

## Standards Development and Maintenance Program

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## **Part 1: General information**

### **1.1 RESOLVE and PR3 Standards**

RESOLVE is a Washington, D.C.-based non-profit that specializes in creating innovative partnerships to solve critical health and environmental challenges. PR3 is a public-private partnership program, launched by RESOLVE in 2019, that develops standards for reusable packaging systems.

This document reflects RESOLVE's process for developing consensus for the approval, reaffirmation, revision, and withdrawal of standards as American National Standards. The procedures within this document apply to the standards that are part of the RESOLVE's PR3 partnership on reusable packaging.

PR3 standards shall be in the best interest, mutually, of consumers, communities, workers, businesses and the general public. They shall relate to actual use conditions and be technically and scientifically sound. Their use or observance is voluntary.

These procedures align with [ANSI Essential Requirements](#) and all other normative policies and administrative procedures established by the ANSI Executive Standards Council. Recognition by other established national and international standards organizations may also be sought for PR3 standards including by CEN and ISO, among others.

These procedures shall be available on RESOLVE's website.

Any party with a direct and material interest in PR3 standard has a right and is encouraged to participate in the standards development process by expressing a position and its bias, having that position considered, and having the right to appeal.

### **1.2 Glossary**

The following terms are used in this document.

**ANSI (American National Standards Institute)** – A private nonprofit organization that coordinates and administers the U.S. voluntary standards and conformity assessment system. ANSI also coordinates the U.S. participation in the development of international standards.

**Appeals Panel** – A standing impartial panel that will hear appeals pertaining to the development or revision of an ANSI Standard.

**Consensus** – As defined in Annex A of the [ANSI Essential Requirements](#), consensus means substantial agreement has been reached by directly and materially interested parties. This signifies the concurrence of more than a simple majority, but not necessarily unanimity. Consensus requires that all views and objections be considered, and that an effort be made toward their resolution. For RESOLVE standards, consensus is considered achieved when:

- there is approval by at least two- thirds of those members voting who have submitted a vote, excluding abstentions, negatives without comment, and negatives based on material not under consideration, and
- a majority of the SP have returned a ballot, and
- all other procedural requirements contained in this document have been met.

**International Standard** – Typically, a standard developed and published by the International Electrotechnical Commission (IEC) or the International Organization for Standardization (ISO).

**SP (Standards Panel)** – A Standards Panel (SP) is a balanced group of individuals representing a variety of interest categories formed to review submitted proposals and to meet and discuss standards-related issues. An SP serves as the consensus body to review and vote on proposals prior to publication.

**SP Designated Engineer** - The SP Designated engineer represents RESOLVE on the SP under the interest category of “Testing and Standards”. This person is a voting member of the SP and is typically a RESOLVE staff member or consultant.

**SP Manager** – The SP Manager works coordinates the SP and works closely with its members to process proposals, publish standards documents, determine SP membership and maintain a roster, and issue correspondence to SP members. The SP Project Manager is a non-voting member of the SP and is typically a RESOLVE employee or consultant.

### **1.3 Scope of PR3 standards**

PR3 standards shall relate to the design and operation of reusable packaging systems. This includes design of the packaging itself, as well as other equipment, assets, and operations in the system, such as return points, logistics, transport, washing, signage, container handling, digital tracking and reporting.

PR3 Standards are intended to provide guidance on:

- the design of products used in a reuse system, including containers, collection machines and other equipment;
- the safe and efficient handling of packaging and packaged products throughout a reuse system; and
- tracking containers and performance throughout the system.

### **1.4 Standards format and style**

PR3 standards shall follow the ISO House Style. Information on this style can be found here:

<https://www.iso.org/drafting-standards.html>

### **1.5 Reference to outside standards**

PR3 advocates the use of the most current versions of the outside standards and guidelines it may

reference. Any undated reference to a code, standard, or guideline appearing in the requirements of a standard shall be interpreted as referring to the latest edition of that code or standard.

