



# **Corrections and Clarifications Report**

## **October 2021**

The following Green Seal standards underwent non-substantive changes on October 29, 2021.

- GS-8, Edition 5.5, Cleaning Products for Household Use
- GS-37, Edition 7.6, Cleaning Products for Industrial and Institutional Use
- GS-44, Edition 4.2, Soaps, Cleansers, Hand Sanitizers, and Shower Products for Household Use
- GS-48, Edition 1.5, Laundry Care Products for Household Use
- GS-50, Edition 1.2, Personal Care Products and Cosmetics
- GS-52, Edition 2.5, Specialty Cleaning Products for Household Use

## Introduction

Corrections and Clarifications Reports (CCRs) are Green Seal's public record of all non-substantive changes made to Green Seal standards. CCRs do not undergo a public comment process 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, including a 30-day public comment period.

## Publication Schedule of CCRs

Corrections and Clarifications Reports are released on a quarterly basis on the last Friday of the month. These reports are available on Green Seal's website.<sup>1</sup>

## Edition Numbers of Standards

Although the text of a standard is clarified or corrected, the edition number of a standard (e.g., GS-8 Standard, Edition 5.5) remains the same after a Corrections and Clarifications Report.

## Our Stakeholder-Based Process

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

## Clarifications

Green Seal periodically identifies problems with the text of a standard. In certain cases, a requirement may be worded in a way that leads to misinterpretations. In these cases, Green Seal clarifies the text of the standard via text deletions or text additions. The intent and reasoning behind clarifications is summarized in Corrections and Clarifications Reports.

## 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. The background of the error and the explanation for the correction is summarized in Corrections and Clarifications Reports.

## 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.

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<sup>1</sup> Green Seal Standards Documents Library, <http://www.greenseal.org/green-seal-standards/library#section27>

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## Standard for Cleaning Products, Household Use, GS-8

### 1. Water Temperature, Dilution Instructions, Clarification

The previous text of the criterion was overly prescriptive and put certain types of environmentally leading products at a disadvantage: those that are concentrated. The text of this criterion has been clarified to better reflect Green Seal’s intent – to prevent the instructions on product labels from mentioning hot or warm water as being necessary or beneficial for dilution. The updated criterion below maintains the original intent and provides a more appropriate and flexible approach.

#### Updates to the Criterion Text

**5.2 Dilution Instructions.** Where the product is intended to be diluted with water by the consumer prior to use, the label shall ~~not instruct users to dilute with hot or warm water. state clearly and prominently that dilution with water from the cold tap is recommended and shall state the~~ **The label shall include the** recommended level of dilution in commonly understood measurements. Carpet cleaner labels ~~may instruct users to use hot or warm water if dilution in cold water results in~~ **shall specify the use of cold water for products that do not suffer** significant performance degradation ~~in cold water.~~

#### Updated Placement of Carpet Cleaner Label Exemption

**5.2 Dilution Instructions.** Where the product is intended to be diluted with water prior to use, the label shall not instruct users to dilute with hot or warm water. **Carpet cleaner labels may instruct users to use hot or warm water if dilution in cold water results in significant performance degradation.** The label shall include the recommended level of dilution in commonly understood measurements.

#### Final New Text

**5.2 Dilution Instructions.** Where the product is intended to be diluted with water prior to use, the label shall not instruct users to dilute with hot or warm water. Carpet cleaner labels may instruct users to use hot or warm water if dilution in cold water results in significant performance degradation. The label shall include the recommended level of dilution in commonly understood measurements.

## Standard for Cleaning Products, Industrial and Institutional Use, GS-37

### 1. General-Purpose Cleaners, Product Performance, Correction

An editorial typo in a footnote reference to the ASTM D4488 test for general-purpose cleaners has been corrected.

#### Updates to the Footnote Text

<sup>3</sup> ASTM D4488 has been withdrawn, however, it is still the best available method for this performance testing, it is available for purchase, and it is regularly used by laboratories to test performance.

#### Final Text

<sup>3</sup> ASTM D4488 has been withdrawn, however, it is still the best available method for this performance testing, it is available for purchase, and it is regularly used by laboratories to test performance.

## Standard for Soaps, Cleansers, Hand Sanitizers, and Shower Products, GS-44

### 1. Ingredient Listing, Ingredient Line, Correction

The foreword of each Green Seal standard states that products must comply with the relevant laws and regulations of its product type and geographical region:

“This standard neither modifies nor supersedes laws and regulations. Any conformity assessment to this standard requires compliance with all applicable laws and regulations for the manufacturing and marketing of the products.”

Due to the presence of this language in the foreword, the sentence in the Ingredient Line criterion, “The product shall also follow any additional labeling regulations that apply to the product,” is redundant. This sentence has therefore been deleted for clarity.

Additionally, a sentence has been added to clarify that Green Seal will accept any order of listing ingredients if those ingredients exist in the product at less than 1 percent. With the addition of this sentence, this criterion is now consistently worded with the Ingredient Line criteria of most other Green Seal standards and is also generally consistent with the current labeling conventions for personal care and cosmetic products sold in the US.

