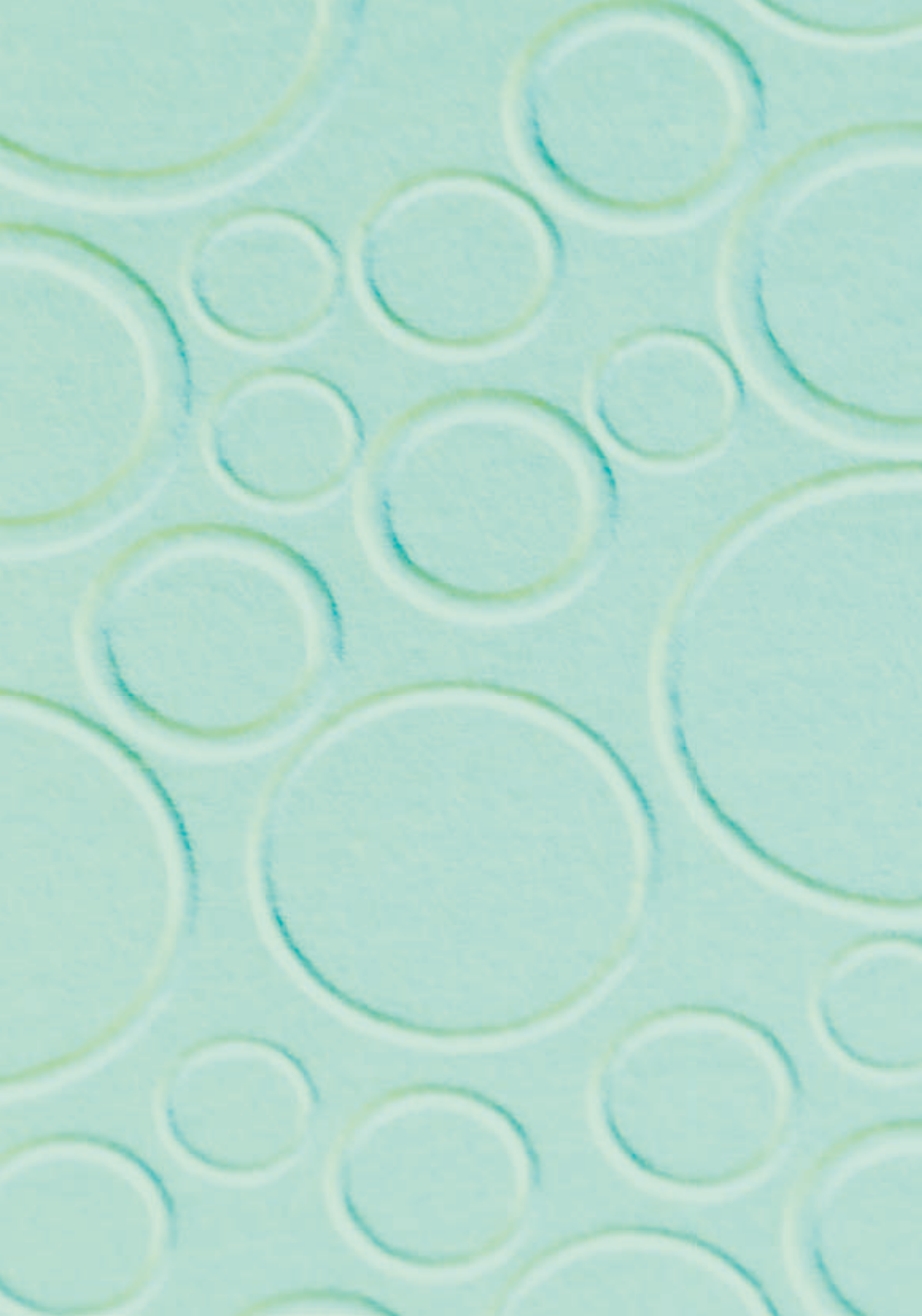




Environmental labels  
and declarations

How ISO  
standards help







## How green is green ?



These days we are all trying to be more environmentally conscious, particularly at the supermarket. The problem is knowing what to buy in order to make a real difference, especially when you hear so much about “green-washing”, with manufacturers making out that products are better for the environment, when there are no discernible improvements. You buy the brand of laundry detergent that is labelled as being “clean, green and phosphate-free” only to discover that phosphates haven’t been used in any detergents for the last 20 years. So why’s this product being made out to be so clean and green ?