### **1.6 Metric policy**

PR3 standards shall use the International System of Units (SI units). Where appropriate, PR3 standards may also incorporate the US Customary Units (inch-pound units). When US Customary Units are included, they will be provided as a secondary unit of measurement and shown in parentheses.

### **1.7 Language**

PR3 Standards shall be drafted and published in English. PR3 does not render interpretations of standards. ANSI also does not provide interpretations. Requests for interpretations of PR3 standards addressed to ANSI shall be referred to RESOLVE.

### **1.8 Patent policy**

In the context of PR3 standards, RESOLVE adopts and adheres to the [ANSI Patent Policy](#) as outlined in 3.1 in the current edition of *ANSI Essential Requirements*. If RESOLVE receives information that a patent or intellectual property claim may be involved in a standard being developed, the requirements in *ANSI Essential Requirements* shall be followed and the proper notifications shall be included in the document prior to publication.

SPs developing standards under RESOLVE shall exercise due diligence when requiring provisions for which a license may be required because of patent rights. RESOLVE and ANSI shall not be responsible for identifying all patents for which a license may be required by an American National Standard or for conducting inquiries into the legal validity or scope of those patents that are brought to its attention. A disclaimer shall be included in the standard as necessary.

### **1.9 Commercial terms and conditions**

In the context of PR3 standards, RESOLVE adopts and will adhere to the Commercial Terms and Conditions requirements set forth in section 3.2 of the current edition of [ANSI Essential Requirements](#). In general, PR3 standards shall not include terms or conditions that are primarily contractual or commercial in nature, as opposed to technical, engineering or scientific in nature. Thus, PR3 standards shall not include contractual requirements, endorse or require the use of proprietary products or services, or endorse or require the use of particular conformity-assessment bodies, testing facilities or training organizations.

### **1.10 Antitrust policy**

PR3 standards shall be developed in accordance with applicable antitrust and competition laws and meetings amongst competitors to develop PR3 and standards are to be conducted in accordance with these laws.

## **PART 2: Standards development**

When it is determined that a standard is a candidate for ANSI designation, RESOLVE employs a consensus body process as outlined below.

### **2.1 Standards maintenance**

RESOLVE maintains PR3 standards according to a continuous maintenance and open participation process.

- RESOLVE is continually open to input from the users of PR3 standards and other interested groups.
- PR3 standards will be kept current and relevant by consideration of recommended changes to any part of it.
- RESOLVE solicits comments from public review through announcements in *ANSI Standards Action* and BSR-8 form.
- RESOLVE will seek input from the full range of interest categories, including from industry, consumer and labor groups, government agencies and regulatory authorities, trade associations, advisory groups, and testing and standards organizations.
- RESOLVE encourages interested parties to actively participate in PR3's standards development process by becoming a member of a consensus body or by submitting proposals and comments on PR3 standards, the process for which is described in this document. Anyone materially affected by a PR3 standard is encouraged to submit proposals and comments. Correspondence should be addressed to RESOLVE's SP Manager.
- Participation is electronic, through video and phone conferences, electronic mail submissions, and electronic voting, including for submitting proposals, ballots, and comments. No hardcopies of correspondence are accepted.
- Consensus body meetings are held when the SP Manager determines there is a need to convene the consensus body because there are proposals to discuss or comments to resolve. Meetings can also be considered if requested by consensus body members.
- Consensus body meetings for standards-related issues are open to those affected by the proposals being discussed. Permission for non-SP members to attend a meeting must be requested via email in advance of the meeting.

### **2.2 Standards initiation or termination**

When RESOLVE first recognizes the intention to develop a new standard, or revise, reaffirm or withdraw an existing standard, or terminate a standards project, it will follow these steps:

1. RESOLVE will determine whether the standard may be in conflict with any existing ANS.
2. RESOLVE will make a good-faith effort to resolve any potential conflicts through coordination/harmonization as prescribed in the *ANSI Essential Requirements*.
3. If no conflict exists, Resolve shall submit a project initiation or termination notice to ANSI.

