SUSTAINABLE GREEN PRINTING PARTNERSHIP

sgppartnership.org

SGP
Printers Guidance Document

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Introduction

The demand for products to be manufactured in a sustainable manner has affected all industries, including the printing, packaging and publishing industry. The Sustainable Green Printing Partnership (SGP)'s certification criteria specify the requirements for management and production operations that define a sustainable printing operation. The criteria also allow the end-user of printed products the ability to identify and distinguish sustainable printing operations in their supply chain.

Facilities pursuing SGP certification progress though a comprehensive independent evaluation before becoming SGP certified. To assist applicants gain a better understanding of the certification process and requirements, SGP developed this guidance document.
This guide explains the requirements, and helps you understand the necessary policies, procedures and documentation necessary for achieving SGP certification.

Although there is not a specific sequence of implementation, this guide follows the sequence of the SGP Partnership Criteria document. It is recommended that you use this guidance document in conjunction with the SGP criteria document and follow the order of sections as presented.

The following are the criteria elements outlined in this guide and that you must address:

- *Sustainability Management System (SMS)*
- *Sustainability Policy*
- *Sustainability Committee*
- *Implementation*
    - *Environmental laws*
    - *Safety and Health laws*
    - *Employment Labor laws*
    - *Continuous Improvement Project (CIP)*
    - *Communications*
    - *Training*
- *Checking and Corrective Action*
    - *Environmental compliance audit*
    - *Safety and Health compliance audit*
    - *Sustainability Management System (SMS) conformance audit*
- *Senior Management Rreview*
- *Document Control*
- *Annual Report*

Best Practices

- *Annual Metrics for Continuous Improvement*
- *Internal Stakeholder Communications*
- *External Stakeholder Communications*
- *Employee Training*
- *Conduct an Air Emission Reduction Assessment*
- *Demonstrate acceptable Indoor Air Quality (IAQ)*
- *Social*
- *Equipment/Material*
- *Chemical Management – General – All Print Processes*
- *Chemical Management - Lithographic Specific Applicability*
- *Chemical Management - Flexographic Specific Applicability*
- *Chemical Management - Screen Specific Printing Applicability*
- *Chemical Management - Digital Specific Printing Applicability*
- *Waste Management – General – All Print Processes*
- *Transportation Management - General – All Print Processes*
- *Utilities/Energy Management - General – All Print Processes*
- *Grounds Management - General – All Print Processes*

Under Appendices D and E of this guide there is information which addresses the best practices for "Conducting an Air Emission Reduction Assessment" (Section 4.5.1) and "Demonstrating Acceptable Indoor Air Quality" (Section 4.5.2).

Since these elements are more involved and unique in their focus, they are presented as separate topics.

There are additional assistance tools available for air emission reduction assessments and indoor air quality determinations provided in the resource section of the SGP website at http://sgppartnership.org/resources/

Eligibility for SGP Certification

All standalone printing operations, in-plant printing facilities, binding and finishing operations, loose-leaf facilities, and printing departments within schools or government agencies, which are located in the United States and Canada, are eligible to apply for SGP certification.

If the facility is applying as an in-plant operation, only the printing, binding and/or finishing, and loose-leaf portions of the facility are eligible for SGP certification, not the entire facility.

The Certification Process

A facility wishing to become SGP certified must first submit an SGP application. There are no prerequisites required prior to submitting the application.

Once a facility's application is reviewed and accepted, it has twelve (12) months to prepare for and schedule the on-site audit conducted by an independent SGP auditor. Only under exceptional circumstances, facilities that require additional time may request an extension.

Note: Facilities often choose one employee to drive the certification process and coordinating internal sustainability team members to address specific SGP requirements. Previously certified facilities reported that it takes on average a dedicated staff person approximately 22 hours per week during the 12 month period to complete the initial certification process.

Prior to receiving an on-site audit, an SGP auditor will request certain information including the sustainability management system procedures and evidence of implementation of best practices to determine if the facility is prepared for the on-site audit. During this phase, the SGP auditor will provide the facility with a pre-audit form which identifies the information the auditor will review ahead of the onsite audit. Once the facility completes and passes the pre-audit process, an on-site audit will be scheduled.

Once a facility has completed and passed the SGP audit component, paid the certification fee, and paid auditor travel expenses, they will be contacted by the SGP office. At that time the certified facility will be permitted to use the SGP logo according to the instructions of use provided by SGP and identified as a certified facility on the SGP web page. SGP facilities receive a certificate and other tools, such a Proof of SGP Certification to be used in situations such as responding for business RFPs. Certified facilities are encouraged to use the SGP logo in their promotional and marketing materials.

Certification is valid for a two-year period. The facility must submit its first annual progress report and pay the annual fee within one year and two months after the initial audit and certification as specified in Section 3.2.

Submission and approval of the annual progress report is a condition of continued certification. Failure to submit the annual report on schedule will result in a corrective action being issued in the next audit.

Upon the second anniversary of becoming certified, a facility must have scheduled a re-audit date and be prepared to report on another year's annual progress.

Understanding Written Procedures & Documentation

The process of becoming certified requires SGP to verify achievement of all applicable criteria elements. That verification includes a review of written procedures and documentation developed by your facility as part of your Sustainability Management System (SMS).

The SGP criteria elements state that a written procedure is required and it will identify the relevant documentation of conformance that is necessary for that element.

To ensure that the difference between a written procedure and documentation is understood the following descriptions of Written Procedures and Documentation is provided.

Written Procedures

A written procedure is similar to a Standard Operating Procedure (SOP). It is a written document that outlines the procedural steps you will take to accomplish a task, in this case a criteria requirement.

For example, the SGP criteria elements state that you need to "develop a written procedure on how communication with employees, community, customers, and vendors is achieved". This specific written procedure would need to outline the process you would follow for completing the task of achieving communication.

There is no one set format for a written procedure; however, each written procedure must include all of the following elements:

1. *A scope that identifies the criteria topic covered by the procedure and a statement that describes the purpose of the procedure. In other words, describe what the intent is of the procedure.*

   For example, a procedure for the Continuous Improvement Project (CIP) could simply identify it as the "CIP procedure" and the purpose would be a statement describing the need to continuously improve the facilities sustainability performance through the selection of an annual project.

2. *Identification of any associated reference documents that support the procedure.*

3. *The process steps you will follow (in as many steps as you deem necessary) to complete the procedure).*

4. *Identification of who will be responsible for executing the tasks or steps.*

   Note: A job title or individuals name can be used; however job titles are better in case a named individual changes responsibility or leaves the company

5. *Identification of any records that will be kept to demonstrate conformance with this task.*

6. *The frequency of how often the tasks will be performed.*

7. *Date the procedure was created along with a record of any changes that are made (see Document Control, discussed later).*

If more information or assistance is required on this subject, contact SGP or access the resources available through the SGP website - http://sgppartnership.org/resources/

Documentation

Documentation is written proof that something has been completed. There is no set format or elements that need to be included for documentation as there is with a written procedure.

For example, SGP requires documentation that you have performed an Environmental, Health, and Safety (EHS) compliance audit. The documentation can be an audit report and a collection of documents that are used to accomplish the audit including compliance checklists, reference notes, training records, test reports, evaluation forms, etc.

See Appendix A for a list of required written procedures and documents for the criteria elements.

Note: When developing and implementing procedures and documentation within the SMS, always look first for established business or process mechanisms you have already created, if any, so you can build upon those rather than re-inventing the wheel. Your SMS will be more successful when it is a part of your business structure, is efficient, and easy to use.

Guidance by SGP Criteria Topic

Section 3.1 - Sustainability Management System (SMS)

The Sustainability Management System (SMS) is the management of a company's sustainability program and describes how the program is implemented in a systematic and documented manner. The SMS is the backbone of the SGP program.

The SMS must include the following elements:

- *3.1.1 Sustainability Policy*
- *3.1.2 Sustainability Committee*
- *3.1.3 Implementation and Operation*
- *3.1.4 Checking and Corrective Action*
- *3.1.5 Management's Commitment, Participation, and Review*
- *3.1.6 Document Control*
- *3.2 Annual Report*

Having an SMS is important because it outlines how a company plans, develops, implements, and maintains its overall sustainability program. It keeps a company's sustainability efforts organized and establishes on track.

If you have already implemented a management system such as ISO 9000 or ISO14001, it can be used as a basis to create your SMS. However, any SMS developed for the SGP program must meet all elements outlined in the SGP criteria.

To ensure its effectiveness, you must monitor your SMS periodically and document any changes. This is explained more under the function of the sustainability committee and under the section on Checking and Corrective Actions.

Note: For each of the SMS elements within SGP, a written procedure is required as well as any necessary documentation.

Section 3.1.1 - Sustainability Policy

The sustainability policy is a written document similar to a company's mission statement, but it specifically addresses the sustainability program.

A written procedure is not required to develop and write a sustainability policy. The written sustainability policy is your documentation.

