

Guide to Effective Commenting on the SWEEP Local Government Standard

As a member of the National Consensus Committee (NCC), you have the opportunity to vote and comment on the SWEEP Local Government standard, which will set the stage for a 21st century sustainability framework for the materials management industry.

The SWEEP committees have spent hundreds of volunteer hours developing the draft and we have received dozens of helpful comments from industry professionals such as yourself. In the process of developing the SWEEP standard, we have tried to write credits in a format that is clear, concise, doable, documentable, verifiable, objective and meaningful. We all want to make the standard better and the best way to help us is to make comments that have similar attributes to the credits as described above.

Although a tremendous amount of work has been done on the standard, there is still more to do to bring it to the point where it can be effectively released to the public. This is the purpose of the Pilot Program: to bring "ground truth" to the requirements that we have developed and refine them accordingly.

We have prepared this short guide to the NCC to help you participate in the SWEEP Balloting and commenting process in the most effective way.

Overview of Balloting

The SWEEP Local Government standard will be approved by and affirmative vote of the NCC after a 30-day balloting period. The standard was released June 10th and balloting will conclude July 15th. Members of the NCC may vote "approve," "approve with comments," "disapprove with comments," or "abstain." The quorum for the NCC is a majority of the registered members and all negative votes must be resolved.

Explanation of various voting options

SWEEP will accept comments from all individuals registered to the NCC. However, only one ballot vote per organization will be accepted.

- Approve: Self explanatory
- <u>Approve with Comments</u>: Approve of the overall SWEEP standard, but identifies issues that could be evaluated during the pilot or incorporated in subsequent drafts of the standard.
- <u>Disapprove with Comments</u>: straight "Disapprove" votes are not allowed. In order to be accepted by the NCC executive committee (SWEEP Steering Committee and Local Government Committees), comment must be both substantive and germane.
- <u>Abstain</u>: The voting organization wishes to vote for the purpose of establishing a quorum, but may not want to express a specific position on the standard.

Helpful Comments

"Approve:" Our favorite comment!

"Approve with Comments:" Of most concern are things that we "got wrong." With a standard of this scope it is possible that some of the research we did or examples we evaluated have been since shown to not be correct based on more up-to-date examples. SWEEP is committed to ensuring that all of the credits in the standard have a sound

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technical basis. There may be additional sustainable materials management credits, ideas or activities that are worth doing, but can wait until after the Pilot. This is likely where we will get the most 'Approve with Comments' votes.

"Disapprove with Comments:" As above, if SWEEP got something technically wrong that must be corrected immediately because it would cause reputational or actual harm, then we want to fix it. If the standard has set a technical requirement that is not achievable, we would need to see credible of the evidence of infeasibility. In some cases, we refer to leadership practices that are common in the European Union, but not necessarily in the United States. If a program is implemented in the EU, then by definition it is feasible. Similarly, current market conditions may render some of the performance levels difficult to achieve, but because market conditions are variable, this typically would not be an acceptable basis for a Disapprove vote.

Philosophical comments are certainly welcome, but will not be acceptable as the basis for a "Disapprove" vote.

SWEEP will attempt to resolve substantive and germane "Disapprove" comments with the commenter. If there is no urgent reason to adopt a comment prior to the Pilot, the strong preference of the NCC Executive Committee will be to convince Disapprove commenters to modify the vote to "Approve with Comments." If the commenter does not wish to modify the vote, then the full NCC will be engaged to either agree with the commenter or the Executive committee. A simple majority vote will determine whether to implement the comment prior to the Pilot or afterward.

"Abstain:" No reason is needed for an abstention. An Abstain vote will count toward achieving a voting quorum.

SWEEP Calculation Protocols & Definitions

During the Pilot Program, SWEEP will be developing the material in the Certification Manual. This resource will be jointly produced with hired consultants, technical committee members and Pilot participants. The Certification Manual will contain background on the topics covered by the standard, calculation procedures and the basis for their inclusion.

SWEEP intends to develop the various calculation protocols referenced in the standard by starting with the data reporting and calculations in the Municipal Measurement Program developed on the Re-TRAC Connect platform. In addition, we will work with the Pilot cities and companies, as well as the SWEEP Technical Committees, to ensure that the data required is available and the calculations are as straightforward as possible. We will either provide calculation tools through the Re-TRAC Connect platform or stand-alone online calculators and background materials.

Because of our proposed collateral development plan during the Pilot, lack of a defined calculation procedure accompanying the standard will not be accepted as a "germane and substantive" basis for a "Disapprove" vote.

Please contact SWEEP at info@sweepstandard.org if you have any questions.