



Sustainable Green Printing Partnership Program

Certification Criteria

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SUSTAINABLE GREEN PRINTING PARTNERSHIP

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Table of Contents TO BE UPDATED ONCE STANDARD IS APPROVED

3.1 Sustainability Management System (SMS)	3
3.1.1 <i>Sustainability Policy</i>	3
3.1.2 <i>Sustainability Committee</i>	3
3.1.3 <i>Implementation and Operation</i>	4
3.1.4 <i>Checking and Corrective Action</i>	5
3.1.5 <i>Management's Commitment, Participation, and Review</i>	5
3.1.6 <i>Document Control</i>	6
3.2 Annual Report	6
4.0 Best Practices	7
4.1 Annual Metrics for Continuous Improvement	7
4.2 Internal Stakeholder Communications	7
4.3 External Stakeholder Communications	7
4.4 Employee Training	9
4.5 Checking and Corrective Actions	9
4.6 Social	10
4.7 Equipment/Material	10
4.8 Chemical Management – Applicable to All Print Processes	10
4.9 Chemical Management – Lithographic Specific Applicability	11
4.10 Chemical Management – Flexographic Specific Applicability	12
4.11 Chemical Management- Screen Printing Specific Applicability	12
4.12 Chemical Management – Digital Printing Specific Applicability	12
4.13 Waste Management – Applicable to All Print Processes	12
4.14 Transportation Management – Applicable to All Print Processes	13
4.15 Utilities/Energy Management – Applicable to All Print Processes	13
4.16 Grounds Management – Applicable to All Print Processes	13

3.1 1.1 Sustainability Management System (SMS)

The facility must develop and implement a Sustainability Management System. The SGP Partnership does not mandate any one particular management system, model, or approach. A generic management system can be constructed through a basic “Plan, Do, Check, Act” (PDCA) approach, sometimes referred to as the “Deming Cycle.” An applicant can choose to implement a management system based on commonly available Environmental Management System (EMS) models, ISO 9000/14001, or other quality management systems. Facilities, however, must demonstrate implementation of a formal management system supported by written documentation that includes the following elements:

3.1.1 1.1.1 Sustainability Policy

The facility must make available a written Sustainability Policy. This policy must be signed and dated by a member of top management and made publicly available. This policy must set out the organization’s commitment towards adoption of sustainable business practices. The Policy must be reviewed and reissued every two years. It must include, as a minimum, commitments to the following:

- ~~3.1.1.1~~ **1.1.1.1** Identifying and monitoring applicable EHS regulations and maintaining compliance.
- ~~3.1.1.2~~ **1.1.1.2** Identifying and monitoring applicable Federal, State/Provincial, and/or local employment labor laws and maintaining compliance.
- ~~3.1.1.3~~ **1.1.1.3** Continuous improvement of the facility’s sustainability performance that emphasizes source reduction, reuse and recycling
- ~~3.1.1.4~~ **1.1.1.4** Sharing information on sustainability performance with all stakeholders.

3.1.2 1.1.2 Sustainability Committee

The facility must develop and maintain a formal Sustainability Committee whose scope includes all areas of environment, health, and safety (EHS). The committee must:

- ~~3.1.2.1~~ **1.1.2.1** Include members that are representative of the facility’s departments including management and employees.
- ~~3.1.2.2~~ **1.1.2.2** Identify a Sustainability Chair/Coordinator
- ~~3.1.2.3~~ **1.2.2.3** Develop a regular meeting schedule and meet at least four times per year.
- ~~3.1.2.4~~ **1.2.2.4** Develop and disseminate agendas and meeting minutes **that document progress on meeting the annual requirements of the certification criteria and other opportunities to improve performance.**
- ~~3.1.2.5~~ **1.2.2.5** **Identify existing business communication methods with stakeholders. In partnership with the appropriate facility department, develop and enhance communication channels for stakeholder input and feedback.**

~~3.1.2.6~~ 1.2.2.6 Identify and document potential continuous improvement projects.