While you must include the commitment statements that are identified under Section 3.1.1into your sustainability policy, you are not limited to those statements. You can expand the policy to address your current continuous improvement project or any other information you deem relevant to your sustainability program.

The sustainability policy must be made publicly available and must be signed by a responsible individual (e.g., owner, CEO, President). Publicly available means posting the policy in such locations as your website, in a lobby, on the employee bulletin board, or any combination of these locations.

A sustainability policy must be reviewed every year, and reissued with a new date every two years. The review should be conducted and documented as part of the Sustainability Management System Audit and Management Review process.

For any changes made to your sustainability policy, even if it involves only a date change, you will need to document the review by changing the date on the policy.

Note: Any changes to an SGP record or document must be recorded. Please review the requirements of the Document Control Procedure addressed later in this guidance.

Section 3.1.2 - Sustainability Committee

The sustainability committee is your team that supports your company's sustainability efforts and helps develop and integrate its efforts pertaining to sustainability. They assist with assessing your company's sustainability condition, brainstorming and discuss ideas, suggest and/or set goals, and may suggest and/or create action plans. The sustainability committee also works to engage and motivate your employees toward sustainability, which can help promote and support your sustainability programs and goals.

You must maintain a formal sustainability committee whose mission includes, but is not limited to environmental, health and safety issues. You do not need to create a new committee if you can expand the roles and responsibilities of an existing committee, such as an environmental committee, safety committee, or management committee. If a Safety and Health Committee is legally mandated by your state or province, this committee can be used as the sustainability Committee to address sustainability initiatives.

The following are core requirements for committee membership:

- *The committee should be representative of all facility departments*
- *It is acceptable for a single committee member to represent more than one department*
- *The committee must contain more than one person. It is recommended that the committee contain at least three people.*
- *Members of the committee must include employees as well as management*
- *A list of current committee members is required.*

To be effective, there should be a leader who is going to champion the efforts of this committee to management and employees.

Note: Your SGP committee must meet at least four times per year.

SGP requires a schedule of upcoming meetings and demonstration of past meetings. Evidence of past meetings can be demonstrated through documentation of agendas and minutes. Therefore, each committee meeting held must be documented by an agenda and meeting minutes. Some facilities keep past agendas and minutes in a binder for easy reference. Others have a sustainability folder on their server with a sub folder for committee documents.

Sustainability committee meetings are not required to last for a specified time, but should be held long enough to address agenda business. Committees can meet more often than quarterly, but not less than four times per year.

The sustainability committee also functions as a check and balance effort for your sustainability program and certification, ensuring that the SGP criteria are in place and performing as expected.

Typical functions of the committee could include:

- *Monitoring the SMS*
- *Developing a calendar of compliance to follow and keep track of the SMS requirements that must be completed for certification and re-certification*
- *Developing a list of potential continuous improvement projects*
    - *Such projects lists would include a definition of a problem your company is considering to resolve through continuous improvement, and the potential environmental, business and/or societal impact of that project. For example, an environmental impact would be waste reduction or reduction of air emissions. Societal impact would include community based projects.*
- *Reviewing the sustainability policy and make appropriate suggestions for improvement*
- *Recording document changes within the Document Control document*
- *Ensuring that the SGP Annual Report Form is used for the annual report*
- *Reviewing Annual Report form and ensuring it is filled out completely and accurately*
- *Acting as a conduit for employee suggestions on process improvements*
- *Using a standard agenda format to ensure continuity and cover all areas of responsibility*

Section 3.1.3 - Implementation - Regulations

Regulatory compliance is the foundation to any credible sustainability system. This section of the SGP criteria addresses the identification of site specific regulatory compliance requirements and steps to achieve compliance. As an SGP certified facility, you are required to be in compliance with all applicable environmental laws, safety and health laws, and labor laws.

Note: You are required to establish and maintain a written procedure addressing how you will identify, achieve and comply with the following regulatory laws. You can develop an individual written procedure for each law or combine into a single procedure.

Section 3.1.3.1 - Environmental Laws

SGP requires that you develop a list of all environmental regulations and laws (federal, state, provincial, and local) that specifically apply to your operation site.

To accomplish this you should first establish a list and description of your site specific facility and operations which would include, but is not limited to, building configurations, equipment used, chemicals and materials used, storage and handling of materials, and employee work practices.

Note: You can collect the necessary information in a number of ways including self investigation, hiring outside consultants, contacting the applicable regulatory agencies, attending regulatory training seminars or inquiring through your trade association.

After you have your site-specific facility and operations list and description, you can then research the environmental regulations to compare your facility list to the list of regulations and determine which regulations apply.

For example, if you found that your operation discharges waste water to the sewer, you would research the environmental regulations for waste water discharges and/or sewer codes and if there is a regulation that matches your activity, you would then place it onto your applicability list.

Note: You can research the applicable regulations in a number of ways including self investigation, hiring outside consultants, contacting the applicable regulatory agencies, attending regulatory training seminars or inquiring through your trade association.

Once you have determined the list of applicable regulations, standards, and laws this list should form the basis for the environmental regulatory compliance audit, discussed later in this guide.

Section 3.1.3.2 - Safety and Health Laws

SGP requires that you develop a list of all safety and health regulations and laws (federal, state, provincial, and local) that apply to your operations.

To accomplish this you should first establish a list and description of your site specific facility and operations which would include but is not limited to, building configurations, equipment used, chemicals and materials used, storage and handling of materials, and employee work practices.

Note: You can collect the necessary information in a number of ways including self investigation, hiring outside consultants, contacting the applicable regulatory agencies, attending regulatory training seminars or inquiring through your trade association.

After you have your site-specific facility and operations list and description, you can then research the safety and health regulations to compare your facility list to the list of regulations and determine which regulations apply.

For example, if you found that your operation uses forklifts, you would research the safety regulations and determine if there is a regulation for forklifts, and if there is a regulation that matches your activity, you would then place it onto your applicability list.

Note: You can research the applicable regulations in a number of ways including self investigation, hiring outside consultants, contacting the applicable regulatory agencies, attending regulatory training seminars or inquiring through your trade association.

Once you have determined the list of applicable regulations, standards, and laws this list should form the basis for the safety and health regulatory compliance audit, discussed later in this guide.

Section 3.1.3.3 - Employment Labor Laws

SGP requires that you develop a list of all major employment labor laws that impact your facility. You must document compliance with all relevant local, state, provincial, and federal employment laws including, but not limited to:

- *Equal employment opportunity workplaces (Human Rights Code in Canada)*
- *Child labor and immigration*
- *Minimum wage/hour and overtime*
- *Accommodations for persons with disabilities*

Note: You can collect this information in a number of ways including self investigation, hiring outside consultants, contacting the applicable regulatory agencies, attending regulatory training seminars or inquiring through your trade association.

For each of the above, SGP requires that you document how you will maintain compliance, therefore, your written procedures should clearly identify the person or job title that will be responsible for any identified or recognized daily, monthly and/or annual tasks.

Section 3.1.3.2 - Implementation - Continuous Improvement Project (CIP)

A Continuous Improvement Project (CIP) is an annual activity that brings together company staff to work toward a sustainability goal for continued improvement. SGP certification requires implementation of an annual CIP.

Note: You are required to establish and maintain a written procedure addressing how you will develop the CIP's.

A CIP should be selected only after reviewing the annual metrics, evaluating CIPs from past years, and considering which projects and/or activities will contribute to the greatest sustainability impact. SGP encourages feedback from employees as they often provide valuable insight into the operations of a facility.

The project can be selected by management or by consultation with the committee depending on how the SMS is managed and driven.

Each CIP must include the following:

- *Goal Statement using the SMART* format*
- *Project objective statement(s)*
- *Baseline metric for which progress will be measured against*
- *Actions to be taken to accomplish objective*
- *Resources needed to accomplish project (e.g., employees, funding, outside contractors, etc.)*
- *Employee responsibilities*
- *Method for monitoring ongoing progress against the baseline metric*
- *Schedule for periodic review of ongoing progress against baseline metric*

The SGP auditors are looking for evidence that you have a process in place to identify, monitor and review the CIP. The above elements should provide this evidence.

The Goal Statement using the SMART format means the CIP must be:
***S**pecific, **M**easurable, **A**chievable, **R**ealistic, and **T**ime-Bound*

For example: If a company chooses to retrofit its lighting to LED's to reduce electricity consumption as its CIP, the goal statement could be written as follows:

"Reducing electricity consumption for the facility by 10% through retrofitting existing lights with LED lighting before the end of the certification year"

The following explains how the above goal statement fits the SMART format:

***S**pecific – There is a specific goal for a reduction of electricity by 10% and a specific means through retrofitting of lights*

***M**easurable – The electricity usage can be tracked by monitoring meter and/or electric bills*

***A**chievable – Retrofitting lighting systems are a known way to reduce electricity consumption*

***R**ealistic – Affordable LED lighting systems exist and are known to consume far less electricity than other forms of lighting*

***T**ime Bound - The timeframe of the CIP fits within the certification year*

Note: The "Time-Bound" element is already specified by SGP, in that the CIP must be accomplished within the present certification year.