Fortunately, there are International Standards aimed at taking the complex world of environmental science and reducing it to a simple set of rules and guidelines for how the environmental aspects of a product can legitimately be represented on a consumer label or in a declaration. When applied by manufacturers and ecolabelling practitioners, these internationally agreed standards ensure that the consumer is only being given valid purchasing information, without any “green-washing”. This applies whether the claim is made through a seal of approval type of system, or in a claim made by a manufacturer.

# ISO in brief



ISO has a membership of 164\* national standards bodies from countries large and small, industrialized, developing and in transition, in all regions of the world.

ISO's portfolio of over 19 400\* standards provides business, government and society with practical tools for all three dimensions of sustainable development: economic, environmental and social.

ISO standards make a positive contribution to the world we live in. They facilitate trade, spread knowledge, disseminate innovative advances in technology, and share good management and conformity assessment practices.

ISO standards provide solutions and achieve benefits for almost all sectors of activity, including agriculture, construction, mechanical engineering, manufacturing, distribution, transport, medical devices, information and communication

technologies, the environment, energy, quality management, conformity assessment and services.

ISO only develops standards for which there is a clear market requirement. The work is carried out by experts in the subject, drawn directly from the industrial, technical and business sectors that have identified the need for the standard, and which subsequently put the standard to use. These experts may be joined by others with relevant knowledge, such as representatives of government agencies, testing laboratories, consumer associations and academia, and by international governmental and nongovernmental organizations.

An ISO International Standard represents a global consensus on the state of the art in the subject of that standard.

\* October 2012.



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# Introduction



The ISO 14020 series of standards provides businesses with a globally recognized and credible set of international benchmarks against which they can prepare their environmental labelling, which is increasingly used on products and in advertising, in response to consumer demand.

With the relentless focus on climate change and health, consumers are becoming more interested in less tangible product attributes such as the ethical and environmental aspects of a product's production and supply. In response to this, manufacturers often voluntarily choose to provide information concerning the environmental aspects of their products on labelling and in advertising.

In short, the environmental benefits of a company's products, such as recyclability of packaging, are part of its overall marketing strategy. Smart businesses are making

a virtue out of necessity, by promoting the environmental features of their products. Getting a market benefit through environmental labelling makes sense, particularly where companies have made the investment in environmental improvement and putting environmental management systems in place.

People are understandably eager to "do their bit" for the environment, and are more and more inclined to favour products that seem likely to do the least damage to it. Manufacturers, sensing increased business, may be keen to encourage this interest by marking their products or packaging to reassure consumers that their products cause less stress on the environment.

How much real value attaches to such claims and marks is a concern, and surveys worldwide have shown that some environmental

labelling can leave a lot to be desired. Such labelling may be scientifically inaccurate or, even when accurate, confusing to the consumer. In addition, it is not uncommon to see reassuring phrases on products such as “made with care for the environment” without any further information as to the real impact the product has.

Does any of this matter? Well, consumers can only express their preferences through their purchasing decisions if they have access to accurate, comparable information.

Consumers have the power to stimulate manufacturers to innovate because manufacturers may hope that improved environmental performance communicated to consumers means increased market share. However, if consumers are confused to the point where they cannot distinguish between competing products in terms of environmental performance, they are unable to express preferences through their purchases.

If it makes no difference in terms of product sales whether an







environmental claim accurately reflects genuine improved environmental performance, or is just a repackaging of existing products with a “green gloss” on the marketing campaign, what incentive is there for companies to innovate?

Further, those producers who do improve their environmental performance are entitled to be reassured that they can accurately pass this information on to consumers without being undermined by competitors seeking to gain the same commercial advantage without doing anything to improve performance. In short, there needs to be a level playing field.

