Corrections and Clarifications Report

April 2021

The following Green Seal Standards underwent non-substantive changes on the publication date of this report: April 30, 2021.

- GS-1, Edition 6.3, Sanitary Paper Products
- GS-8, Edition 5.5, Household Cleaning Products
- GS-11, Edition 3.2, Paints, Coatings, Stains, and Sealers
- GS-37, Edition 2.1, Cleaning Products for Industrial and Institutional Use
- GS-41, Edition 2.3, Hand Cleaners and Hand Sanitizers for Industrial and Institutional Use
- GS-42, Edition 2.3, Commercial and Institutional Cleaning Services
- GS-44, Edition 4.2, Soaps, Cleansers, and Shower Products
- GS-50, Edition 1.2, Personal Care Products and Cosmetics
- GS-53, Edition 2.6, Specialty Cleaners for Industrial and Institutional Use

Additional Non-Substantive Changes:

Updates to Trademark Use Requirements – Across All Standards

- **April CCR Addendum:** Updates to Trademark Use Requirements

Introduction
Corrections and Clarifications Reports (CCRs) are Green Seal's public record of all non-substantive changes made to Green Seal standards. CCRs are not proposed for public comment due to their low impact on the standards. Substantive changes, which may raise or lower the bar of health and environmental leadership, are still required to undergo Green Seal's rigorous stakeholder engagement process, which includes a 30-day public comment period.

Edition Numbers of Standards
Although the text of a standard is clarified or corrected, the edition number remains the same.

Release Schedule of CCRs
Reports are released on a quarterly basis and can be accessed on Green Seal's website.[1]

Our Stakeholder-Based Process
Although non-substantive changes are not published for public comment, Green Seal remains open to all input from our stakeholders on all issues regarding the standards. We encourage any interested party or individual to submit comments on Green Seal standards via Green Seal's website, email, or phone.

Clarifications
Green Seal periodically notes issues with the text of a standard. In certain cases, a requirement is worded in a way that leads to misinterpretations. In these cases, Green Seal improves the text of the standard via clarifications to ensure clear and consistent interpretations.

Corrections
Green Seal standards undergo scheduled quality reviews during which errors may be noted. Examples of errors include typos, grammatical errors, misplaced text, omissions in information, and inconsistencies within a standard.

Information about the Red-lined Text within CCRs
CCRs use formatting that is consistent with Green Seal's Standard Revision Proposals to depict the differences between the previous edition of a standard and the current edition.

- Text Boxes are used to highlight the excerpts of standard content.
- Red font is used to show that text has been added to a standard.
- Text with ~~strikethrough lines~~ show that text has deleted from a standard.

[1]Green Seal Standards Documents Library, www.greenseal.org/green-seal-standards/library#section26

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Standard for Sanitary Paper Products, GS-1

1. Deletion of Reporting Requirements

During development of the GS-1 standard, several manufacturing reporting criteria were included in the standard with the intent of collecting information that would inform future standard development. These criteria are reporting-only requirements and do not have achievement thresholds. Green Seal will use other ways to gather this information outside of the certification process to inform future development and provide a more agile certification process in which only necessary information is gathered. As a result, these criteria have been deleted from the standard.

~~**4.2 Manufacturing and Converting Reporting Requirements.** The following information shall be collected for processes including pulping, re-pulping, deinking, papermaking, product converting, and waste treatment (on-site or off-site facilities), on an annual basis, and reported to Green Seal during the initial evaluation and or when any changes are made to the processes.~~

~~If a manufacturer only does converting, then the supplier of the *parent rolls* will be required to provide additional relevant data. The facility shall also provide their total annual production of paper[1] data as tons[2].~~

~~**4.2.1 Air Monitoring.** Air monitoring data shall be reported as required by the facility's air permit. The data shall be reported at the frequency and units specified in the permit and the associated permit limits for monitored parameters shall be provided.~~

~~**4.2.2 Wastewater Monitoring.** *Wastewater* monitoring data shall be reported as required by the facility's *wastewater* permit. The data shall be reported at the frequency and units specified in the permit and the associated permit limits for monitored parameters shall be provided.~~