Facilities that do not completely meet the goal established in a CIP will not be penalized or lose your certification. However, they must document the reason why they were unable to meet the goal and address it within the annual report and management review.

A CIP can be selected from any list of ideas but should address feasible options and those that affect sustainable improvement. See Appendix B for a list of suggested CIP's.

A CIP would not qualify if it is performed due to a regulatory requirement; is considered a regular company function (i.e., scheduled cleaning, maintenance, general upkeep, etc.); or if the goal statement is stated in terms of increasing sales or achieving cost reductions.

Remember, vague or general goal statements will not be acceptable. It must meet the SMART format.

When you begin submitting the SGP Annual Report (Section 3.2), you will be asked to provide the results of your CIP by including the key objective statements for the CIP, the baseline metrics used, and a description of the actions taken to achieve goal. In addition, you will also include the SMART goal statement for the CIP you have chosen for the next reporting year.

A CIP is allowed to be completed before the SGP on-site audit. The completed action plan and other associated documentation you have regarding the CIP will be your evidence of how the CIP was established, implemented, and achieved through the process.

Once a CIP is completed, you should begin to develop your next CIP. Some facilities keep records of their past and current CIP's in a sustainability binder. Others set up a sustainability folder on the server and create a sub folder for CIP's.

Section 3.1.3.3 - Implementation - Communications

To create awareness of your sustainability program you need to continually communicate relevant information to appropriate stakeholders such as employees, community, customers and vendors.

Note: You are required to establish and maintain a written procedure addressing how you will implement the required communications with each identified stakeholder group.

Since stakeholders can vary from facility to facility, you will need to identify all applicable stakeholder groups and members of each group relevant to your individual sustainability program and/or operations.

At a minimum, relevant information for communication includes the following elements and needs to be conducted annually with each stakeholder group:

- *Sustainability policy (Section 3.1.1)*
- *Role of the committee (Section 3.1.2)*
- *Current Continuous Improvement Project (Section 3.1.3.2)*

General Communication Strategy

Having a general communication strategy will be helpful in implementing your communication efforts.

The form of communication is not dictated by SGP and can encompass such means as public meetings, newsletters, website, social media, intranet, emails, notices on bulletin boards, notices with visitor sign in sheets, insert information links with invoices/payments, etc. To be effective, seek existing channels of communications with stakeholders and utilize these for sustainability communications. If you create a new vehicle for communication that is time-consuming and cumbersome to use, it is unlikely that it will survive beyond initial certification.

The communication should also explain your sustainability efforts, and how the initiatives benefit the applicable stakeholder groups.

Note: the following Best Practices are a part of this communication strategy:

- ***Internal Stakeholder Communications – Section 4.2***
- ***External Stakeholder Communications – Section 4.3***

Some facilities keep records of their communications in a sustainability binder. Others set up a sustainability folder on the server and create a sub folder for awareness. And some include awareness with all other training records in HR.

See further discussion under Best Practices section.

Section 3.1.3.4 - Implementation - Training

Training is one of the key efforts that ensure your sustainability program will function as intended. For SGP certification you are required to identify the training topics you determine necessary to support and run your sustainability program.

You must describe how you will conduct the identified training for your employees, and if applicable, on-site service providers and suppliers with regard to your sustainability program.

Note: You are required to establish and maintain a written procedure addressing the identification of training elements that are required for your sustainability program and how the training will be conducted.

SGP does not dictate a specific format for this requirement. Options can include developing and using a simple training matrix or using an existing HR software program.

Note: The following Best Practice is a part of Training:

- ***Employee Training – Section 4.4***

Any training identified and provided for on-site providers and suppliers will depend on their involvement in your sustainability program.

Section 3.1.4 - Checking and Corrective Action

The elements under this section of the SGP criteria address the requirements for environmental audits, safety and health audits, and the Sustainable Management System (SMS) audits. Specific guidance on each of these audits is described below:

Section 3.1.4 - Checking and Corrective Action - Environmental, Health, and Safety Audits

SGP requires that EHS audits are performed for your facility to determine whether or not you are in compliance with the applicable federal, state, provincial, and local regulations. These audits help ensure your site-specific EHS programs are current and provide a road map toward compliance and help with identifying efficiency reduction opportunities, waste reduction options, and improvement projects.

Note: You are required to establish and maintain a single written procedure addressing how you will perform an environmental audit and how you will perform a health/safety audit.

Under Section 3.1.3 -Implementation – Regulations, you are required to identify all of the EHS regulations that are specific to your company. This list of specific regulations can form the basis of the EHS compliance audits.

- *Environmental and Health and Safety audits can be combined into one audit activity however all applicable items (both safety/health and environmental) need to be addressed and documented.*

- *The SGP Criteria list these elements separately as Section 3.1.4.1 for environmental and Section 3.1.4.2 for safety/health so that you see and understand the different scope and requirements.*

- *Environmental aspects address issues that deal with impacts to the outside environment (air, waste, water, etc.) and have specific environmental laws associated with them.*

- *Safety/health aspects address issues that deal with impacts to employee safety and health while working at the production facility and these have specific safety laws and rules associated with them.*

- *Compliance audits can be performed through a third party or by an internal party that you deem as competent in understanding the appropriate regulations, requirements, and their application.*

- *If an internal party is chosen to complete the compliance audit, they need to have a working knowledge of the company operations and EHS compliance that allows them to understand the intent of the regulation, its application to the operation, and recognition of any gaps in compliance.*

- *You need to document the process that was used to conduct the audit and identify the process within the written procedure. The audit should include examination of records, a walk through the facility to observe operating conditions and interviews with staff.*

- *Each audit report must include documentation of evidence used to determine compliance. For example, if training records were examined then you should document that you reviewed the training curriculum and interviewed employees about the training they received.*

- *Audit reports generated under this section must include, as a minimum, the list of applicable and specific environmental and safety/health regulations, the identity of who conducted the audit; the date the audit was conducted; the duration of the audit activity; the scope of area covered; and all findings and recommendations including deficiencies and corrections.*

- *Involuntary enforcement inspections would not be acceptable audits to meet SGP requirements. However, voluntary regulatory consultations, such as the Occupational Safety and Health Administration (OSHA's) SHARP/VPP program, would qualify if they are performed as a wall-to-wall audit.*

Each facility must adhere to SGP's policy on "Addressing Regulatory Violations" which requires SGP Certified Printers to contact SGP if the facility receives an environmental, health or safety notice of violation, citation, etc. from a governmental agency which has a significant impact. SGP will determine the correct course of action

Note: A significant violation is one that result in environmental damage or could cause harm to human health or the environment. Simply receiving a notice of violation or citation does not constitute a significant violation. Significant violations are not those involving recordkeeping or other minor administrative issues.

Section 3.1.4.3 - Checking and Corrective Action - Sustainability Management System Conformance Audit

The intent of the Sustainability Management System (SMS) conformance audit is to examine all of the elements of your SMS and ensure that it is functioning and self sufficient.

Note: You are required to establish and maintain a written procedure on how you will perform and document the SMS conformance audit and address any necessary corrective actions.

- *The SMS conformance audit should follow the sequence of the SGP program criteria elements. The audit should be performed prior to the management review.*

- *The SMS conformance audit should include examination of records, a walk through the facility to observe operating conditions and interviews with staff.*

- *The sustainability committee should perform regular monitoring of SMS compliance to reduce the occurrences of SMS deficiencies.*

- *An SMS conformance audit is required at the end of your first year of the implementation of the SMS and annually thereafter.*

- *During the SGP pre-audit process the SGP auditor will request your SMS conformance audit and documentation indicating the completion of any recommendations presented during the SMS audit and/or corrective actions for deficiencies that were identified by the SMS audit.*

The SMS conformance audit should be seen as an opportunity to improve the SMS and not an exercise to find fault.

A thorough SMS conformance audit should be able to identify opportunities to improve sustainability performance and the way the facility complies with the SGP criteria. Opportunities for example, can be a method to improve the efficiency of communication or a way to get something done faster using fewer resources.

A list of opportunities for improvement or corrective actions as a result of the SMS conformance audit is not a bad outcome. Rather, it shows that the system is working as it should, to identify gaps and put a plan in place to strengthen the SMS. It is uncommon to finish an SMS conformance audit with no findings.

Certified facilities should develop a procedure that will ensure prompt corrective action for any non-conformance that is identified within the SMS. The procedure should follow the format of all written procedures as outline under Document Control (Section 3.1.6.) and should include the following:

- *Identify how to report non-conformance issue*
- *Describe the process of how to document the discovered non-conformance*
- *Describe the process to develop/document the action plan for correcting the non-conformance issue*
- *Identify the management representative that will review and approve the action plan*
- *Identify staff that will be assigned to implement the action plan*

Note: A procedure is not required under the criteria but documentation is needed and the use of a written procedure provides the best means to provide the documentation. SGP has provided an example of such a procedure in Appendix C.

