



Certified Energy Savings Certification

**Standard Audit Plan
April 2024**



1.0 Background

A Certified Energy Savings Certification (CES) demonstrates an organization's commitment to reducing impacts during the use phase of a product's life cycle. Products that use less energy have financial and environmental benefits for all organizations implementing and producing them. Validating that a product can save energy has significant value as government regulations and sustainable procurement plans continue to evolve and incorporate requirements for carbon footprint and energy usage reduction. GreenCircle Certified, LLC's (GreenCircle's) Certified Energy Savings Certification validates that a product will save a percentage of energy as compared to a standard or competitive product in the product use phase.

GreenCircle will conduct the audit for Certified Energy Savings Certification in accordance to the requirements and methods set forth in this audit plan and in GreenCircle's Certification Scheme, in compliance with ISO17065:2012. This document explains GreenCircle's audit process for qualifying and quantifying a product's energy savings involved in certifying a product for Certified Energy Savings. The 'use phase' is the energy required to operate the product(s) by the consumer.

Additionally, GCC will evaluate the eligibility for Amazon Climate Pledge Friendly for any applicable products that meet the requirements set by Amazon.

Use Phase Energy Savings: Based on a thorough review of data collected from energy meter readings of the energy used by the product to be certified and a competitive product (or previous version/standard version of the same product), GreenCircle will validate the percent energy savings of the specified product. GreenCircle will require that the product's energy consumption be tested using a calibrated energy meter. GreenCircle will witness testing of the energy consumption from the meter readings of the product and the comparable product. GreenCircle will work with the manufacturer to understand the different energy consumption modes such as warming/startup, standby/idle, run/active, and cooldown for which both the certified product and comparable product will be evaluated and will use this information to determine the percentage energy savings for the product.

Aided Consumer Use Phase Energy Savings: Some products have been redesigned to achieve energy savings, if used as directed through consumer behavior. For products that require consumer behavior to save energy, GreenCircle can certify energy savings based on the Company's intended use of the product(s). GreenCircle will validate the percent energy savings of the products' intended use in comparison to the standard or current use by consumers. GreenCircle will review evidence of the current average consumer behavior, as well as energy models detailing the savings related to consumer behavior changes to the clients intended use. GreenCircle will also validate



that product formulation required to perform as stated under the Company’s intended use parameters and review evidence of the specification parameters of this formulation.

2.0 Goal

The goal of Certified Energy Saving Certification is to certify the energy savings claims of a product as compared to a competitive or standard product.

3.0 Company Qualifications

Companies that have carefully designed products with energy consumption in mind and have reduced the energy consumption for a specified product as compared to a standard or competitive product are eligible for Certified Energy Savings Certification. During the proposal development process, GreenCircle will conduct initial conversations with the client to understand the energy consumption of the specified product as compared to comparable products. It is not guaranteed that a product will be certified for Certified Energy Savings until a thorough audit is completed by GreenCircle.

For the use phase, Companies will need to provide energy/power monitoring equipment to complete the assessment, along with calibration documentation.

For the consumer-aided use phase, companies will need to provide documentation on consumer behavior including demonstrated changes in consumer behavior and the evidence that this is reasonable and representative of the general population.

4.0 Document Requirements

To certify a product, a Company must provide the following information:

Use Phase:

- A description detailing how the product was designed to reduce energy consumption in the use phase, as compared to a standard or competitive product.
- Technical data sheets for both the certified product and the standard or competitive product that provide specific information on the energy consumed by the product.
- Any documents to substantiate the current energy savings claims of the product as compared to a comparable product.
- Actual use phase energy consumption data for the product and standard or competitive product. This data will be collected during an on-site or virtual visit



and observed by GreenCircle. Screenshots or images of actual energy consumption data for each product will need to be collected and documented using a calibrated energy meter.

- Any additional information needed to conduct an energy savings validation.
- Pictorial documentation and visual verification of energy meter calibration is required for all energy meters used to conduct the energy readings for both the product seeking certification and the competitive or standard product to validate the percent energy savings of the product to be certified.

