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A Members Guide to GENICES

The Global Ecolabelling Network's Internationally Coordinated Ecolabelling System

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Purpose of this Document

The purpose of this document is to guide interested members of the Global Ecolabelling Network (GEN) in preparing their GENICES application. This document provides information regarding GENICES and outlines which GEN members are eligible to complete GENICES, describes associated costs, documentation requirements and provides a general overview of what members can expect in each stage of the process.

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The Global Ecolabelling Network

The Global Ecolabelling Network (GEN) is a non-profit association of Type I ecolabelling organizations and its proponents around the world. Since its inception in 1994, the reach of GEN has continued to expand. With members in more than 25 countries, GEN works to improve, promote and develop the ecolabelling of products and services on a global scale. While GEN does not develop criteria or certify products, we support all of our members and their respective programs as *they* undertake the development of leading environmental standards and the ecolabelling of products and services. To this end, GEN has developed the GENICES process, a framework for evaluating and auditing the programs operated by our members to enhance mutual trust and recognition among our various members, and to provide assurance that the programs are in fact operating reputable Type I Ecolabelling programs in accordance with ISO 14024.

Our Mission

The Global Ecolabelling Network endeavors to help government, industry and consumers recognize the unique and important value afforded by Type I ecolabelling programs. To this end, strategic decisions are guided by the following mission objectives:

i) Serve our members, other ecolabelling programs and the public by improving, promoting and developing the ecolabelling of products, the credibility of ecolabelling programs worldwide, and the availability of information regarding ecolabelling standards from around the world.

ii) Foster cooperation, information exchange and harmonization among our members and other ecolabelling programs with regard to ecolabelling.

iii) Facilitate access to information regarding ecolabelling standards from around the world.

iv) Participate in international organizations to promote ecolabelling generally.

v) Encourage the demand for, and supply of, more environmentally responsible products and services.

An Introduction to GENICES

GENICES- the Global Ecolabelling Network's Internationally Coordinated Ecolabelling System was launched in 2003 to enhance mutual trust and cooperation among GEN members. More specifically, the purpose of GENICES is to serve as a mechanism to enhance multilateral cooperation and collaboration in criteria development and review and product certification among GEN members. It also serves as a process to enable GEN member organizations' customers to have easier access to other GEN member organizations' programs.

GENICES involves the submission of an application form and accompanying supporting documents as well as an on-site audit to review the ways and means in which the audited organization conducts ecolabelling in line with the principles of ISO14020 and ISO 14024. Both the documentation review and on-site audit are parts of the peer review process that facilitates broader cooperation among GEN members.

In addition to verifying that your program abides by ISO 14024 principles and is robust and trustworthy, the process can inspire your employees around a shared societal goal. The audit encourages mutual learning for continual improvement from both the GENICES candidate and the auditors.

Four Guiding Principles of GENICES

1. GENICES is to provide a mechanism for enhanced cooperation and collaboration on product certification, criteria development and review.
2. GENICES participation is voluntary and open to current full GEN members, and a requirement for Associate members seeking transition to Full membership.
3. A formal methodology is to be used for common criteria development, review and adoption.
4. The GENICES is to remain intact for an indefinite period of time, but continue to evolve. GEN recommends re-assessment every 5 years.

Understanding the GENICES Process

GEN recognizes that the operation of a Type I ecolabelling program often varies from country to country to reflect regional differences such as the level of government involvement in the program, the strength of government green procurement in the region, the size of the local market and several other factors. For this reason, it's important to understand that the purpose of GENICES is not to instruct GEN members as to how to operate their program, but to understand how they are managing their program to confirm adherence to ISO 14024 principles.

The GENICES peer review process typically has seven steps:

1. **Expression of Interest:**
   GEN (Full) Member or prospective (Full) Member (the "applicant") contacts the Secretariat to express interest in undertaking GENICES and an application form is provided to the GEN Member.

2. **Scheduling:**
   GEN Secretariat canvasses auditors to determine availability to conduct an on-site audit and communicates with GENICES applicant to confirm a mutually agreeable date for the audit.

