



Guidance Document 2011

FREQUENTLY ASKED QUESTIONS

TABLE OF CONTENTS

BACKGROUND AND PURPOSE.....	1
GENERAL CERTIFICATION PROCESS QUESTIONS.....	1
Who can apply?.....	1
Once I apply for certification, do I have to request an audit within a certain set period of time?	1
What are the general requirements for SGP Certification?	1
What requirements have most frequently caused delays in certification?	1
How much does it cost to get certified?	2
How long does certification last?.....	2
What does the on-site audit process entail?	2
SPECIFIC QUESTIONS ABOUT CRITERIA ELEMENTS.....	3
Can I use information from other management systems as a basis for my Sustainability Management System (SMS)? (Section 3.1)	3
What is a Sustainability Policy? (Section 3.1.1).....	3
What is the structure of a Sustainability Committee? (Section 3.1.2).....	3
What is the correct way to write a procedure? (Section 3.1.3)	3
What is the procedure to document compliance with EHS and labor laws/regulations? (Section 3.1.3.1)	4
How do I demonstrate we communicate relevant information about sustainability efforts to appropriate stakeholders? (Section 3.1.3.2)	4
What type of continuous improvement project (CIP) is acceptable? (Section 3.1.3.3)	4
For my CIP, what actions need to be accomplished within completion dates? (Section 3.1.3.3).....	4
What happens if the organization hasn't completed or seen significant progress on the CIP in the year being reported? (Section 3.1.3.3)	4
How do I prove employees were trained? (Section 3.1.3.4).....	4
What do I need to do to prove on-site service providers/contractors and suppliers have been informed? (Section 3.1.3.5).....	5
What does an EHS compliance audit entail? (Section 3.1.4.1)	5
What does the SMS conformance audit entail? (Section 3.1.4.2)	5
What must we do to document management's commitment, participation and review? (Section 3.1.5)	5
What is required to document Best Management Practices (BMPs)? (Section 3.2).....	5
How do we demonstrate that we have an open dialog with customers to evaluate the most efficient use of materials, layout, and substrate characteristics? (Section 3.2.1.1)	6
How do we demonstrate that we are maintaining a dialog with suppliers for responsible materials sourcing and management? (Section 3.2.1.2)	6
How should we demonstrate acceptable indoor air quality? (Section 3.2.2.1.1)	6
What type of inventory management is required? (Section 3.2.2.1.2).....	7
How do we conduct and document an air emission assessment, review and implementation process? (Section 3.2.2.1.3).....	7
How do we document that employees were trained on proper handling and use of inks, solvents and other chemicals, and shop towels to minimize waste and fugitive emissions? (Section 3.2.2.1.4)	7
How do we demonstrate and document that when selecting and using input materials and selecting and purchasing equipment that continuous improvement, environmental impact, and employee protection are considered in addition to meeting performance requirements and customers' specifications? (Sections 3.2.2.1.5, 3.2.2.3.1 and 3.2.2.4.1).....	7
What is an example for establishing and documenting a preventative maintenance (PM) program for equipment identifying what actions will be performed, their frequency and responsible personnel? (Section 3.2.2.1.6).....	7
How do we demonstrate that we have established management practices to ensure that chemicals are properly disposed? (Section 3.2.2.1.7)	8
What do we have to submit to prove the heavy metals (lead, mercury, cadmium, and hexavalent chromium) content in our production chemicals? (Section 3.2.2.1.10)	8
What is required to establish and follow written operating procedures to minimize makeready waste? (Section 3.2.2.1.12).....	8
What is required to establish and follow written operating procedures to minimize production waste? (Section 3.2.2.1.13).....	8
Isn't some of the prepress criteria process-specific? (Section 3.2.2.2).....	8
How do we demonstrate that practices are being met to reduce shipping? (Section 3.2.3.1)	9
How do we ensure that packaging materials and practices have been implemented to minimize waste? (Section 3.2.3.1).....	9

What is required for the energy audit? (Section 3.2.3.2.2)9
What is the “sustainability metrics form?” (Section 3.4)9
What is the baseline metric? (Section 3.4)9
What is the Annual Report and when is it submitted? (Section 3.5)9
What criteria elements require written procedures? 10