Section 3.1.5 - Management's Commitment, Participation and Review

The management review is different from the SMS conformance audit (Section 3.1.4.3). The management review is a high level process that should examine the overall performance and effectiveness of the SMS. It is achieved by reviewing the SMS conformance audit report, the updated SGP Metrics (Section 4.1), the results of the past continuous improvement project(s) and future plans (Section 3.1.3.2) and any other data identified.

Note: You are required to establish and maintain a written procedure addressing how you will perform and document the management review and address any necessary corrective actions.

- *The management review process should be conducted after the SMS audit (Section 3.1.4.3) and must be conducted as a separate event.*

- *This review should facilitate a much more holistic discussion regarding your sustainability program. The focus of this review should be placed on ensuring that your facility is moving in the right direction, achieving results, addressing any deficiencies found in the SMS audit and reviewing the status of resources available to continue progress.*

- *A management review is required at the end of your first year once you have implemented the SMS and annually thereafter.*

- *During the SGP pre-audit process for re-certification the SGP auditor will request your Management Review and documentation, such as meeting minutes, indicating the completion of any recommendations presented during the management review and/or corrective actions for deficiencies that were identified by the management review.*

Section 3.1.6 - Document Control

Document control is the process that ensures all SGP required documents are created, regularly reviewed, revised as needed, removed as needed, and distributed as necessary.

Note: You must develop a written procedure describing how the document control will be performed.

The requirement for document control applies to all written procedures that are requested as part of the SGP certification process. This requirement also applies to any written procedure required by the SGP's Best Management Practices (Section 4.0).

To ensure that SMS documents are current and complete, the facility must ensure that the following elements are included within each written procedure:

- *Purpose*
- *Scope*
- *Background and definitions*
- *Associated reference documents*
- *Responsible persons (The sustainability committee can be the responsible party)*
- *Procedural steps*
- *Frequency*
- *Identification of records that will be kept*
- *Revision history/document control*

Documentation kept does not have to be written paper documents, but can be located on an intranet or web based system as long as it is accessible to the auditor. If you are undergoing initial certification, one year's worth of documentation is acceptable.

All required documents and records must be kept for 3 years. Records include meeting minutes; agendas; and all required written audit reports and assessments. Some facilities keep records in a sustainability binder. Others set up a sustainability folder on the server and create sub folders for different electronic records. You are allowed to determine what system works best for you.

Section 3.2 - Annual Report

The Annual Report consists of a form with a series of questions that documents the progress of a facility's sustainability initiatives. This is a SGP- specific form that must be completed in its entirety and submitted to SGP on an annual basis. To ensure proper completion, instructions are provided with the form.

The Annual Report must be annually submitted to the SGP Program Office no later than two months after a facility's anniversary date of the initial certification. The anniversary date is the last day of the month indicated in the first two numbers of a facility's certification number.

Failure to submit the Annual Report will be considered a corrective action at the time of recertification. Facilities that do not submit the Annual Report in a timely manner will not be eligible for the Desk Top Audit option for recertification.

4.0 - Best Practices

The Best Practices must be implemented into the business management or operations of the facility, where applicable.

Note: Not all Best Practices will apply to your print process, operations, or facility. You should review each to determine applicability based on your process.

Best Practices that apply only to a specific print process are clearly marked for that specific process.

4.1 - Annual Metrics for Continuous Improvement

The sustainability metrics are an internal, site-specific benchmarking tool, however, they are not a standard against which conformance to the SGP program is measured.

Metrics measure the value of sustainability programs as well as the environmental performance of your operations. The metrics also provide data with which a company can design more efficient processes, decrease material usage and environmental impacts while at the same time reduce costs.

Note: As metrics are a site-specific benchmark tool, the metrics would need to be re-calculated anytime you relocate your operations, or if you significantly modify or expand your existing operation location.

You are required to calculate and track your metrics information. To accomplish this task, SGP is providing facilities the use of an official SGP metric spreadsheet that can be used to calculate your metrics and carbon foot print. The SGP metric spreadsheet can also generate your SGP metric form that you can then submit at the time of certification or re-certification.

Note: You are not required to use the SGP metric spread sheet, however, you must record and track your metrics in a format that the auditor can review when they are on site. The format must identify the baseline year and have results for every subsequent year.

The metrics track a series of sustainability measurements including VOC/HAP emissions, air toxics emissions, energy use, water consumption, safety and health, and waste generation. Metrics document your sustainability performance and can be used to track your progress toward continuous improvement goals.

SGP requires you to track metric information on an annual basis as part of the certification process.

Within the SGP metric form, it will require that you document a baseline year. The baseline year is the beginning data point and should be selected from a time period before any initiatives were implemented. For example, if you began your SGP certification in 2017, the metric for annual water usage could be selected from your 2016 records.

The SGP auditor will review the metrics form to ensure that all required metrics outlined by the SGP Program are being tracked.

Note: Since metrics are considered confidential business information, SGP will not post this information on the SGP community website or otherwise share the information.

With regard to the Continuous Improvement Project (Section 3.1.3.2), once a CIP is chosen, a written statement must be provided within the annual report form detailing the metric(s) that will be used to measure progress of a chosen CIP. For example, if you choose to reduce the amount of electrical energy consumed by your facility, the metric used would be electricity.

Section 4.2 - Internal Stakeholder Communications

This best practice requires that you ensure your employees are able to understand all plant rules, safety policies, postings, training instructions and other sustainability materials presented to them.

If your employees are not "competent" in the English language, SGP requires that all plant rules, safety policies, postings, training instructions and other sustainability materials be communicated in the language understood by the employee(s). Many facilities utilize another employee who is bilingual to act as a translator when necessary.

The means of communication can be verbal or written.

The term "competent" means that your employees are sufficiently capable of understanding the intent of the information, directions, or instructions being communicated.

Section 4.3 - External Stakeholder Communications

This best practice involves the relevant conversations you need to have with your customers and suppliers.

Section 4.3.1 Customer Communications

For customers, the facility must initiate and/or maintain a dialog with respect to the following to evaluate the most efficient use of materials, layout, and substrate:

- *Design aspects for packaging and waste reduction*
- *Logistics for product shipment, and*
- *Final use and disposition*

Talk to your sales team to find out what initiatives they have taken with customers. Oftentimes they have already implemented many of the SGP requirements to reduce cost and increase efficiency for the customer. They may also have developed marketing tools that capture these aspects.

Section 4.3.2 Supplier Communications

For suppliers, the facility must initiate and/or maintain a dialog with the suppliers with respect to reducing the impact associated with input materials. To accomplish this you must evaluate the characteristics (listed below) of the supply materials. Documentation for this can be accomplished through notes, emails, matrix, summaries, etc. showing that the materials have been evaluated.

Evaluation Characteristics

- *Biodegradability – Unqualified claims can be made only if they can be proved that the entire product will completely break down within one year. Items destined for landfills, incinerators, or recycling facilities will not degrade in a year so unqualified claims should not be made. Products that have been tested substantiated by ASTM D5988-12, Standard Test Method for Determining Aerobic Biodegradation of Plastic Materials in Soil may make the claim.*

- *Compostability – Claims of compost ability require competent and reliable scientific evidence that all materials will breakdown into or become part of usable compost. Claims should clearly state whether or not the product is safe for home composting. Claims should be qualified that a product can be composted in a municipal or industrial facility if facilities are not available to a substantial majority of consumers.*

- *Recyclability – To make this claim, recycling facilities must be available to at least 60 percent of the consumers or communities where the product is sold.*

- *Recycled content (post-consumer) – Claims should only be made for materials that have been recovered or diverted from the waste stream during the manufacturing process or after consumer use. Claims for products made from partly recycled materials should clearly state the percentage, such as "made from 30% recycled material"*

- *Organic textile material content – Claims made should follow the Global Organic Textile Standard, Version 4.0. A textile product carrying the GOTS label grade 'organic' must contain a minimum of 95% certified organic fibers whereas a product with the label grade 'made with organic' must contain a minimum of 70% certified organic fibers*

In addition, for all chemical products used in production (Section 4.3.3) you are required to evaluate the content of:

- *Volatile organic compounds (VOCs) as defined "Volatile organic compounds (VOC)" means any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions, excluding those compounds listed as exempt by a regulatory agency. If you have SDSs on file for all your chemicals, the VOC content should be listed there in the physical properties section.*

- *Hazardous Air Pollutants (HAPs) (U.S. companies only) Hazardous air pollutants, also known as toxic air pollutants or air toxics, are those pollutants that cause or may cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental and ecological effects. EPA's current list contains 189 substances and state agencies may list additional chemicals. If you have SDSs on file for all your chemicals, the HAP content should be listed there in the regulatory requirements section*

- *For those facilities in Canada, you may need to evaluate products under the Substances Declared Toxic under Canadian Environmental Protection Act (Canadian facilities only)*

Section 4.4 - Employee Training

Training is a key element for your SGP programs. Maintaining SGP certification cannot occur without properly trained employees.