~~3.1.2.7~~ 1.2.2.7 Monitor Sustainability Management System activities including audits and assessments **and document in meeting minutes.**

3.1.3 1.1.3 Implementation and Operation

~~3.1.3.1~~ 1.1.3.1 Regulations

The facility must establish, implement and maintain a written procedure(s) to identify, ~~achieve~~, monitor and comply with applicable Federal, State/Provincial, and/or local:

~~3.1.3.1.1~~ 1.1.3.1.1 ~~Environmental laws~~ **Environmental laws including an environmental compliance audit every two years. The audit must use a checklist that is based on the regulations that apply to the facility, and document the evidence found to determine compliance and corrective actions required for any non-conformances.**

~~3.1.3.1.2~~ 1.1.3.1.2 ~~Safety and health laws~~ **Safety and health laws including a safety and health compliance audit every two years. The audit must use checklist that is based on the regulations that apply to the facility and document the evidence found to determine compliance and corrective actions required for any non-conformances.**

~~3.1.3.1.3~~ 1.1.3.1.3 Employment **standards and** labor laws

~~3.1.3.2~~ 1.1.3.2 Continuous Improvement Project (CIP)

~~The facility must establish, implement, and maintain a written procedure for the CIP. The facility must select and implement an annual CIP. The project must be selected after review of the annual metrics and CIPs from past years and consideration of which activities contribute to the greatest sustainable improvement. The CIP must include the following:~~

The facility must establish, implement and maintain a written procedure for the Continuous Improvement Project (CIP) to identify and select the annual CIP project. The objective must focus on improvement of the facility's performance. The following factors must be considered when selecting the project:

- **Be selected from the sustainability pillars of planet or people**
- **Be substantial and chosen from an area of significant impact after review of facility metrics, stakeholder input and previous CIPs**

The CIP process must include the following:

~~3.1.3.2.1~~ 1.1.3.2.1 Goal statement using SMART format (specific, measureable, achievable, realistic, and time-bound).

~~3.1.3.2.2~~ 1.1.3.2.1 Project objective statement(s).

~~3.1.3.2.3~~ 1.1.3.2.3 Baseline metric for which progress will be measured against.

~~3.1.3.2.4~~ 1.1.3.2.4 Actions to be taken to accomplish objective with completion dates.

~~3.1.3.2.5~~ 1.1.3.2.5 Resources (e.g., employees, time, capital costs, outside

contractors, etc.) needed to accomplish project.

~~3.1.3.2.6~~ 1.1.3.2.6 Employee responsibilities for project implementation.

~~3.1.3.2.7~~ 1.1.3.2.7 Method for monitoring ongoing progress against the baseline metric.

~~3.1.3.2.8~~

~~3.1.3.2.9~~ 1.1.3.2.8 Schedule for periodic review of ongoing progress against baseline metric.

~~3.1.3.3~~ 1.1.3.3 Communications

Facility must develop a written procedure documenting identification of stakeholder groups and communication strategies for each. The facility must create awareness of the facility's sustainability program by **annually** communicating ~~at least annually~~ relevant information to appropriate stakeholders, including employees, community, customers, and suppliers. The communication strategy must include all employees and those customers and suppliers that represent 80% of the business.

Relevant information includes the following elements:

- Sustainability policy
- **The role of the sustainability committee**
- **A description of the current Continuous Improvement Project, including impacts and expected improvements**
- **The role of the SGP Impact Tracker Engagement Display**
- **The role of the SGP Impact Tracker data.**

~~Facility must develop a written procedure documenting how communication with each identified stakeholder group is achieved.~~

~~3.1.3.4~~ 1.1.3.4 Training

The facility must have a written procedure on how training will be conducted **and documented** within the facility. Procedure must reference the training elements required for **each identified stakeholder, based on job requirements** and include ~~employees, on-site service providers/contractors and suppliers.~~

- **Employees**
- **Temporary employees/contract labor**
- **On-site service providers/contractors**
- **Suppliers**

1.1.3.5 Management of Change

The facility must have a written procedure on how changes to the facility operations, equipment or materials will be assessed and the impact of the change to requirements within the SMS. The procedure must assess the impact on the following:

- **Equipment Inventory**
- **Energy usage and the Energy Audit**
- **Emissions to the environment and the Air Emissions Assessment**
- **Employee exposure to hazardous materials and the Indoor Air Quality Assessment**