ACRONYMS & ABBREVIATIONS USED IN THIS DOCUMENT

BMP: Best Management Practices
CIP: Continuous Improvement Project
EHS: Environmental, Health & Safety
FIFO: First-In First-Out
HAP: Hazardous Air Pollutant
Haz Comm: Hazard Communication
MSDS: Material Safety Data Sheet
OSHA: Occupational Safety & Health Administration
PAS: Perchloroethylene (perc) Alternative Solvent
PEL: Permissible Exposure Limit
PM: Preventive Maintenance
SGP: Sustainable Green Printing
SMART: Specific, Measurable, Achievable, Realistic and Time-bound
SMS: Sustainability Management System
U.S. EPA: United States Environmental Protection Agency
VOC: Volatile Organic Compound
WHMIS: Workplace Hazardous Information Materials System

BACKGROUND AND PURPOSE

On May 1, 2011, the Sustainable Green Printing Partnership (SGP Partnership) adopted updated criteria for SGP Certification. To help applicants gain a greater understanding of the certification process, the organization has provided this FAQ document.

GENERAL CERTIFICATION PROCESS QUESTIONS

Who can apply?

Any of the following commercial or related graphic communication facilities located in the United States or Canada are eligible to apply for SGP certification, including:

- Any print process (lithography, flexography, screen, digital, gravure)
- Any size facility
- Binding, finishing and loose leaf facilities
- In-plant printing operations*
- Printing departments within educational institutions

**If applying as an in-plant operation, only the printing portion of the facility is eligible for SGP certification.*

Once I apply for certification, do I have to request an audit within a certain set period of time?

Once your facility's application has been approved, you have twelve months to request an audit.

What are the general requirements for SGP Certification?

- Embracing the Guiding Principles
- A sustainability policy that includes elements addressing environmental, health, and safety (EHS) compliance, pollution prevention, continuous improvement, and stakeholder communication
- Development and implementation of a sustainability management system (SMS)
- A sustainability committee that meets at least twice a year
- Commitment to U.S. EPA and OSHA regulatory compliance for US facilities, commitment to applicable federal, provincial and municipal requirements in Canada
- A EHS audit every two years
- An energy audit every two years
- An air emissions reduction assessment
- Indoor air quality evaluation
- Identifying and working on one annual continuous improvement project
- Adoption of the mandatory best management practices
- Meeting the corporate social responsibility elements
- Completing the metrics form
- Submitting an annual report to SGP

What requirements have most frequently caused delays in certification?

The most common cause of delays is the facility not having a good understanding of the certification requirements. Each candidate facility is encouraged to download the criteria and study it prior to submitting an application.

- For facilities in the United States, not understanding or meeting the requirements for stormwater discharge regulation in the United States. In the United States, all printing facilities with stormwater discharges to "waterways" must have either a stormwater permit or a no-exposure certificate.

- Not having a clear understanding regarding the audit process itself. Prior to moving to the audit phase, applicants need to ensure that all criteria elements have been addressed as stated in the criteria document. Written documents need to be submitted to SGP as part of a pre-audit review to ensure that the facility is ready for an onsite audit. To assist with this process, this guidance document provides further information and clarification.
- Documentation of certain sustainability practices in written procedures. SGP applicants frequently fail to provide all of the written procedures or provide ones that have missing components. SGP Applicants should take care in preparing these procedures by reviewing the SGP Criteria thoroughly and, if unsure, contact their trade association for guidance. Otherwise, a SGP Auditor may delay the audit until the procedures are considered adequate.
- SGP applicants frequently think that providing Hazard Communication (Haz Comm) and hazardous waste training is sufficient to meet the SGP criteria. They are not. SGP Applicants must provide and adequately document employee training on the company's sustainability procedures and any other compliance required training. The SGP Criteria also requires waste minimization training, which is not required under hazardous waste requirements. Waste minimization training must include all types of wastes generated, not just hazardous waste. The SGP auditor will verify that the training is completed and that it is up to date.
- Education of print customers is not just providing a cost list of environmentally-friendly substrates. SGP applicants need to go beyond a cost list and educate the print customer about the benefits/disadvantages of different substrates; inks; manufacturing costs; manufacturing wastes generated and disposal; and end-of-life recyclability. SGP applicants should provide documentation that they have compiled the information and that they have an active customer outreach program being implemented by trained marketing and sales staff.
- The annual Continuous Improvement Project (CIP) documents are not consistent with the SMART approach. *See below for further description of that approach.*

How much does it cost to get certified?