3. **Submission of application:**
   Applicant prepares and submits an application to the GEN Secretariat for distribution to the auditors at least one month in advance of the scheduled on-site audit. Please use the application cover sheet, attached as Appendix A.

4. **Evaluation of written submission:**
   The auditors assigned to the GENICES will review the submission and contact the Applicant directly should they have any questions about your application or require further clarification.

5. **Site-Audit:**
   The auditors will visit Applicant office for two days to review program operations and interview key staff. The auditors will communicate directly with the Applicant on how the organization wishes to proceed, including identifying who they would like to interview in advance of the audit.

6. **Audit Report:**
   The auditors will prepare a draft site audit report and deliver it to the Applicant within one month of completing the audit. The Applicant will be given the opportunity to respond to comments or suggested corrective actions and recommendations. Upon receiving this feedback, the auditors will finalize the report and email a final, signed copy to the Applicant.

7. **Conclusion of GENICES Process:**
   If there are no suggested corrective actions identified by the auditors, the Applicant will be notified that it has successfully completed GENICES and will be awarded a GENICES certificate at the next Annual General Meeting. The Applicant will also be contacted by the Secretariat to sign the Memorandum of Understanding (MOU) that GEN members who have completed GENICES sign. The auditors may make suggestions towards program improvement, which are optional.

   If the auditors identify suggested corrective actions, the award of the GENICES certificate may be contingent upon the Applicant developing a corrective plan and implementing any necessary measures according to a mutually acceptable timeline.

Eligibility

Associate members must undertake the GENICES process if they seek to transition to Full Membership. If the Associate member successfully completes GENICES, it will be eligible for Full Membership and upon being granted Full Membership can engage and access all of the benefits associated with having successfully completed GENICES. An Associate Member with no intention of transitioning to a Full GEN Member is not eligible to undertake GENICES. The GEN Board of Directors has final discretion regarding whether an Associate GEN Member may undertake GENICES.

Who Will Complete My Audit?

Two individuals, typically current or former Board Members, the Secretariat, or any other individual the Board deems capable, will undertake your audit. While specific auditors cannot be requested, every effort will be made to ensure that a person who may be a close competitor of the GENICES applicant is not assigned to the audit to avoid any possible or perceived conflict of interest.

Scheduling the On-Site Audit

The Secretariat will coordinate with the GENICES Applicant and the two auditors to identify a mutually agreeable date for the on-site audit. GENICES Applicants should be aware that auditors volunteer to undertake these audits and are often not immediately available. If possible, it is advisable to schedule a GENICES audit to take place in conjunction with a Board meeting or an Annual General Meeting to minimize travel costs, as doing so allows the auditor to travel from the event directly on to the GENICES audit. In most cases, GENICES audits are scheduled 4 to 8 months from the time a GEN member formally expresses their intention to undertake the process.

Costs

GENICES Applicants are responsible for paying the following costs for two auditors: travel (airfare, taxi's etc.), accommodations and meals for the duration of the audit. GENICES applicants are also responsible for reimbursing each auditor $250 USD per day, to help offset the cost of the auditor being out of the office from their home organization. GENICES Applicants are only responsible for paying the $250 USD per day fee if the auditor submits an invoice for it.

Applicants that cannot afford to bear all of these costs are advised to convey this information to the Secretariat when an expressing intention to undertake GENICES. In these instances, the auditors may agree to waive the $250 USD/day fee, and GEN may be able to cover some of the other costs associated with travel for the auditors. The final decision regarding GEN financial support rests with the Board of Directors and will be decided on a case by case basis.

Arranging Travel and Accommodation for Auditors

The auditors are responsible for booking their economy-class flight as far in advance of the on-site audit as possible so as to take advantage of cost savings. The auditors must provide the GENICES Applicant with an estimate of flight costs and details before booking the flight. The GENICES Applicant is responsible for reserving hotel accommodations on behalf of the

auditors; the recommended hotel should be shared with the auditors for their approval before any reservations are made.

