government Department of Health and Ageing. The Report of the Expert Panel is available at <http://accord.asn.au/sustainability/recognised/recognised-documents/>

Q: Why did Accord develop this scheme?

A: Accord developed the ‘Recognised – Environmental Credentials Scheme’ in recognition that, although efficacy is the number one consideration for commercial cleaning products, there is increasing demand for products with environmentally preferable characteristics.

In addition, Accord developed the ‘Recognised – Environmental Credentials Scheme’ to help address the proliferation of seemingly unsubstantiated environmental claims in the commercial marketplace. This Scheme brings certainty and promotes knowledge regarding product claims through openness and transparency: information relating to the Scheme is made publicly available; rationalisation is provided for all criteria and additionally in regard to the omission of certain criteria.

Please refer to “**Q: What are the key features of the Scheme?**” for more information.

Q: Who is the third-party scientific assessor?

A: Davoren Environmental is the third-party assessment body.

Davoren Environmental is a niche environmental consulting firm with extensive experience in conducting (eco)toxicity assessments of chemicals. <https://www.davorenenvironmental.com.au/>

Q: What are the key features of the Scheme?

A: There are a number of key features of the ‘Recognised – Environmental Credentials Scheme’

- *It identifies environmentally preferable commercial cleaning products through science-based criteria.* The *Standard Criteria* were developed by a working group of chemists and technical specialists from industry, and reviewed by an independent Panel of expert toxicologists as being “sound and robust”, “science-based, targeted and pragmatic”.
- *It focuses on the environment.* Remarkably, some “eco”-labels focus primarily on human health impacts and have very few criteria relating to potential environmental harm. The criteria for this Scheme centre on the potential environmental impacts of commercial cleaning products, but also recognise the importance of human health by prohibiting, restricting or requiring disclosure of certain chemical ingredients.
- *It is independently assessed.* Davoren Environmental conducts an evidence-based, objective assessment of product data and information against the *Standard Criteria*.
- *It maximises accessibility.* Costs are kept to a minimum, with a flat rate application fee based on the cost of the third-party scientific assessment and a licence fee to cover administration and logo use. There is no turnover-based fee. The Scheme is open to members and non-members of Accord.
- *It is open and transparent, promoting knowledge and flexible approaches to environmental formulation.* Simplistic and unexplained criteria – such as banned lists of ingredients – are avoided.

Rationalisation is provided for all criteria, and made publicly available. Rationalisation is also provided for the omission of criteria that are either irrelevant, unnecessary, or too complex to be addressed through this Scheme.

Q: Which commercial cleaning products are included?

A: This Scheme includes, but is not limited to, the following products for use in commercial applications:

- hard surface cleaning products including general purpose cleaners, bathroom cleaners, toilet bowl cleaners, glass cleaners, floor cleaners and oven cleaners
- carpet & upholstery cleaners
- hand hygiene products
- laundry detergents
- dishwashing products
- automotive cleaners
- sanitisers

Q: Why are household cleaning products not included?

A: This Scheme recognises that commercial cleaning products have specific requirements and are often subject to higher performance expectations or more stringent hygiene requirements for their applications than domestic-use products.

At this stage there is no intention to extend the Scheme to household cleaning products, however this may be considered in the future.

Q: What criteria do products need to meet?

A: Criteria for the ‘Recognised – Environmental Credentials Scheme’ are set out in the *Standard Criteria*, available at <http://accord.asn.au/sustainability/recognised/recognised-documents/>.

The *Standard Criteria* set requirements for the commercial cleaning products based upon the chemical ingredients from which they are formulated. It is the characteristics of these ingredients that determine the potential impact of the product in the environment and on human health.

Furthermore, the *Standard Criteria* not only sets product requirements, it also provides rationalisation for all included criteria and for the omission of certain criteria that are irrelevant, unnecessary or too complex to be addressed through this Scheme.