The application and audit fees are found on the SGP website www.sgppartnership.org. If the applicant is a member of one of the industry associations supporting the SGP Partnership, the fees are reduced. The applicant is also responsible for the auditor's travel expenses. Any other internal company costs associated with meeting the certification are the responsibility of the SGP applicant.

How long does certification last?

Facilities are certified for two years. During that time, certified printers must submit an annual report based on their CIP. They must reapply for certification on the second year.

What does the on-site audit process entail?

When the applicant contacts the SGP Executive Director to schedule an on-site audit, a pre-audit checklist will be sent to the facility. Once all requested files are received, SGP will assign an auditor, who then conducts a pre-audit review in which he/she determines whether the company is ready for the onsite certification audit. If the auditor reports to the SGP Executive Director that the company is not prepared for the certification, the auditor will contact the SGP applicant to resolve any identified issues before the applicant can move forward to the on-site phase of the audit process.

SGP Auditors are trained to follow a specific certification protocol that includes interviews with selected employees, a plant tour, examination of documents and conversations with staff on the plant floor, in the front office, and throughout the company from all departments. Sustainability needs to be pervasive throughout the operation and the auditor will want to talk to those involved in the effort. During the audit, the SGP Auditor will collect evidence that the facility complies with all the SGP certification criteria. The evidence found will be documented in the audit report.

Expect that the audit will take a full 8-hour day, usually split over two half days. At the end of the audit, the SGP Auditor will recommend for or against certification. If they recommend against certification, the applicant will receive a list of

corrective actions and a deadline by which to resolve them. SGP will then follow up to make sure that the corrective actions have been addressed.

SPECIFIC QUESTIONS ABOUT CRITERIA ELEMENTS

Can I use information from other management systems as a basis for my Sustainability Management System (SMS)? (Section 3.1)

If a facility has already implemented a management system such as ISO 9000/14001, it can be used as a basis to create a SMS. However, any SMS developed for the SGP program must meet all elements outlined in the SGP criteria document.

What is a Sustainability Policy? (Section 3.1.1)

All SGP certified facilities must develop and publish a sustainability policy. This policy must be signed by a responsible individual (e.g., owner, CEO, President), made visible, and publicly available. For example, post the policy on the company website, and/or print for distribution. This policy must set out the organization's commitment towards adoption of sustainable business practices and include the following elements:

- Identify and monitor applicable EHS regulations and maintain compliance
- Identify and monitor applicable Federal, State/Provincial, and/or local employment labor laws and maintain compliance
- Continuous improvement of the facility's sustainability performance.
- Pollution prevention that emphasizes source reduction, reuse, and recycling
- Share information on sustainability performance with all stakeholders

What is the structure of a Sustainability Committee? (Section 3.1.2)

The facility must maintain a formal Sustainability Committee whose mission includes but is not limited to environment, health and safety. The Sustainability Committee must be a viable committee including pertinent responsible members representing all departments in the company. A list of committee members is required. To be effective, there must be a leader who is going to champion the efforts of this committee to management and employees. A schedule of upcoming meetings and demonstration of past meetings, which includes agendas and meeting minutes, are required.

What is the correct way to write a procedure? (Section 3.1.3)

SGP requires the development of a management system that contains a number of procedures that describe how the company will establish, implement, and maintain compliance with specific program components and certification in general. Procedures should contain the following elements as appropriate:

- The purpose, scope, background and definitions
- Associated reference documents
- Responsibilities
- Procedural steps
- Frequency (should reflect the nature of the covered action)
- Identification of records that will be kept
- Revision history/document control

The format used to write procedures in an environmental management system (EMS), such as ISO 14001 would be acceptable.

What is the procedure to document compliance with EHS and labor laws/regulations? (Section 3.1.3.1)

A written procedure must be included in the SMS regarding how the facility will determine applicable regulations and the process the facility will undertake to ensure that compliance issues are always updated. In order to be compliant, the facility needs to identify which regulations apply to their operation. The procedure needs to address the specific steps on how the EHS compliance audit will be conducted, including documentation regarding any necessary corrective actions.

To facilitate compliance, the applicable regulations should be compiled into a list. The EHS regulations can then be used for the EHS compliance audit and included in the audit report. In the event the facility is exempt from any environmental permits, primarily air pollution permits, the SGP applicant must prove with documentation why exemption is applicable.

