GS-20 Program Response to Comments
Draft Criteria Document for 3M Easy Trap Sweep and Dust Sheets

May 19, 2020

Green Seal is committed to transparency in standard development, which includes maintaining a platform for stakeholder input. The Environmental Innovation Program, within which Green Seal develops Criteria for Environmental Innovation, also includes critical public engagement, in which Criteria is published for public comment.

The Proposed Criteria Document for 3M Easy Trap Sweep and Dust Sheets was published for public comment from March 18 to April 19, 2020. We appreciate those who participated in this process and provided valuable input, which resulted in improvements and clarifications to the Criteria Document.

Green Seal appreciates those individuals and companies that submitted input. The following stakeholders submitted comment.

**Americo Manufacturing**

**Contact:**

**For Inquiries:**
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Overview of Comments and Green Seal’s Responses

Below is an overview of Green Seal’s responses by category and the details of any actions taken in response to stakeholder input.

1. **Significantly Improved Performance Threshold**

   Commenter stated disagreement that the applicant product could provide evidence that supports the performance claims and stated that a competing product has evidence that disproves the claim (i.e., 30 percent improved compared to two competitor products) as one aspect of the basis for the applicant to earn a Certification of Environmental Innovation.

   **Green Seal Response:** Green Seal has acknowledged the comments received, discussed its assessment of concerns raised regarding performance claims and test methodology, provided information on how performance test data is evaluated during the Certification Evaluation Phase, and reiterated the additional requirements necessary for the applicant product to earn a Certification of Environmental Innovation.

2. **Independent Testing**

   Commenters stated concern regarding the allowance for in-house testing of products.

   **Green Seal Response:** Green Seal has provided background justification for its allowance of in-house testing for performance-based claims.
1. SIGNIFICANTLY IMPROVED PERFORMANCE THRESHOLD

Comment Summary:

Commenter stated disagreement that the applicant could provide evidence that supports the product performance claims and stated that a competitor has evidence that disproves the claim (i.e., 30 percent improved compared to two competitor products) as one aspect of the basis for the applicant to earn a Certification of Environmental Innovation.

Comment Excerpts:

“We have received the attached information regarding 3M’s attempt to gain GS-20 certification for their Easy Trap dusting sheets. It appears that 3M is basing their Green Seal certification request partly on the Innovation claim that their product performs “...at least 30% better than competitor products at surface clearing.” Furthermore, in Section 3.2 of their Impact Reduction Summary, 3M specifically claims that their product improves “product performance for surface clearing by at least 30% compared to competitor products results in more output per dust sheet over time and for each surface clearing task, thereby maximizing the useful life of a single use product.”

We strenuously object to 3M’s claims and request that this application be rejected by Green Seal for false and inaccurate assumptions. [because we have already conducted product testing of ours against the 3M Easy Trap product].

RESPONSE:

Green Seal appreciates the commenter’s participation in this public comment process.

This commenter states that performance data gathered for a competitor product exists, that would prevent the applicant product from receiving Certification, and has submitted that test data to Green Seal.

Green Seal has not yet reviewed the applicant’s performance data at this point in the process. This will be collected and evaluated once the criteria document is final.

A third party can appeal a certification decision in writing to Green Seal’s Vice President of Certification, who will take the information provided under advisement, attempt to verify the information provided, and determine a resolution.

If the basis of an appeal includes test data, the data must come from an independent laboratory using the test methodology specified in the final Criteria Document.

An independent laboratory is a laboratory that 1) has been recognized by a laboratory accrediting organization to test and evaluate products to a related product standard, and 2)
is free from commercial, financial, and other pressures that may influence the testing and evaluation process.

During this phase in the Environmental Innovation Program, (i.e., the Criteria Development Phase), Green Seal seeks input on substantive issues regarding the Criteria Document, including:

- the validity of claims,
- the validity of the data collection process, in this case the performance test methodology detailed in Section 4.0, and
- any substantive inputs on the assumptions and analysis regarding the health or environmental impacts of the product type, and associated impact reductions.

Green Seal requires data and test results to validate any performance claim within any of its standards and has internal protocol for ensuring validity, impartiality, and reliability of the test data received. Data is collected, reviewed, and validated during the Certification Evaluation Phase, which begins once a Final Criteria Document is published. Green Seal has reviewed the relevant commentary and supporting test data submitted by the commenter from the perspective of the appropriateness of the proposed test methodology, test processes, and controls. The commenter tested along a similar metric as the applicant (i.e., debris removal vs. surface clearing). Individual manufacturers independently develop both methods and have no third-party referenced standards (e.g., ISO, ASTM, etc.) to dictate process; both commenter and applicant used a similar process to conduct their tests along related metrics pertinent to the functional use of the product.

Through this assessment, Green Seal has not identified arguments from the commenter that call into question the validity of the test methodology, processes or controls established within the applicant Criteria Document.

In addition, Green Seal received no substantive feedback that conclusions from test results and establishment of statistical significance should rely upon referenced standards other than those cited in the applicant Criteria Document (i.e., ASTM Standards 2586, E456-13a, and E178). Therefore, no substantive changes have been made to the Final Criteria Document as a result of this feedback.

Improved Functional Performance is one aspect of the applicant’s set of requirements necessary to earn a Certification of Environmental Innovation. The product must demonstrate conformance with all of the following attributes, in addition to meeting all Environmental and Human Health Requirements cited in Section 5.0:

- The polyethylene terephthalate (PET) is made from at least 90% post-consumer recycled content by weight.
- The product performs at least 30% better at surface clearing then competing products on the market.
- Both sides of the product are usable, maximizing the surface clearing capability per square inch of product.
2. INDEPENDENT TESTING

Commenters stated concern regarding the allowance for in-house testing of products.

Comment excerpts:

“For the record, Americo has already taken the liberty of having our TrapEze disposable dust cloth material tested by a highly reputable and independent 3rd party lab and included 3M’s Easy Trap material for comparison in dust pickup and surface cleaning. [...] While our test results are provided by an outside independent lab, it is noteworthy that on page 6 of the Green Seal Draft Criteria that it states…..” all testing was completed on the 3M laboratory floor”, which could easily be biased toward their own product. [...]”

[...] We strongly believe that a GS-20 certification of 3M’s Easy Trap products would be false and misleading to the marketplace. It would also threaten the integrity of all other GS-20 certifications and would diminish the value of such a certifications in our industry.”

RESPONSE:

Green Seal validates performance claims for all certifications with in-house or independent performance testing to ensure the standard’s requirements are met and does not require that tests be conducted in an independent laboratory.

During the most recent revision process to the Environmental Innovation Standard (GS-20), Green Seal undertook a significant effort to determine whether requiring independent testing was appropriate. Green Seal conducted outreach with independent laboratories and discussed the potential option of third-party independent testing with companies of various sizes making Improved Function claims.

Green Seal determined that requiring independent testing is not an effective approach in the majority of cases for this standard and that, for our analyses, in-house product testing is an acceptable method of data collection.

Green Seal considers the Improved Function option in the Environmental Innovation Standard as an opportunity to build greater transparency and wider understanding of performance testing and performance benchmarks for many industries. Green Seal continues to effectively ensure validity of claims by requiring a detailed level of disclosure of the nuances of a test's design, methods, and resulting data.