Eco Labelling Criteria for Activated Carbon



National Cleaner Production Centre, Sri Lanka



1. Introduction

- 1.1 The Certification Scheme for Eco Labelling of Products/Services of the National Cleaner Production Centre, Sri Lanka (NCPC-SL) is based on the requirements laid down in the ISO 14024:2018 Environmental Labels and Declarations Type 1 environmental labelling Principles and Procedures.
 - ISO 14024 specifies the requirements for eco-labeling certification. The Eco Labelling criteria /s of NCPC SL satisfy the ISO 14024 requirements as required by the eco-labelling certification schemes. Here are the key requirements fulfilled accordingly;
 - > Scope: The eco-labeling certification scheme covers specific product categories/services with a significant impact on the environment.
 - Product Criteria: Clear and transparent environmental criteria has been established for products/ services to be eligible for the eco-label. These criteria has been based on scientific evidence and consider the entire product life cycle.
 - Independent Third-Party Verification: NCPC SL conduct independent third-party verification of compliance with the eco-labeling criteria.
 - Impartiality: The certification process is impartial and free from any conflicts of interest that could undermine its credibility.
 - Transparency: The eco-labeling scheme has provided transparent information about the certification process, criteria, and verification procedures.
 - Continuous Improvement: The scheme encourages continuous improvement in the environmental performance of certified products /services.
 - > Stakeholder Involvement: Stakeholders, including businesses, NGOs, consumers, and government representatives, has been involved in the development and revision of the ecolabeling criteria.
 - Non-Discrimination: The certification scheme has not discriminated against products or services from different sources based on factors unrelated to environmental performance.
 - Compliance Monitoring: Regular monitoring and surveillance of certified products or services has been conducted to ensure ongoing compliance with eco-labeling criteria.
 - Public Access to Information: Information about the eco-labeling scheme, certified products, and their environmental criteria shall be accessible to the public.
 - Environmental Labeling and Advertising: The use of the eco-label in advertising or labeling has been controlled and subject to the certification scheme's rules.
 - Review and Revision: The certification scheme should undergo periodic review and revision to ensure its relevance and effectiveness.

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- 1.2 This document sets out specific managerial and technical criteria for raw material acquisition, transporting, production, and dispatching activated carbon for sale. Terminologies and aspects related to the concepts of sustainability management are covered during the involved processes. The aspects related to sustainability management described in this document can include environmental impacts, energy, and water security, socio-economic development, or any combination thereof.
- 1.3 The certification of Eco Labelling of activated carbon is implemented through a set programme operated over a specified period as agreed upon with relevant parties. The NCPC-SL functions as the scheme owner of this certification scheme. This document includes environmental criteria, functional characteristics, and legal requirements related to activated carbon manufacturing.
- 1.4 This specific product environmental criteria document has been prepared by the Expert Committee on Eco Labelling appointed by the NCPC-SL and authorized for adoption by the Board of Directors of NCPC-SL. The activated carbon manufacturers who are seeking eco-labeling certification are required to meet the following requirements.
 - I. The product and processing conditions shall comply with the requirements given in the below NCPC-SL guidelines;

and

II. The product and processing shall comply with relevant regulations mentioned in this document and enforced in the country, as applicable;

and

- III. The product should conform to the relevant national, regional, and internationally recognized standards
- 1.5 This document supplements the below guidelines and provides guidance for the certification of activated carbon for both Assessors and Producers who are preparing for certification. Each criterion mentioned herein is categorized depending on the significance of its impact on the product environmental criterion or product function characteristic being discussed, e.g. energy, water, environment, or socio-development, as follows.
 - I. Mandatory requirements (M) Related to the legal requirements and product functional characteristics
 - II. Critical requirements (C) Significant to product environmental criteria
- III. Non-critical requirements (NC) Not so significant to product environmental criteria when compared to critical requirements

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- 1.6 This document should also be read in conjunction with the Rules and Procedures of NCPC-SL as applicable to the Eco Labelling Certification scheme.
- 1.7 This document will be periodically reviewed and updated based on the experience gained and the developments that have taken place in technology and the use of energy, water, material, and the environment. The term 'shall' is used in this document to indicate those provisions which are mandatory. The term 'must' is used to indicate the guidance that, although not mandatory, is provided by NCPC-SL as a recognized means of meeting the requirements of the standard. The term 'should' is used to indicate recommendations for implementation.
- **1.8** The client should submit the relevant pieces of evidence for conformity verification for the last calendar year.
- 1.9 Only test reports generated by laboratories accredited according to ISO/IEC 17025, which outlines the general requirements for the competence of testing and calibration laboratories, will be considered valid. Additionally, verifications in the form of LCA reports, EMS Certifications and Waste management certifications will be accepted if they adhere to specified limit values.
- **1.10** For process-related verifications across different sections, the relevant test reports should not exceed two years from the application date. Similarly, the necessary test reports for assessing the ingredients within the materials incorporated into the products and evaluating the product's suitability for use in various sections should not be older than one year at the time of application.