~~**4.2.3 Solid Waste.** *Solid waste* shall be reported as the tons of material entering an external *solid waste* disposal stream as an annual total. *Solid waste* such as waste packaging materials that cannot be recycled, shall be reported as tons based on the as-disposed weight. *Solid waste* such as *wastewater* solids shall be reported as dry tons (i.e., wet tons multiplied by the fractional solids content).~~

[1] Total production represents the gross production of paper from the machines, and not sales of paper.
[2] 1 ton = 0.907 metric tonnes

Standard for Cleaning Products for Household Use, GS-8

1. Performance Requirements, Test Method, Correction

The organization that developed the glass cleaner testing protocol "DCC 09" was previously named the Consumer Specialty Products Association (CSPA) and has been renamed the Household and Commercial Products Association (HCPA). The out of date reference has therefore been deleted from this standard, and the updated name added.

2.1 Standard Performance Requirements

Glass cleaners. The *glass cleaner* product shall achieve at least a rating of three in each of the following ~~Consumer Specialty Products Association (CSPA)~~ HCPA method DCC 09 categories: soil removal, smearing, and streaking.

Standard for Paints, Coatings, Stains and Sealers, GS-11

1. VOC Limits, Product Categories, Clarification

In the 2015 revision to GS-11, Green Seal provided VOC limits as an exemption for categories of products that were determined to be outside the scope of CARB Suggested Control Measure for Architectural Coatings (2007). The intent of the revision at that time was to not make the definition of leadership in that product category more stringent than what was defined for that product. The language in the criteria has been clarified to reflect that it is the standard's intent that product categories align with CARB Suggested Control Measure for Architectural Coatings (2007) when possible. Additionally, the specific reference to CARB Suggested Control Measure for Architectural Coatings (2007) was added for clarity.

3.4 Volatile Organic Compounds (VOCs). The VOC content of the product shall not exceed the current content limits for its product category as set by CARB Suggested Control Measure for Architectural Coatings (2007),[18] unless specified otherwise in this standard.

- *Floor paints* shall meet the VOC limits established by CARB for floor coatings.
- *Anti-corrosive coatings* shall meet the VOC limits established by CARB for rust preventative coatings.
- *Intumescent coatings* shall meet the VOC limits established by CARB for *fire resistive coatings.*
- *Sealers* and *waterproofing sealers* labeled for use on wood or metal substrates shall meet the VOC limits established by CARB for wood coatings.

Exception: For the following product types, the VOC limits listed in the table below will be used instead of the applicable CARB limits:

Product Type	***VOC* level (g/L)**
Reflective Wall Coating	50
Reflective Roof Coating	100
Varnishes	350
Conjugated Oil Varnish	450
Lacquer	550
Clear *Brushing Lacquer*	680

Exception: For *low-solids coatings*, the CARB VOC limit for *low-solids coatings* shall apply, instead of the VOC limit that would otherwise apply for the product category (as mandated by CARB).

Exception: Products labeled as *industrial maintenance coatings* shall meet the VOC limits for their relevant product category.

Exception: Products sold in containers equal to or smaller than 1 liter are not exempted from the VOC content limit for their product category (even though exempted by CARB).

For other product categories not regulated by CARB, the VOC level shall not exceed a limit set by CARB for a similar product category.

Standard for Environmental Innovation, GS-20

1. Certification Term, Site Visit, Correction

Two criteria in GS-20 – Certification Term and Site Visit - are specified in other documents such as the Application for Certification, and the Manufacturing Audit Checklist – available on Green Seal's website. Both criteria are administrative requirements related to the management of the standard. International best practices for standard development specify administrative requirements should not be "integrated with technical and/or performance requirements."[1]

Originally, GS-20 was created with the intention of serving as a program-focused document; however, it is intended to be used in the same way as other Green Seal standards. To maintain consistency with other standards, and to follow best practices for standard development, these two criteria are being deleted from the standard language.