Application Requirements

Before the on-site audit takes place, the GEN Member must prepare a written submission for evaluation by the assigned auditors at least one month in advance of the scheduled audit. The purpose of the application/written submission is to describe and demonstrate how the ecolabelling organization has been established and functions in an overall manner that reflects good and appropriate practices for Type I ecolabelling programs according to the ISO 14024 standard. The following key aspects of the program must be addressed in the application form:

Key Aspects of Ecolabelling Programs to be Addressed in GENICES Submission

1. Selection of Product Categories
2. Criteria Development
3. Consultation
4. Compliance and Verification
5. Transparency
6. Accessibility
7. Reporting and Publication
8. Avoidance of Conflict of Interest
9. Costs and Fees
10. Confidentiality
11. Mutual Recognition
12. International Trade Aspects
13. Impartiality
14. Qualifications of Staff and Auditors
15. Quality Management System

For each element, the Applicant should make an effort to:

- Describe how the program functions in regard to the issue, and
- Provide sufficient evidence of that functioning. This can be done either through the provision of examples, appended diagrams, certificates or forms, or by referencing alternate means that can be confirmed during the site audit.

There is no prescribed format for the application documentation other than the "Application Cover Sheet" [Appendix A] and that the main body of the application must be in English. However, an effective way to address each of the key components above in the written submission is to capture each "key aspect" as a heading in the document, and describe how your organization addresses each of these elements, while also attaching or referencing other documents such as Standard Operating Procedures, as necessary.

For further guidance and assistance in preparing the Application documentation, Applicants may consult the GEN Secretariat. When the application documentation is ready to be submitted it should be emailed to the GEN Secretariat for dissemination to the assigned auditors.

If the initially submitted documentation is inadequate, the auditors may request and specify what additional information is required or request more information during the scheduled site audit.

How Am I Evaluated?

The auditors review the written submission to evaluate 15 key aspects of the ecolabelling program against the criteria and questions contained in Appendix B. The checklist in the table is a tool for the Applicant when preparing the application and is not meant to be prescriptive.

After reviewing the written submission, the auditors identify which aspects of the application are to be further examined during the on-site audit. The auditing process should be relatively simple. Although the guidelines below have some specific requirements, mainly to indicate what needs to be considered, the written submission should describe how the individual program operates in relation to the ISO 14024 principles and give the two assessors a comprehensive understanding of how the program operates. The onsite audit essentially consists of "testing" the content of the written submission.

In some cases, it may not be necessary to go into an in-depth audit. For instance, a program which is government-funded may require little financial scrutiny, while an NGO more needs to demonstrate financial stability and freedom from undue influence.

It is of paramount importance to look at the certification process from initial application through the assessment process to final approval, in addition to the development of a standard from start to finish. Although not a pass or fail situation, assessors may occasionally find areas which need to be corrected based on the ISO principles, identifying recommendations for improvement or suggested corrective actions where they see that the system warrants improvement.

GENICES Applicants should be prepared to go through their written submission and supporting documents in detail, and be prepared to provide additional evidence where necessary. A short history or background information on your organization may be helpful, but the paramount concern of the auditors is trying to understand how your program works so that they can attest to its trustworthiness.

Expectations of GEN Members Who Have Successfully Completed GENICES

Applicants that have successfully completed GENICES are encouraged to undertake the following:

1. Sign the memorandum of understanding (MOU) that other GEN members who have also successfully completed GENICES have also signed.

2. Notify GEN if the program or any aspect of its process has changed materially such that it may affect the member's status as a Type I ecolabelling program.

3. Undertake the GENICES process every five years to demonstrate ongoing compliance with the ISO 14024 principles.

4. Engage with other GEN members who have also completed GENICES to collaborate and potentially develop common core criteria, or identify ways to make certification to both of your labels easier for licensees.

Do I Need to Complete GENICES More Than Once?

GEN members must repeat the GENICES process every five years. Much in the same way that standards are revised every five years, GEN believes it is prudent in maintaining the integrity of the GENICES process for members to repeat the activity to re-confirm that the program continues to operate according to the principles of ISO 14024.