2. References

In the preparation of this criteria document, the following documents were referred;

- 2.1 ISO 14020 Environmental labels and declarations General principles
- 2.2 ISO 14024 Environmental labels and declarations- Type 1 environmental labeling– Principles and procedures
- 2.3 Guidelines for Providing Product Sustainability Information, UN Environment Programme, 2017
- **2.4** Reference: Sri Lanka Standard 1551: 2016, Principal Criteria And Indicator For Sustainably Produced Fuelwood

3. Terms and Definitions

For the purpose of this document, the terms and definitions given in the referred standards and the following shall apply.

- **3.1 Conformity**: Fulfillment of a requirement Note: Conformance and compliance are synonymously used for conformity but deprecated.
- **3.2 Verification:** Confirmation through the provision of objective evidence that specified requirements have been fulfilled.
- **3.3** Organization: The Applicant organization is hereinafter referred to as an organization.

4. Certification Criteria

The criteria are aimed, particularly, at identifying products with a reduced environmental impact throughout their entire life cycle. These criteria focus on specific enhancements that enable products to be: sourced from more sustainable practices, manufactured with heightened resource and energy efficiency, produced through cleaner and less polluting processes, composed of fewer hazardous substances, and designed and specified for superior quality and durability. The criteria established for awarding the Ecolabel - Sri Lanka to Activated Carbon encompass these aforementioned aspects, thereby encouraging the promotion of products that exhibit enhanced performance in these domains.

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Certification Criteria Requirements	Weighting Factor	Marks
5. Phase: Raw Material Extraction	1 0.0001	
5.1 Coconut Shell and Charcoal Procurement		
a) Coconuts should be sourced from farms practicing sustainable and organic farming methods	_	_
Conformity verification Conformity verifications Certifications such as Organic, Fair Trade for plantations	NC	3
b) Charcoal should be purchased after evaluating the supplier, checking the quality of the charcoal and checking the best available techniques to maintain the material efficiency in the charcoal production		
Conformity verification Supplier evaluation Reports Test reports of coconut shell charcoal – Moisture & dust Best available practices for charcoal production (Ex:"Green Charcoal Pit")	NC	3
5.2 Traceability and Transparency		
 a) Full traceability of coconut shell charcoal from the charcoal manufacturers or suppliers to the factory must be ensured Conformity verification Documentation and records of the supply chain are maintained Raw material supplier evaluation records on environmental concerns Certifications relevant to the raw materials Test reports and other relevant records of the raw materials obtained from accredited laboratories 	С	5
5.3 Raw Material Transport to the Factory		
a) The organization should reduce the environmental impacts related to inbound and outbound transportation (to minimize oil/fuel consumption and air emissions during coconut shell transportation.) Conformity verification The records on oil/fuel consumption for transportation are maintained Emission test reports of the vehicles Evidence for green practices such as two-mode transportation etc. Or If the inbound and outbound transportation is carried out by a third party, appropriate measures should be taken to reduce associated environmental impacts with the involvement of the relevant party (Eg: conditions through agreements) Conformity verification Copy of Signed Agreement Details of the projects implemented and the efforts taken to minimize dust emission reduction due to transportation	NC	3