#### Updates to the Criterion Text

**5.2 Ingredient Line.** The product shall list the product *components* using the naming convention of the International Nomenclature of Cosmetic Ingredients in order of predominance. **Ingredients in concentrations of less than 1% may be listed in any order after those in concentrations of more than 1%.** The general term ‘*fragrance*’ may be used for *fragrance components*. ~~The product shall also follow any additional labeling regulations that apply to that product.~~

#### Final Text

**5.2 Ingredient Line.** The product shall list the product *components* using the naming convention of the International Nomenclature of Cosmetic Ingredients in order of predominance. **Ingredients in concentrations of less than 1% may be listed in any order after those in concentrations of more than 1%.** The general term ‘*fragrance*’ may be used for *fragrance components*.

## Standard for Laundry Care Products, Household Use, GS-48

### 1. Water Temperature, Dilution Instructions, Clarification

The previous text of the criterion was overly prescriptive and put certain types of environmentally leading products at a disadvantage: those that are concentrated. The text of this criterion has been clarified to better reflect Green Seal's intent – to prevent the instructions from mentioning hot or warm water as being necessary or beneficial for dilution. The updated criterion maintains the original intent via a more appropriate and flexible approach.

#### Updates to the Criterion Text

**6.1.1 Dilution for Concentrates.** For *concentrates*, the manufacturer's label shall **not instruct users to dilute with hot or warm water** ~~state clearly and prominently that dilution with water from the unheated tap is recommended~~ unless tested otherwise to meet the performance requirements in Section 2.0 herein, and shall state the recommended level of dilution (e.g., for products that use manual dilution or dosage, state amount of product in common and measurable terms such as milliliters, ounces, teaspoons, pumps, or capfuls).

#### Final Text

**6.1.1 Dilution for Concentrates.** For *concentrates*, the manufacturer's label shall not instruct users to dilute with hot or warm water unless tested otherwise to meet the performance requirements in Section 2.0 herein, and shall state the recommended level of dilution (e.g., for products that use manual dilution or dosage, state amount of product in common and measurable terms such as milliliters, ounces, teaspoons, pumps, or capfuls).

## Standard for Personal Care and Cosmetics Products, GS-50

### 1. Fragrance Components, Ingredient Line, Correction

During the development of the GS-50 Standard, the Ingredient Line criterion was unintentionally set to be more difficult than those product label requirements set by the Food and Drug Administration (FDA)<sup>1</sup> and the EU Ecolabel<sup>2</sup> for rinse-off cosmetic products.

The requirement for listing all fragrance components is not currently feasible for manufacturers and is not in line with the requirements of other Green Seal standards. The language in the criterion has been corrected to align with other standards and remove this infeasible requirement.

#### Updates to the Criterion Text

**6.1 Ingredient Line.** The product label on each *package* shall list the product ingredients using the naming convention of the International Nomenclature of Cosmetic Ingredients (INCI) in order of predominance. Ingredients in concentrations of less than 1% may be listed in any order after those in concentrations of more than 1%. The general term ‘fragrance’ may be used for *fragrance components*. ~~however a list of *fragrance components* shall be made available to users in an easily accessible means, such as the company website or through customer service.~~

#### Final Text

**6.1 Ingredient Line.** The product label on each *package* shall list the product ingredients using the naming convention of the International Nomenclature of Cosmetic Ingredients (INCI) in order of predominance. Ingredients in concentrations of less than 1% may be listed in any order after those in concentrations of more than 1%. The general term ‘fragrance’ may be used for *fragrance components*.

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<sup>1</sup>Code of Federal Regulations Title 21, Volume 7, Chapter 1 Food and Drug Administration Department of Health and Human Services, Subchapter G – Cosmetics,

<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=701.3>

<sup>2</sup> Commission Decision of 9 December 2014 establishing the ecological criteria for the award of the EU Ecolabel for rinse-off cosmetic products, <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=701.3>



## Standard for Specialty Cleaning Products, Household Use, GS-52

### 1. Water Temperature, Dilution Instructions, Clarification

The previous text of the criterion was overly prescriptive and put certain types of environmentally leading products at a disadvantage: those that are concentrated. The text of this criterion has been clarified to better reflect Green Seal’s intent – to prevent the instructions from mentioning hot or warm water as being necessary or beneficial for dilution. The updated criterion maintains the original intent via a more appropriate and flexible approach.

#### Updates to the Criterion Text

**6.1 Label Dilution or Dosage Directions for Concentrates.** For *concentrates*, the label shall ~~not instruct users to dilute with hot or warm water state clearly and prominently that dilution with water from the unheated tap is recommended,~~ unless tested otherwise to meet the performance requirements in Section 2 herein (e.g., *upholstery cleaning products* and *dish cleaning products*), and shall state the recommended level of dilution or dosage (e.g., for products that use manual dilution or dosage, state amount of product in common and measurable terms such as milliliters, teaspoons, or capfuls).

#### Final Text

**6.1 Label Dilution or Dosage Directions for Concentrates.** For *concentrates*, the label shall not instruct users to dilute with hot or warm water unless tested otherwise to meet the performance requirements in Section 2 herein (e.g., *upholstery cleaning products* and *dish cleaning products*), and shall state the recommended level of dilution or dosage (e.g., for products that use manual dilution or dosage, state amount of product in common and measurable terms such as milliliters, teaspoons, or capfuls).