Environmental Claim Validation Procedure (ECVP)

Environmental Claim Validation Procedure (ECVP) for Substance Content Claims

UL ECVP 2884

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Summary of Topics

This is the Second Edition of the Environmental Claim Validation Procedure (ECVP) for Substance Content Claims, UL ECVP 2884, dated 05-03-2024.

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Introduction

1.0 GENERAL

1.1 This section provides an outline of the requirements necessary in establishing any substance content claims. Further sections elaborate specific requirements needed for particular chemicals, chemical groups to be claimed as “non-detectable” in the product or as “free” of emitted substances from the product. In addition, the sections below provide customized requirements needed according to specific product formations and characterizations.

1.2 The documentation requirements for the product manufacturer, material supply and productions are outlined and are mandatory for each type of product. In addition, each part deals with a particular substance content claim, provides further details on the scope of the claim, appropriate definitions, a list of additional documentation required, an outlined procedure, relevant tests, and example claims for the claim sought after.

1.3 In order to account for any variations in measurement during testing of the product under consideration, an appropriate number of samples shall be tested in order to reasonably determine that the validated product meets the requirements of this ECVP.

1.4 The goal of validating the content of a substance in a product is to identify products that avoid the use of the substance in order to reduce the health and environmental hazards associated with the various additive and precursor chemicals. Only product categories whose constituent materials have historically used substance in product formulations and could have been incorporated into the product at some point will qualify for validation. The requirements may be applied to other material types if found to be appropriate.

2.0 SCOPE

2.1 The scope of this procedure is to provide a framework for evaluating and validating substance content claims for manufactured products that would have historically used the substance under consideration. This procedure also documents the framework for the periodic reevaluation of claims. Claims typically consist of the manufacturer indicating that according to the test results, no measurable amount of substance above threshold was detected in the product sample.

3.0 UNITS OF MEASUREMENT

3.1 For the purposes of this procedure, values shall be reported in accordance with the requirements of the individual criterion. If the manufacturer’s choice of units deviates, that change shall be documented and justified as to the reason and relevance for that change.

4.0 UNDATED REFERENCES

4.1 Any undated reference to a code or standard appearing in the requirements of this procedure shall be interpreted as referring to the latest edition of that code or standard.

5.0 GLOSSARY

5.1 For the purpose of this procedure, the following definitions apply.

5.2 SUBSTANCE – can apply to both chemicals and/or materials that constitute the component/product.

5.3 SUBSTANCE CONTENT CLAIMS – The content or concentration emitted of the applicable substance(s) is less than the specified limits within the relevant sections, thus is non-detectable. The claim states that the applicable substances are non-detectable by a specific test method outlined in the corresponding sections of this document.

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Compliance, Evaluation and Assessment Criteria

6.0 DOCUMENTATION

6.1. The manufacturer shall provide composition details for the products validated. Full product formulation specifications for each product must be submitted for validation, as well as test reports demonstrating compliance with the requirements of the procedures outlined in the corresponding sections of this document. The following information shall be provided:

- Manufacturing site address and contact person details for all validated products
- Product details:
  - Product formulations in form of a bill of materials (BOM) with CAS numbers and +/- tolerances (for both, the formulation, and a minimum of 5 production batch records)
  - Safety Data Sheet (SDS) for each raw material / substance present in the final product and for the final product
  - List of suppliers
- Description of the manufacturing process, including flowcharts showing high level manufacturing process with material inputs and outputs
- Documentation of product/components made from similar materials demonstrating that it typically contains the substance(s) that the claim is intended for.

6.2 The manufacturer shall demonstrate that a management system or process is used to enable the control of the materials and processes relevant for the claim. Thus, an accreditation of the location according to ISO 9001 and ISO 14000 is appropriate to fulfil the requirements but is not mandatory. During the validation, documentation such as the SOPs for handling the materials, quality control of the incoming materials (e. g. certificate of analysis), supplier quality checks (letters, audit reports, etc.), and receiving / shipping records will be reviewed.

6.3 Requirements for additional documentation are detailed in each specific substance section.

7.0 PROCEDURE

7.1 The manufacturer shall submit the requested documentation, as per Section 6, necessary for verifying the proposed substance content claims.

7.2 Environmental claims that are validated to this procedure are to undergo an annual review. As part of the annual review, the manufacturer shall complete a substance content ECV Annual Review Declaration.

7.3 Requirements for additional information are detailed in the specific substance sections.

8.0 METHODOLOGY

8.1. Audit and validation of documents, review of product formulation and tests results based on protocols are further detailed in specific substance content claims sections.

8.2 Any testing required shall be conducted by an ISO 17025 accredited laboratory. The test report shall not be older than 3 years and retesting during the renewal process is required every 3 years.

8.3 Sample requirements for substance content testing

a) Environmental Project Manager determines the number of samples based on a review of the product formulation and identification of substance content in base materials

b) For one product line with similar product formulations, test one product at each manufacturing location where product is manufactured

c) For multiple product lines or for products with dissimilar formulations, review product formulations to aid in choosing the worst- case scenario content for product or multiple products

d) Communicate number of samples, sample choice methodology and proper sample preparation to the client

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