How do I demonstrate we communicate relevant information about sustainability efforts to appropriate stakeholders? (Section 3.1.3.2)

A written procedure must be included in the SMS regarding how facilities will inform all stakeholders, and explain the sustainability efforts of the facility, and how the initiatives benefit all stakeholder groups. There is no specific method required for stakeholder communication and it can be accomplished by sharing information in newsletters, meetings, websites, bulletin boards, etc.

What type of continuous improvement project (CIP) is acceptable? (Section 3.1.3.3)

SGP Certified facilities are committed to improve their sustainability profile. All continuous improvement projects should be written as a SMART goal. That is, they must be Specific, Measurable, Achievable, Realistic and Time-bound. The “T” has already been defined by SGP, in that it must be an annual goal. The other aspects are defined by the company. This includes the actual project, staff involved, and the metric to be measured to demonstrate commitment to improvement.

A CIP can be chosen to improve environmental or safety and health performance of the organization. The metric cannot be solely based on dollars saved.

For my CIP, what actions need to be accomplished within completion dates? (Section 3.1.3.3)

A written procedure must be included in the SMS regarding how the facility will achieve the objective is required as outlined in Section 3.1.3.3.2 of the criteria document. This plan should include a series of steps with an associated time line, identifying who in the facility is responsible for overseeing, monitoring and calculating metrics, and setting up project milestone meetings. The written plan should also include any resources that will be needed to accomplish the project. There needs to be some evidence that this has been completed. This can be in the form of a sign off sheet, emails communicating the information, meeting minutes, etc. The written plan should also include the responsible employees for executing the CIP. The written plan needs to include a periodic review schedule.

What happens if the organization hasn't completed or seen significant progress on the CIP in the year being reported? (Section 3.1.3.3)

If an SGP facility has not completely met the goal set, but has shown progress toward that goal, they are not going to be penalized or lose their certification.

How do I prove employees were trained? (Section 3.1.3.4)

A written procedure must be included in the SMS regarding employee training and the training needs to be tailored based on the involvement of each employee in the sustainability program. All employees are to receive general

awareness training and employees with specific responsibilities must have more detailed training specific to their job responsibilities and how they impact the sustainability program and/or CIP.

Documentation of training needs to be developed and retained regarding each training session that identifies the topics, trainer, and employees present. Records can be in the form of a sign off sheets, emails communicating the information, etc.

What do I need to do to prove on-site service providers/contractors and suppliers have been informed? (Section 3.1.3.5)

A written procedure must be included in the SMS regarding communicating the general awareness and impact that the service providers/contractors have on the sustainability program. Documentation of communication efforts needs to be developed and retained regarding each service provider/contractor. Records can be in the form of a providing a summary sheet on arrival at the facility and signing an acknowledgement form, sending information to the contractor and requiring the contractor to distribute the information to relevant employees, having the company contact and brief contractors on initial visit, sign off sheets, emails communicating the information, etc.

What does an EHS compliance audit entail? (Section 3.1.4.1)

The compliance audit should reference a list of regulatory requirements that apply to the facility. This could be incorporated into the audit report or be a reference document. The audit can be conducted by knowledgeable staff or an experienced and qualified third-party. The audit needs to be documented in writing and in addition to the list of applicable regulations; the audit needs to include the name of the person/organization conducting the audit, audit date, a summary of compliance status, identification compliance deficiencies. The SGP Auditor will request to see during the pre-audit review the audit and documentation on the completion status of any audit recommendations including corrective actions for deficiencies.

What does the SMS conformance audit entail? (Section 3.1.4.2)

A written procedure must be included in the SMS describing how the SMS conformance audit is to be conducted, including the documentation process for the audit and addressing any necessary corrective actions. The purpose of the audit is to examine all aspects of the company's implementation of SMS procedures to ensure that it continues to meet the procedures identified in the SMS. During the pre-audit review for the second and subsequent audits, the auditor will request the SMS conformance audit and documentation on the completion status of any audit recommendations including corrective actions for deficiencies. An audit is required at the end of the first year of the implementation of the SMS and annually thereafter.