4. For projects to develop or revise an ANS, RESOLVE will notify ANSI using the Project Initiation Notification Systems (PINS) form, or its equivalent, for announcement in *ANSI Standards Action*.
5. For projects to reaffirm or withdraw an ANS, RESOLVE may notify ANSI using the PINS form, though it is not required.
6. A statement shall be submitted and published as part of the PINS notification that includes:
  - a) an explanation of the need for the project, including, if it is the case, a statement of intent to submit the standard for consideration as an ISO, IEC or ISO/IEC JTC-1 standard; and
  - b) identification of the stakeholders (e.g., telecom, consumer, medical, environmental, etc.) likely to be directly impacted by the standard; and
  - c) the interest categories that will or are expected to comprise the consensus body.

If the response to sub-section (b) changes substantively as the standard is developed, a revised PINS shall be submitted and published.

RESOLVE also adopts the following provisions from the ANSI Essential Requirements: 2.5.1.1. PINS Exceptions, 2.5.1.2. Assertions of conflict or duplication, and 2.5.1.3. PINS Deliberation Report.

### **2.3 Outreach**

Proposals to develop, revise, reaffirm, or withdraw a standard are balloted to a Standards Panel (SP), which serves as the consensus body. There are no membership dues associated with SPs.

A list of potential SP members shall be created by RESOLVE, consisting of those organizations, companies, government agencies, standards developers, individuals, etc., known to be, or who have indicated that they are, directly and materially affected by PR3 standards. RESOLVE will inform potential members directly in electronic writing about the formation of a SP and the consensus process.

RESOLVE will also publicize formation of a SP and the consensus process through suitable media and stakeholder convening platforms as appropriate to demonstrate the opportunity for participation by all directly or materially affected persons. Some current examples of convening platforms include: WEF's Reuse Platform, PlanetReUse in Europe, and Upstream in North America.

RESOLVE's package of outreach information shall include:

- a) the title, designation, scope, and description of the standard along with the history of its development;
- b) PR3 interest categories with descriptions;
- c) an application to join the standards body;
- d) an explanation of the ANSI function; and
- e) a response deadline.

RESOLVE will include as many applicants as possible in the SP, while maintaining a balance of interests. The criteria for balance are that:

- a) no single interest category constitutes more than half of the membership of a SP; and
- b) the SP includes members from the U.S. and at least two other [UN global regions](#). UN global regions include Latin America-Caribbean, Africa, Eastern Europe, Asia-Pacific, and Western Europe-other states. Geographic balance will assist in aligning reuse infrastructure across borders to facilitate trade, minimize costs, and increase efficiencies.

If a SP applicant does not select an interest category, selects multiple interest categories, or it is determined that an incorrect interest category may have been selected, RESOLVE shall consult with the SP applicant, ask them to choose a single appropriate category, and obtain written confirmation from the applicant.

The SP roster shall meet the requirements in 1.2 of *ANSI Essential Requirements* regarding lack of dominance. No consensus body member shall appear more than once on this list. The affiliation and interest category of each member of the SP shall be made available to interested parties upon request.

Once outreach has been completed for a standard, it need not be repeated for subsequent balloting of the document. In addition, a single outreach process may be conducted for a group or category of standards. RESOLVE shall add new members at RESOLVE's option when it can be done while maintaining balance.

## **2.4 Interest categories**

The following are the available SP member interest categories for PR3 standards.

