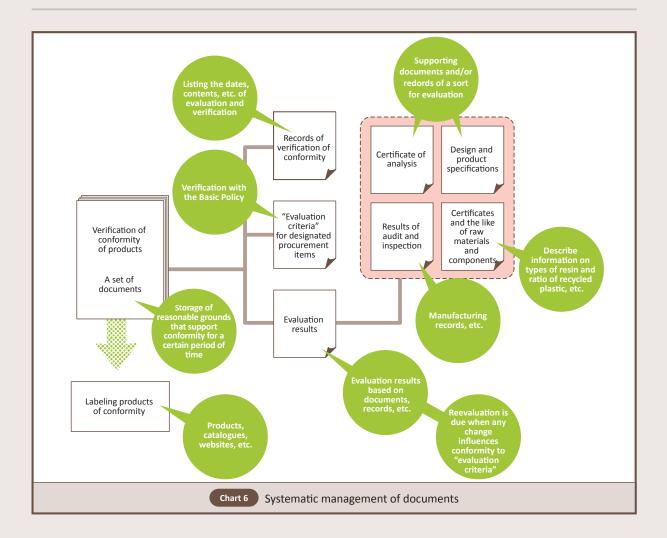
2

## **Document Management**

Businesses should prepare and retain verification documents attesting conformity of products to "evaluation criteria".

Documents as well as records with reasonable grounds that support conformity of products to "evaluation criteria" should be systematically managed.





"Reasonable grounds that support conformity" should not necessarily be certificates. Design and product specifications, delivery notes, and information from the Web may also be reasonable grounds. However, any verified documents and records should be saved for a certain period of time<sup>4</sup>, while the dates and contents of them have to be registered. Saving will do on either print or electronic media.



Businesses should verify that their products conform to the "evaluation criteria" not just in the primary production but also as long as they keep manufacturing. They should also reevaluate the conformity as necessary when product specifications change.

<sup>4</sup> Verified documents and records should be saved at least for the same time period as that of safety and quality assurance documents. JIS Q 14021:2000 "Environmental labels and declarations: Self-declared environmental claims (Type II environmental labelling)" requires that "the evaluation shall be fully documented and the documentation retained by the claimant for the purpose of the information disclosure referred to in 6.2.2. This shall be for the period that the product is on the market, and for a reasonable period thereafter, taking into account the life of the product".

## **Appropriate Labels and Claims**

Each environmental label and claim should be appropriate and in accordance with "Guidelines for Environmental Representations".5

Any labels and claims that indicate a product conforms to the "evaluation criteria" are considered as environmental labels and claims. Businesses should thus make the labeling appropriately making reference to the requirements of the "Guidelines for Environmental Representations".

Businesses should provide consumers with correct and non-misleading claims when they display the claims on products and brochures to verify that their products conform to the "evaluation criteria."

Appropriate environmental representations shall meet the following requirements:

- to be correct and evidence-based information
- to be verifiable

to be non-misleading

• to be unambiguous and non-abstract

"Guidelines for Environmental Representations" refers conformity with international standards on environmental labels and declarations (ISO/JIS Q 14020 series) as the basic concept of appropriate provision of environmental information toward businesses.

## Appropriate environmental labels and claims

Eco-labels, declarations of conformity, etc. are examples of appropriate environmental labels and claims.



### **Eco-labeling**



Eco Mark Program<sup>6</sup> (implemented by the Eco Mark Office, Japan Environmental Association)



### **Declaration of conformity**

特定調達品目の判断の基準への適合宣言書

番号:

※宣言を識別するための固有番号を記載

発行年月日: ○○年○○月○○日 発行者の名称:株式会社〇〇〇〇 発行者の住所: ○○県○○市○○○

代表者の役職・氏名: 代表取締役社長 ○○○○

代表者の署名: ○○○○

特定調達品目の種類: ○○○

※適合する特定調達品目の種類(基本方針に記載)

宣言の対象: 商品番号〇〇-〇〇

※判断の基準に適合する特定調達物品等の名称、型式等を記載 JIS○○○による○○○の測定 (○○○への依頼試験による) 参考情報:

原料供給業者による○○○の証明書 ※適合を確認するために用いた手法、試験実施機関等

問合せ先: ○○部○○係 電話: ○○○、FAX: ○○○、E-mail: ○@○○

担当部署、担当者、電話番号・FAX番号・E-mail等の必要情報を記載

JIS Q 17050-1:2005 Conformity assessment- Supplier's declaration of conformity - Part 1: sets forth examples of forms of documents (supplier's declaration of conformity) attesting conformity of a product, etc. to certain criteria, as well as clarifying responsible persons for conformity and declaration.

The supplier's declaration of conformity can also be used as a certification of designated procurement goods.

- "Guidelines for Environmental Representations" is available in Japanese at the following website of the Ministry of the Environment. https://www.env.go.jp/policy/hozen/green/ecolabel/guideline/
- The Eco Mark Program is the first and the only Type I environmental labeling program of ISO in Japan, which has been implemented by the Japan Environment Association since 1989. The enacted certification criteria for every product category have taken the environment into consideration throughout the product lifecycle, including resource extraction, manufacture, distribution, use, recycling, and disposal. In order to use and indicate an Eco Mark, a product must meet the necessary criteria and be approved by the association as one with low environmental load and contributing to environmental conservation.