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6. Manufacturing Process			
6.1 General Requirements	_		
a) Environmental Management System/s must be implemented in the organization	С	5	
Conformity verification Valid ISO 14001 EMS certificate Records on Environmental Management Policy, procedures, and environmental management programmes are maintained			
b) A Documented Environmental Management Roadmap must be developed to address the potential environmental problems of the organization	С	5	
Conformity verification > Environment management roadmap of the organization			
6.2 Water Resource Consumption and Conservation			
a) The documented Water distribution system/Plan must be available for the facility level	C	5	
Conformity verification > Documented water distribution system/Plan			
b) Infrastructure must be maintained to quantify the water usage in the organization	С	5	
Conformity verification Total Water supply metering and submetering facilities established in the organization Water consumption records are maintained on a daily basis			
c) The organization should implement a water assessment/audit, internally or externally to evaluate the water intake/input vs. usage/output	NC	3	
Conformity verification Water assessment/analysis/audit report Records on tracking and reporting program including all relevant water sources of the organization			
d) The water usage report/consumption records of the organization must readily verifiable via documented records and supporting evidence with all data sources.	С	5	
Conformity verification Documented records and supporting evidence with all data sources (e.g. water bills, meter readings, etc.), assumptions used (e.g., estimation techniques), and calculation methodologies in data inventories			



e) Company benchmark/baseline for water consumption must be established and monitor on a continuous basis	С	5
Eg: specific water consumption in m³ / T (m³/Kg) of product manufactured or per employee water consumption		
Conformity verification		
 Details of annual production, annual water consumption & specific water consumption for at least 2 years Details of company benchmarks including comparisons with previous two years 		
f) The organization must identify significant water uses of the	С	5
process/facility and take measure to reduce consumption		
Conformity verification Records on water consumption		
g) The organization must set targets for reducing water use from any sources	С	5
Conformity verification		
Documented records on targets and their achievement		
h) The organization must have an implementation plan to reduce water consumption and improve water efficiency	С	5
Conformity verification		
Documented records on planning for implementation		
i) Specific water consumption (Annual Water Consumption/Annual Production) should be reduced by a minimum of 3% from the	NC	3
baseline/Base year has to be reported		
[Reduction in specific water consumption ≥ 3% (1 mark), Reduction in specific water consumption ≥ 5% (2 marks),		
Reduction in specific water consumption ≥ 7% (3 marks)]		
Conformity verification		
Details of annual production, annual water consumption & Specific water consumption for 3 years		
j) Water conservation techniques and technologies must be implemented	С	5
to reduce water consumption and increase water efficiency		
Conformity verification		
Site inspection regarding the implementation of Water conservation techniques and technologies,		
 Details of annual water consumption & Specific water consumption 		
[Reduction in specific water consumption ≥ 7% from the previous year		
(1 mark), Reduction in specific water consumption ≥ 3% from the previous year (2 marks)		
(3 marks), ➤ Reduction in specific water consumption ≥ 5%) from the previous year		
(5 marks)]		



k) At least 5% of the total annual water consumption (Considering agroecological conditions in the region) should be from the harvested rainwater that runoff from roof & non-roof areas of the manufacturing facility	NC	3
Conformity verification Observations of the operating rain water harvesting system Quantitative information of the rain water collected monthly/annually 		
Organizational/product level water footprint should be calculated, recorded, and maintained. Conformity verification	NC	3
The transparent and verifiable calculation method is available		
6.3 Energy Resource Consumption and Conservation		
a) Infrastructure must be maintained to quantify the energy usage for industrial processes and other purposes in the organization	C	5
Conformity verification Electricity sub-metering facilities established in the organization Electricity/Fuel consumption records are maintained on a daily/monthly basis		
 b) The organization must conduct an Energy assessment/audit, internally or externally to evaluate the Energy consumption of the facility Conformity verification Energy Audit/assessment/analysis report Records on tracking and reporting program including all relevant energy sources of the organization 	C	5
c) The organization should identify significant Energy uses of the process/operations and take measures to reduce consumption Conformity verification Energy assessment report	NC	3
d) Effective Energy Management System (EnMS) or policies, procedures, and energy management programmes should be implemented by the organization	NC	3
Conformity verification > Valid EnMS Certificate > Records on Energy management Policy, procedures, and energy management programmes are maintained		
e) The organization must set targets for reducing energy consumption and improve efficiency	С	5
Conformity verification > Documented records on targets and their achievement		
> Documented records on targets and their deflievement		l .