**Industry:** Organizations including any of the following -

- *Consumer Goods:* Organizations that manufacture consumer goods in reusable packaging or intend to sell products in reusable packaging covered by the standards.
- *Food Service:* Organizations that serve or intend to serve food or beverages to consumers in reusable packaging containers covered by the standards. This includes only food and beverage that is packaged at the point-of-sale, not food and beverage packaged in an industrial manufacturing facility.
- *Consumer retail:* Organizations that sell products in reusable packaging covered by the standards.
- *Reuse Service:* Organizations that provide services in reusable packaging systems, such as collecting, transporting, or washing reusable packaging or related data covered by the standards.
- *Supply chain:* Organizations that are engaged in the manufacture of reusable packaging, collection point machines, bins, washing equipment or other products and components used in reusable packaging systems.

**Consumers:** Individual consumers or organizations that represent consumers or community groups.

**Workers:** Individuals or organizations that represent formal or informal workers in roles related to or impacted by reusable packaging, including but not limited to workers at manufacturing facilities, food service and retail locations, container sorting and washing facilities, transport and logistics companies, and workers in recycling or waste collection.

**Government:** Representatives from national or local government agencies, including food and drug agencies, environmental agencies, public utilities or other agencies that may be involved in aspects of packaging regulation, production, use, or end-of-life.

**Testing and Standards:** Organizations that test and/or certify products, services, or systems covered by the standards, or that develop standards/codes related to the products, services, or systems covered by the standards.

**General interest:** Community activists, academia, scientists, expert consultants, and others that are not covered by the other participation categories, such as representatives from groups impacted by packaging production or waste, professional societies and trade associations, attorneys, and food safety experts. This includes all others not otherwise classified.

## **2.5 Conduct of Standards Panels**

### **2.5.1 Project initiation**

Proposals for new American National Standards, and proposals to revise, reaffirm, or withdraw approval of existing American National Standards shall be transmitted to ANSI using the PINS form, or its equivalent, for listing in *ANSI Standards Action* to provide an opportunity for public comment. Upon receipt of a PINS, ANSI shall publish the notification in *ANSI Standards Action*. This will alert all to the proposal and may elicit additional interested parties as consensus body members.

For proposals where general solicitations for consensus body participation are sought, RESOLVE shall denote the request on the PINS form to trigger ANSI to issue a general solicitation for participation.

A public comment initiation announcement may be requested at any stage in the development of the standard, at the option of RESOLVE and may be concurrent with balloting.

### **2.5.2 Information provided to SP members**

The following information shall be made available to all SP members and other interested parties so requesting:



- a) a copy of the SP list, consisting of the name, affiliation, and interest category of each SP member;
- b) the complete proposed ANS, when it exists, or the relevant portion under consideration when the SP member has previously received the complete standard;
- c) a ballot form with the specific positions identified in 2.6.1;
- d) instructions on how to submit comments in accordance with 2.6.1;
- e) the deadline for submitting ballots or comments in accordance with 2.6.2; and
- f) a statement as to whether the ballot is considered a new ballot or recirculation ballot in accordance with 2.6.5.

If the document contains material that is not to be considered for approval as an American National Standard, such as an introduction or annex, a clear statement shall be included indicating those portions of the standard that are to be considered for approval by ANSI.

### **2.5.3 Standards Panel participation**

The role of an SP member is to fully participate in the consensus process by commenting and voting on proposals, helping to resolve comments, and submitting new proposals. Continued membership is contingent on active participation.

The SP Manager may appoint a task group to focus on a particular issue and develop proposals for consideration by the SP. SP members can participate on task groups, but task group members are not required to be SP members. If held, task group meetings are not required to be open. Task groups are not required to have a balance of interest categories.

## **2.6 Balloting**

### **2.6.1 Ballot position options and comments**

The ballot form used by RESOLVE shall provide opportunity for the SP member to indicate their position:

- a) Affirmative;
- b) Affirmative, with comment;
- c) Negative, with reasons (the reasons for a negative vote shall be given and if possible should include specific wording or actions that would resolve the objection); or
- d) Abstain.

Comments should be submitted using the online platform that RESOLVE and the SP use for standards development and balloting.