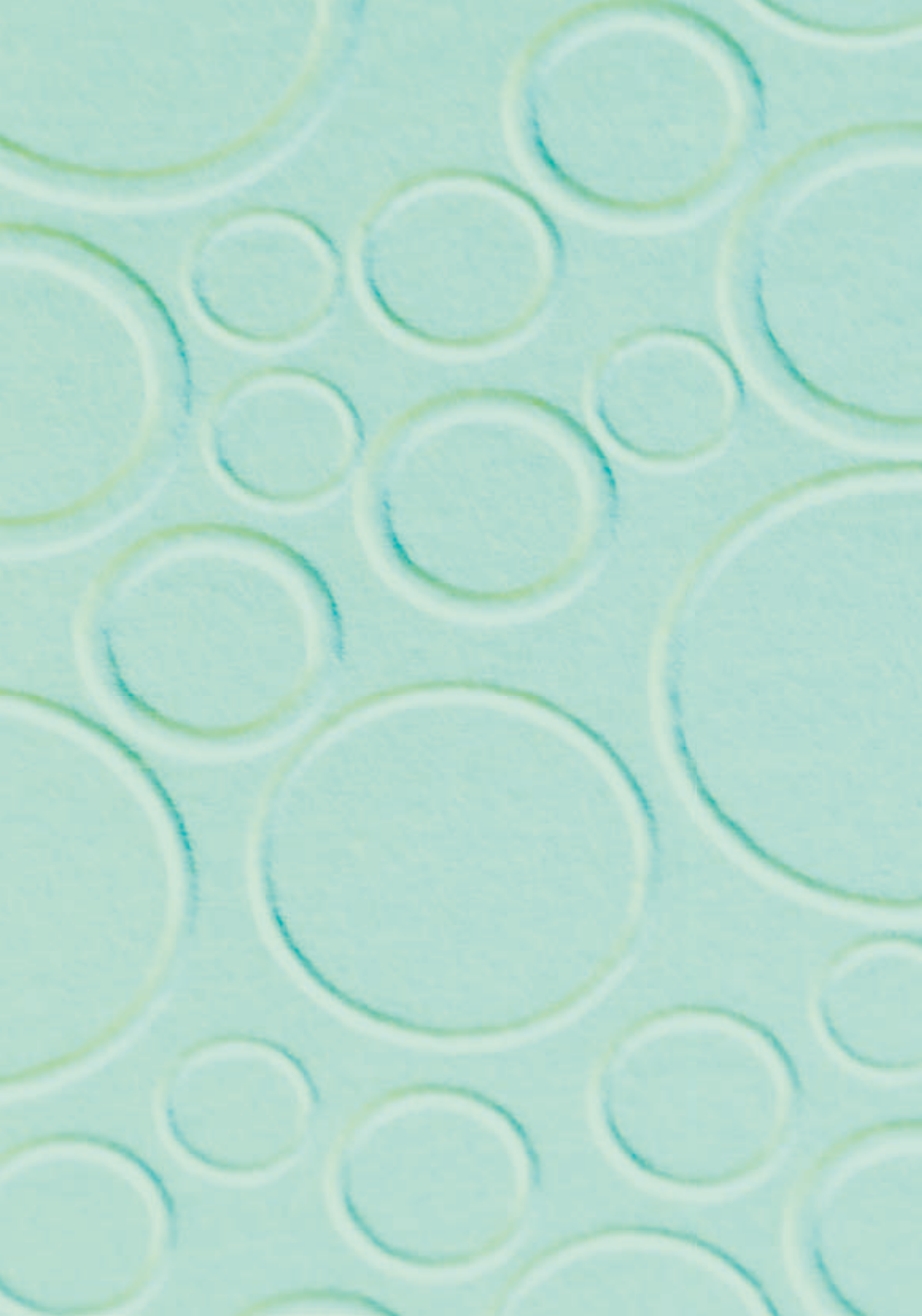
These basic issues have been recognized worldwide for a number of years and they have been the subject of many reports. ISO was not slow to see this issue as part of the broader sustainable development agenda. As part of the ISO 14000 series of environmental management standards, the ISO 14020 series deals specifically with aspects of environmental labels and declarations. (For an introduction, those interested are directed to ISO 14020:2000, *Environmental labels and declarations – General principles*).

At the start of its work, the ISO subcommittee responsible for the development classified different types of labelling by type number. The two main types already in existence were:

- The “classic” ecolabelling schemes, which award a mark or a logo based on the fulfilment of a set of criteria – these were identified as **Type I environmental labelling**
- Claims which were made by manufacturers and businesses, and could be seen as being “self-declared” – these were identified as **Type II self-declared environmental claims**

In addition, however, it was recognized that a third type was starting to emerge which consisted of a formalized set of environmental data describing the environmental aspects of a product. These declarations were identified as **Type III environmental declarations**.







# Self-declared environmental claims :

**ISO 14021:1999, *Environmental labels and declarations*  
– *Self-declared environmental claims*  
(*Type II environmental labelling*)**



## Who should use this standard

ISO 14021 is extremely wide in its application. It deals with all environmental claims voluntarily made for products. While self-declared claims are often made on products and/or their packaging, they are not restricted to on-pack claims, but include all environmental claims however they are made, for example, in advertising, on the Internet or in trade reports.

In addition, ISO 14021 does not just deal with claims made for products, but encompasses claims made for services, for instance, environmental claims for tourist services or banking; all are within the ambit of the standard.