~~**7.1 Certification Term.** The initial Certification Term shall be 4 years. After the Certification Term, the applicant has the option to undergo Recertification.~~

~~**7.2 Site Visit.** The applicant shall undergo a site audit of product manufacturing facilities that includes verifying product characteristics and quality manufacturing processes.~~

2. Annex A, Definitions, Correction

The definition for Skin Sensitizer was out of date for GS-20 in that it did not reference the regulatory body Green Seal uses to define skin sensitizers. The reference has been added for consistency with the definition for this term in other standards. Additionally, the standard was missing the definition for Source-Reduced Package. That definition has been added.

ANNEX A (Glossary of Terms)

Skin Sensitizer. A substance that will lead to an allergic response following skin contact. Identified under Category 1 for skin sensitization (H317) under the GHS.

Source-Reduced Package. A *primary package* that has at least 20% less material (by weight) compared to containers commonly used for that product type.

[1] ISEAL Standard Setting Code. https://www.isealalliance.org/get-involved/resources/iseal-standard-setting-code-good-practice-version-60

Standard for Cleaning Products for I&I Use, GS-37

1. Performance Requirements, Test Method, Clarification

The organization that developed the glass cleaner testing protocol "DCC 09" was previously named the Consumer Specialty Products Association (CSPA) and has been renamed the Household and Commercial Products Association (HCPA). The out of date reference has therefore been deleted from this standard, and the updated name added.

2.1 Product Performance

2.1.4 Glass Cleaners. *Glass cleaners* shall achieve at least a rating of three in each of the following ~~Consumer Specialty Products Association (CSPA)~~ HCPA method DCC 09 categories: soil removal, smearing, and streaking.

Standard for Hand Cleaners and Hand Sanitizers, GS-41

1. Performance Testing, In Vitro Testing, Clarification

The current monograph for over the counter hand sanitizers does not include any specific requirements for final formulation product testing, and will not until such time that the FDA has determined one of the three active ingredients currently allowed in hand sanitizers to be determined as Generally Recognized as Safe and Effective (GRAS/GRASE). [1] It is Green Seal's intent to require performance testing that is in line with what is accepted by industry when there is a lack of regulatory requirements. ASTM E2783 and ASTM E2315 are considered by industry to be standard tests to measure hand sanitizer performance. These two tests measure the number of bacterial organisms killed during a specific sampling time, as opposed to Minimum Inhibitory Concentration / Minimum Bactericidal Concentration (MIC/MBC) tests, which measure the concentration of a product needed to inhibit bacterial growth. ASTM E2783 and ASTM E2315 are incorrectly labeled as MIC/MBC tests. As a result, the sentence referencing MIC/MBC requirements has been deleted.

2. Performance Testing, CGMPs, Clarification

The requirement that hand sanitizer testing be carried out in accordance with Current Good Manufacturing Practices was intended to demonstrate alignment with FDA requirements. However, the requirements of Current Good Manufacturing Practices are intended to ensure manufacturers have quality control processes to ensure every batch of product is pure and will perform as expected based on the initial efficacy test. It is outside Green Seal's scope to require verification of every product batch, and it is the intent of the performance requirements section to confirm a one-time test of final formulation effectiveness. Green Seal confirms quality control of manufacturing process during the audit phase of certification. The sentence requiring one-time performance testing to be carried out in compliance with current good manufacturing practices has been deleted.

2.2 Hand Sanitizers.

In Vitro Testing. *Hand Sanitizers* ~~The product~~ shall demonstrate at least a 3-log reduction (99.9 percent) of ~~a~~ the test organism within 30 seconds~~, as determined by a Minimum Inhibitory Concentration / Minimum Bactericidal Concentration (MIC/MBC) test.~~ Acceptable methods for in vitro testing include ASTM E2783 and ASTM E2315.

A test organism shall be representative of microorganisms that commonly exist in consumer or healthcare settings.