- **Environmental regulatory requirements**
- **Safety and health regulatory requirements**
- **Solid waste generation and the Solid Waste Audit**
- **Demonstrate and document that when making equipment and material purchasing decisions used in pre-press, press and post-press operations, continuous improvement, environmental impact, and employee protection are considered. (Moved from current section 4.7.2)**
- **Demonstrate and document that when selecting and using janitorial supplies, continuous improvement, environmental impact, and employee protection are considered and meet performance requirements. (Moved from current section 4.8.7)**

3.1.4 1.1.4 Checking and Corrective Action

The facility must establish, implement and maintain a single written procedure on the facility's process to conduct and document:

~~3.1.4.1 Environmental compliance audit every two years, including documentation of prompt corrective actions for any non-conformances. Moved to 1.1.3.1 Regulations.~~

~~3.1.4.2 Safety and Health compliance audit every two years, including documentation of prompt corrective actions for any non-conformances. Moved to 1.1.3.1 Regulations.~~

~~3.1.4.3~~ 1.1.4.1 Sustainability Management System (SMS) conformance audit every year including documentation of prompt corrective actions for any non-conformances. **The audit must use a checklist that is based on the the facility's SMS, and document the evidence found to determine compliance and corrective actions required for any non-conformances.**

3.1.5 1.1.5 Management's Commitment, Participation and Review

The facility must:

~~3.1.5.4~~ 1.1.5.1 Establish, implement and maintain a written procedure documenting the senior management review of all elements of the sustainability management program. The review must include the following:

- SGP Metrics,
- results of the annual continuous improvement project,
- results of the SMS Audit and
- any corrective actions for non-conformances identified by the audits conducted under 3.1.4

~~3.1.5.2~~ 1.1.5.2 Annually conduct and document the senior management review. Any recommendations for improvement or modifications must be documented.

3.1.6 1.1.6 Document Control

The facility must:

3.1.6.4 1.1.6.1 Establish, implement, and maintain a written procedure for document control. The facility must establish a process for the creation, review, revision, removal, and distribution of documents that describe and control the Sustainability Management System

3.1.6.1.1 1.1.6.1.1 The written procedure must describe the use of the SGP Impact Tracker for retention of required documentation and who is responsible for maintaining documentation.

3.1.6.1.2

3.1.6.2 1.1.6.2 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
- Responsibilities
- Procedural steps
- Frequency
- Identification of records that will be kept
- Revision history/document control

3.1.6.3 1.1.6.3 All required documents and records must be kept for 3 years. **In addition to the records maintained in the Impact Tracker, this includes training records and communication documentation.** ~~Records include meeting minutes; agendas; and all required written audit reports and assessments.~~

3.2 1.2 Annual Report

The facility must complete the SGP Partnership Annual Report **by uploading the required documents to the SGP Impact Tracker. Each annual report is due one year and two months from the facility's initial certification month.** ~~using the SGP Annual Report Template and submit to SGP for approval.~~

Note: ~~The first annual report is due one year and two months from initial certification date.~~

4.0 2.0 Best Practices

The Best Practices that are listed below must be implemented into the business management or operations of the facility, where applicable. It's important to note that not all Best Practices will apply to a print platform or facility. Any Best Practices that apply only to a specific print process will be marked for that specific process. The facility should review each Best Practice and make the determination if it applies.

4.1 2.1 Annual Metrics for Continuous Improvement To Track Performance of the Sustainability Management System.

The facility must ~~complete~~ **collect, track and document** SGP Sustainability Metrics **and enter or upload the data onto the SGP Impact Tracker.** ~~using the SGP Metrics Spreadsheet.~~ All metrics must be updated and maintained on an annual basis.

~~Determine the start of the year for collecting data and record on the metrics sheet. The start may coincide with a calendar year, a fiscal year, or the SGP audit anniversary.~~

4.2 2.2 Internal Stakeholder Communications

If employees in the facility are not competent in the English **or other official** language, all plant rules, safety policies, postings, and training materials and other sustainability programs must be communicated to accommodate each language spoken in the facility.

