

ICMA ECOLABEL STANDARD PROGRAM MANUAL

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PROGRAM OVERVIEW

The International Card Manufacturers Association (ICMA) has developed the ICMA EcoLabel Standard Program through an open process involving the input, support and consensus of card manufacturers, personalizers, issuers and industry suppliers.

The ICMA EcoLabel Standard Program establishes measurable criteria (as defined in the *Indicators for the Environmental Impact of Cards* document, the "Indicators Document") for assessing the environmental impact of transaction and identification cards for the purposes of ICMA EcoLabel Standard Program certification to meet issuer demand and create manufacturer-driven opportunities.

Ecolabeling is a voluntary method of environmental performance evaluation and labeling that identifies the overall environmental integrity of a product within a specific product category. As businesses have come to recognize that consumer environmental concerns may be translated into a market advantage for certain products, various environmental declarations, claims and symbols have emerged on products with respect to their environmental responsibility (e.g. natural, recyclable, eco-friendly, energy saving, recycled content, etc.).

However, without guiding standards by an independent third-party, such as ICMA, consumers and users may doubt the credibility of manufacturers' assertions that a product is an environmentally preferable alternative.

In contrast to "green" symbols or claim statements, an ecolabel is awarded by an impartial and credible third-party in relation to products that are determined to meet environmental leadership criteria.

Emergence of the "green" card:

By choosing a product with an ecolabel, the consumer can confidently make an informed choice to purchase a product. The ecolabel does not imply the product has no negative impact, but it does verify that the product has been impartially evaluated against accepted thresholds for specific characteristics.

In response to consumer demand, there has been considerable interest in environmentally responsible transaction cards. As of today, there have been no third-party card industry initiatives to confirm and/or certify card manufacturers and cards as "green." The ICMA EcoLabel Standard Program fills this void as a means of evaluating, quantifying and comparing the environmental impact of specific cards and administering a third-party ecolabeling certification program for card manufacturers.

• License

A license is issued by ICMA to qualified card manufacturing members who have agreed to the criteria set forth in the ICMA EcoLabel Standard Program. Licensed manufacturers may apply for EcoLabel product registration or certification.

• EcoLabel

An EcoLabel is a logo that is granted for a card product that signifies it has met the criteria set forth in the ICMA EcoLabel Standard Program.

Card Product

Defined by its generically identified layers, layer thickness and layer materials of construction. A card construction that is identical in this regard, yet sold to multiple Issuers, is considered to be a single card product. For example, a financial card* with split core construction and coated overlay of identical thicknesses and materials, same 4-color litho printing front and single black litho on reverse layers, and similar hologram/signature panel/chip module/magnetic stripe "real estate" layers will be considered the same card product. Alternatively, for a standard financial card*, a card product may be defined by the submission of the approved construction drawing and the association's* approved construction numbers and/or approval letter (*VISA, MC, AMEX, DISCOVER, JCB, UNIONPAY and others). However, to continue the example, a gift card with identical construction except for the absence of a chip module and/or hologram is considered a different card product.

Declared

An EcoLabel assurance level where a licensed card manufacturer declares, without third party verification, that the card product meets the criteria set by the ICMA EcoLabel Standard Program. This signifies that the card is "registered."

• Registered

See definition for "declared" above and additional information on page 10.

• Verified

An EcoLabel assurance level where a licensed card manufacturer provides an Assessment Report to ICMA, issued by a recognized third-party assessor, verifying that the manufacturer's declarations have been made in accordance with the ICMA EcoLabel Standard Program and are supported by adequate documentation and records. This signifies that the card is "certified."

• Certified

See definition for "verified" above and additional information on page 10.

ICMA ECOLABEL STANDARD PROGRAM OBJECTIVES

The primary objectives of the ICMA EcoLabel Standard Program are:

- Implement an ICMA card industry environmental standard and guidelines for manufacturers and cards to meet issuer demand and create manufacturer-driven opportunities.
- Define criteria for environmental green card standards for a card industry ecolabel certification. License member manufacturers and register or certify card products and administer ICMA EcoLabel usage.
- Provide information and best practices to manufacturers contemplating or applying for EcoLabel licensing and registration or certification of their products.
- Disseminate ICMA EcoLabel information to the card industry.
- Represent the interests of ecolabeling in international meetings and forums.

Voluntary and expandable

The decisions of ICMA member card manufacturers to participate in the ICMA EcoLabel Standard Program are voluntary. The initiative is also designed and operated so that additional card industry segments/participants can request that ecolabeling categories and criteria be developed for additional products or services.

