Substantive vs. Non-substantive Changes in SWEEP

As part of the National Consensus Leadership Standard process being managed by ANSI-accredited standard developer, Institute for Market Transformation for Sustainability (MTS), SWEEP is required to re-ballot any substantive changes made to a Consensus Leadership Standard that result from changes made in response to 'Disapprove with Comments' votes from members of the National Consensus Committee (NCC) on the standard. In addition, during the normal review process, other changes, such as editorial, non-substantive changes are also introduced into the standard, but do not require balloting.

During the balloting process, SWEEP will make available for public viewing several drafts of the standard during each phase:

- A "clean" draft that includes the current language in the full standard, without changes being highlighted.
- A "redline" draft that includes all changes, substantive and non-substantive, highlighted.
- A "Comment" draft for review prior to the start Ballot, unless the standard is in its "Final" phase.
    - Comments, both substantive and non-substantive, made on the Comment draft may be incorporated into the subsequent Ballot draft if appropriate.
- A "Ballot" draft that if:
    - More than 25% of the credits contain substantive changes,
        - Includes all of the credits in the standard.
    - Fewer than 25% of the credits contain substantive changes,
        - Includes only the credits with substantive changes being considered for adoption.
        - If a standard under ballot includes substantive changes in fewer than 20-25% of the credits, then this standard shall be deemed a "Final" and differences over substance ("Disapprove with Comment" votes) will be resolved through a live (in-person or virtual) meeting of the NCC

Substantive changes include changes in threshold values (e.g. 30% vs. 50% of a fleet meets fuel economy requirements) or benchmark values (e.g. exceed *"standard x"* by 10% vs. 20%) or modifying key components (e.g. removing biosolids from consideration in the standard) of determining thresholds or benchmarks.

Editorial, non-substantive changes do not require re-balloting. Editorial non-substantive changes include those which introduce no change in technical content, correct typographical errors, modify editorial style, change non-technical information, reduce ambiguity, and correct typos in substance.

- For example, adding an alternative compliance pathway for a credit is considered non-substantive because it does not change the substance of a credit, but rather adds an additional means of meeting its substance.
- Similarly, adding specific definitions for certain terms—as in the case of defining the meaning of “alternative fuel”—is considered non-substantive because it clarifies intent and reduces ambiguity, as opposed than creating a new threshold for compliance.