4.3 2.3 External Stakeholder Communications

~~4.3.1~~ The facility must initiate and/or maintain a dialog with customers **to highlight the opportunities available for their products to align with the key principles of a circular economy. The conversations should include the following:** ~~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~~
- Product design aspects that can reduce waste and pollution during manufacturing with the end objective to design out these factors**
- Designing with durability for purpose, reuse, manufacturing and recycling to keep products, components and material circulating in the economy**
- Regeneration of natural systems by avoiding the use of non-renewable resources and preserving or enhancing renewable ones.**

~~The facility must document (e.g., notes, emails, matrix, summaries, etc.) that they have evaluated the characteristics including but not limited to those listed under Evaluation Characteristics shown below.~~

~~4.2.3~~ **2.3.2 The facility must initiate and/or maintain a dialog with substrate suppliers to highlight the opportunities for their products to align with the key principles of a circular economy.**

The dialog with suppliers to ~~reduce the impact associated with input materials.~~ **optimize participation of substrates in the circular economy must cover the following characteristics and be documented.**

- 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

~~4.3.2~~ **2.3.2 The facility must initiate and/or maintain a dialog with chemical suppliers to identify products that will reduce the impact associated with chemical products at all stages in the life cycle.**

For chemical products used in production (e.g., prepress, press, and postpress) **the facility must maintain a dialogue with suppliers** including, but not limited to, 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.
- 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.
- Substances Declared Toxic under Canadian Environmental Protection Act (Canadian companies only)
- **IARC Chemicals (need to list specific categories)**
- **Proposition 65, Safe Drinking Water Act**

~~4.3.3~~ **2.3.3** Investigate with suppliers availability of take back programs for unused materials

2.3.4 The facility must initiate and/or maintain dialog with suppliers to reduce the impact associated with operating their facility and transportation fleet through implementation of sustainable operations. The following programs should be included in the dialog: SGP Supplier Certification, ISO 9000/14001 or other management systems.

4.4 2.4 Employee Training

~~4.4.1~~ **2.4.1** Train employees on specific responsibilities and skills required by the sustainability program and procedures **to include, at a minimum, the following:**

- **Procedures for segregating and handling solid waste**
- **Procedures to minimize make ready and production waste**
- **Procedures to minimize and improve energy efficiencies throughout the facility**
- **Proper handling and use of inks, solvents and other VOC containing chemicals and shop towels to minimize waste and fugitive emissions**
- **Procedures for communications with customers, contractors and suppliers.**
- **Preparation and Collection of SGP metrics as defined in 2.1, Annual Metrics to Track Performance of the Sustainability Management System.**

4.4.2 **2.4.2** Train employees **and contractors, as appropriate**, on specific responsibilities and skills for those involved in the annual ~~CIP~~ **Continuous Improvement Project**.

~~4.4.3 Train employees on proper handling and use of inks, solvents, other VOC containing chemicals and shop towels to minimize waste and fugitive emissions. **MOVED TO 2.4.1.**~~

4.4.4 **2.4.3** Conduct annual training on all elements listed above and as needed when changes occur and/or new elements is introduced.

4.4.5 **2.4.4** Document all training elements.

4.5 Checking and Corrective Actions ~~2.5 Environment, Health and Safety Programs~~

~~4.5.1~~ **2.5.1 Identify potential reductions of emissions of volatile organic compounds and/or hazardous air pollutants to the environment by conducting an** ~~Conduct an Air Emission Reduction Assessment by performing the following:~~

- Prepare a written inventory of products emitting Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) including:
 - Product name
 - VOC and HAP Content of each product
- Calculate VOC/HAP emissions for each inventoried product and sum all emissions based on annual product usage.
- ~~Prepare a written assessment to~~ Identify and document options to reduce the product usage and emissions of VOCs/HAPs and determine if any of the options are technically and economically feasible.
- Document any implementation of air emission reduction activities.
- Review and update the Air Emission Reduction Assessment every two **years following 1.1.3.5, Management of Change** ~~when an opportunity to reduce emissions is presented, when new technology is available, or when new equipment, chemicals, chemical handling work practices, storage procedures, facility conditions, or operation configurations change which impact air emissions~~

~~4.5.2~~ **2.5.2 To ensure the health and safety of employees demonstrate acceptable Indoor Air Quality (IAQ) by performing the following:**

- Prepare a written inventory of all products used with the following information:

- The product name,
 - Hazardous ingredients that will be emitted to air from the ingredients listed on the Safety Data Sheet,
 - Exposure limit (e.g., Permissible Exposure Limit or Threshold Limit Value), and update it on an annual basis.
- Document a review of operations and equipment for conditions when air contaminants are emitted but are not identified on a Safety Data Sheet including the following:
 - Fossil fuel combustion units (e.g., driers, space heaters, forklifts etc.),
 - Welding operations, and
 - Dust generation and collection units (e.g., powder from sheetfed offset lithographic presses, perfect binders, cyclones, and bailers).
 - Document a physical review of facility conditions to identify other potential contaminants such as accumulations of dust/particulates, mold, asbestos, offensive odors, and lead dust
 - Document an annual review of any preventative maintenance and/or repair records for ventilation systems and controls to ensure normal operations
 - Investigate and document all employee complaints regarding indoor air quality.
 - Conduct a comprehensive Indoor Air Quality assessment. ~~using the~~ **The facility may use the SGP IAQ DETERMINATION TOOL** to determine adequate indoor air quality or the need for indoor air testing
 - Review indoor air quality when ever there is an introduction of new equipment, chemicals, **following 1.1.3.5, Management of Change.** ~~chemical handling work practices, storage procedures, facility conditions, or operation which impacts indoor air quality or employee exposure~~

4.6 2.6 Social

Investigate possible opportunities to work with outside stakeholders on sustainability projects that benefit both the community and facility.

4.7 2.7 Equipment/Material

~~4.7.1~~ **2.7.1** Establish and document a preventative maintenance program for equipment identifying what actions will be performed, their frequency, and responsible personnel.

~~4.7.2 Demonstrate and document that when making equipment and material purchasing decisions used in pre-press, press and post-press operations, continuous improvement, environmental impact, and employee protection are considered.~~ **MOVED to Section 1.1.3.5, Management of Change.**

4.8 2.8 Chemical Management – Applicable to All Print Processes

~~4.8.1 Establish management practices to ensure that both hazardous and non-hazardous chemicals are properly recycled, reused, or disposed.~~

~~4.8.2 Ensure that no industrial wastewater is discharged to a septic system and is properly recycled, reused, and/or disposed.~~

~~4.8.3 Recover silver 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.~~

~~4.8.4 Implement work practices to properly manage dust from paper collection systems and trim from paper cutting operations.~~

~~4.8.5 Implement work practices to properly manage spray powder and paper dust from print production areas.~~

~~4.8.6~~ **2.8.1** For facilities employing contract cleaning companies, investigate and request that when selecting and using janitorial supplies, third party certified products are considered, **avoiding the use of the following chemicals:**

- **Hydrochloric Acid in toilet bowl cleaners**
- **Chlorine Bleach as a sanitizing agent**
- **Isopropyl alcohol in glass cleaners**

~~4.8.7 Demonstrate and document that when selecting and using janitorial supplies, continuous improvement, environmental impact, and employee protection are considered and meet performance requirements.~~ **Moved to Section 1.1.3.5, Management of Change.**

~~4.8.7 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.~~

4.9 2.9 Chemical Management - Lithographic Specific Applicability:

~~4.9.1 Extend the use of plate development chemistries by monitoring and replenishing through appropriate quality control systems or by following manufacturer's recommendations~~

~~4.9.2~~ **2.9.1** ~~When appropriate, Investigate replacing~~ replace conventional CTP plate chemistry that is corrosive with non-corrosive chemistry

~~4.9.3~~ **2.9.2** When compatible with plate imaging and developing system and process, use pre-sensitized aqueous developed plates

~~4.9.4 Recycle or treat metal etching developers to remove metals when using bi-metallic lithographic plates and embossing dies~~

~~4.9.5 Investigate the use of computer to plate technology or computer to output device technology~~

~~4.9.6 Investigate the use of a computer to press or computer to output device technology~~

4.10 2.10 Chemical Management - Flexographic Specific Applicability:

~~4.10.1 2.10.1 If using liquid photopolymer flexographic plates collect and recycle any uncured polymer~~

~~4.10.2 Use perchloroethylene alternative solvent (PAS), water-washable, or dry plate development systems for flexographic plates~~

~~4.10.3 2.10.2 Review effective anilox roll cleaning options to evaluate approaches that result in less environmental impact, cost and potential damage to anilox rolls~~