Negative votes that are not accompanied by comments or comments not related to the proposal under consideration may not be considered.

### **2.6.2 Balloting or response period**

The balloting period for new or recirculation ballots shall end a minimum of two weeks and a maximum of six weeks from the date of issue, or as soon as all ballots or responses are returned, whichever comes first. The duration shall be determined by RESOLVE. An extension may be granted at RESOLVE's option, when warranted or requested.

### **2.6.3 Public review and coordination**

Proposals for new American National Standards and proposals to revise, reaffirm, or withdraw approval of existing American National Standards shall be transmitted to ANSI using the BSR-8 form, or its equivalent, for listing in *ANSI Standards Action* in order to provide an opportunity for public comment. If it is the case, then a statement of intent to submit the standard for consideration as an ISO standard shall be included as part of the description of the scope summary that is published in *ANSI Standards Action*.

The comment period shall be one of the following:

- A minimum of thirty days if the full text of the revision(s) can be published in *ANSI Standards Action*;
- A minimum of forty-five days if the document is available in an electronic format, deliverable within one day of a request, and the source (e.g., URL or an E-mail address) from which it can be obtained by the public is provided to ANSI for announcement in *Standards Action*; or
- A minimum of sixty days, if neither of the aforementioned options is applicable.

Such listing may be requested at any stage in the development of the proposal, at the option of RESOLVE, and may be concurrent with final balloting. However, any substantive change subsequently made in a proposed ANS requires listing of the change in *ANSI Standards Action*.

### **2.6.4 Consideration of views and objections**

Prompt consideration shall be given to the written views and objections of all participants, including those commenting on the PINS announcement or public comment listing in *ANSI Standards Action*.

In connection with an objection articulated during a public comment period, or submitted in connection with a vote, an effort to resolve all expressed objections shall be made, and each objector shall be advised in electronic writing of the disposition of the objection, and the reasons therefore.

Following all attempts at resolution of comments, those submitting comments shall receive a report of the disposition of all comments that contains the name of the commenter, the clause, the comment, and the resulting committee response. If any of these changes are deemed as substantive (see *ANSI Essential Requirements, Annex A*), they shall be clearly identified as such. An attempt will be made at resolution of all comments.

If resolution is not achieved, the objector shall be informed in electronic writing that an appeals process exists using the RESOLVE appeals procedures in Section 2.9. In addition, each objection resulting from public review or submitted by a member of the SP, and which is not resolved must be reported to the ANSI BSR. An objection shall be considered resolved when a negative vote cast by a consensus body member is revised in writing by the voter, or where a public reviewer accepts or does not respond to the proposed resolution of their comment in the timeframe determined in accordance with 2.6.3 or as allotted in the communication from RESOLVE.

Unresolved objections, attempts at resolution, and any substantive change shall be reported to the SP to afford all members an opportunity to respond, reaffirm, or change their vote within the balloting and response period outlined in 2.6.2. Substantive changes made in a proposed ANS shall be listed in *ANSI Standards Action* in accordance with *ANSI Essential Requirements*.

Any comments received after the closing of the public review and comment period may be considered as part of the current disposition process or shall be considered in the same manner as a new proposal. Timely comments that are not related to the proposal under consideration shall be documented and considered in the same manner as submittal of a new proposal and will generally be considered during the next review cycle. The submitter of the comments shall be so notified.

#### **2.6.5 Recirculation and new ballot options**

If a previous round of balloting results in any substantive changes, a recirculation ballot shall be sent to the SP. In addition, the SP shall receive a summary regarding the extent of changes that were made, including identification of any substantive changes. If any SP members do not respond to the recirculation ballot, then their ballots from the previous round of balloting shall carry over to the current round of ballots.

RESOLVE may deem that a revised draft standard has been substantially changed to the point where the revised version of the draft standard should be treated as a new proposal. In this case, the previous balloting results shall be discarded in favor of a new set of ballots with no carryover of votes from the most recent ballot to the current ballot. If this action is taken, the revised ballot information shall clearly state that previously cast votes shall not be considered in favor of the response on the current ballot.