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f) The organization should have an implementation plan to reduce energy consumption and improve energy efficiency	C	5
Conformity verification		
 Documented records on Planning for implementation to reduce energy 		
consumption and improve energy efficiency		
	С	5
g) Appropriate measures (Eg: Variable Frequency Drives(VFDs), Fuel switching, waste heat recovery applications, etc) must be implemented to improve energy efficiency in the organization	C	5
Conformity verification		
 Site inspection relevant to the energy efficiency measures implemented 		
Records on energy savings done through such implementation		
h) The organization should substitute nonrenewable energy sources with	NC	3
renewable energy (Eg: biomass, solar power, hydro power, waste to energy)	NC	3
Conformity verification		
The energy requirement is supplied by the Biomass boiler		
Electricity Generation from Solar power systems, Hydro Power, biomass etc		
i) The organization must establish baselines/benchmark for Electrical energy	С	5
use and monitor on a continuous basis		_
Eg: Electrical energy consumption per unit of production (KWh / MT)		
Lg. Electrical energy consumption per unit of production (KWIT) WIT)		
Conformity verification		
> Documented benchmark		
> Details of annual/monthly production, energy consumption &		
specific energy consumption for the preceding at least 2 years		
'\ Constitution Con	NC	2
j) Specific electricity consumption (Annual Energy consumption/annual	NC	3
production) should be reduced by a minimum of 3% from the		
baseline/Base year has to be reported		
[Reduction in specific electricity consumption ≥ 3% (1mark),		
Reduction in specific electricity consumption \geq 5% (2 marks),		
Reduction in specific electricity consumption ≥ 10% (3 marks)]		
Conformity verification		
Details of annual production (MT), energy consumption & specific		
energy consumption for at least 2 years		
Details of implementation of energy efficiency improvement		
measures with actual benefits achieved		

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6.4 Raw Material Consumption		
Coconut shell and other Input material usage must be quantified Conformity verification Material consumption records are maintained on a daily/monthly basis/batch wise	С	5
 The best available techniques must be implemented to maintain the material efficiency in the activated carbon production Conformity verification Site inspection in the factory and records maintained (Ex: activation kilns) Records of Material consumption per unit of production output 	С	5
6.5 Chemical Consumption		
a) Sound chemical management practices including storage, handling, the disposal shall be implemented and manintained	M	
 Site inspection regarding the implementation of chemicals safety best practices Safety Data Sheets (SDS) for all chemicals, records of chemical usage, and disposal methods PRECURSOR licence 		
b) Regulations regarding the use of any hazardous chemicals in the manufacturing process must be available and ensure any necessary chemicals are managed responsibly Conformity Verification Chemical inventory management system, adherence to the Globally	O	5
Harmonized System (GHS) for chemical labelling c) Chemicals safety best practice guidelines must be communicated to the	С	5
relevant workers Conformity verification Chemicals safety best practice guidelines are available to all the employees who are involved in chemicals handling Interview relevant workers during the site inspection chemical hazard signage and safe handling equipment in the areas of the facility where chemicals are handling Wearing appropriate PPE for handling hazardous chemicals	,	3
d) Chemical accidents preparedness plan must be implemented	С	5
Conformity verification Chemical accidents preparedness plan is available. The organization must mark, designated chemical storage and temporary storage areas in the facility – Site Inspection Utilizing spill kits for chemical accident response 		



6.6 Solid Waste Management		
 a) Implement strategies for minimizing waste during cutting, sizing, and finishing processes. Any waste generated during the process should be recycled. Conformity Verification Waste audit reports and documentation of waste diversion 	NC	3
strategies. b) The organization must maintain a facility to segregate all waste streams into	С	5
non-hazardous and hazardous waste and store them separately.	C	3
Conformity verification ➤ Site visit for waste stores/yard		
 c) Effective waste management policies and programmes must be implemented documented for hazardous and Non-Hazourdous solid waste with regard to the following; Quantities and types of waste recovered for reuse internally and externally; Quantities and types of waste recycled internally and externally; Quantities and types of waste disposed of to landfill; Information on disposal locations for all wastes; and Initiatives are taken to reduce waste generation and improve recovery/recycling of waste. Conformity verification The records on waste management are maintained, Site inspection on 	C	5
the implementation of the waste management programmes/plan		
 d) The organization must set a baseline for solid waste generation by determining the average amount of solid waste generated per unit of production during the baseline period. This can be expressed as a ratio or percentage to compare with future performance. Conformity verification Records on Solid wastes and production data 	С	5
e) The Organization must set targets to reduce waste quantity referring to the base year Conformity verification	С	5
Records on set targets and records on Solid wastes and production data		
f) A scheduled waste management license for the manufacturer for producing hazardous solid waste shall be obtained from Central Environmental Authority and implemented accordingly.	M	
 Conformity verification Copy of contract/agreement with CEA certified third-party waste collection agencies for safe disposal 		