Consumer-Aided Use Phase Energy Savings:

- Bill of materials or product recipe for the product to understand how the product is formulated to perform in the intended use phase and to understand product variability for scope, product families and assessment of likeness to future products.
- A description detailing how the product was designed to reduce energy consumption in the use phase, as compared to a standard or competitive product. If applicable, an explanation of how the products formulation has changed from a comparable product to offer high efficacy during a product's intended use.
- Energy models for the product in its intended use phase compared to a similar current product in its use phase.
- All standard assertions and assumptions in relation to the types of machines, if applicable, the product is intended for within the regions where the products are sold. All background data and sources on methodologies for assertions and assumptions.
- All standard assertions and assumptions relating to consumer behaviors within the regions that the products are sold. All background data and sources on methodologies for assertions and assumptions.
- Background data, methodologies, and all assumptions for how the data was collected. The data source tables must be clearly denoted with year, collection method, and practitioner(s) listed.
- The quality and consistency of data sources must follow guidelines set out by ISO 14044/44 or a similarly recognized guiding body for product use phase.
- Marketing and educational materials that a client is using to encourage behavior change towards the intended use of the product.
- Marketing plan of how the client will disseminate information and continue to monitor for behavior change for future recertification.



5.0 Audit and Certification Process

5.1 Data Collection

Once the proposal and certification agreement are signed by the product manufacturer, GreenCircle will conduct an initial project meeting, via video or conference call, with contact(s) at each manufacturing facility to discuss the required data, GreenCircle's audit process and project schedule. GreenCircle will obtain information on energy consumption data and collect all data to substantiate energy savings claims.

GreenCircle will provide an initial data request to be completed by the client. See the Documentation Requirements for information that will be requested in the data collection stage.

5.2 Site Audit

GreenCircle will conduct a site visit to manufacturing (or testing) facilities to audit and verify the energy consumption for a product and the comparable product specified. A GreenCircle Analyst will verify any energy documentation and conduct testing to demonstrate energy consumption of the specified product and comparable product in the configurations/situations specified by the certification within the audit plan. Photo documentation of all trials will be obtained during the site visit. GreenCircle may elect to witness the testing virtually if capabilities allow.

For energy savings related to aided consumer behavior changes, a site visit will not be conducted.

5.3 Certified Energy Savings Calculations

After completion of the GreenCircle energy savings audit process, GreenCircle will certify the energy savings claims per product and certify the percentage by which the product reduced energy consumption as compared to a standard product.

For Consumer-Aided Use Phase, GreenCircle will also work with the Company to ensure a mechanism is in place that allows GreenCircle to verify that the certified products perform as stated under the Company's intended use parameters. GreenCircle will then apply this mechanism to verify the claim of certification across product family. This mechanism will be utilized for future verification of the certified energy savings results during annual recertification. This mechanism will also be utilized in future reviews if a client expands the scope to include new products under the original certified claims.

5.4 Exceptions

GreenCircle may elect to witness only portions of the testing and data collection based on the length of time required for testing of all energy consumption modes. If any offline



testing results vary significantly from the witnessed testing, additional testing may be required.

GreenCircle may elect to accept previous collected energy testing data based on an evaluation of data quality in the following areas:

- Data Source: An outside organization than company seeking certification. Data collected by the company seeking certification will require further evaluation of testing methods, procedure, and documentation
- Data Type: Recorded energy meter measurements
- Data Samples: 10-100+ per testing mode; minimum of 3 trials per mode
- Data Age: Within the last five (5) years
- Data Relevancy: Measurements should be taken for the entire duration of consumption, per mode
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5.5 Certification Audit Deliverables

Upon verification of the Certified Energy Savings claims, GreenCircle will issue GreenCircle Certified, LLC certificates and marks for the specified product manufactured at a specific facility. The certificate will document that an independent evaluation of the certified energy savings claims has been conducted on behalf of the company for the specified product(s). All certificate holders must notify GreenCircle Certified, LLC of any significant changes in products or operations that could alter any of the claims detailed in certification.

GreenCircle will prepare a written report on the audit process and findings and provide this report to the Client. GreenCircle will also list the final certificates on the GreenCircle Certified Product Database and provide GreenCircle marks for use in marketing.

GreenCircle may require the use of an asterisk (*) for consumer-aided use phase energy savings achievements to ensure transparency of the consumer behavior required for energy savings. GreenCircle's Mark Usage Guidelines provide more details on the requirements for a certificate issued with an asterisk.