Conformance with existing international standards

The ICMA EcoLabel Standard Program was developed to comply with provisions of the International Standards Organization (ISO) with reference to the general international principles and procedures of environmental labels and declarations.

Accurate and verifiable environmental information

The ISO has undertaken efforts to standardize the international practices and key characteristics relating to ecolabeling. The ICMA EcoLabel Standard Program is structured to conform with the ISO principle that ecolabels communicate verifiable and accurate information, that is not misleading, about the environmental characteristics of labeled products. This encourages the demand for and supply of products causing less environmental stress and stimulates market-driven continuous environmental improvement.

See pages 14-15 of this Manual for FTC Compliance information.

Criteria parameters

Detailed and specific EcoLabel criteria may be obtained on the ICMA website in the ICMA *Indicators for the Environmental Impact of Cards*, which clearly defines the parameters below. ICMA is aware there may be some cards that are promoted as "green" even though they do not meet ICMA's EcoLabel Standard Program criteria or display the ICMA EcoLabel logo. In general, the ICMA EcoLabel Standard Program criteria include:

- Reduced Materials (a minimum of 25%)
- Recycled Materials (a minimum 25% threshold)
- Compostable (municipal and home)
- Biobased content (a minimum of 40%)

GENERAL INFORMATION AND GUIDELINES CONTINUED

Issuer compliance and standards verification

It is the responsibility of the issuer of an ICMA EcoLabel "certified" card product to initiate third-party authentication of manufacturer claims, as well as comply with Visa, MasterCard, American Express and other brand issuing requirements. Card manufacturers may also choose to conduct third-party authentication testing as described in the **Verified** Assurance level of the program.

Audit option

ICMA may request an audit at the manufacturer's expense, if deemed necessary, of the manufacturer's documentation supporting their claim to verify the standards and specifications of an ICMA EcoLabel "certified" product are being met. The audit may be in the form of remote document review, third-party card testing, and/or an on-site audit, or other reasonable review and testing as determined by the ICMA in their sole discretion.

Responsive to innovation

In order to be credible and effective, the ICMA EcoLabel Standard Program must be responsive to technological innovation, shifting market forces and changing industry requirements. This requires periodic review and, when necessary, updating of both environmental label criteria and categories, taking into account technological and marketplace developments.

LICENSING APPLICATION PROCESS AND FEE

To initiate a licensing application for the ICMA EcoLabel Standard Program, an applicant will supply the following through an EcoLabel Standard Program section of the ICMA website or separately in writing where required:

- Manufacturer contact information.
- Confirmation that the company agrees to accept and abide by the ICMA EcoLabel Standard Program criteria and specifications. This will also include an agreement from the manufacturer regarding any marketing language associated with using the ICMA EcoLabel logo.
- Printing of the ICMA EcoLabel on a registered or certified card product is optional. Manufacturers may choose not to display the EcoLabel on the card product.
 - On any cards produced by a Manufacturer that do bear the ICMA EcoLabel symbol, Manufacturer agrees to ensure that any environmental marketing language and/or non-ICMA environmental marketing symbols appearing on the cards comply with ICMA's Indicators Document, as well as the standards contained within ISO 14021:2016. Manufacturer is solely responsible for maintaining copies of these documents and referring to them as necessary to ensure compliance on all cards bearing the ICMA EcoLabel symbol.
- Payment of the annual ICMA EcoLabel license fee of \$1,500. (Note: Once your application has been submitted and approved, you will be sent an email with an invoice and instructions to pay via the ICMA online portal.)

Once the above steps are complete, ICMA will assign the licensed EcoLabel card manufacturer an ID code. At this time, an EcoLabel Registration form will be made available to you, and you will be provided with the EcoLabel Licensee logo.

Licensing Terms and Conditions

- Licenses are granted to ICMA member companies in good standing.
- The licensing fee applies to a card manufacturing company entity (separate licenses are not required for branch locations).
- If an ICMA member company's membership expires, their license will be revoked.
- License fees are paid annually on an anniversary basis from the date the license is issued.
- If a license is revoked or expires for either of the above reasons, the company must cease use of any ecolabeling claims, logos or references on their materials.

