



Voluntary Standards: Summary of Stakeholder Feedback

In a recently issued press release, the Electric Utility Industry Sustainable Supply Chain Alliance announced the publication of voluntary standards, which identify best practices and metrics to help suppliers assess their environmental performance and utilities assess the environmental performance of their supply chain operations. A copy of this press release and the voluntary standards are posted on the Alliance Web site at www.EUISSCA.org.

Prior to finalizing the voluntary standards, the Alliance invited interested stakeholders to comment on a draft version. The Alliance hosted several webcasts to inform stakeholders of Alliance work and to address stakeholder questions and comments about the voluntary standards.

Most stakeholder feedback was incorporated into the final standards, as noted below. There were a few comments from stakeholders that warranted substantive modifications to the layout of the voluntary standards document, as well as modifications to the metrics, but did not result in fundamental changes to the best practices or to the voluntary standards overall. Where stakeholder feedback was not incorporated into the final version of the voluntary standards, an explanation is provided in this document as to why.

Modifications to the Final Voluntary Standards in Response to Feedback

1. The voluntary standards were formatted in a table that more clearly illustrates the alignment between each best practice and its corresponding metric and to show a clear progression of supplier, utility supply chain and Alliance metrics
2. The Sustainable Supply Chain Framework ('the pyramid'), which illustrates the voluntary standards hierarchy, was added back into the document
3. The Environmental Impact Areas table was edited to remove 'compliance' as a separate impact area to avoid confusion with compliance as the foundation of sound environmental performance reflected in the Sustainable Supply Chain Framework
4. The compliance best practice was edited slightly to confirm that it addresses a track record of compliance with environmental laws and regulations
5. Applicable metrics can be measured as absolute and/or intensity so suppliers that have already been taking steps to reduce their environmental impact are able to utilize the metrics



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6. Alliance metrics were edited to include ones that measure the aggregate environmental performance of utility industry suppliers
7. Metrics in all environmental impact areas now follow a consistent hierarchy that has also been incorporated into the Alliance survey questions:
 - Measure and trend performance
 - Establish voluntary program to reduce impact
 - Establish voluntary commitment to reduce impact
 - Year over year reduction is demonstrated
 - Performance/results are reported to senior management/board of directors
 - Performance/results are publicly reported
 - Performance/results are verified by a 3rd party
8. Metrics were added to measure the recycling of hazardous waste
9. Wording was added to confirm that electric utilities that adopt the voluntary standards will phase in the metrics to allow suppliers time to acclimate to any new requirements
10. The final leadership best practice was edited slightly to confirm that learning and best practices will be shared with interested stakeholders

Response to Comments Received

Below are the comments received from stakeholders, which the Alliance is currently considering as part of its strategy development. These comments are not directly related to the environmental voluntary standards and are therefore not incorporated in the final voluntary standards document.

1. Our company would like more information about how to participate in category working teams.

[As each working team is launched, suppliers and other stakeholders for that category will be contacted to participate on the team. Suppliers and other stakeholders are also invited to visit the Alliance website for a list of current working teams and contact information for those working teams.](#)



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2. Strategy Development

- Develop overall Alliance strategy that outlines change it is seeking to create (include strategic and tactical objectives, initiatives, measurement and targeted stakeholders)
- Use survey results to help establish improvement priorities and goals
- Consider energy efficiency as a primary focus area
- Adjust communications strategy (website and presentation) to align with this strategy
- Benchmark against other consortiums working toward sustainability (e.g. EICC or auto industry)
- Adopt a standard GHG Reporting Protocol (e.g. WRI/WBCSD)
Each of these comments is being addressed as the Alliance develops its long term strategy. The Alliance survey results will inform this strategy and help the Alliance set priorities and goals for both the short and long term. Stakeholders will be invited to comment on the draft strategy.

3. Alliance Members Adopt Voluntary Standards

- Alliance members should adopt similar standards/measures as suppliers to strengthen commitment and demonstrate ‘walk the talk’
- Establish minimum requirements for Alliance membership around supply chain environmental performance

Each Alliance member has an individual company focus on improving its environmental footprint and broader sustainability objectives. Members have also begun to take steps to green their own supply chain operations. Members are encouraged to incorporate the voluntary standards into their business practices, at their discretion; however participation in the Alliance is voluntary and adoption of its standards is voluntary and not a condition of membership or participation. The Alliance will not maintain any enforcement mechanism for standards adopted by the Alliance.



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4. Publicly report results

The Alliance intends to conduct its voluntary consensus standards development activities in the open. Interested parties, regardless of membership, will have the opportunity to participate meaningfully in the standards development process, and the Alliance expects to hold meetings soliciting input from interested parties in the development of voluntary consensus standards that will be publicly noticed, along with agendas and items set for discussion.

The Alliance shall work to use the internet to the extent it is practicable and economically viable to publicize its activities and has established a website for this purpose: www.euissca.org. Alliance work products and the final Alliance Survey Report will be posted on this website.

5. Advocate for climate change legislation and policy

As provided in the Alliance's Bylaws, the Working Teams of the Alliance are not expected or encouraged to create policy in their standards absent being requested to do so by the Executive Committee. Rather they endeavor to develop voluntary consensus standards, which can be implemented at each Member's discretion.

6. Expand Alliance scope

- Include broader environmental (e.g. biodiversity) and sustainability focus
- Track both water consumption and availability
- Measure utility member scope 3 GHG emissions
- Include offset measure in GHG metrics

These items are currently out of the scope of the Alliance's activities, but may be considered in the future as the Alliance's work evolves.



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7. Coordinate Alliance Efforts

- Post a list of suppliers that meet the various reporting criteria
- Coordinate implementation of metrics among utilities (to lessen impact on suppliers)

As a registered 501c6 standards development organization, those proposed actions are not within the scope of Alliance activities. It is the Alliance's policy to adhere strictly to the letter and spirit of the antitrust laws.

Members are encouraged to implement the voluntary standards into their business practices, at their discretion; however, participation in the Alliance is voluntary and implementation of its standards is voluntary and not a condition of membership or participation. The Alliance will not maintain any enforcement mechanism for standards adopted by the Alliance. Utilities will implement the metrics from the voluntary standards, if any, that best align with their individual business strategies. Utilities are encouraged to phase in metrics to allow suppliers to acclimate to any new requirements.

8. Conduct audits of supplier responses

As stated in the Alliance Guiding Principles, the Alliance will establish an appropriate mechanism for suppliers' verification of their performance data (e.g., publicly available data, self verification, and third party endorsements).