#### **2.6.6 Criteria for approval**

For approval of a new standard, revision or reaffirmation of an existing standard, or an addendum to part or all of an existing standard, proposals must reach consensus.

Consensus is considered achieved when

- there is approval by at least two-thirds of those members voting who have submitted a vote, excluding abstentions, negatives without comment, and negatives based on material not under consideration, and
- a majority of the SP have returned a ballot, and

- all other procedural requirements contained in this document have been met.

The SP vote shall be conducted and reported in accordance with the rules set forth in *ANSI Essential Requirements* Section 2.7. Votes for the approval of a document or portion thereof as a candidate ANS shall be obtained by electronic means. All members of the consensus body shall have the opportunity to vote. When recorded votes are taken at meetings, members who are absent shall be given the opportunity to vote before or after the meeting.

## **2.7 Submittal of proposed standard for approval**

Upon completion of the procedures for balloting, for disposition of views and objections, and for appeals, the proposed standard may be submitted to ANSI for approval using ANSI's BSR-9 or equivalent form.

The information to be supplied to ANSI shall include:

- a) title and designation of the proposed ANS;
- b) indication of the type of action requested (that is, approval of a new ANS or reaffirmation, revision, or withdrawal of an existing ANS);
- c) a declaration that applicable procedures were followed;
- d) a declaration that the proposed standard is within the scope of the previously registered standards activity;
- e) a declaration that conflicts with another ANS have been addressed in accordance with these procedures;
- f) a roster of the SP that indicates: the vote of each member including abstentions and unreturned ballots, if applicable; the interest category of each member; and a summary thereof;
- g) a declaration that all appeal actions related to the approval of the proposed standard have been completed;
- h) a declaration that the criteria contained in the ANSI patent policy have been met, if applicable; and
- i) identification of all unresolved negative views and objections, with names of the objector(s), and a report of attempts toward resolution.

## **2.8 Withdrawal of an existing ANS**

The recommendation for the withdrawal of an existing ANS shall originate from the SP responsible for its development and affirmed by RESOLVE.

RESOLVE may decide to abandon the processing of a proposed new or revised American National Standard or portion thereof at its own discretion. RESOLVE shall notify ANSI immediately of such actions.

## **2.9 Appeals**

RESOLVE's appeal process is similar to the appeals process used by the Material Handling Institute, described in *MHI Procedures for the Development and Coordination of American National Standards (Canvass Committees)*, as below.

### **2.9.1 Eligibility**

The right to appeal actions or inactions at any point in the standards development process shall be incorporated into written communications at all stages of the development process.

Persons who have directly and materially affected interests and who have been or will be adversely affected by any procedural action or inaction by a standards developer regarding the development of a proposed ANS or the revision, reaffirmation, or withdrawal of an existing ANS, have the right to appeal, including SP members. RESOLVE does not allow non-procedural appeals. The burden of proof to show adverse effect shall be on the appellant.

### **2.9.2 Complaint submitted to RESOLVE**

The appellant shall file a written complaint addressed to RESOLVE's SP Manager within 30 days after the date of notification of action or at any time with respect to inaction. The complaint shall state the nature of the objection(s) including any adverse effects, the clause(s) of these procedures or the standard that is at issue, actions or inactions that are at issue, and the specific remedial action(s) that would satisfy the appellant's concerns. Previous efforts to resolve the objection(s) and the outcome of each shall be noted.

### **2.9.3 Response**

Within 30 days after receipt of the complaint, RESOLVE shall respond in writing to the appellant, specifically addressing each allegation of fact in the complaint to the extent of the respondent's knowledge. The appellant shall be given notification that they have 30 days to respond, in writing, identifying whether RESOLVE's written response satisfactorily addressed the complaint, or whether the appeal hearing shall be necessary. If the appellant does not respond, RESOLVE shall consider the complaint resolved and the appeal request closed.