Subsequent GENICES audits involve the same costs [See Section 9] and process [see Section 5], including the submission of an application and supporting documentation as well as an on-site audit. Although it is at the discretion of the auditors, the on-site audit in the case of a 'second' GENICES is often only one day in length, instead of two, and the nature of a re-audit process is seen as an opportunity for evaluation and improvement, focusing on those elements of the program that have changed since the last audit.

Confidentiality

The names of Applicants who have applied to undertake the GENICES process are kept confidential—they are not announced to GEN members or the general public until the review process has been successfully completed. Similarly, GENICES applications and any accompanying documents are never made public or shared with other GEN members without express written consent from the Applicant.

Appendix A
Peer Review Process Application Cover Sheet

1. Name of Applicant Organization:

   _____

2. Office Address [to be subjected to subsequent site visit]:

   _____
   _____
   _____
   _____

3. Web Site Address: _____

4. Ecolabelling Program(s)/Scheme(s) Managed/Operated:

   _____
   _____
   _____
   _____
   _____

5. Lead Official(s) On Preparation and Submission of the Application:

   Name(s): _____

   Position Title(s): _____

   Email Address(es):_____

   Telephone #(s): _____

   Facsimile #(s): _____

I attest that the information provided in the attached GENICES MMT Peer Review Process Application documentation is correct and truthful to the best of my knowledge, and all attachments are genuine.

Signature: _____

Date of Submission: _____

Appendix B: Potential Issues and Questions Addressed

Elements	Questions Asked
1.0 Selection of Product Categories 1.1 Conducting a feasibility study A study should be conducted on potential product categories and the nature of the market. The feasibility study should include: ▪ initial selection of possible product categories; ▪ consultation with interested parties; ▪ market survey; ▪ suppliers in the market place; ▪ potential and need for environmental improvement; ▪ definition of scope of product categories, taking into account equivalence of use; ▪ availability of data; ▪ current national and international legislation and agreements. 1.2 Proposal for product category A product category proposal should be prepared for the interested parties which summarizes the components of the feasibility study, its findings and the considerations leading to the proposal of product categories for the program.	• Are interested parties identified and involved in the consultation process? • Are comments from interested parties received and responded? How? • Are small and medium-sized enterprises involved in the study? How? • Are foreign and domestic producers involved in the study? How? • Has product with equivalent of use been considered? • Is there a documented proposal for selected product categories within a certain period of time? How are they selected? • Has the proposal been reviewed by interested parties? How?

2.0 Criteria Development 2.1 Life cycle consideration All the life cycle stages have to be taken into account when developing product criteria. 2.1 Selectivity Criteria shall be established to differentiate environmentally preferable products from others in the product category, based on a measurable difference in environmental impact. 2.2 Life cycle consideration The product environmental criteria shall be based on indicators arising from life cycle Considerations. 2.3 Basis of Criteria Criteria should be set at attainable levels and give consideration to relative environmental impacts, measurement capability and accuracy.	• Have all the life cycle stages (extraction of resources, manufacturing, distribution, use and disposal) been taken into consideration? • Has any departure from this approach or selective use of restricted environmental issues been justified? How? • Can established criteria differentiate better products from others in the same product category? In other words, only leading products (e.g., top 20~ 30 %) can meet the criteria? • Are the life cycle stages where there is differentiation of environmental impacts among products within the category properly identified? • Is the difference in the environmental impact measurable? • Are the criteria indicators arisen from life cycle consideration? • Is there a consultation process with interested parties? • Is the matrix that links stages of the product