This standard is a critical tool for manufacturers and businesses who

are making environmental claims on their products. It is also an essential reference for advertisers who



are making environmental claims in their advertisements.

## Introduction

ISO 14021:1999 is the International Standard that deals with so-called self-declared claims. It states that the overall goal of environmental labels and declarations is, through the communication of verifiable, accurate information that is not misleading, to encourage the demand for, and supply of, products which cause less stress on the environment, thereby stimulating the potential for market-driven, continual environmental improvement.

ISO 14021 does not require that environmental claims should be made. Rather, it addresses the issue that if a claim is made, how can it be made in a way which is meaningful and useful to a consumer. The objectives of ISO 14021 are stated to be the harmonization of the use of self-declared environmental claims with the following anticipated benefits:

- Accurate and verifiable environmental claims that are not misleading
- Increased potential for market forces to stimulate environmental improvements

- Prevention or minimization of unwarranted claims
- Reduction in marketplace confusion
- Facilitation of international trade
- Increased opportunity for consumers to make more informed choices

There are three key elements to ISO 14021 concerning requirements for claims. These give the basic rules for the making of environmental claims.

- **Use of symbols.** This deals with the fact that many claims for products are made not just with the use of text, but also by the use of pictures, symbols or logos
- **Evaluation and claim verification requirements.** Essentially this requires that claims must be verified before they are made, and that this information must be available on request to any person
- **Specific requirements for selected claims.** This recognizes that some claims are used more frequently than others (e.g. recyclable or biodegradable), and provides for



specific requirements in the use of such claims

## Requirements for all self-declared environmental claims

The basic requirements for all claims are that they shall be:

- Accurate and not misleading
- Substantiated and verified
- Unlikely to result in misinterpretation



There are a number of requirements setting out the general rules for the making of self-declared environmental claims. The language used in the drafting of the standard is prescriptive and does not allow for any latitude, as shown by the core

requirement that environmental claims shall be accurate and not misleading.

The standard also states that vague or non-specific claims, which broadly imply some environmental benefit, shall not be used. Examples of such claims include “environmentally friendly”, “green”, “nature’s friend”.

Claims of “sustainability” generally fall into this category. Whichever definition of “sustainability” is used, we are still some way off having internationally agreed benchmarks for the minimum economic, social and environmental performance that would indicate a product had been manufactured in a truly “sustainable” manner. The 2011 amendment refers to the standard ISO 26000:2010, *Guidance on social responsibility*, but reinforces the requirement in the 1999 text that self-declared claims of achieving sustainability shall not be made.

ISO 14021 also deals with the use of symbols to make environmental claims. There are two specific aspects to this:

- General requirements
- Möbius loop

The International Standard applies exactly the same rules to the use of symbols as to the use of text. This is an important point of principle.

It was recognized that pictures, symbols and logos are routinely used to convey a message about the environmental attributes of a product. Potentially, such images could be even more ambiguous than text. It was felt, therefore, that the only proper way of dealing with this matter was to make no distinction between the use of text and the use of symbols.

Essentially, therefore, any logo or image used to convey an environmental message shall comply with the basic rules referred to above, and shall be unlikely to result in misinterpretation or be misleading.

## Evaluation and claim verification requirements

ISO 14021 deals with evaluation and claim verification requirements and has four key elements:

- Responsibility of the claimant
- Evaluation of comparative claims
- Methods used
- Access to information

The standard makes it clear that the primary responsibility to ensure a claim is accurate resides with the person making the claim. Effectively, the person making a claim must have the information necessary to verify it before it is made. Further, this information must be kept for a reasonable period, testing must use accepted test methods and the information must be disclosed to any person who wants it.

This information includes:

- Identification of test method used
- Documentary evidence if claim cannot be verified by end-product testing
- Test results
- Name and address of independent party if used to evaluate claim

In fact, the standard goes further and says that if a claim can only be verified using confidential business information, then the claim must not be made.

The standard does not describe particular test methods; the onus is on the person making the claim to be able to verify it before the claim is made. However, the standard



does state that where internationally agreed test methods exist, these must be used.

## Specific requirements for selected claims

The final element of the standard is the specific requirements for selected claims, for instance :

- Degradable
- Recyclable
- Recycled content
- Reduced energy/water consumption

The standard published in 1999 set specific rules on the usage of the term, qualifications and evaluation methodology and, as appropriate, gave guidance on 15 commonly used claims.