The Eco Mark Office, Japan Environment Association https://www.ecomark.jp/english/



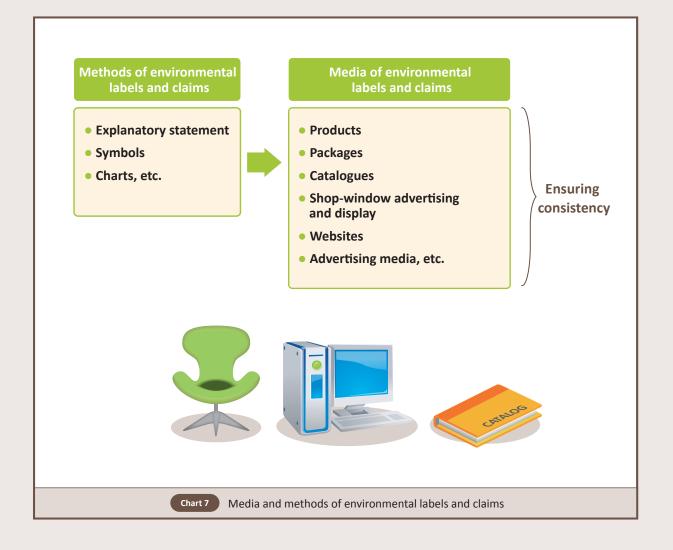
# **Ensuring Consistency of Labels and Claims**

# Environmental labels and claims should be consistent with each other when applied in different media.

Products, etc. that have been verified to have conformity with the "evaluation criteria" may be labeled accordingly.

Not only labels and claims, but also declarations of conformity, catalogues, invoices, manuals, websites, etc. may be used to indicate conformity with the "evaluation criteria" (Chart 7).

When different media are used to indicate conformity with "evaluation criteria", they all should be consistent.





Having various media of environmental labels and claims will be convenient for purchasers to check product conformity to the "evaluation criteria". On the other hand, manufacturers, importers, and suppliers need to update any changes of the conformity information with all media to ensure consistency of labels and claims.

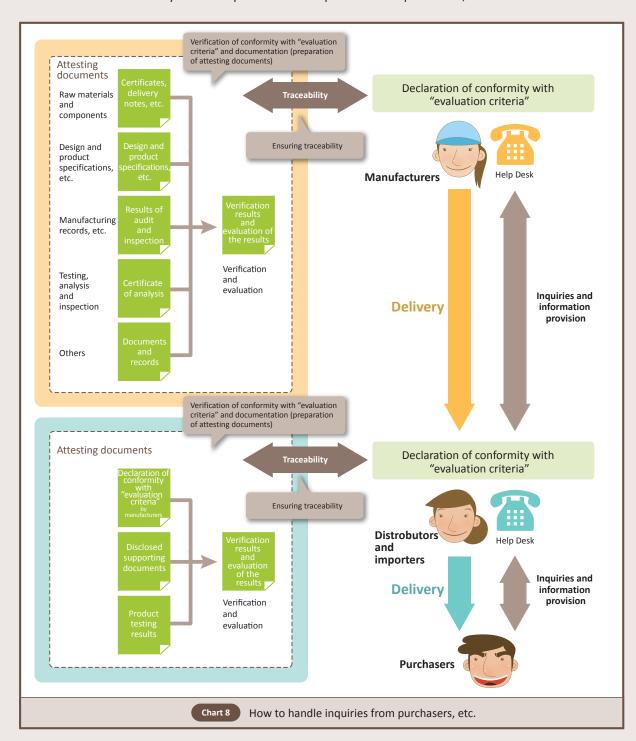
Some businesses are ensuring consistency of environmental labels and claims through uniform management under a specific section.

5

# **Inquiry Handling**

Businesses must improve the inquiry handling system to provide appropriate information.

Businesses must be ready to present documents and/or records of their products conforming to "evaluation criteria" whenever they receive inquiries about the products from purchasers, etc.





The evaluation criteria of the Act on Promoting Green Procurement are applied to various products. Businesses need not only to verify that their products conform to the "evaluation criteria", but also to explain details about the respective basis of conformity with the "evaluation criteria" to purchasers.

6 Reevaluation

Businesses must reevaluate the conformity with the "evaluation criteria" and record it as necessary.

Businesses must reevaluate the verification of conformity when any change or updates may affect the conformity of their products, and record the result.

### Businesses must reevaluate the conformity

- when the "evaluation criteria" have been updated,
- when the product design and/or specification have been updated, and
- when raw materials or component suppliers have been changed.



Other than the above cases, annual review is important for avoiding overlooking lapses concerning verifying the conformity as well as management of verification documents to improve reliability.

References

## The Ministry of the Environment's Website

The Ministry of the Environment provides information about the Act on Promoting Green Procurement through its website. Government agencies, local governments, and businesses may refer to the website for checking "evaluation criteria" which are revised annually and other relevant materials.



http://www.env.go.jp/en/laws/policy/green/index.html

Search by

green procurement Japan



How can I enhance reliability of environmental labels and claims as a business operator?

You may use third-party certification bodies or inspection agencies to enhance reliability of your environmental labels and claims. In Japan, there are several third-party certification bodies including the Eco Mark Program, which is a Type I environmental labeling entity. The Japan National Laboratory Accreditation (JNLA) system may also help to ensure reliability of inspection results.

#### February 2015

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