~~Testing must be carried out in compliance with Current Good Manufacturing Practice for Finished Pharmaceuticals (CRF Title 21, Chapter 1, Subchapter C, Part 211).~~

[1] Safety and Effectiveness of Consumer Antiseptic Rubs; Topical Antimicrobial Drug Products for Over-the-Counter Human Use. https://www.federalregister.gov/documents/2019/04/12/2019-06791/safety-and-effectiveness-of-consumer-antiseptic-rubs-topical-antimicrobial-drug-products-for

Standard for Commercial and Institutional Cleaning Services, GS-42

1. Cleaning Techniques, Disinfection, Correction

Current GS-42 requirements regarding use of disinfectant are addressed in Section 2.0 Operations, 2.3 Cleaning Techniques/2.3.1 Disinfection.

The requirements previously restricted the use of disinfection "where required as described in Section 2.2.3 (Restrooms)," presenting an issue of practicality for GS-42 certified services.

In light of the serious impacts COVID-19 has had on public health and cleaning practices, and the possibility of services being required by new policies to apply disinfectants in areas beyond bathrooms in order to reduce pathogen transmission risk, Green Seal has removed the restriction sentence "*Use disinfectants only where required as described in Section 2.2.3*." listed in 2.3.1.1.

2.3 Cleaning Techniques.

2.3.1 Disinfection. The *cleaning service* shall:

2.3.1.1 Disinfect areas or surfaces where pathogens can collect. ~~Use disinfectants only where required as described in Section 2.2.3.~~

2.3.1.2 Disinfect using only disinfectants registered or devices regulated by the U.S. Environmental Protection Agency (EPA).

2.3.1.3 Follow product label directions for preparing disinfection solutions (e.g., dilution rate), and for the appropriate method for disinfecting and cleaning the area.

Standard for Soaps, Cleansers, and Shower Products, GS-44

1. Performance Testing, In Vitro Testing, Clarification

The current monograph for over the counter hand sanitizers does not include any specific requirements for final formulation product testing, and will not until such time that the FDA has determined one of the three active ingredients currently allowed in hand sanitizers to be determined as Generally Recognized as Safe and Effective (GRAS/GRASE). [1] It is Green Seal's intent to require performance testing that is in line with what is accepted by industry when there is a lack of regulatory requirements. ASTM E2783 and ASTM E2315 are considered by industry to be standard tests to measure hand sanitizer performance. These two tests measure the number of bacterial organisms killed during a specific sampling time, as opposed to Minimum Inhibitory Concentration / Minimum Bactericidal Concentration (MIC/MBC) tests, which measure the concentration of a product needed to inhibit bacterial growth. ASTM E2783 and ASTM E2315 are incorrectly labeled as MIC/MBC tests. As a result, the sentence referencing MIC/MBC requirements has been deleted.

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A test organism shall be representative of microorganisms that commonly exist in consumer or healthcare settings.

~~Testing must be carried out in compliance with Current Good Manufacturing Practice for Finished Pharmaceuticals (CRF Title 21, Chapter 1, Subchapter C, Part 211).~~

[1] Safety and Effectiveness of Consumer Antiseptic Rubs; Topical Antimicrobial Drug Products for Over-the-Counter Human Use. https://www.federalregister.gov/documents/2019/04/12/2019-06791/safety-and-effectiveness-of-consumer-antiseptic-rubs-topical-antimicrobial-drug-products-for

Standard for Personal Care Products and Cosmetics, GS-50

1. Manufacturing Sustainability Requirements, Reporting Requirements, Correction

During development of the GS-50 standard, criteria for Energy, Water, Air, Waste, and Distribution reporting were included in the standard with the intent of collecting information that would inform future standard development. These criteria are reporting-only requirements and do no have achievement thresholds Green Seal will use other ways to gather this information outside of the certification process to inform future development, and provide a more agile certification process in which only necessary information is gathered. As a result, these criteria have been deleted from the standard.