- Once approved as a licensee, the company may communicate that status to the marketplace. However, licensee status does not apply to individual card products, which must be "certified" on a per-product basis through ICMA website registration (See the EcoLabel Registration Process section on page 9).
- Licensed manufacturers agree to abide by all ICMA EcoLabel Standard Program criteria and guidelines for the individual card products they register for an EcoLabel.
- Licensed manufacturers will verify, on an EcoLabel per-product basis (see EcoLabel Usage section on page 9), that a card product is in compliance with the ICMA EcoLabel Standard Program.
- A licensee shall indemnify and hold ICMA harmless from and against any claims or actions brought against the association and any losses, damages, liabilities, or costs (including attorney fees) arising out of ICMA EcoLabel licensing and/or certification of individual card products if the legal action is the result of an action taken by the manufacturer, or their product not meeting ICMA EcoLabel requirements.

EcoLabel Registration Process

Card products that meet program criteria are registered following the instructions below. Licensees must register information on specific card products that are being registered for EcoLabel qualification and must pay for each card product that is registered. It will be considered a separate product if the construction of the card body changes or differs and in this case, a separate registration must be done.

 Card products that will also become certified with a third party assessment report can be submitted at the same time as the initial product registration or at a later date.

Card Product: Defined by its generically identified layers, layer thickness and layer materials of construction. A card construction that is identical in this regard, yet sold to multiple Issuers, is considered to be a single card product. For example, a financial card* with split core construction and coated overlay of identical thicknesses and materials, same 4-color litho printing front and single black litho on reverse layers, and similar hologram/signature panel/chip module/magnetic stripe "real estate" layers will be considered the same card product. Alternatively, for a standard financial card*, a card product may be defined by the submission of the approved construction drawing and the association's* approved construction numbers and/or approval letter (*VISA, MC, AMEX, DISCOVER, JCB, UNIONPAY and others). However, to continue the example, a gift card with identical construction except for the absence of a chip module and/or hologram is considered a different card product.

- EcoLabel Usage Fee: \$1,000 per card product and if the manufacturer also desires to display the EcoLabel on a card product, an additional fee of \$250 will apply.
 - Usage forms (available on the ICMA website) and the usage fee must be submitted on a per-card product basis.
 - Usage form information includes:
 - Your EcoLabel manufacturer ID code (as assigned by ICMA)
 - EcoLabel desired (reduced materials, recycled content, compostable, biobased content – including percentage)
 - Level desired (registered/declared or with the intent to also have the product certified/verified) (see Assurance Level section on page 10)
 - Product construction information including a cross-section drawing with generically identified layers, thickness and materials defined.
 - Whether the manufacturer wishes to display the EcoLabel on the card product (regardless of the issuers using the product; one issuer's desire to display the logo requires the fee.)

Assurance Levels

ICMA has defined two assurance levels. A licensee may select either level for any card product being "submitted" for an EcoLabel registration, or a card product may be submitted at the declared level first, with the step of certification following at a later date once the third party assessor report is obtained.

- Declared
 - During the registration of a product for an EcoLabel, the card manufacturer must declare that the card meets the criteria set by the ICMA EcoLabel Standard Program.
 - This card has not been verified by a third-party and is solely based on the manufacturer's declaration.
 - Within ICMA's EcoLabeling scheme, a product with the assurance level "Declared" is considered "registered."
- Verified
 - During the submission of a product for an EcoLabel registration, or at a later date, the manufacturer provides an Assessment Report to ICMA, issued by a recognized third party* assessor, verifying that the manufacturer's declarations have been made in accordance with the ICMA EcoLabel Standard Program and are supported by adequate documentation and records. (see Compliance – Laboratory Testing section on page 11).
 - This card is then considered verified by an independent third-party in accordance with ICMA's rules and regulations.
 - Within ICMA's EcoLabeling scheme, a product "registered" with the assurance level "Verified" is considered "certified."

Assurance Level Registration

- Declared Product Registration:
 - Through the ICMA website, the manufacturer registers the product.
 - The manufacturer pays the EcoLabel product Usage Fee and Label display fee (if applicable). (ICMA will email you an invoice and online payment link.)
 - The manufacturer receives a "label number" unique to the card product.
- Verified Product Certification: (at time of initial registration or a later date)
 - The manufacturer requests a recognized third-party assessor to verify that the card is supported by sufficient evidence in accordance with the ICMA EcoLabel Standard Program.
 - The assessor provides an assessment report to the manufacturer.
 - Through the ICMA website, the manufacturer registers the product and requests certification.
 *see the ICMA website for currently recognized third party assessors

ECOLABEL PROCESS CONTINUED

- As part of the registration process, the manufacturer uploads the assessment report issued by the ICMA approved assessor.
- The manufacturer pays the EcoLabel Usage Fee and Label display fee if applicable.
- ICMA checks that the assessment report recommends certification of the product.
- The manufacturer receives a "label number" unique to the product.