The amendment published in 2011 to reflect marketplace developments, added the usage of the following terms, qualifications and evaluation methodology :

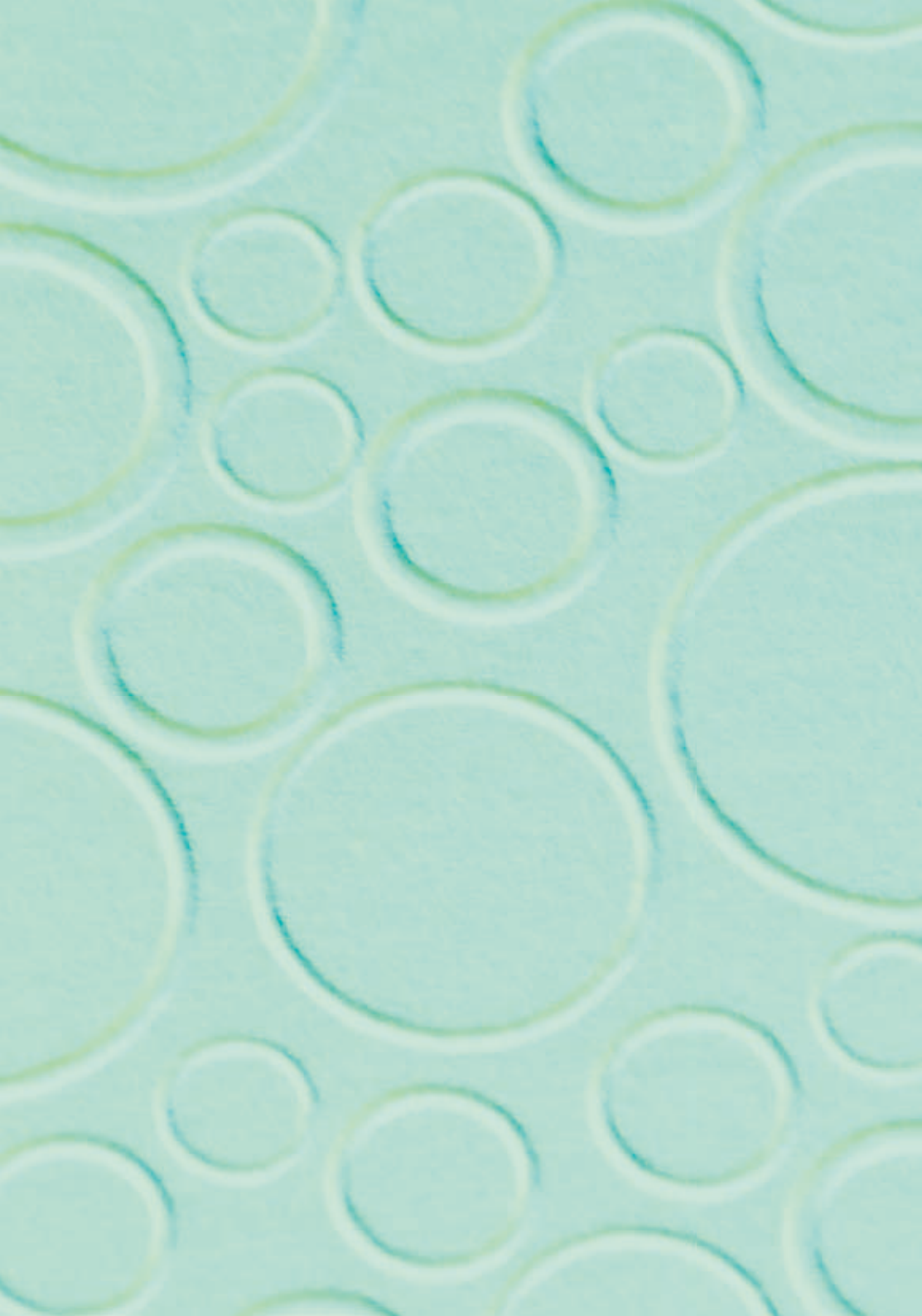
- Renewable material
- Renewable energy
- Sustainable
- Claims relating to greenhouse gas emissions
  - Product “Carbon footprint”
  - “Carbon neutral”

## Application to emerging issues

New environmental labelling approaches are constantly emerging, such as the use of the term “food miles” or similar. The environmental aspects associated with transporting products should certainly be taken into consideration, but ISO 14021 states that the impacts across all phases of the life cycle should be considered together, so that low CO<sub>2</sub>-emissions during the transport phase are not used to mask a higher overall burden due to high production emissions.

## What effects and impact will ISO 14021 have ?

A huge amount of work went into the development and updating of this standard over many years. The range of stakeholders that participated in its development adds greatly to its credibility and included developed and developing countries, business, consumer groups, environmental groups, regulatory agencies, government departments. The fact that consensus was achieved adds greatly to its credibility, and the result should be a marketplace where consumers can exercise better informed choice.