What must we do to document management's commitment, participation and review? (Section 3.1.5)

A written procedure must be included in the SMS describing how senior management will review the sustainability program and processes including the documentation process for the audit and addressing any necessary corrective actions. The purpose of the audit is to examine all aspects of the SMS, applicable Best Management Practices (BMPs), and other aspects of the SGP criteria (such as metrics, annual report, etc.) to ensure that it continues to meet the SGP criteria. During the pre-audit review for the second and subsequent audits, the auditor will request the Management Review and documentation on the completion status of any recommendations including corrective actions for deficiencies. A management review is required at the end of the first year of the implementation of the SMS and annually thereafter.

What is required to document Best Management Practices (BMPs)? (Section 3.2)

SGP requires facilities to meet best management practices applicable to the activities conducted at their facility. Depending on the print process(es) utilized at the facility, not all BMPs will apply to each individual facility. In some cases, a written procedure is required and for others documentation (either verbal or written) is required. Where a written procedure is required, the criteria will specifically state it. Where documentation is required, materials such as emails, letters, brochures, matrices, etc. will be acceptable.

How do we demonstrate that we have an open dialog with customers to evaluate the most efficient use of materials, layout, and substrate characteristics? (Section 3.2.1.1)

The purpose of this criteria element is to ensure that the facility maintains an open and ongoing dialog with the customer to determine whether there are new or alternate products/materials that can be used to improve the sustainability profile of the finished product and the manufacturing operation. Documentation is required demonstrating that this interaction has occurred and is ongoing. The documentation can include records of facility tours, seminars, emails, correspondence, phone logs, and sample information packages.

Note: Some of the identified attributes may not apply to your operation or products. For example, organic textile material content is an issue for a screen printing operation, but not a flexographic printing operation. For clarification of the terminology, consult the glossary of terms.

How do we demonstrate that we are maintaining a dialog with suppliers for responsible materials sourcing and management? (Section 3.2.1.2)

The purpose of this criteria element is to ensure that the facility maintains an open and ongoing dialog with its suppliers to determine whether there are new or alternate methods or products/materials that can be used to improve the sustainability profile of the finished product and the manufacturing operation. There must be some evidence that this interaction has occurred and is ongoing. Documentation is required demonstrating that this interaction has occurred and is ongoing. The documentation can include records of facility tours, seminars, emails, correspondence, phone logs, and sample information packages

Note: Some of the identified attributes may not apply to your operation or products. For example, organic textile material content is an issue for a screen printing operation, but not a flexographic printing operation. For clarification of the terminology, consult the glossary of terms.

How should we demonstrate acceptable indoor air quality? (Section 3.2.2.1.1)

The purpose of this criteria element is to ensure employee protection from excessive exposures to chemicals and other indoor air quality irritants as this is a critical aspect to being a sustainable facility. Because different printing methods have different levels of exposure risk to airborne volatile organic compounds (VOCs), chemicals, dust, or mold, the facility should first assess what chemicals may become airborne, during what activities, available ventilation, and who may be exposed.

There are a variety of ways to demonstrate acceptable indoor air quality and documentation of the chosen methodology is required. Documentation can include demonstrating that quantities of chemicals used in the process do not result in any significant airborne concentration, ventilation surveys showing sufficient air turn over exists (i.e., generally 4-5 room air changes per hour), previous exposure monitoring records, or written assessment using the permissible exposure limits (PEL) on the MSDSs as the basis to show that chemicals used in the operation have high exposure limits.

A facility can also conduct an indoor air survey to demonstrate that adverse exposure risk is prevented. The survey can be conducted by using "exposure badges" that are placed on representative employees or a full exposure study by using personnel sampling devices.

In some instances, the full exposure testing can be done without incurring any costs. Some insurance companies do provide this testing and all states have an OSHA Consultation Program that can perform the specific testing. The OSHA

Consultation Program is non-regulatory, but the results need to be shared with the employees and any identified corrective action needs to be implemented. See <http://www.osha.gov/dcsp/smallbusiness/consult.html> for more information about the program and how to schedule a visit.

What type of inventory management is required? (Section 3.2.2.1.2)

Demonstration that an inventory management system to reduce waste of materials that could be made obsolete and/or subject to spoilage has been implemented must be provided. Demonstration could include, the development and use of a policy, a labeling system where material with a date, or arranging containers so that the oldest is at the front are simple method of implementing “first-in, first-out” (FIFO). Another approach would be to conduct weekly or monthly inventories of vulnerable materials.