The environmental criteria focus on:

- product concentration
- aquatic toxicity, persistence and bioaccumulation - in conjunction, as per the US Safer Choice Program approach (https://www.epa.gov/sites/production/files/2013-12/documents/dfe_master_criteria_safer_ingredients_v2_1.pdf)
- dyes/colorants
- VOCs (volatile organic compounds)
- packaging

The human health criteria focus on:

- toxic substances
- known, presumed or suspected human carcinogens, mutagens and reproductive toxins
- fragrances

The *Standard Criteria* also stipulate when information regarding certain ingredients must be provided upon request, since these ingredients are important and relevant only to a minority of scenarios and users.

Q: Which aspects of the product lifecycle do the criteria cover?

A: The *Standard Criteria* for the ‘Recognised – Environmental Credentials Scheme’ are specific to the impacts of the ingredients of commercial cleaning products during use and disposal, and the impacts of their packaging.

Whilst it is anticipated that manufacturers of environmentally preferable products, such as those licenced under the ‘Recognised – Environmental Credentials Scheme’, are committed to continual improvement in sustainability, this is beyond the scope of this product-based, eco-label approach.

It is a requirement of this Scheme that all marketing and labelling associated with use of the ‘Recognised – Environmental Credentials Scheme’ logo does not imply or attempt to imply that the logo preferentially endorses a company’s operations and manufacturing processes.

Q: What guarantees are there that the criteria are reliable?

A: The *Standard Criteria* for the ‘Recognised – Environmental Credentials Scheme’ have been reviewed by an independent Panel of environmental toxicology experts (“Expert Panel”).

Please refer to “Q: Who developed the scheme?” for more information.

The Report of the Expert Panel and Accord’s actions in light of the Recommendations contained within this Report are publicly available at <http://accord.asn.au/sustainability/recognised/recognised-documents/>, as are the Standard Criteria.

Q: Who can participate in the Scheme?

A: Brand-owners and manufacturers of commercial cleaning products can apply to the ‘Recognised – Environmental Credentials Scheme’.

The scheme is open to members and non-members of Accord.

Q: What is the application process?

A: The application process for the ‘Recognised – Environmental Credentials Scheme’ is detailed in the document *Guidance on applying for the Recognised - Environmental Credentials Scheme*, available at <http://accord.asn.au/sustainability/recognised/recognised-documents/>.

To summarise the process, there are essentially three stages to an application:

- Notification to Accord: Applicants are required to complete and return the *Short Form Agreement* to Accord. This Agreement notifies Accord of the applicant’s intention to participate in the ‘Recognised – Environmental Credentials Scheme’
- Data submission and fee payment to Davoren Environmental: Applications to Davoren Environmental are via <https://www.davorenenvironmental.com.au/recognised.html>. Upon application, an *Application Submission Receipt* is sent to the applicant detailing a unique application reference number and application link. Applicants then need to submit all supporting product data to Davoren Environmental and pay the screening fee. For applications that proceed past the screening stage to full technical assessment, Davoren Environmental will notify the Applicant who is then required to pay the technical assessment fee.
- Licencing by Accord: Accord is notified by Davoren Environmental when an Application passes technical assessment. Accord will then provide the licence agreement and licence fee invoice for completion and return by the Applicant.

Q: What guarantees are there that the assessment is reliable?

A: Products are subject to expert, independent, scientific evaluation by third-party assessor Davoren Environmental (<https://www.davorenenvironmental.com.au/>). It is only following recommendation from Davoren Environmental that the product satisfies the requirements of the *Standard Criteria* that a product can be Licenced under the ‘Recognised – Environmental Credentials Scheme’.

Davoren Environmental is a niche environmental consulting firm, providing specialist advice that is underpinned by international best practice methods to deliver successful project outcomes.

For each Application, Davoren Environmental conducts screening to determine whether it has been completed correctly and contains all necessary supporting data. Applications that pass screening

undergo full technical assessment by Davoren Environmental, who prepare an internal report that is subject to internal peer review. It is only following this review that Davoren Environmental will advise the applicant and Accord of the assessment outcome.

Q: Does a separate application need to be submitted for every product?

A: An application is in respect to a formulation, with all brands using that formulation covered by the application. These brands must be stipulated with the original application.

Q: What is the timeframe from application to licencing of products?