# Ecolabelling schemes :

## **ISO 14024:1999, *Environmental labels and declarations – Type I environmental labelling – Principles and procedures***



### **Why have the standard ?**

Ecolabels are intended to educate and increase consumer awareness of the environmental impacts of a product and bring about environmental protection by encouraging consumers to buy products with a lower environmental impact.

Consumers' purchasing decisions can provide a market signal to producers about product preferences. Under effective ecolabelling regimes, producers and sellers have an incentive to compete to improve the products, perhaps by changing inputs or adopting different technologies to lower the environmental burden of the product. Producers of environmentally superior products have an incentive to use environmental marketing

techniques such as ecolabelling to differentiate their products. Firms may be motivated by gaining extra market share, improving their public image or pre-empting mandatory labelling requirements.

### **What is the standard about ?**

This International Standard establishes the principles and procedures for developing Type I environmental labelling programmes, including the selection of product categories, product environmental criteria and product function characteristics ; and for assessing and demonstrating compliance. The standard also establishes the certification procedures for awarding the label.

Type I environmental labelling refers to the multi-criteria, life-cycle seals

of approval, commonly known as “ecolabelling”. ISO 14024 provides the requirements for operating an ecolabelling scheme, like the Nordic Swan or the Japanese Eco-Mark. The standard has been adopted as a benchmark by the Global Ecolabelling Network (GEN), the international federation of ecolabelling bodies. It provides the rules to overcome some of the past criticisms of ecolabelling and provides guidance for new schemes under development.

The **principles** of this standard include the following stipulations:

- Environmental labelling programmes should be voluntary
- Compliance with environmental and other relevant legislation is required
- The whole product life cycle must be taken into consideration when setting product environmental criteria, e.g. extraction of resources, manufacturing, distribution, use and disposal relating to relevant cross-media environmental indicators. Any departure from this comprehensive approach or selective use of restricted environmental issues has to be justified

- Product environmental criteria need to be established to differentiate environmentally preferable products from others in the product category when these differences are significant

**Product environmental criteria** are based on indicators arising from life-cycle considerations and are required to be set at attainable levels and give consideration to relative environmental impacts, measurement capability and accuracy.

The period of **validity of the programme** requires that the product





environmental criteria and product function requirements for each product category need to be set for a predefined period after which there should be a review which takes account of factors such as new technologies, new products, new environmental information and market changes.

The standard requires that a process of formal open participation among interested parties be established at the outset for the purpose of selecting and reviewing product categories, product environmental criteria and product function characteristics.



All the elements in the product environmental criteria and product function characteristics of the environmental labelling programme need to be **verifiable** by the ecolabelling body using standards suggested in ISO 14024.

Type I environmental labelling programmes need to be able to demonstrate **transparency** through all stages of their development and operation. Transparency implies that information is available to interested parties for inspection and comment where appropriate. This information includes :

- Selection of product categories
- Selection and development of product environmental criteria
- Product function characteristics
- Testing and verification methods
- Certification and award procedures
- Review period
- Period of validity
- Non-confidential evidence based on which the label has been awarded
- Funding sources for programme development



(e.g. fees, government financial support)

- Compliance verification

Procedures and requirements for environmental labelling programmes cannot be prepared, adopted or applied with a view to, or with the effect of, creating unnecessary obstacles to international trade.

All applicants who fulfil the product environmental criteria for a given product category and the other programme requirements, are entitled to be granted a licence and authorized to use the label.

The development and selection of criteria are to be based on sound scientific and engineering principles and derived from data that support the claim of environmental preferability.

Type I environmental labelling programmes are to be free from undue influence and be able to demonstrate that sources of funding do not create a conflict of interest.

**Mutual recognition** of tests, inspections, conformity assessment, administrative procedures and, where appropriate, product environmental criteria, is encouraged.

To ensure full transparency, information on existing mutual recognition agreements with other ecolabelling bodies is to be made available.

The standard stipulates that a study should be conducted to consider the feasibility of establishing the **product categories** and lists what should be considered in the study. Once a feasibility study has been completed, the ecolabelling body is then in a position to ascertain which product categories are most likely to obtain marketplace acceptance. A product category proposal needs to be prepared for the interested parties which summarizes the components of the feasibility study, its findings, and the considerations leading to the proposal of product categories for the programme.