### **2.9.4 Hearing**

If the appellant and the respondent are unable to resolve the written complaint informally in a manner consistent with these procedures, RESOLVE shall schedule a hearing (in person or by teleconference) with an appeals panel on a date agreeable to all participants, giving at least 10 working days' notice.

### **2.9.5 Appeals panel**

The appeals panel shall consist of three individuals who have not been directly involved in the matter in dispute, and who will not be materially or directly affected by any decision made or to be made in the dispute. At least two members shall be acceptable to the appellant and at least two shall be acceptable to the respondent.

### **2.9.6 Conduct of the hearing**

The appellant has the burden of demonstrating adverse effects, improper actions or inactions, and the efficacy of the requested remedial action. The respondent has the burden of demonstrating that the SP and RESOLVE took all actions in compliance with these procedures and that the requested remedial action would be ineffective or detrimental. Each party may adduce other pertinent arguments, and members of the appeals panel may address questions to individuals. Robert's Rules of Order (latest edition) shall apply to questions of parliamentary procedure for the hearing not covered herein.

### **2.9.7 Decision**

The appeals panel shall render its decision in writing to the appellant within 30 days, stating findings of fact and conclusions, with reasons therefore, based on a preponderance of the evidence presented to the appeals panel. Consideration shall be given to the following positions, among others, in formulating the decision:

- a) Finding for the appellant, remanding the action to the consensus body or the secretariat with a specific statement of the issues and facts regarding which fair and equitable action was not taken;
- b) Finding for the respondent, with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections;
- c) Finding that new, substantive evidence has been introduced, and remanding the entire action to the consensus body for appropriate reconsideration.

### **2.10 Final actions**

RESOLVE provides SP members and the public notice when proposals have completed the consensus process. For standards that receive ANS designation, upon approval confirmation from ANSI, RESOLVE shall prepare an updated version of the standard that includes the ANSI logo or the words "an American National Standard." The text of the standard's introduction shall include the ANSI approval date.

Final publication of proposals completing the consensus process are published as a first edition standard, as revision pages to the current edition, or in the form of a subsequent new edition of the standard. Standards will be published on RESOLVE's website as soon as possible and no later than six months after approval as an ANS.

### **2.11 Requests for changes to standards**

RESOLVE will consider any comments or suggested changes for future revisions of its standards. Comments and requests for changes shall only be considered in response to a written request sent to RESOLVE's SP Manager by email.

Comments and change requests must be submitted utilizing the following format:

- a) Designation: Cite the standard designation and the date of ANSI approval;
- b) Subject: Cite the portion(s) of the standard subject to the change request;

- c) Issue: Clearly and concisely state the issue that needs to be addressed (e.g. do values need to be changed, are editorial changes needed, is additional explanation needed, or do requirements need to be added/dropped?);
- d) Suggested revision: Optionally state suggested changes to the standard.

Requests which are not submitted in this format shall be returned to the submitter by RESOLVE, along with information on how to submit the requests in the proper format. RESOLVE shall maintain a log of all change requests received for an ANS so they may be considered during the next revision cycle.

### **2.12 National adoption of ISO or IEC Standards as American National Standards**

If RESOLVE wishes to adopt an ISO or IEC standard as an American National Standard, they shall comply with the requirements set forth in *ANSI Procedures for the National Adoption of ISO or IEC Standards as American National Standards*.

### **2.13 Records retention**

Records shall be prepared and maintained to provide evidence of compliance with RESOLVE procedures and *ANSI Essential Requirements*. RESOLVE shall retain records for a minimum of five years or until approval of the subsequent revision or reaffirmation of the complete standard.

Records concerning withdrawals of all American National Standards and discontinuation of projects shall be retained for at least five years from the date of withdrawal or for a duration consistent with the ANSI audit schedule.