2.4 Scientific Basis The development and selection of criteria shall be based on sound scientific and engineering principle. 2.5 Selection of product environmental criteria (1) Result of consultation between the ecolabelling body and interested parties. (2) Typical product environmental criteria selection matrix links life cycle stages with environmental input and output indicators. (3) Selection of criteria will not lead to the transfer of impacts from one stage of the life cycle to another or from one medium to another without a net gain of environmental benefit. 2.6 General (1) Take into account of local, regional and global environmental issues, technology and economic aspects. (2) Expressed in terms of impacts on environment and natural resources, or, environmental aspects. (3) Criteria that require or exclude the use of particular PPM without justification shall be avoided. (4) Exclusion of certain substances should be based on methodology meeting Principle 3 of ISO 14020. 2.7 Identification of the areas --- for reduction of environmental impact (1) Identify the life cycle stages where there is differentiation of environmental impacts among products within the category (2) Ranges and variability of data --- shall be analyzed to ensure the criteria are adequate and reflect the differences among products. 2.8 Use of Qualitative and Quantitative Indices Weighting factors to selected requirements may be used. 2.9 Determination of numerical values for each relevant criterion Assign numerical value to selected aspects, in the form of minimum value, threshold levels and scale-point system, etc. 2.10 Product environmental criteria and product function characteristics for each product category The criteria and function characteristics set out the technical requirement elements of the program for each category. 2.11 Product function characteristics Fitness for purpose of the product and levels of	life cycle with the major environmental input and output indicators used for the selection of product environmental criteria? If not, what alternative method is used? • Does the selection of criteria lead to a net gain of environmental benefit? • Have local, regional and global environmental issues, technology and economic aspects been taken into consideration? • Are criteria expressed in terms of impacts on environment and natural resources, or, environmental aspects? • Are criteria that require or exclude the use of particular PPM justified? How? • Is exclusion of certain substances based on methodology meeting Principle 3 of ISO 14020 (e.g., risk assessment)? • Are weighting factors to the selected requirements used? If yes, are reasons for each weighting factor clearly explained and justified? • Is numerical value (may be in the form of minimum value, threshold levels and scale-point system, etc.) assigned to selected aspects? Product function characteristics

performance shall be taken into account. 2.12 Selection of product function characteristics (1) In terms of performance, rather than design or descriptive characteristics (2) Consider (i) function characteristics, (ii) key performance elements, (iii) applicable to all products in the category and (iv) necessary levels of performance. 2.13 Validity of program requirements Product environmental criteria and product function requirements shall be both set and reviewed within a predefined period. 2.14 Implementation of modifications to the product environmental criteria Factors to be considered : (1) Urgency of complying with revised criteria, (2) Extent of change, time, complexity in retooling the manufacturing process, (3) Avoidance of giving advantage to a particular manufacturer, design or process, (4) Need to involve licensee's material suppliers, (5) Action needed to deal with existing products, (6) Time for consultation with licensees, (7) Complexity of administering the changes for the ecolabelling body, (8) Legislative requirements.	• Has the fitness for purpose of the product and levels of performance been taken into account in the development of criteria? • Is the product function addressed in terms of product performance, rather than design or descriptive characteristics? • Are the product function characteristics applicable to all products in the category? • Are key performance elements and necessary levels of performance identified? Validity of program requirements • Are the validities of product environmental criteria and function requirements predefined and announced? • Are they reviewed within a predefined period of time? • How are the product criteria and function requirements reviewed? • What are the factors to be considered in the review? Is there a consultation process with licensees and other interested parties? • Is there any effort to avoid giving advantage to a particular manufacturer, design or process? • Is there enough time given to the manufacturers to meet the new criteria? • Is there a documented procedure to deal with existing products, both in the marketplace and in the manufacturer's warehouse? • Is there a documented procedure to deal with existing licensees? • Is there a documented procedure to administer the changes of product criteria?

3.0 Consultation Participation among interested parties shall be established at the outset for the purpose of selecting and reviewing product categories, product environmental criteria and product function characteristics. 3.1 Consultation with interested parties (1) Participation of all interested parties' representatives (2) An on-going process (3) Interested parties be given adequate time and access to details and sources of information. (4) Comment receives consideration and response (5) Reasonable efforts should be made to achieve a consensus	Consultation with interested parties • Are interested parties properly identified and involved in the consultation process? • Are interested parties given adequate time and access to details and sources of information? • Are recommendations (on product category, specific product, criteria and function characteristics, etc.) and comments from interested parties received and responded? How? • How are appeals or complaints received and resolved?