The **Selection of product environmental criteria** is intended to provide uniformity while allowing decisions on the final criteria to be the result of the consultation process between the ecolabelling body and interested parties. The matrix in the standard links the stages of



the product life cycle with the major environmental input and output indicators.

The standard sets out the process for establishing the **product environmental criteria** which take into account relevant local, regional and global environmental issues, available technology, and economic aspects.

The standard suggests that the ecolabelling body needs to :

- Identify the product life-cycle stages where there is differentiation of environmental impacts among the products within the category. The ranges and variability of the data obtained for specific products need to be analysed to ensure that the selected product environmental criteria are adequate and reflect the differences among products
- Consider it proper to apply weighting factors to the selected environmental requirements with reasons for each weighting factor being clearly explained and justified
- Determine the criteria that most accurately reflect the selected environmental aspects and then assign numerical values to them which could take the form

of minimum values, threshold levels not to be exceeded, a scale-point system or other relevant and appropriate approaches

- Provide a reference to the test methods that are required for any given criterion or characteristic, and examine the availability of competent laboratories capable of performing the tests. Testing and verification requirements should be considered in parallel with the preparation of requirements for a given product category

The standard states that in the selection of the product function characteristics, due consideration needs to be given to the product function.

Once the product categories, product environmental criteria and product function characteristics have been established, they need to be published. The selected report format is to be accompanied by information specified in the standard.

In cases where the label has already been awarded to products, there are a number of factors which the standard sets out and which should be considered.

General rules covered in the standard control the general conditions for the awarding of the licence and the use of the label. Procedures for assessing and demonstrating compliance are also covered.

### **Ecolabelling schemes and the role of the Global Ecolabelling Network (GEN)**

Established in 1994, the Global Ecolabelling Network is a non-profit association of Type I ecolabelling organizations around the world. There are GEN member programmes operating in well over 50 countries: they work to improve, promote and develop the ecolabelling of products and services on a global scale. GEN fosters information exchange amongst its members and associates, the dissemination of information to the public, the cooperation and collaboration among its members and like-minded organizations, in addition to facilitating the harmonization of Type I ecolabelling programmes around the world.

Members of GEN operate Type I ecolabelling programmes. This

means that they developed environmental standards against which products can be certified. The standards themselves are designed to identify environmental leadership in any given product category, and are developed in an open, public, transparent process. In many cases, certification to a particular standard is audited by an independent third party. Although criteria differ based on the product category, standards will address multiple environmental attributes and have requirements for items such as toxicity, air quality, energy use, recyclability, VOCs, carcinogens and other issues of concern. Life-cycle assessment is often used by GEN members in developing standards to ensure that environmental aspects of the entire life cycle of the product or service, from raw material extraction, to use and disposal, are considered.

Type I products have the capacity to change the market, especially with, for example, the support of green procurement initiatives by governments in many countries.



# Life-cycle data declarations :

## **ISO 14025:2006, *Environmental labels and declarations – Type III environmental declarations – Principles and procedures***



### **Who should use this standard ?**

Type III environmental declarations are of growing importance in business-to-business commerce. The fact that the standard and the technical report that preceded it were developed in parallel with the emergence and refinement of this new approach has allowed ISO to play a key guiding role.

This type of evaluation is not easily dealt with as one walks down the aisle of the supermarket and Type III declarations have proven to have limited application to the consumer market.

However, a commercial enterprise will often have specific environmental targets embedded in its purchasing policy, allowing for

objective evaluation of the Type III information.

### **What is the standard about ?**

ISO 14025 establishes principles and specifies procedures for issuing quantified environmental information about products, based on life-cycle data referred to as environmental declarations. A Type III environmental declaration can be described as: quantified environmental data for a product with pre-set categories of parameters based on the ISO 14040 series of standards, but not excluding additional environmental information.

Type III environmental declarations present the environmental performance of a product to enable objective comparisons between

products fulfilling the same function. Such declarations :

- Are based on independently verified life-cycle assessment (LCA) data, life-cycle inventory analysis (LCI) data, converted LCI data to reflect the life-cycle impact assessment (LCIA) of a product or information modules in accordance with the ISO 14040 series of standards and, where relevant, additional environmental information
- Are developed using predetermined parameters
- Are subject to the administration of a programme operator, such as a company or a group of companies, industrial sector or trade association, public authorities or agencies, or an independent scientific body or other organization

The output is known as the declaration which has the objective to communicate environmental performance within clearly defined and classified product categories and service types. The system approach covers separate products and services, as well as complete or partial assortments of products and services. A Type III environmental declaration is designed to

meet various information needs within the supply chain and for end products in both the private and public sectors, as well as for more general purposes in information activities and marketing.