Under this element you need to determine the specific training requirements for your employees with regard to your sustainability program. This effort will help support and maintain your policies and procedures and brings everyone together to understand the needs and goals for a successful sustainability program.

At a minimum all employees must receive the following training:

- *General awareness training of your sustainability program (Section 4.4.1)*
- *Specific responsibilities involving your CIP with detailed training specific to their job (Section 4.4.2)*
- *Proper handling and use of inks, solvents, other VOC containing chemicals and shop towels to minimize waste and fugitive emissions (Section 4.4.3)*

The minimum employee training listed above must be conducted on an annual basis, whenever you determine re-training is needed, and whenever a change occurs or a new element is introduced into the sustainability program or CIP.

Training sessions must be documented. This documentation must include the title of the training topic, identification of the trainer, date of training, and a list of all employees and/or service providers/ suppliers being trained.

Documentation for training can include but are not limited to sign-in sheets and email communications. Some facilities keep training records in a sustainability binder. Others use electronic records or maintain all training records in HR.

SGP does not dictate the format for how the training is provided. Training can be conducted through classroom, on-line, or through informal means as long as the required information is provided and that the training can be documented.

Note: You do not need to create new training venues. You are encouraged to incorporate SGP training into any existing training activities or department/facility meetings.

Section 4.6 - Social

This best practice requires you to look into possible opportunities to work on projects that benefit both your local community and your facility. It does not require you to choose a project.

You must, however, document any opportunities or projects you identify as possibilities. If you elect to implement an identified opportunity or project this can then be considered a CIP and you should follow all of the procedure requirements under the section on CIP's (Section 3.1.3.2) for documentation.

Possible outreach opportunities and projects can include but are not limited to, environmental projects (such as adopt a park, adopt a road, clean a stream); supporting employees in fundraising events (races, walk a thons, etc.); or working to establish a community wide program (such as a community recycling program).

Section 4.7 - Equipment/Material

This best practice covers two elements. The first is the establishment of a preventative maintenance program for your equipment. The second is that you need to demonstrate that you consider continuous improvement, environmental impact, and employee protection when you make any equipment and material purchasing decisions.

The first element (Section 4.7.1), preventative maintenance (PM) program, is an important part of keeping a production operation running at its optimum performance. A successful PM program can ensure longer equipment life, reduce waste and save repair and unexpected downtime losses. It can also prevent accidents and fires.

There are two parts to a PM program that you must document. The first is to identify what PM activities are performed in your facility and for which equipment. The second part is that you need to document how often the PM is performed and who is responsible for performing the PM.

Note: A PM program can be conducted by an internal party using a checklist or performed by an outside service contractor who can provide service records as documented proof. A written procedure is not required for a preventative maintenance (PM) program.

PM is required for all major pieces of equipment. This can include things such as forklifts, equipment that impacts the outdoor environment (e.g., thermal oxidizers, bag houses, roof top heating/conditioning units etc.), conventional printing presses and digital printers, those that impact health/safety, or equipment that will generate waste or cause environmental contamination if there was a failure.

Some equipment such as printing presses and digital equipment have a PM schedule programmed into their software that tracks time for the next maintenance and logs the date when the last maintenance was performed. This would suffice for documentation of the PM for those pieces of equipment. If programmed PM schedules are not available, hard copy checklists that are signed and dated can be used. Often these records are kept in binders at the equipment.

The second element (Section 4.7.2) requires only that you consider continuous improvement, environmental impact, and employee protection when you make equipment and material purchasing decisions.

You are not required to decline a purchase based on those considerations.

You can demonstrate conformance with this element by using a set of questions you establish to ask vendors or specific specifications you determine to be relevant and which would be discussed before making a purchase. Some parameters to consider would include such things as VOC and HAP content for materials such as inks, cleaning solutions, coatings, and other input materials, energy usage, make-ready time, estimated waste generated, production speed, automated cleaning or color matching, and print resolution.

Section 4.8 - Chemical Management – Applicable to All Print Processes

This best practice section addresses the chemical management aspect that SGP established as important for certification purposes and which can be applicable to all print processes.

Note: For any practice that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices must be addressed and documented, if applicable:

- *Facilities must establish management practices to ensure that both hazardous and non-hazardous chemicals are properly recycled, reused, or disposed. This can be accomplished by developing written policies, practices, and/or instructions for employees to follow when handling waste chemicals. Prohibited dumping signs posted near sinks and well organized waste accumulation areas are steps to achieve this.*

- *Facilities that utilize a septic system on premise must ensure that no industrial wastewater is discharged to the septic system and that the waste water is properly recycled, reused, and/or disposed. Documentation for this element can include a written company policy instructing on the allowed and prohibited discharges to the septic system and prohibited dumping signs posted above sinks.*

- *Facilities that utilize a system that generates waste silver must ensure that silver is recovered from used fixer by installing silver recovery equipment from prepress wastewater prior to discharge or contract with a service for shipment and treatment of silver containing wastewater. Documentation for this element can include written logs of monitoring and maintenance for silver recovery systems, or the invoices, service contract's and manifests from service contractors.*

- *Facilities must implement work practices to properly manage dust that can be generated from paper collection systems and trim from paper cutting operations. Documentation for this element can include developing standard operating procedures and provide training to employees with regard to proper housekeeping in these locations.*

- *Facilities must implement work practices to properly manage and control spray powder and paper dust accumulation that can result from activities in print production areas. Documentation for this element can include developing standard operating procedures and provide training to employees with regard to proper housekeeping in these locations.*

- *Facilities that contract with outside cleaning companies must request those companies to investigate and consider selecting and using third party certified products for janitorial supplies. Documentation for this element can include a letter to the cleaning company requesting that they consider selecting and using third party certified products for their janitorial supplies.*

  Note: An example of a common third party certified products is "Green Seal" which is an organization dedicated to the development of environmental standards and certification.

- *Facilities must demonstrate and document that when selecting and using janitorial supplies, continuous improvement, environmental impact, and employee protection are considered and meet performance requirements. Documentation for this element can include instructional memos, emails, and policies associated with material purchases. Hydrochloric acid in toilet bowl cleaners, isopropyl alcohol in surface cleaners and ammonia are examples of ingredients to avoid in janitorial cleaners.*

  Note: Some regulatory requirements for facilities that manufacture food packaging may dictate the type of janitorial cleaners required.

- *Facilities must demonstrate and document that production inks, toners, coatings, adhesives, laminates and hot stamping foils contain no more than 100 ppm total for lead, mercury, cadmium, and hexavalent chromium. This can be accomplished by contacting your vendors/suppliers of these materials and obtaining written verification on the suppliers letterhead that these limits are being met.*

Note: Suppliers and vendors are familiar with these types of requests and should have the verification response readily available.

Section 4.9 - Chemical Management - Lithographic Specific Applicability:

This best practice section addresses the chemical management aspect that SGP established as important for certification purposes and which can be specific to the lithographic process.

Note: For any element that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices must be addressed and documented, if applicable:

- *Facilities that use plate development chemistries should ensure that they extend the use of this chemistry by monitoring and replenishing through appropriate quality control systems or by following manufacturer's recommendations. Documentation for this element can include written instructions and/or standard operating procedures established for staff using this chemistry.*

- *Facilities must consider replacing conventional Computer-to-Plate (CTP) chemistry that has a high pH with a lower pH or one that is non-corrosive. Documentation for this element can include communication with the manufacturer and/or purchase records.*

- *Facilities must use pre-sensitized aqueous developed plates when they are compatible with the plate imaging and developing system/process that the facility currently uses. Documentation for this element can include communication with the manufacturer of the unit.*

- *Facilities must recycle or treat metal-etching developers to remove metals if the facility uses bi-metallic lithographic plates and embossing dies. Documentation for this element can include records of contracting with an outside recycler or treatment facility.*

- *Facilities must investigate the use of computer-to-plate technology. You can demonstrate conformance with this element by demonstrating that the equipment is being used or using a set questions you establish to ask vendors or specific specifications you determine to be relevant.*

- *Facilities must investigate the use of a computer-to-press or computer-to-output device technology (digital printing). Documentation for this element can include emails, memos, and other communication means that show research or investigation of options applicable to the facility operations.*

Section 4.10 - Chemical Management - Flexographic Specific Applicability:

This best practice section addresses the chemical management aspect that SGP established as important for certification purposes and which can be specific to the flexographic process.