4. Compliance and Verification	Compliance and Verification
4.1 Relationship with legislation *A precondition for the granting and maintenance of a Type I environmental label shall be the compliance by the applicant with environmental and other relevant legislation.* 4.2 All the elements in the product Environmental criteria and product function characteristics of the environmental labeling program shall be verified by the ecolabelling body. 4.3 Certification and compliance General rules should address: (1) Publicity by licensees, (2) Conditions of suspension, cancellation or withdrawal of a license, (3) Procedures for corrective action in case of non-conformity, (4) Procedures for resolution of dispute, (5) Procedures for testing and verification (6) Fee structure, (7) Guidance for the use of the logotype. 4.4 Licensing The ecolabelling body shall award a license, among other contractual obligations, when an applicant is (1) in compliance with the general rules, and (2) the product is in compliance with criteria and function characteristics. 4.5 A list of labeled products shall be maintained and made publicly available. 4.5 Procedures for assessing and demonstrating compliance 4.7 Basic principle Methodology shall be documented and have rigor to maintain confidence. 4.8 Supervision and control Ecolabelling body shall review and determine appropriate form of verification for, each program requirement. A plan of supervision and control shall be prepared. 4.9 Supporting documentation Ecolabelling body shall (1) require the applicant to commit to comply with legislation, (2) obtain evidence of applicant's conformity with program requirements, and (3) make available documentation on criteria, categories, function characteristics, etc. 4.10 Declaration of conformity Applicant should make declaration of conformity	• Are there rules addressing the prerequisites and procedure for awarding the license and the use of label, e.g., fee structure, testing and verification methodologies and other program requirements? • What compliance assessment methods are used? Are they documented? Are they in the correct order of preference (ISO and IEC standards; other internationally recognized standards; regional and national standards; other repeatable and reproducible methods which follow accepted principles of good laboratory practice and manufacturer's evidence)? • Is there a documented procedure to receive enquiries and applications for the label? • Are requirements for the preparation of application documents well defined? • Is there a checklist used to evaluate application documents? • What evidences are needed to decide if an applicant is in compliance with the environmental laws and other relevant legislation? • How are the elements in the product criteria and function characteristics verified? Is there a checklist used to evaluate these elements? • Is an on-site audit required to verify these elements? If not, skip points 9~14. • If an on-site audit is required, is there a procedure for certification audit? • How are audit team selected? • How are the auditors qualified? • How is the performance of the audit team monitored? • If contract auditors are used, is there a procedure to qualify them? • Is there a procedure to report the result of the on-site audit? • Is the use of applicant's declaration of conformity with certain program requirements allowed (e.g., declaration of no use of certain ingredients or chemicals)? If yes, does the declaration follow the guidelines set out in ISO/IEC Guide 22? • Is there a certification panel or review committee to decide on the award of license? • Is there a procedure to control non-conforming applications? • Is there a procedure to receive and respond to complaints or to resolve appeals from non-conforming applicants? • Are there rules for compliance monitoring of licensees (e.g., surveillance and re-audits, notification of change which may affect continued compliance and random sampling and testing of products)?

4.11 Compliance monitoring (1) The licensee shall inform of any change that affects its continued compliance, (2) The ecolabelling body shall require the licensee to initiate corrective action if compliance is not maintained. (3) The licensee is responsible to ensure compliance with the program requirements. 4.12 Protection of the Label (1) The Label shall be legally protected. (2) The ecolabelling body shall have a policy regarding the proper use of the label. 4.13 Determination of test methods, procedures and availability of test laboratories (1) Organizational, technical and economic feasibility of testing and verification requirements should be considered. (2) Reference to test methods should be provided. (3) Availability of competent laboratories should be examined.	• Are there rules addressing the conditions of suspension, cancellation or withdrawal of a license? • Is there a procedure to deal with non-conforming products manufactured by a licensee? • Is there a policy or a guideline regarding the proper use of the certificate (if any) and label? • Are there rules for the renewal of license? Determination of test methods, procedures and availability of test laboratories • Have organizational, technical and economic feasibility of testing and verification requirements been considered in the determination of test methods and procedures? • Has the reference to test methods been provided by the implementation body? • Has the availability of competent (accredited) laboratories been examined?