### **Credibility, transparency and openness**

Type III environmental declarations developed by organizations are subject to major stakeholder review processes and then published in the public domain by country-based registrars. This supports consistency within an industry and enables comparison of products via the use of Type III environmental declarations. There are several market applications for Type III environmental declarations, e.g. for different types of reporting and internal product development work. One primary application of a Type III environmental declaration is to assist purchasers in green procurement where they need to make informed comparisons between separate products. Environmental declarations according to ISO 14025 are probably the only internationally recognized tool enabling such a comparison to be carried out. In most cases, this is





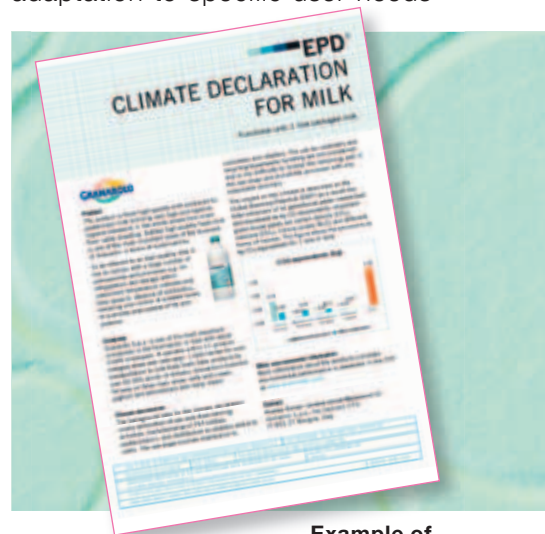
exactly what is needed from a procurement point of view in making fair selections among different bids.

To be able to fulfil high market expectations for a number of practical applications, Type III environmental declarations must comply with specific and strict methodological prerequisites. These expectations include the possibility to sum LCA-based information in the supply chain and to compare the information in different Type III environmental declarations. To achieve this goal, Type III environmental declarations are constituted in accordance with common and harmonized calculation rules to ensure that Type III environmental declarations prepared by different organizations in the same product category, use the same scope of data and metrics. However, groups of products usually differ in their inherent environmental performance, requiring specific calculation rules for the product group, the so-called Product Category Rules, PCR. PCR contain specific instructions detailing LCA-based data collection methods for different product groups, conversion of the collected data to the pre-set indicators, and the format for presentation of the information. The

development of PCR follows a strict procedure, including a multi-phase approach for initiation, preparation, consultation, approval and publication, and updating.

### Single-issue Type III environmental declarations

Information from Type III environmental declarations is sometimes felt to be too specific and detailed, as it covers many familiar environmental impacts from the perspective of the life cycle of a product. It is, therefore, important that Type III environmental declaration information is flexible enough to allow for adaptation to specific user needs



**Example of a climate declaration**

and market applications. One such approach is the concept of so-called single-issue Type III environmental declarations. A single-issue Type III environmental declaration can, for instance, extract the information in a Type III environmental declaration related to climate change by describing the greenhouse gas emissions in terms of CO<sub>2</sub>-equivalents to become a climate declaration. As climate declarations are based on the same principles as Type III environmental declarations, they give recognition to the information as being objective and covering the full life cycle. They also give credibility because of the compulsory requirement for independent third-party verification. An example of a climate declaration is given above.

Other possible applications of single-issue Type III environmental declarations could be a eutrophication declaration, summing up the environmental impact of nutrient-enrichment of lakes and coastal areas, or a recycling declaration, describing various ways to recycle used materials as inputs in the manufacturing of new products.

## Climate declarations as a source of consumer-oriented carbon footprint information

The market demand for information on the climate impact of products and services is constantly growing. Over the past few years, different stakeholders have stressed the need to find scientifically valid and relevant information on the climate performance of goods and services, not neglecting private consumers. However, behind any simple environmental claim, there is a complex world of science-based assumptions and facts. It is, therefore, of vital importance that any concept for carbon footprint information introduced on the market be indisputable and correct from the very beginning.

A number of challenges must be overcome to be able to convey a fairly simple and understandable message about the climate performance/carbon footprint of a product in a life-cycle perspective. One such approach is given on the preceding page.



## Summing up

Any businesses involved in improving the environmental aspects of their products and services should consider using the appropriate standard from the above suite of standards. Reasons for using these standards are:

- As ISO standards, they have global recognition
- They have the legitimacy that comes from being drafted by a diverse range of stakeholders
- They represent objectively agreed benchmarks that create a level playing field for the dissemination of environmental information



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