Compliance – Laboratory Testing

- In order to show compliance of the green card standard at the verified level, a laboratory will need to be able to carry out the following tests:
- Recycled content:

Using a generically labeled cross section of the product, a qualified 3rd party must verify the % recycled content of the card and clearly show the process used to certify the product, for example review of documents from material provider that specify the amount of recycled material, and review of the card manufacturer's process documentation which demonstrate use of the specified material in a sample of the card product.

Reduced material:

Using a generically labeled cross section of the *original* product and the *current proposed* product, a qualified 3rd party must verify the % reduced material and clearly show the process used to certify the product.

- Compostable:
 - ASTM D 5338, Standard Test Method for Determining Aerobic Biodegradation of Plastic Materials Under Controlled Composting Conditions
 - ISO 14855-1, Determination of the ultimate aerobic biodegradability of plastic materials under controlled composting conditions — Method by analysis of evolved carbon dioxide — Part 1: General method
 - ISO 14855-2, Determination of the ultimate aerobic biodegradability of plastic materials under controlled composting conditions — Method by analysis of evolved carbon dioxide — Part 2: Gravimetric measurement of carbon dioxide evolved in a laboratory-scale test
 - ISO 16929, Plastics Determination of the degree of disintegration of plastic materials under defined composting conditions in a pilot-scale test

- ISO 20200, Plastics Determination of the degree of disintegration of plastic materials under simulated composting conditions in a laboratory-scale test
- Biobased Content:
 - ASTM D 6866, Standard Test Method for determining biobased content.
- In order to show compliance with the toxic metal content, the test laboratory would need to provide analytic chemical analysis through such methods as Inductively Coupled Plasma Mass Spectrometry (ICP/MS).
- Recognized third-party assessors capable of performing these audits are listed on the ICMA website.

EcoLabel Card Logo

- The use of the ICMA EcoLabel card logo is trademarked and restricted only to those member card manufacturers currently licensed to participate in the ICMA EcoLabel Standard Program.
- Printing of the ICMA EcoLabel on a registered or certified card product is optional. Manufacturers may choose not to display the EcoLabel on the card product.
- The presence of the ICMA EcoLabel card logo is intended to provide assurance to the consumer that a particular card meets the criteria set within the ICMA EcoLabel Standard Program for one or more environmental attribute(s) and that the card manufacturer assures that any environmental marketing language and/or non-ICMA environmental marketing symbols appearing on the card comply with ICMA's Indicators Document, as well as the environmental marketing standards contained within ISO 14021:2016, Environmental labels and declarations – Selfdeclared environmental claims (Type II environmental labeling).
 - The licensed card manufacturer is solely responsible for maintaining copies of these documents and referring to them as necessary to ensure compliance on all cards registered or certified or bearing the ICMA EcoLabel card logo. Please refer to the Licensing Terms and Conditions section on page 7 of this manual for more information on card manufacturer obligations.
 - The EcoLabel Logo Guidelines design standards are intended to provide the necessary instructions for incorporating the ICMA EcoLabel card logo into qualifying card artwork prior to manufacturing. Please refer to the Assurance Levels section on page 10 of this manual regarding the steps to qualify a card prior to the use of the ICMA EcoLabel logo

• Appearance of the ICMA EcoLabel Card Logo on Qualifying Cards

- The ICMA EcoLabel card logo may be printed in black, in color, or reversed out of a solid background, as shown in the EcoLabel Logo Guidelines document. No artwork or type may interfere with the ICMA EcoLabel card logo.
- The card manufacturer's assigned ICMA EcoLabel card manufacturer ID code must appear in close proximity to the ICMA EcoLabel logo (see the EcoLabel Logo Guidelines document).
- A 1.5 mm clear space, free of any copy or design elements must be maintained around both the ICMA EcoLabel card logo and the ICMA EcoLabel card manufacturer ID code (see the EcoLabel Logo Guidelines document).

ECOLABEL STANDARD PROGRAM PARTICIPATION

Licensee Marketing Benefits:

- The EcoLabel Licensee logo may be placed on all manufacturer corporate, sales and product literature (see EcoLabel Logo Guidelines document).
- The EcoLabel Licensee logo may be placed on the manufacturer's website.
- Manufacturers may initiate corporate public relations relating to the ICMA EcoLabel Standard Program.
- Editorial coverage in the ICMA Card Manufacturing magazine. Additional publicity via other ICMA communications platforms (newsletters, social media, PR)

Manufacturers with "Declared" cards may promote and claim that they have a "registered" product in accordance with ICMA's EcoLabel Standard Program.