A: Standard timeframes are as follows:

- Screening Period – within 10 business days of application lodgement.
- Technical Assessment Period – within 3 weeks of receipt of the technical assessment fee, unless otherwise notified by Davoren Environmental, or if a Remedy Period applies.
- Licencing – within 1-2 business days of receipt of the completed *Licence Agreement* and licence fee by Accord

Q: What happens if an application fails screening?

A: An application may fail the screening stage of the assessment process if it is incomplete, incorrect, or does not contain all necessary supporting data. Davoren Environmental will advise the applicant of the application's deficiencies via a *Screening Failure Notification*.

Upon receiving a *Screening Failure Notification*, the applicant can remedy and resubmit the application (with re-payment of the screening fee) within a 'Remedy Period' of 20 business days. Alternatively, the application can be allowed to lapse.

Q: What happens if an application fails technical assessment?

A: In an application fails the technical assessment stage of the assessment process, the product does not meet the requirements of the 'Recognised – Environmental Credentials Scheme' and will not be licenced to use the logo or be listed on the on-line Register. Davoren Environmental will advise the applicant of this outcome via a *Rejection Notification*.

Q: What is a 'Remedy Period'?

A: A Remedy Period applies in two situations:

1. During screening, Davoren Environmental may advise the applicant that the application does not contain sufficient information to pass screening and will not proceed to a full technical assessment. Davoren Environmental will also list the reasons for the application not passing screening. In this situation, the applicant has a 'Remedy Period' of 20 business days to resubmit the application, and make re-payment of the screening fee.

2. During technical assessment, Davoren Environmental may advise the applicant that the application does not contain sufficient information to continue with the full technical assessment via a *Remedy Notification for Missing Assessment Information*. Davoren Environmental will also advise the applicant of the technical information issues preventing continuance of the technical assessment. In this situation, the applicant has a 'Remedy Period' of two calendar months to respond with:

- information/data from a certifiable source addressing the identified issues; or
- evidence which shows how the applicant plans to address the issues.

Applicants have one opportunity to address the information issues under the existing application before a new technical assessment fee applies.

Q: How long is the licence valid for?

A: The licence for products under the 'Recognised – Environmental Credentials Scheme' is valid for **5 years**.

During this period, prior to each anniversary of the licence commencement date, the licence holder must return an *Annual Compliance Statement* to Accord. Via this Statement, licence holders provide assurance that there has been no change to the product formulation, no change to the original brands utilising this formulation, and that they are not aware of any reason, change or event which would result in the formulation no longer being eligible for accreditation under the Scheme.

Q: What does it cost to participate in the Scheme?

A: The 'Recognised – Environmental Credentials Scheme' maximises accessibility by minimising cost. This is important so that the eco-logo reflects environmental preferability rather than affordability of participation.

There is no fee based on sales turnover.

There is a flat-rate application fee, based on the cost of the third-party scientific assessment. In 2017 this fee is \$1,830 (exclusive of GST). The flat-rate application fee consists of a screening fee (\$460), payable upfront, and a technical assessment fee (\$1,370), payable upon the application proceeding past screening.

For products that pass the technical assessment, a licence fee is required to cover administration and use of the logo. The licence fee differs for members and non-members of Accord, in recognition of the considerable investment that Accord members have made to the establishment of the Scheme, and make to the ongoing costs associated with running the Scheme. Accord members fund, via their membership fees: administration costs, legal costs, logo design costs, Davoren Environmental's annual retainer, and Expert Panel expenses. Many Accord members have also invested the time, travel and expertise of their staff in development of the *Standard Criteria*.

For members of Accord, the licence fee is \$250 per application. For non-members of Accord, the Licence Fee is \$1,000 for the initial application and \$500 for each subsequent application. These costs are exclusive of GST.

Q: How are Licensed products identified?

A: Products licensed under the 'Recognised – environmental credentials scheme' are listed on an online Register at <http://accord.asn.au/sustainability/recognised/register-recognised-products/>. Products may also be identified by display of the 'Recognised – environmental credentials scheme' logo on their packaging.