Note: For any element that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices must be addressed and documented, if applicable:

- *Facilities that use liquid photopolymer flexographic plates must collect and recycle any uncured polymer. Documentation for this element can include records of contracting with an outside recycler.*

- *Facilities must use, where compatible, perchloroethylene alternative solvent (PAS), water-washable, or dry plate development systems for flexographic plates. Documentation for this element can include purchase records, communication with vendors, or other correspondence.*

- *Facilities must review effective anilox roll cleaning options to evaluate approaches that result in less environmental impact, cost, and potential damage to anilox rolls. You can demonstrate conformance with this element by emails, memos, and other communication means that show a review was performed of the facility operations. Media blasting is one alternative to solvent for cleaning heavy build-up.*

- *Facilities must review effective plate cleaning options to evaluate approaches that result in less environmental impact, cost and potential damage. You can demonstrate conformance with this element by emails, memos, and other communication means that show a review was performed of the facility operations. Dedicated plate cleaning machines using recycled solvent or aqueous cleaner are examples of an acceptable practice.*

Section 4.11 - Chemical Management - Screen Specific Printing Applicability

This best practice section addresses the chemical management aspect that SGP established as important for certification purposes and which can be specific to the screen printing process.

Note: For any element that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices must be addressed and documented, if applicable:

- *Facilities must investigate the use of computer to screen imaging technology if they are not already using computer to screen*

- *Facilities must investigate the use of computer to output device technology if they are not already using this technology*

- *Facilities must investigate the use of automatic screen reclamation systems if they are not already using these systems*

For any of the above elements documentation can include emails, memos, and other communication means that show research or investigation of options applicable to the facility operations. Some facilities keep training records in a sustainability binder. Others use electronic records and create a sustainability folder with sub folders for each item.

Section 4.12 - Chemical Management - Digital Specific Printing Applicability

This best practice section addresses the chemical management aspect that SGP established as important for certification purposes and which can be specific to the digital printing process.

Note: For any element that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices must be addressed and documented, if applicable:

- *Facilities that utilize a photographic based digital output device must ensure that silver is recovered by installing silver recovery equipment or contracting with a service for shipment and treatment of silver containing wastewater. Documentation for this element can include written logs of monitoring and maintenance for silver recovery systems, or the invoices, service contract's and manifests from service contractors.*

Section 4.13 - Waste Management – Applicable to All Print Processes

This best practice section addresses the waste management aspects that SGP established as important for certification purposes and which can be applicable to all print processes.

Note: For any element that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices must be addressed and documented, if applicable:

- *Establish and follow written operating procedures to minimize both make ready and production waste.*
- *Segregate and recycle production waste (e.g. trimmings, dust, scrap) when recycling is available.*
- *Recycle used film and aluminum plates.*
- *Utilize a proofing system that minimizes impact and is compatible with both the manufacturing process and customer requirements.*
- *Investigate options to reuse and recycle packaging materials and disposable packaging, such as pallets, gaylords, plastic wrap, cores, cartons, drums, and cans, to minimize waste. For example, investigate whether metal ink cans can be scraped out and recycled as metal waste or if pre-press plastic containers can be included in a plastics recycling stream with plastic wrap and plastic strapping.*
- *Implement an office recycling program for materials such as office equipment, paper, and food/beverage containers. For any electronic wastes such as batteries, monitors, etc. you can investigate the options available for recycling such wastes..*

- *Establish ink, toner, coating, adhesive and substrate estimation methods that are as accurate as possible to minimize inventory and reduce waste from materials being used in the press and post press/post printing processes. If you use digital printing, ink is metered by the printer from the reservoir, substrate is counted exactly for the order (maybe plus one) and estimating is not required.*

- *For input materials that are subject to obsolescence and/or spoilage, establish an inventory management system for recall and reuse and maintain a "First –in, First-out" (FIFO) use plan. For digital and process color inks, FIFO can be achieved by placing new containers at the back and using from the front. For mixed and returned inks, maintaining a list and blending older inks into different colors may be utilized.*

- *For reducing shipping waste, consider using shredded waste paper, if appropriate*

- *Investigate recycling options for your unwanted fill materials such as in packaging Investigate the options for reuse and take-back of packaging materials of all types. Documentation would include conversations with your suppliers about current packaging materials. Chemical totes are usually returnable. Office printer cartridges are usually returnable to the manufacturer. Broken wooden skids may be returnable.*

Section 4.14 - Transportation Management - Applicable to All Print Processes

This best practice section addresses the consideration and management when using transportation means for receiving goods and materials and for shipping goods.

Note: For any element that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices must be addressed and documented, if applicable:

- *Facilities must investigate ways to optimize the movement of goods, including internal product movement and off-site shipments when using owned, leased, or third-party transportation services.*

- *Facilities must investigate participation in the Smart Way program and/or work with transportation companies that are participating in Smart Way.*

  The Smart Way program is a tool facilities can use, free of charge, to reduce their carbon footprint associated with shipping of product.

  Note: Smart Way programs are available in the U.S. (US EPA's Smart Way), and in Canada (Natural Resource's Smart Way).

- *Facilities must investigate options to encourage more environmentally friendly means of commuting by employees such as installing bike racks, lockers and shower facilities; enrollment programs for discounted bus passes; establishment of car pools, installation of outlets for electric vehicles; and preferred parking for hybrid and electric vehicles.*

- *Facilities must investigate the implementation of a no-idle policy for vehicles loading and off-loading at loading dock locations.*

Section 4.15 - Utilities/Energy Management - Applicable to All Print Processes

This best practice section addresses the considerations and management of energy and utilities consumed by the facilities.

The following practices must be addressed and documented, if applicable:

- *Facilities that are replacing equipment must purchase Energy-Star compliant (or equivalent, based on country of manufacture) equipment such as computers, monitors, servers, and appliances where available to meet the specifications of use. You can demonstrate conformance with this element through emails, memos, and other communication means that instruct personnel to ensure this consideration is implemented where feasible and available. Some facilities keep records in a sustainability binder. Others use electronic records and create a sustainability folder with sub folders for each item.*

- *Facilities must conduct and document a comprehensive energy audit, review the audit every two years, and implement appropriate energy reduction projects. Energy audits can be performed internally, by your own staff, or through an outside third party service.*

  If a previous energy audit was conducted, it need only be reviewed every two years. A new audit is not required unless significant changes have occurred with the facility building structure, energy sources, or if additional equipment has been installed or removed.

  Note: If LED lights have not been installed in the facility, the economic feasibility of this option should be assessed during the next two year review cycle.

  You can demonstrate conformance with this element by copies of the energy audit report indicating who performed the audit, date of the audit, areas covered by the audit, findings, and conclusions or recommendations for the facility.

- *Facilities must investigate options to reduce water usage.*

  Note: The U.S. EPA provides additional information and options at the Water Sense partnership website.

- *Facilities that are remodeling or replacing fixtures must evaluate the use of low-flow toilets, double-flush toilets, motion-activated faucets and toilets, and other water-use-reducing items, such as purchasing Water Sense rated fixtures*

- *Facilities must investigate green buying, and green pricing for renewable energy options for the facility.*

  Green buying is where a facility purchases and is supplied energy in whole or in part from renewable energy sources, such as wind, solar power, geothermal, hydropower, and various forms of biomass.

  Green pricing is an optional utility service that allows customers an opportunity to support a greater level of utility company investment in renewable energy technologies. Participating customers pay a premium on their electric bills to cover the incremental cost of the additional renewable energy.

Facilities should investigate the current source(s) of electricity for their facility (contact your utility to obtain the generation mix for your location) and then compare any other available options.

Also available to facilities are Renewable Energy Certificates (RECs), also known as Green Tags, Renewable Energy Credits, Renewable Electricity Certificates, or Tradable Renewable Certificates (TRCs), are tradable, non-tangible energy commodities in the United States

Renewable Energy Certificates represent proof that 1 megawatt-hour (MWh) of electricity was generated from an eligible renewable energy resource (renewable electricity).

Solar renewable energy certificates (SRECs) are RECs that are specifically generated by solar energy. There are companies that specialize in providing RECs. For more information on renewable energy options, contact the SGP Program Office for additional resources.

Section 4.16 - Grounds Management - Applicable to All Print Processes

Under this best practice implementation may depend on whether you own or lease the property. In either case, documentation is required.

Note: Not all practices will apply due to facility geographic location and/or facility site design.

Note: For any element that is not applicable, for documentation and audit purposes, you should still record and have available a brief note that states that the particular element is not applicable to your process or operation.