How do we conduct and document an air emission assessment, review and implementation process? (Section 3.2.2.1.3)

A documented assessment detailing the options to reduce air pollution emissions is required. In addition, an action plan for implementing any air pollution reduction actions identified that are economically and technically feasible must be developed. The assessment should consist of a documented effort to evaluate facility practices that use volatile organic compounds/hazardous air pollutants (VOCs/HAPs) and looks at how the company can incrementally reduce usage over the long term by product substitution, work practice changes, and/or equipment changes.

It is possible that a facility may be using the lowest emitting equipment and materials and cannot reduce any more given the constraints of the technology and economic viability. In these instances, the evaluation needs to be documented along with the reasons demonstrating that the facility cannot achieve further reductions or any further reductions are not economically feasible.

How do we document that employees were trained on proper handling and use of inks, solvents and other chemicals, and shop towels to minimize waste and fugitive emissions? (Section 3.2.2.1.4)

Documentation that all employees who handle inks, solvents, other chemicals, and shop towels have been trained in proper handling procedures is required. Documentation for each training session needs to include the topics, trainer, and employees present. Records can be in the form of a sign off sheets, emails communicating the information, etc

Note: Haz Comm or workplace hazardous information materials system (WHMIS) training does not usually cover waste minimization unless it is specifically added to the training program.

How do we demonstrate and document that when selecting and using input materials and selecting and purchasing equipment that continuous improvement, environmental impact, and employee protection are considered in addition to meeting performance requirements and customers' specifications? (Sections 3.2.2.1.5, 3.2.2.3.1 and 3.2.2.4.1)

A written procedure is not required to meet these elements. Documentation is required to demonstrate how these decisions are made. Documentation can include product literature, telephone logs and emails. Many companies require written justifications to make major equipment purchases. Including environmental and safety considerations in the justification would be considered acceptable for this purpose.

What is an example for establishing and documenting a preventative maintenance (PM) program

for equipment identifying what actions will be performed, their frequency and responsible personnel? (Section 3.2.2.1.6)

A written procedure of the preventative maintenance (PM) program is not required. However, some air pollution control permits do require written PM plans. PM is required for equipment that will result in either indoor air quality issues such as propane powered industrial tucks, pre-press equipment, certain post press equipment, or those that impact the outdoor environment such as thermal oxidizers, bag houses, presses, post press etc. The PM program can be in the form of checklists that employees initial and date when maintenance is completed or it can be contracted out to a third party and records of servicing need to be maintained. Some equipment such as printing presses have a PM schedule programmed into their software that tracks time to next maintenance and logs the date when last maintenance was performed.

How do we demonstrate that we have established management practices to ensure that chemicals are properly disposed? (Section 3.2.2.1.7)

Written procedure detailing management practices regarding disposal of waste are not required, however; they may be a legislative requirement in your jurisdiction. Evidence that the means to properly identify (e.g, hazardous, nonhazardous, universal, recyclable, solid), collect, and dispose of chemicals properly must be available. Such evidence may consist of written procedures, appropriate closed and labeled containers in production areas or a waste collection area, interviews with employees regarding waste collection practices, and authorization or test data demonstrating compliance with local sewer codes and discharge limits.

What do we have to submit to prove the heavy metals (lead, mercury, cadmium, and hexavalent chromium) content in our production chemicals? (Section 3.2.2.1.10)

Written documentation from material suppliers is required for each input material used to produce a product. A written statement is required from each supplier stating that the total concentration of the four heavy metals is less than 100 ppm. A material safety data sheet (MSDS) does not meet this requirement unless the specific statement is found on the MSDS. This provision only applies to production materials and not materials used in support functions such as desktop printers in the office area.

What is required to establish and follow written operating procedures to minimize makeready waste? (Section 3.2.2.1.12)

A written procedure is required to document actual procedures. This is a specific procedure instructing the equipment operator how to start up press or post-press equipment generating the least amount of waste. Procedures can be equipment, product, or workflow specific. This procedure should capture normal set up routines and include only those items that reduce the amount of waste during set up.

What is required to establish and follow written operating procedures to minimize production waste? (Section 3.2.2.1.13)

A written procedure is required to document actual procedures. This is a specific procedure instructing the equipment operator how to generating the least amount of waste during the running of press or post-press equipment. Procedures can be equipment, product, or workflow specific. This procedure should capture normal set up routines and include only those items that reduce the amount of waste during set up.