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6.7 Waste Water Management		
a) The organization shall be complied with Central Environment Authority (CEA) stipulated regulations before discharging water into the environment	M	
Conformity Verification Treated waste water test reports by CEA approved laboratory Operating wastewater treatment plants to clean industrial effluent before discharge into public sewers or natural water bodies		
b) The organization must take measures to track its wastewater volume by using acceptable methods (Eg: Metering) (Industrial/Domestic/Combined) Conformity Verification Records on Wastewater generation, site visit	С	5
c) The organization should reuse or recycle processed wastewater (closed loop) Conformity Verification Records on wastewater management Water Quality test reports	NC	3
6.8 Air Quality Management		
 a) Measures must be implemented to minimize emissions during the process. Conformity Verification Stack emission test reports and compliance with relevant environmental protection regulations Ambient air quality test reports 	С	5
 b) Appropriate initiatives (implementation of a dust management plan or other suitable initiatives) should be taken to reduce dust and air quality issues. Conformity verification Site inspections and records relevant to the dust management activities/plan 	С	5
 c) Emissions to air shall not exceed the CEA stipulated limits to make it ensure the factory atmosphere is safe for the environment Conformity verification Valid Environmental Protection License Ambient air quality Test Reports 	M	
6.9 GHG Emission Management		
 a) Organizational/product carbon footprint (assertion of GHG emissions and removals) should be calculated, recorded, and maintained. Conformity verification A transparent and verifiable calculation method is available. 	NC	3



b) The organization must set targets for reducing the facility overall GHG emissions	С	5
Conformity verification > Documented records on targets and their achievement		
7. Phase: Product Quality, and Product Design		
a) Effective Quality management system (QMS) or policies, procedures, and quality plan/programmes should be implemented by the organization	NC	3
Conformity Verification Valid ISO 9001 QMS Certificate Records on Quality Policy, procedures, and quality plan/ programmes are maintained		
b) A traceability system must be maintained to trace the finished product back to the invoice to ensure the activated carbon meets industry standards for purity and performance.	С	5
Conformity verification Maintain traceability records indicating products		
c) Ensure that the activated carbon meets specific purity and performance standards relevant to its intended use.	С	5
Conformity Verification > Regular product testing reports, certifications from relevant authorities		
d) The product should demonstrate superior performance and longevity compared to standard activated carbon products, reducing the need for frequent replacements.	NC	3
Conformity Verification		
Comparative lifecycle assessments (LCAs) and performance testing reports.		
8. Phase: Packaging and Labelling		_
 a) Use materials that are recyclable, biodegradable, or made from recycled content. Conformity Verification Records on types and quantities of packaging materials used Specifications of packaging materials, recycling and content 	С	5
certifications		
b) Manufacturers should provide relevant environment-related information (Eg: Recycle material content of the packaging, etc) on the label/packaging of the product	NC	3
Conformity verification ➤ Observations on the product label		
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9. Phase: Distribution		
a) Efficient transport modes/plans should be used for finished product distribution to minimize carbon footprint	NC	3
Conformity verification The transport management plan/Product distribution plan is maintained		
10. Phase: Occupational Health and Safety		
a) A fire safety management plan must be implemented.	С	5
Conformity verification An evacuation plan is available and the fire extinguishers, fire alarm, fire hydrant, etc have been established Training records		
b) Occupational Health and Safety practice guidelines, Emergency Preparedness plan must be developed and implemented as per the following national/international requirement Eg: ISO 45001:2018 Occupational health and safety management systems or	С	5
equivalent. Standard procedure/ practices for chemical storage as per GHS -Globally Harmonized System of Classification and labelling of chemicals.		
 Conformity Verification Valid ISO 45001:2018 certificate Copy of emergency response plan Documentary evidence for applying standards in chemical storage and handling 		
c) Occupational Health and Safety practice guidelines must be developed and communicated to the relevant workers	С	5
Conformity verification Conformity verification Conformity verification Conformity verification Conformity verification Solution and Safety practice guidelines are available Interview relevant workers during the site inspection Training Records		
d) Organization shall be adherence to requirements of factory ordinance Conformity verification	М	
 Ensuring that all employees have access to and use the necessary PPE such as masks, gloves, and goggles, especially given the fine particulate nature of carbon dust. 		