The following practices need to be addressed:

- *Demonstrate and document that when selecting and using fertilizers, pesticides, and insecticides, continuous improvement, environmental impact, and employee protection are considered and meet performance requirements. Documentation may include product active ingredients list, SDS or other safety, health and environmental information and purchase records.*

- *Demonstrate and document that when selecting and using environmentally safer ice melting chemical treatment, when applicable and practical, continuous improvement, environmental impact, and employee protection are considered and meet performance requirements. Documentation may include product SDS or description of composition and purchase records.*

- *Investigate a system for capturing rainwater for irrigation purposes.*

- *When replacing landscaping, use native and low-water-use plants wherever possible.*

- *When possible, turn yard waste into mulch or compost.*

- *Consider, where applicable, using part of the grounds as a source of habitat protection.*

- *Maintain grounds and property in a responsible manner to prevent degradation or environmental contamination.*

If you own the property you need to document that you have addressed, where applicable, the following items. If not applicable, a short not explaining why it is not applicable will be sufficient documentation (e.g. Facility does not use ice melt due to location in Miami).

If you lease the property you need to recommend, where applicable, the elements listed above to the property owner and the recommendations need to be documented. A letter to the property owner recommending the applicable best practices listed above and their response would be sufficient documentation.

Appendix A

The following chart identifies the criteria elements which require a written procedure, documentation, or both. As noted earlier in this guide, all SMS elements require a written procedure.

Criteria Section	Criteria Title	Written Procedure	Documentation
3.1.1	Sustainability Policy	X	X
3.1.2	Sustainability Committee	X	X
3.1.3.1.1	Environmental Laws	X	X
3.1.3.1.2	Safety and Health Laws	X	X
3.1.3.1.3	Employment labor Laws	X	X
3.1.3.2	Continuous Improvement Project (CIP)	X	X
3.1.3.3	Communications	X	X
3.1.3.4	Training	X	X
3.1.4.1	Environmental compliance audit	X	X
3.1.4.2	Safety and Health compliance audit	X	X
3.1.4.3	SMS conformance audit	X	X
3.1.5	Senior management review	X	X
3.1.6	Document Control	X	X
3.2	Annual Report	X	X
4.1	Annual Metrics for Continuous Improvement		X
4.2	Internal Stakeholder Communications		X
4.3	External Stakeholder Communications		X
4.4	Employee Training		X
4.5.1	Conduct an Air Emission Reduction Assessment		X
4.5.2	Demonstrate acceptable Indoor Air Quality (IAQ)		X
4.6	Social		X
4.7	Equipment/Material		X
4.8	Chemical Management – General – Applicable to All Print Processes		X
4.9	Chemical Management - Lithographic Specific Applicability		X
4.10	Chemical Management - Flexographic Specific Applicability		X
4.11	Chemical Management - Screen Specific Printing Applicability		X
4.12	Chemical Management - Digital Specific Printing Applicability		X
4.13	Waste Management – General – Applicable to All Print Processes		X
4.14	Transportation Management - General – Applicable to All Print Processes		X
4.15	Utilities/Energy Management - General – Applicable to All Print Processes		X
4.16	Grounds Management - General – Applicable to All Print Processes		X

Appendix B

Suggested Continuous Improvement Projects

- *Reductions in energy and utility consumption (installation of LED lights, installation of new roof/reflective roof, installation of air management system, locking thermostats and turning down/up, use of natural lighting, motion sensors for offices/warehouses, turning off compressors when not in use, regularly checking for air leaks, installing variable drive motors)*

- *Reductions in greenhouse gas (GHG) emissions*

- *Reductions in VOC/HAP emissions*

- *Reductions in Toxic Substances (Canada)*

- *Reductions in overall solid waste generation*

- *Specific solid waste reduction projects (packaging materials, lunchroom waste, etc.)*

- *Reduction in landfill waste generated (switch to/increase recyclable substrate, segregate broken pallets and plastics)*

- *Increasing the use of a renewable resource or recycled content of input materials*

- *Increasing the amount of certified substrate used*

- *Replacement of company vehicles with low emitting/alternative fueled models*

- *Redesigning delivery routes and schedules to streamline product deliveries*

- *Coordinating with vendors to reduce impact from vehicle deliveries*

- *Employee/community volunteer efforts (trash pick-up, community garden, recycling)*

- *Implementing compost activities for facility wastes*

- *Collecting rainwater for irrigation purposes*

- *Re-landscaping with native species or other plants that do not require watering, or pesticide application*

- *Creating a wildlife refuge on facility property*

- *Installing renewable energy devices on property, such as solar panels or wind turbines*

Appendix C

Corrective Action Procedure Example

Purpose
To ensure prompt corrective action of any non-conformance discovered in the company's SMS.

Procedure

- *Upon discovery of a non-conformity issue, the employee who discovered the non-conformity requests an internal corrective action report from a Sustainability Committee member and provides the completed report to a Committee member. Committee members provide a correction action report within one day of the request.*

- *The Committee management representative reviews the submitted corrective action report and assigns an SMS committee member(s) responsibility for taking action to correct the reported non-conformance.*

- *The assigned SMS committee member takes corrective action, consulting with the SMS committee if necessary.*

Frequency

This procedure will be performed whenever a non-conformance is discovered in the company's SMS.

Records

(Name of person or title) will be responsible for maintaining records associated with this procedure and will keep these records in their office.

Appendix D

Air Emission Reduction Assessment

This information is designed to assist applicants and certified printers in understanding and achieving the requirements for performing an Air Emission Reduction Assessment.

Air emission reduction assessments are an essential exercise for sustainable facilities in order to continually be aware of their environmental impacts as well as continually review and improve their operations and processes.

Note: It is not mandatory that you select an option for emission reduction. In some cases, emission reduction may not be possible or feasible. The only requirement is that a facility investigates possible options.

Air emissions are mostly associated with chemicals and process equipment that emit air contaminants that could impact the facility's environmental air pollution outside of the building and fall under environmental issues. Air emissions can include Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAP), dust and other particulate matter and byproducts of fuel combustion. Air emissions can also impact the local community.

To begin you need to list all products containing hazardous chemicals used in the facility. This task should have already been compiled as part of the requirements under the regulatory compliance audit process.

The existence and accuracy of the list should be verified during the regulatory compliance audit. If your list only includes products that are hazardous chemicals, it should be expanded to include all chemicals such as consumer products (e.g., window cleaner, general cleaners, janitorial chemicals, etc.) In cases where it may be an administrative burden to identify every single product used in a facility, it is acceptable to not include small quantities of products that do not contain hazardous chemicals.

From the list of chemical products used, the facility should then identify any compounds released to the outside air including VOC's and HAP's.

A list of HAP's is available at: http://www.epa.gov/ttn/atw/orig189.html. This is the minimum acceptable list of HAPs that must be considered.

The facility should then investigate and document alternate processes and products that could reduce the amount of VOC/HAPs used and/or emitted. For each alternative identified, the facility shall determine whether it is feasible (technically or economically) and whether it will be implemented.

For example:

- *Switch from solvent-based inks, coatings, adhesives, laminates to water-based or UV cured ones.*
- *Switch to a lower VOC content or lower vapor pressure cleaning solvent.*
- *When purchasing new printing equipment, opt for cleaning technology such as automatic blanket washing systems that do not generate large volumes of waste cleaning solutions.*
- *Provide containers and covers that reduce additional chemical evaporation.*

- *Eliminate alcohol in lithographic fountain solutions.*
- *Switch to automated flexographic plate cleaners.*
- *Move short runs from litho presses to digital presses.*
- *Combine similar color jobs together to reduce color change cleaning.*

To assist you in accomplishing this task, SGP is providing facilities the use of an SGP Air Emissions Reduction tool that can be used to investigate options for air emission reductions. You can find this tool available through the SGP website - http://sgppartnership.org/resources/

The SGP Air Emission Reduction Tool is used to document options that you investigated, considered, and (if selected) implemented to reduce air emissions. The topics and practices identified in the tool are provided as suggested areas for investigation. Other options can be added or different options can be substituted for those listed.

Section I of the tool provides some brief guidance on air emission reductions

Section II identifies topics and actual emission reduction practices that have been investigated and implemented by other printing operations to reduce a facility's emissions of VOCs and HAP's

Section III identifies the feasible projects you may have selected. It provides an area where you can list the project(s), responsible person for each project, what tasks are required and the estimated date of completion.

Section IV is the Air Emission Reduction Assessment Summary report which can be used to record the number of applicable options investigated, the number of projects selected (if any), and a brief description for each.

See the tool for more detailed description and instructions.

Note: Any option you select for reducing air emissions should still allow you to maintain your operation quality and production standards and needs. Further, for some options considered there may be air pollution control agencies that have established specific limits or requirements that need to be met as with air pollution control devices and the use of cleaning solvents with low VOC's or low vapor pressures.

Appendix E

Demonstrating Acceptable Indoor Air Quality

The following information is designed to assist applicants and certified printers in understanding and achieving the requirements for performing an Indoor Air Quality determination. Indoor Air Quality covers the air quality that employees breathe and are exposed to within the workplace facility and falls under employee safety and health issues.

Note: This information is not intended for regulatory purposes and cannot be used to meet regulatory requirements. This guidance is limited in scope as it only satisfies SGP certification criteria.