~~4.2 Energy, Water, Air, and Waste.~~ ~~The following information shall be reported for the manufacturing processes included in the converting of the raw materials into the finished product (excluding the production of raw materials and package – it is a gate-to-gate report) on an annual basis or when any changes are made to the processes, with alternate reporting units acceptable upon approval by the certifying body:~~

~~**Report**~~	~~**Units**~~
~~Energy~~	~~millions of British thermal unit (BTU)/ton of product~~
~~Water~~	~~gallons/ton of product~~
~~Air Emissions~~	~~regulated air pollutant tons/ton of product~~
~~Waste Water~~	~~gallons/ton of product~~
~~Solid Waste~~	~~dry ton/ton of product~~

~~4.3 Distribution.~~ ~~To the extent feasible, the distance and mode of transportation of raw materials (including packaging) and finished products shall be documented.~~

Standard for Specialty Cleaning Products, I&I Use, GS-53

1. Concentrates and Dosing, Disinfectants and Sanitizers, Correction

For products sold in the U.S., disinfectants and sanitizers are regulated as antimicrobial pesticide products under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)[1]. The GS-53 Standard explicitly sets certification requirements for these products, as defined in the Standard Scope (Section 1.0): "This standard establishes environmental, health, and social requirements for specialty cleaning products intended for industrial and institutional use. For the purposes of this standard, this includes, but is not limited to…*antimicrobial pesticide products* (e.g., products covered by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA))."

Prior to April 30, 2021, disinfectants and sanitizers were implicitly required to be concentrated at no less than a 1:16 dilution, or a 6.25% concentration. Based on a review of the existing market, Green Seal has noted that this requirement is not feasible for this product category. Most disinfectants are hazardous when concentrated, and no longer effective as an antimicrobial product if diluted to lower than 1:16. For example, citric acid is used as an active ingredient in disinfectants on the market at a concentration of 8-15% in a "ready-to-use" (RTU) product. However, a product that would need to be sold as concentrated, i.e. 100% citric acid, that would then be diluted, would be hazardous. Additionally, if diluted to 6.25%, it is likely the citric acid would no longer be effective. To ensure that Green Seal sets feasible requirements for these products so they can be both functionally effective and not hazardous to product users, Green Seal has corrected this issue by adding the product category "antimicrobial pesticide products" to the list of products that are eligible to be certified when sold as "ready-to-use" (RTU) products.

3.23 Concentrates and Dosing. The following products may be sold in a ready-to-use form:

- *Adhesive remover products*
- *Antimicrobial pesticide products*
- *Boat wax, polish, sealant or glaze products*
- *Chewing gum remover products*
- Crème/cream cleansers
- Dishwasher cleaning products
- *Electronic cleaning products*
- *Furniture polish products*
- *Graffiti remover products*
- *Leather cleaning products*
- *Metal cleaning products*
- *Motor vehicle dressing products*
- *Motor vehicle wax, polish, sealant, or glaze products for hand detailing*
- *Optical lens cleaning products*
- *Oven cleaning products*
- *Printing press cleaning products*
- *Pressurized gas duster products*
- *Rust stain remover products*
- *Upholstery cleaning products solely labeled as spot or stain removers*
- *Waterless motor vehicle cleaning products*

[1] Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and Federal Facilities. https://www.epa.gov/enforcement/federal-insecticide-fungicide-and-rodenticide-act-fifra-and-federal-facilities

All Standards – Changes to Trademark Use Requirements

All Green Seal Standards have undergone changes to Trademark Use Requirements.

1. See Supplementary Document: April 2021 CCR Addendum

Justifications and red-lines of the changes are detailed in the April 2021 CCR Addendum.

As noted in the Addendum:

Update to All Standards for Alignment with New Compliance Approach
Green Seal has updated a major program policy document, the Trademark Use Guidelines. This document sets requirements for using Green Seal's trademarks including the Green Seal name and, for eligible companies, the use of Green Seal Certification Mark. This program policy update is intended to ensure that Green Seal is encouraging businesses to promote their Green Seal certification while setting clear requirements that protect the credibility of this program and the value of the certification for all license holders. For more details about the update to Green Seal's Trademark Use Guidelines, visit Green Seal's website.

Non-Substantive Changes to All Green Seal Standards
The update to Green Seal's Trademark Use Guidelines resulted in changes across all Green Seal standards, which went into effect on April 30, 2021. These changes are non-substantive, i.e., companies with certified products and services are not required to make changes or submit new or updated documentation in order remain in compliance. The changes to the standards are intended to align with the updated Trademark Use Guidelines and to define a more flexible and less burdensome compliance process.