6.0 Annual Recertification Process

All certified claims are recertified annually. If the client can confirm that no changes have occurred, CES certifications are eligible for reverification without analysis for an additional two years. After this period, the product is required to undergo a full recertification process, including energy testing. Completion of recertification ensures continued transparency and further use of the GreenCircle mark.



7.0 Complaints, Appeals, and Disputes

GreenCircle must be contacted immediately if there is a complaint, appeal, and/or dispute brought against a certification that GreenCircle has verified. GreenCircle will follow the Appeals, Complaints, and Disputes procedure to review and resolve the issue.

8.0 Guidelines for Private Label User

The Certified Energy Savings Certification is for the exclusive use of the Client. Companies that produce private label products will require any private label Customers, or downstream re-sellers of the certified product(s) who desire to utilize the GreenCircle Certified Energy Savings Certification to enter into a separate Licensing Agreement with GreenCircle regarding the use of the GreenCircle Mark on private label product and promotional materials. Please contact GreenCircle directly for more information.

9.0 Labeling Requirements

The Client agrees to promptly cease display and use of the GreenCircle Certified, LLC mark: (1) Upon expiration of the certification period; (2) If a Client is no longer in compliance with the certification requirements in this audit plan or the GreenCircle terms and conditions Please reference the **GreenCircle Certified Mark Usage Guidelines** for further details and more information on using the mark. The Client shall take caution to ensure that the GreenCircle Certification mark is not associated with products and/or operations which do not comply with the GreenCircle Certification System (GCCS). The Client will be asked to remove the GreenCircle mark immediately if it is found that they have applied the mark on a non-conforming GCCS product and/or operation. If the Client fails to remove the misused mark, an investigation will be conducted pertaining to the misuse, in which the full cost of the investigation shall be borne by the Client. The Client shall not allow the GCCS Certification mark to remain on non-conforming products offered for sale. Such action could invite prosecution under U.S. Trademark statutes or attract other penalty provisions in other U.S. or State law.

10.0 Key Terminology

Audit Plan: Specifies how GreenCircle intends to conduct a particular audit. Our audit plan describes the activities we intended to carry out in order to achieve our audit objectives.

Certification Period: A 12-month period immediately following the completion of a certification during which the certified energy savings claims are valid. Prior to the end



of the certification period, the manufacturer must complete annual recertification requirements in order to maintain certification credentials.

Life Cycle Thinking: A method used in sustainable product development that includes considering the environmental impacts of each stage of a product/material's life cycle. These life cycle stages include: raw material extraction, manufacturing, use, and end-of-life disposal.

Original Equipment Manufacturer: A company that acquires a product or component and reuses or incorporates it into a new product with its own brand name.

Consumer-Aided Use Phase: the specific way a product will be used in a given machine (washing machine, dish washer, etc.) based on the behavior of a consumer. For example: a consumer using cold water to wash clothes – when the current practice is to wash them in hot water.

11.0 Reference Documents

GreenCircle Certification Scheme, GCC-OPS-03-1, Revision 6 – Outlines the certification process and GreenCircle's Management System

The Federal Trade Commission's Green Guides(2012) – Guides for the Use of Environmental Marketing Claims

ISO17020: 2012 Conformity assessment -- Requirements for the operation of various types of bodies performing inspection, The International Standards Organization. This International Standard defines the requirements for the operation of various types of bodies performing inspection. GreenCircle adheres to these requirements in the development of the certification process and audit plans.

ISO 14021:2016 Environmental labels and declarations -- Self-Declared environmental claims (Type II environmental labeling), The International Standards Organization

ISO 17065:2012 Conformity assessment -- Requirements for bodies certifying products, processes, and services, The International Standards Organization. This International Standard defines the requirements for bodies certifying products, processes and services. GreenCircle adheres to these requirements in the development of the certification process and audit plans.



Amendment History

Date	Issue	Summary of Amendments
07/01/2014	Rev. 0	Official issue date of document
11/01/2015	Rev.1	Update language on competitive and/or standard comparable product
04/03/2019	Rev. 2	Minor language revisions and additions to Key Terminology
5/20/2022	Rev. 3	Editorial Updates
5/12/2023	Rev. 4	Intended use phase addition
4/1/2024	Rev. 5	Update for compliance to Certification Scheme

Certification Officer: _____