IAQ can include exposure to chemicals, fumes, vapors, adverse temperatures and humidity levels, and inadequate fresh air supply due to poor ventilation.

There can be an overlap with regard to IAQ and Air Emissions since some sources of IAQ can also be a source of air emissions, for example, a propane fueled forklift truck can emit carbon monoxide (CO) which could contribute to air pollution (outside) but is also a health concern if there are high concentrations within a building.

A list of all products containing hazardous chemicals used in the facility should already be compiled as part of the requirements under the Hazard Communication program. The existence and accuracy of the list should also be verified during the regulatory compliance audit. If your list only includes products with hazardous chemicals, it should be expanded to include all chemicals such as consumer products (e.g., window cleaner, general cleaners, janitorial chemicals, etc.)

Other contaminants include but are not limited to particulates (dust from cutting paper and from scrap paper materials), combustion products such as carbon monoxide, oxides of nitrogen emitted from fossil fuel engines (lift trucks or delivery trucks), mold (from growth on materials that are wet due to flooding, water leaks or poor maintenance of air handling systems), and asbestos.

You can determine your Indoor Air Quality by preparing a written assessment. The written assessment would include the following steps:

1. *Develop an inventory list of all products/materials used and list by product name*

2. *Ensure you have a Safety Data Sheet (SDS) for every hazardous chemical listed. If an SDS is missing for a listed product obtain the SDS.*

3. *Review the Safety Data Sheet and find the following information:*
    a. *Hazardous ingredients emitted to air*
    b. *Permissible Exposure Limit (PEL) or Threshold Limit Value (TLV)*
        i. *Initially look for chemicals with a PEL of less than 50 ppm*
    c. *Make note if there are any chemicals that can be replaced or substituted for one with a higher PEL.*

4. *Review operations and equipment and identify/list where air contaminants may be emitted and determine if these sources are operating properly. Such operations and equipment can include the following:*
    - *Fossil fuel combustion units from driers, heaters, forklifts, etc.)*
    - *Welding operations*
    - *Dust generation/collection units*

    Note: these areas may not be identified within an SDS

    After reviewing these sources, note whether the operations and equipment are in good order as well as any issues for possible correction.

5. *Review preventative maintenance/repair records for all equipment previously listed which emit air contaminants as well as all reviewing ventilation systems and controls for the facility. Ventilation systems and controls can include localized exhaust hoods and air filtration systems.*

    After reviewing these records and control sources, note whether the records are complete and that the ventilation systems and controls are in good order as well as any issues for possible correction.

    The review if preventative maintenance/repair records for all ventilation systems and controls must be conducted annually.

6. *Review facility/building conditions and identify any obvious signs of other potential contaminants. Other potential contaminants can include accumulations of dust/particulates, mold, asbestos, lead dust*

    After reviewing the facility/building, note whether any locations are in good order as well as any issues for possible correction.

7. *Investigate and document all employee IAQ complaints. This can be accomplished by ensuring that there is a policy in place for allowing employees to submit complaints and for interviewing the employees regarding any complaints.*

    Document all complaints and document all steps involved in the investigation process as well as identifying issues and actions taken to correct issues.

Summarize the written assessment in a document capturing all of the above information along with the final determination.

If the results of the determination indicate that exposure testing is required, then it can be accomplished by using several methods described below:

- *Exposure monitoring measures the concentration of contaminants in the air a worker actually breathes during their work day. Sampling may occur over a full shift or a portion of the shift. Sampling devices are worn by workers and thus move with them as they perform their usual work activities. Results are usually only valid for the class of worker (e.g., press operator, material handler, etc.) tested as different workers will perform different activities in different locations.*

- *Individual monitoring involves sampling the air which an employee breathes and can be performed by using either a passive process such as a badge*

- *Area testing can be taken in fixed locations which provide a larger air sample which may affect more employees. This type of testing is usually close to the source of the contaminant to give a worst case concentration result. It can then reasonably be assumed that workers in the area are exposed to a lower concentration than the area sample.*

  Area testing can be achieved by an active process where air is drawn through a tube containing a sorbent and then sending the badge or tube to a lab where the contaminants are desorbed and measured. The test results are then compared to the permissible exposure levels as listed by OSHA.

- *Air contaminants can also be measured directly using a handheld device that uses either an electronic means or colorimetric tubes. Carbon monoxide and general comfort parameters such as temperature, relative humidity and carbon dioxide can be measures simultaneously using a hand held meter. There is also a handheld meter than can measure total VOCs. Colorimeteric tubes can be used to quantify concentrations of some chemicals in the air.*

Written documentation for the testing/sampling portion of the determination can include employee or area exposure monitoring results/records, ventilation surveys, or a written report from an outside service performing indoor air quality.

Note: Unless the facility is holistic UV, or acceptable IAQ can be determined through a written assessment, then air sampling would be required.

If changes occur to Indoor Air Quality that may cause an impact to employee exposure such as facility conditions, worksite configurations, new or replaced equipment, material or chemical replacements and handling or usage, then the facility should conduct another review of the indoor air quality.

Appendix F

Glossary

***Biodegradable**: The entire product or package will completely break down and return to nature, i.e., decompose into elements found in nature within a reasonably short period of time after customary disposal.*

***Continuous Improvement Project (CIP)**: A project that demonstrates commitment to improving a company's sustainability profile. It must be documented according to SGP guidelines.*

***Compostable**: All of the materials in the product or package will break down into, or otherwise become a part of, usable compost (e.g., soil-conditioning material, mulch) in a safe and timely manner in an appropriate composting program or facility, or in a home compost pile or device.*

***Conventional Septic System**: A wastewater treatment that consists of a septic tank, a trench or bed subsurface wastewater infiltration system utilizing a soil dispersal treatment system. It is never acceptable to use a conventional septic system for disposal of industrial waste water.*

***Deming Cycle**: An iterative four-step problem-solving process involving a plan, do, check, act (PDCA) approach typically used for business improvement.*

***Desk Top Audit (DTA)**: An alternative audit process to conduct an SGP Certification audit, performed remotely in lieu of an onsite audit. Special circumstances apply.*

***EHS**: Environmental, Health & Safety*

***EMS**: Environmental Management System*

***Environment Canada (EC):** An agency of the federal government of Canada charged with protecting human health and the environment, by writing and enforcing regulations based on laws passed by the Government of Canada.*

***Energy Star**: A joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy that sets voluntary energy efficient standards for products and practices. (http://www.energystar.gov)*

***First-In, First-Out (FIFO)**: Acronym defining a method of inventory use in which the oldest remaining items are to be the first used.*

***Fugitive**: Pollutant released into air from leaks in equipment, pipe lines, seals, valves, containers, etc., and not from the usual sources such chimneys, stacks, and vents. (www.businessdictionary.com)*

***HAP**: Hazardous Air Pollutant*

***Industrial Septic System**: A wastewater treatment that consists of an onsite holding tank that is designed and constructed to receive raw wastewater. Septage haulers are contracted to remove the wastewater directly from the tank and taken offsite for either treatment or disposal.*

***ISO**: An international-standard-setting body composed of representatives from various national standards organizations.*

***Metrics**: Standards of measurement by which efficiency, performance, progress, or quality of a plan, process, or product can be assessed.*

***Safety Data Sheet (SDS)**: A form required by OSHA and provincial legislation that contains data regarding the physical, chemical, and health characteristics of a product and precautions for safe use of the product.*

***SMS**: Sustainability Management System*

***Occupational Safety & Health Administration (OSHA):** An agency of the United States Department of Labor charged with preventing work-related injuries, illnesses, and occupational fatality by issuing and enforcing standards for workplace safety and health.*

***Organic Textile**: A textile product carrying the Global Organic Textile Standard (GOTS) label grade 'organic' must contain a minimum of 95% certified organic fibers whereas a product with the label grade 'made with organic' must contain a minimum of 70% certified organic fibers. (Source: http://www.global-standard.org)*

***Plan Do Check Act (PDCA):** Principles of a management plan. Also known as a Deming Cycle.*

***Pre-Audit**: A review of initial documentation needed for SGP Certification and performed by an SGP auditor prior to an onsite audit.*

***Product**: The design aspects and input material management to create a finished good.*

***Process**: All manufacturing steps (e.g., prepress, press, and postpress) involved with converting raw materials into a finished product, including process byproducts (e.g., solid wastes, air pollution, and wastewater) that have an EHS impact.*

***Stakeholder**: Person, group, or organization that has direct or indirect interest in an organization because it can affect or be affected by the organization's actions, objectives, and policies. Key stakeholders in a business organization include customers, directors/board members, employees, owners (shareholders), suppliers, unions, and the community from which the business draws its resources.*

***United States Environmental Protection Agency (U.S. EPA)**: An agency of the federal government of the United States charged with protecting human health and the environment by writing and enforcing regulations based on laws passed by Congress.*

***VOC**: Volatile Organic Compound*