Manufacturers with "Verified" cards may promote and claim that they have a "certified" product in accordance with ICMA's EcoLabel Standard Program.

If the card manufacturers' customer wishes to market the Eco-Label:

- Issuers or other clients of the card manufacturer are permitted to promote, through the use of the EcoLabel card logo, a card that has been either "registered" or "certified" in accordance with ICMA's EcoLabel Standard Program in the above-mentioned ways.
- Issuers and other clients of the card manufacturer shall comply with the requirements of 16 CFR Part 260, Guide for the Use of Environmental Marketing Claims. (See page 15, FTC Compliance)

Required Disclosures:

 It is recommended that any licensee, issuer or card manufacturer should include the following disclosure in all disclosures or other correspondence included with cards provided to consumers, or as a separate one-sheet disclosure when providing the card:

THE ECOLABEL LOGO IS ISSUED BY THE INTERNATIONAL CARD MANUFACTURERS ASSOCIATION ("ICMA"), AN INDUSTRY TRADE ASSOCIATION, TO THOSE CARD MANUFACTURERS THAT VOLUNTARILY MEET ONE OR MORE OF THE FOLLOWING CHARACTERISTICS: (A) AT LEAST 25% REDUCED MATERIALS, (B) CONTAINS NO LESS THAN 25% RECYCLED CONTENT, (C) THE CARD IS COMPOSTABLE IN MUNICIPAL, COMMERCIAL AND RESIDENTIAL FACILITIES, OR (D) CONTAINS NO LESS THAN 40% BIOBASED CONTENT. VIRTUALLY ALL PRODUCTS IMPACT THE ENVIRONMENT. FOR FURTHER DETAILS ON WHICH ATTRIBUTES ICMA EVALUATED AND THE REQUIREMENTS TO USE THE ECOLABEL LOGO, VISIT <u>https://icma.com/ecolabel-standard-program/</u>.

FTC Compliance:

- All uses of the EcoLabel Logo or references to the certification on the product and in product advertising shall be conducted in conformance with U.S. Federal Trade Commission guidelines or other national guidelines if outside of the U.S.
- Each licensee, issuer, and card manufacturer understands and acknowledges the Federal Trade Commission ("FTC") works to prevent fraudulent, deceptive, and unfair business practices under Section 5 of the <u>FTC Act</u>, 15 <u>U.S.C.</u> 45, as amended, and ICMA EcoLabel licensing is regulated by the FTC, and that 16 <u>CFR Part</u> 260, *Guide for the Use of Environmental Marketing Claims* is enforced by the FTC. Therefore, each licensee, issuer, and card manufacturer shall comply with all rules, regulations, guidance, and requirements imposed by the FTC.
- Each licensee, issuer, and card manufacturer understands and acknowledges the use of the EcoLabel Logo may be an endorsement, which should meet the criteria for endorsements provided in the FTC's Endorsement Guides, 16 C.F.R. Part 255, including Definitions (§ 255.0), General Considerations (§ 255.1), Endorsements by Organizations (§ 255.4), and Disclosure of Material Connections (§ 255.5).

A licensee shall indemnify and hold ICMA harmless from and against any claims or actions brought against ICMA and any losses, damages, liabilities, or costs (including attorney fees) arising out of ICMA EcoLabel licensing and/or certification of individual card products if the legal action is the result of an action taken by the manufacturer or their product not meeting ICMA Ecolabel requirements.

Questions or Complaints:

All questions or complaints relating to use of the EcoLabel Logo shall be directed to:

ICMA 191 Clarksville Road Princeton Junction, NJ 08550 email <u>info@icma.com</u> tel 1-609-799-4900

ICMA Copyright Policy:

It is the intent of ICMA that all members of the association adhere to the provisions of the United States Copyright Law (Title 17, <u>United States</u> <u>Code</u>, Sect. 101, *et seq*.) and corresponding international copyright laws. This policy statement is for anyone who wishes to reproduce, alter, or transmit standards or other works that are protected by copyright. Copyright protection applies to a variety of creative works—printed materials, sound recordings, video recordings, visual artworks, computer software, and other works, and unauthorized copying or transmission of protected works is expressly prohibited.

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Note: ICMA is not associated with any other program using the term EcoLabel.