Isn't some of the prepress criteria process-specific? (Section 3.2.2.2)

Yes, each of the elements may not be applicable to your print process. For example, metal and some plastic plates used

by lithographers can be recycled, especially the aluminum plates. Recycle or treat metal-etching developers to remove metals when using bimetallic lithographic plates and embossing dies. Screen printers can reuse/recycle screens and investigate the use of an automatic screen reclamation system. For flexographers using liquid photopolymer flexographic plates, collect and recycle any uncured polymer. Flexographers can also use perchloroethylene alternative solvent (PAS), water-washable, or dry plate development systems for flexographic plates. For all printing systems using image carriers, use imaging and developing system and process that involve the use of pre-sensitized aqueous developed image carriers.

How do we demonstrate that practices are being met to reduce shipping? (Section 3.2.3.1)

Minimize shipping frequency and distance traveled by monitoring daily shipping needs, and document what actions have been taken to reduce the frequency, combination of shipments, changes in delivery routes and times to increase efficiency, etc.

How do we ensure that packaging materials and practices have been implemented to minimize waste? (Section 3.2.3.1)

Review packaging materials being used and determine whether any packaging received into the plant can be reused for shipping finished goods. Skids and pallets are a good example. Packaging materials used for plates can often be reused - some manufacturers will take back plate packaging materials. Provide containers or a storage area where materials can be stored after segregation for reuse. Contact suppliers if packaging used is excessive or non-recyclable and request a change in materials. Reuse of packaging materials, selecting recyclable packaging content, recyclable filler material, or packaging that is recyclable by the end user.

What is required for the energy audit? (Section 3.2.3.2.2)

The energy audit can be conducted by knowledgeable staff or a qualified third party such a local utility, industrial outreach programs, schools/universities, or consultants. Examples of areas to audit include: compressed air, occupancy sensors, programmable thermostats, energy efficient lighting, gas and electricity use and insulation and implement appropriate energy reduction projects. A written report with recommendations for reduction is required. The auditor will request to see during the audit what recommendations have been implemented.

What is the “sustainability metrics form?” (Section 3.4)

This form needs to be completed each year. The metrics are not a standard against which conformance to the program or compliance will be measured. The sustainability metrics are an internal benchmarking tool offered as a resource for SGP certified facilities. It identifies a series of sustainability measurements such as VOC emissions, air toxics emissions, energy use, water consumption, safety and health, waste generation, etc. that the facility can use to benchmark their own operation and to track their progress toward continuous improvement goals. The SGP Auditor will review the metrics form to ensure it is completed, but the information will not be made public.

What is the baseline metric? (Section 3.4)

The baseline metric is collected from a time period before any initiatives were implemented to improve the facility's performance that the metric tracks, for example, annual usage of water in gallons in the previous year, annual usage of energy in kWh two years ago. A written statement must be provided detailing the metric(s) that will be used to measure progress of the CIP.

What is the Annual Report and when is it submitted? (Section 3.5)

The Annual Report is a series of questions that documents progress of the facility in sustainability initiatives. It is due one year after certification.

What criteria elements require written procedures?

- Identify, achieve and maintain compliance with appropriate Federal, State/Provincial, and/or local; including EHS laws and regulations, and employment labor laws (3.1.3.1)
- Communicate relevant information about sustainability efforts to appropriate stakeholders, including employees, community, customers and vendors (3.1.3.2)
- Implementation of annual CIP (3.1.3.3)
- Training for employees which must include the following: Awareness of facility's sustainability program such as policy, committee, responsibilities, CIP, and stakeholder communication. Specific responsibilities required by sustainability program and procedures. Specific responsibilities for those involved in the annual CIP. (3.1.3.4)
- Communication with on-site service providers/contractors and suppliers that have job responsibilities that significantly impact the facility's sustainability program which must include the following elements: Awareness of facility's sustainability program such as policy, committee, responsibilities, CIP, and stakeholder communication. Specific responsibilities impacting sustainability program and procedures. Specific responsibilities impacting the annual CIP (3.1.3.5)
- The senior management review process, including documentation of the last review and any corrective actions (3.1.5.1)
 - Operating procedures to minimize makeready waste (3.2.2.1.12)
 - Operating procedures to minimize waste during production runs (3.2.2.1.13)
- Compliance with child labor and immigration (3.3.1.2)
- Compliance with minimum wage/hour and overtime (3.3.1.3)
- Accommodations for persons with disabilities (3.3.1.4)
- Language requirements (3.3.2)