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 Records on facilitating routine medical examinations for employees to monitor any health issues that might arise from working with activated carbon, which can affect respiratory health. Site visit - Ensuring that all equipment and workstations are designed to prevent strain and injury, promoting a healthy working environment. Securing and renewing all necessary licenses and permits for operational, environmental, and health and safety compliance. Reporting Requirements: Meeting all reporting requirements set by local and national bodies regarding environmental impact, worker safety, and production processes. Phase: Legal Requirements 		
a) The Environmental Protection License (EPL) shall be obtained and	М	
implemented all its requirements	IVI	
Conformity verification Valid Environmental Protection License is available		
b) All production activities and products shall comply with the requirements of the relevant national legislation in Sri Lanka	M	
Conformity verification Compilation of all the applicable Environmental and other Regulations (Labour Laws) are maintained		
 c) Business registraion shall be obtained and implemented all its requirements Conformity verification Valid business registraion is available 	M	
12. Phase: Specific Requirements		
a) The monetary values gained through the resource efficiency improvements (water, energy, material) and waste management must be calculated, reported and communicated to the top management Conformity verification	O	5
 Meeting Minutes Records and presentations 		
13. Phase: Continuous Improvement and Innovation		
a) Encourage research and development focused on improving the sustainability of the activated carbon production process, from raw material sourcing to end-of-life.	NC	3

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INSTRUCTIONS FOR USERS

This criteria document contains 64 requirements; 08 Mandatory requirements, 37 critical requirements, and 19 non-critical requirements. marks are allocated for each criterion except Mandatory criteria. At least 70% of the total marks allocation for the criteria shall be scored by the applicant for being successful in the Eco Labelling certification process.

Requirements	Total Marks
Critical (C)	37 requirements* 5 = 185
Non-Critical (NC)	19 Requirements* 3 = 57

Total Marks Allocation = 242

Mandatory Requirements

When the adequacy audit of the organization's application is conducted, there shall be no non-compliance related to the mandatory requirements, and if any nonconformity is reported during the adequacy audit stage or the certificate audit, a major nonconformity will be raised, and that shall be corrected within two months of the certification Audit.

Critical Requirements

If any violation of critical requirements is found during the verification visit, a minor nonconformity will be raised, and suitable corrective action shall be taken within two months.

Non-critical Requirements

If any non-compliance of non-critical requirements is found during the certification Audit, it will be considered as an observation for the improvement. The effectiveness of the corrective actions taken for the observations raised will be audited in the next surveillance audit.

Note: Until the non-conformities are addressed, the marks should not be released to the governing council, and the certificate should not be granted

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Guideline for Marks Allocation;

The below guidelines are to be followed while assessing the implementation of criteria requirements. Marks allocation should be based on the level of implementation and the availability of sufficient evidence.

✓ Criteria 1: Full Marks allocation:

- The criteria requirement has been fully implemented.
- If sufficient evidence exists, the full marks mentioned in the mark's column can be given.

✓ Criteria 2: 70%-80% Marks (Improvement Opportunities)

- The criteria requirement has been fully implemented.
- However, sufficient evidence does not exist or has not been maintained.
- In such cases, 80% of the allocated marks can be given.

✓ Criteria 3: 60%-50% Marks (Improvement Opportunities)

- The criteria requirement has been implemented partially.
- If sufficient evidence exists, 50% of the allocated marks can be given.

✓ Criteria 4: 30%- 20% Marks (Improvement Opportunities)

- The criteria requirement has been implemented partially.
- However, sufficient evidence does not exist or has not been maintained.
- In such cases, 30% of the allocated marks can be given.

✓ Criteria 5: 0 Marks - Non-Conformity (Critical Requirement)

- The criteria requirement has not been implemented.
- If it's a critical (C) requirement, it must be raised as a Non-Conformity.
- In this case, 0 marks should be given.

✓ Criteria 6: 0 Marks - Observation (Non-Critical Requirement)

- The criteria requirement has not been implemented.
- If it's a non-critical (NC) requirement, it must be raised as an observation.
- In this case, 0 marks should be given.

During the mark allocation process, the team of auditors engages in discussions based on the audit findings, which include document reviews, observations, interviews, and other relevant sources of information. These discussions serve to ensure accuracy and prevent inconsistencies in the marks assigned. By collectively evaluating the evidence and considering different perspectives, the team strives to reach a consensus on the appropriate allocation of marks. This collaborative approach helps to enhance the fairness and reliability of the mark allocation process, allowing for a more comprehensive and well-rounded assessment.

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