5. Transparency A Type I program should be able to demonstrate transparency through all stages of its development and operation. Information shall be available to interested parties. Adequate time shall be allowed for comments to be submitted.	Transparency • Is transparency demonstrated through all stages of the program? • Is there an open consultation process with interested parties? Has reasonable effort been made to reach consensus? • How is information made available to interested parties? • Are the following documents available to the public, on request? (1) product categories, criteria and function characteristics (2) period of validity of criteria, (3) testing and verification methods, (4) certification and award procedures, (5) periodic review criteria, (6) nonconfidential evidence on which the awarding of the label is based, (7) funding sources for the program development, (8) compliance verification. • Is there adequate time allowed for comments to be submitted?

6. Accessibility Application to, and participation in, environmental	Accessibility • Is the application and participation in the program open to all potential applicants,

labeling programs shall be open to all potential applicants.	including foreign and domestic, large and small/medium-sized manufacturers? • Does the program have same or equivalent requirements toward foreign and domestic applicants?

7. Reporting and publication (1) Product categories, criteria and function characteristics shall be published. (2) Demonstration of conformance with ISO14024, (3) Criteria are objective and justifiable, (4) Methods are available, (5) Interested parties participated in the process, (6) Provide information on the meaning of the label.	Reporting and publication • Is there a list of labeled products? Is the list publicly available? • Are product categories, criteria and function characteristics published? • Are testing and verification methods available? • Is there information to demonstrate that the program conforms to the scope, principles, practices and requirements set out in ISO 14024? • Is the information on the meaning of the label provided on request?

8. Avoidance of conflict of interest Type I ecolabelling programs shall ensure that they are free from undue influence, e.g., sources of funding do not create a conflict of interest.	Avoidance of conflict of interest • What is the source of funding? • How to demonstrate that the program is free from undue influence, e.g., from a specific manufacturer? • In case a panel or review committee decides the certification, is the panel or review committee organized to avoid conflict of interest?

9. Costs and fees Costs and fees should be kept as low as possible to maximize accessibility	Costs and fees • Do costs and fees documented and made available to the public?

10. Confidentiality Confidentiality of all information which is identified as confidential shall be maintained	Confidentiality • Is there a procedure to identify confidential and non-confidential information? • How are confidential information and records classified and kept from easy access? • 3. How is it to be ensured that the auditors follow the rules on confidentiality?

11. Mutual recognition There may be mutual recognition of tests, inspections, conformity assessment, administrative procedures and, where appropriate, product environmental criteria. Information on MR agreements --- shall be made available.	Mutual recognition • Is there any document stating the conditions of acceptance of other program's tests, inspections, conformity assessment administrative procedures and, where appropriate, product environmental criteria? • Is the information on mutual recognition agreements made available?

12. International trade aspects Procedures and requirements for environmental	International trade aspects • Are procedures and requirements for

labelling programs shall not be prepared, adopted or applied with a view to, or with the effect of creating unnecessary obstacles to international trade	Environmental labelling programs prepared, adopted or applied without creating unnecessary obstacles to international trade?

13. Impartiality Policies and procedures related to the avoidance of decisions and actions which could be seen as not being impartial should be in place.	Impartiality • Are there formal processes to ensure that impartiality is maintained

14. Qualifications of Staff and Auditors Typically staff and auditors should have appropriate qualifications. For example programs are best served if Auditors and Verifiers have ISO lead auditor qualifications	Qualifications of Staff and Auditors • Is there a register of staff and auditors? • Do competency profiles for key staff exist? • Does the register indicate skill levels, qualifications, and experience?

15. Quality Management System Quality management is key to organizations making competent, informed and consistent decisions.	Quality Management System • is a formal QM system is place? • If not, does the program have sufficient quality control measures in place?