~~4.10.4 2.10.3 Review effective plate cleaning options to evaluate approaches that result in less environmental impact, cost and potential damage~~

4.11 2.11 Chemical Management - Screen Printing Specific Applicability:

~~4.11.1 2.11.1 Investigate the use of computer to screen imaging technology~~

~~4.11.2 Investigate the use of computer to output device technology~~

~~4.11.3 2.11.2 Investigate the use of automatic screen reclamation systems~~

4.12 2.12 Chemical Management - Digital Specific Printing Applicability:

~~4.12.1 Recover silver from photographic based digital output devices by installing silver recovery equipment or contracting with a service for shipment and treatment of silver containing wastewater.~~

4.13 2.13 Waste Management – Applicable to All Print Processes

~~4.13.1 Establish and follow written operating procedures to minimize both make ready and production waste.~~

~~4.13.2 Segregate and recycle production waste (e.g. trimmings, dust, scrap) when recycling is available.~~

~~4.13.3 Recycle used film and aluminum plates, when applicable.~~

~~4.13.4 Utilize a proofing system that minimizes impact and is compatible with both the manufacturing process and customer requirements.~~

~~4.13.4 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~~

~~4.13.5 Implement an office recycling program for materials such as office equipment, paper, food and beverage containers, and batteries.~~

~~4.13.6 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.~~

2.13.1 Conduct, document and review every two years, a solid waste audit using a checklist that identifies all points in the facility where solid waste is created, including, but not limited to, packaging, shipping and receiving, pre and post press operations, printing operations and finishing operations.

~~4.13.~~ **2.13.2** 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.

4.14 2.14 Transportation Management - Applicable to All Print Processes

~~4.14.1~~ **2.14.1** Investigate ways to optimize the movement of goods, including internal product movement and off-site shipments using owned, leased, or third-party transportation services.

~~4.14.2~~ **2.14.2** For facilities operating in the United States and Canada, investigate participation in SmartWay program and/or work with transportation companies that are participating in Smartway.

2.14.3 Investigate inclusion in the calculation of the facility’s carbon footprint the movement of product from the facility to the final customer in the facility’s SGP Metrics.

~~4.14.3~~ **2.14.4** Investigate, **through an annual employee survey**, options to encourage cleaner commuting by employees such as 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.

~~4.14.4~~ **2.14.5** Investigate Implementation of a no idle policy in all loading docks.

4.15 2.15 Utilities/Energy Management – Applicable to All Print Processes

~~4.15.1~~ When replacing equipment, 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.

~~4.15.2~~ **2.15.1** Conduct and document a comprehensive energy audit, review the audit every two years, and implement appropriate energy reduction projects.

~~4.15.3~~ **2.15.2** Investigate options to reduce water usage (Water Sense) **at all points in the facility where water is used.**

~~4.15.4~~ **2.15.3** When remodeling or replacing fixtures, 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

~~4.15.5~~ **2.15.4 Investigate and document through a cost benefit analysis, conducted every two years, options for purchasing renewable energy credits, power purchase agreements, and on-site energy generation and storage.**

~~4.15.6 Investigate green buying, and green pricing for renewable energy options for the facility.~~

4.16 2.16 Grounds Management - Applicable to All Print Processes

~~4.16.1~~ **2.16.1** Property owners must address the following, but if the facility leases the property, then the following must be recommended, where applicable, to the property owner and the recommendations need to be documented:

~~4.16.2~~ **2.16.2** 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.

~~4.16.3~~ **2.16.3** Demonstrate and document that when selecting and using environmentally safer icemelting chemical treatment, when applicable and practical, continuous improvement, environmental impact, and employee protection are considered and meet performance requirements.

~~4.16.4~~ **2.16.4** Investigate a system for capturing rainwater for irrigation purposes.

~~4.16.5~~ **2.16.5** When replacing landscaping, use native and low-water-use plants wherever possible.

~~4.16.6~~ **2.16.6** When possible, turn yard waste into mulch or composting.

~~4.16.7~~ **2.16.7** Consider, where applicable, using part of the grounds as a source of habitat protection.

~~4.16.8~~ **2.16.8** Maintain grounds and property in a responsible manner to prevent degradation or environmental contamination.