



# **GS-20 Program Response to Comments**

## **Draft Criteria Document for 3M Easy Trap Sweep and Dust Sheets**

July 23, 2021

### **Overview**

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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 Revised Proposed Criteria Document for 3M Easy Trap Sweep and Dust Sheets was published for a second public comment from May 17 to June 18, 2020. We appreciate those who participated in this process and provided valuable input, which resulted in 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

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

### 1. Functional Performance Criteria

Commenter stated that any performance testing requirements designed to measure the performance characteristics of the applicant product over competitive products would need to include their market leading product, which has shown, via independent testing, to perform significantly better than the applicant product.

**Green Seal Response:** In this document, Green Seal has acknowledged the comments, provided clarification on the criteria in the Environmental Innovation Standard (GS-20), and documented the clarification of the applicant's criteria document, as it relates to functional performance.

### 2. Environmental Innovation Criteria

Commenters stated concern that the applicant product does not demonstrate environmental improvements across the product lifecycle and claims the applicant's product underperforms compared to their market leading product, and therefore cannot be more protective of the environment.

**Green Seal Response:** Green Seal acknowledges this comment. We have provided clarification on the criteria in the Environmental Innovation Standard (GS-20) and specific applicant criteria as it relates to quantified environmental impact reduction. Green Seal has also updated the Criteria Document as it relates to the impact reduction claims.

## 1. COMMENTS ON FUNCTIONAL PERFORMANCE CRITERIA

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### Comment Summary:

Commenter stated that any performance testing requirements designed to measure the performance characteristics of the applicant product over competitive products would need to include their market leading product, which has shown, via independent testing, to perform significantly better than the applicant product.

### Comment Excerpts:

*“Americo Manufacturing Company’s TrapEze® Dusting Sheets are the leading competitive dusting cloth in the marketplace today, in comparison to 3M’s Easy Trap product line. As such, any comparative test results under this application would need to include TrapEze® in the sampling data or the results would be incomplete and inconclusive. (NOTE: An omission of TrapEze® in any test sampling protocol which was designed to measure the performance characteristics of Easy Trap over competitive products would suggest an intentional act by the Applicant to avoid the nullification by Green Seal of the above-reference application, such denial due specifically to the Applicant’s failure to satisfactorily support equivalent or superior performance claims of their Easy Trap dusting sheets over competitive dusting sheets.)”*

*“Americo’s TrapEze® Dusting Sheets and 3M’s Easy Trap Dusting Sheets were tested by an independent lab to determine the effectiveness in dirt saturation of each product.<sup>4</sup> Those comparative test results reflected a “notable performance gap between the 3M and Americo dusting cloths.” Americo’s TrapEze® Dusting Sheets averaged 73% more material pickup by weight over the 3M product; this was not an incidental or incremental difference, nor was it a possible rounding error. Rather, these test results were conclusive in the profound distinction between the effectiveness of Americo’s TrapEze® Dusting Sheets compared specifically to 3M’s Easy Trap Dusting sheets. The superior performance of TrapEze® over Easy Trap validates just one of several reasons why Americo currently enjoys a distinct competitive advantage over 3M in the dusting cloth marketplace.”*

### RESPONSE:

Green Seal appreciates the commenter’s participation in this public comment process and providing Green Seal the opportunity to clarify intentions of the performance requirements in the Environmental Innovation Standard (GS-20).

The GS-20 standard states:

**Section 4.0 Evaluation of Functional Performance and Fitness for Purpose:** Applicant shall demonstrate that the product functions as well as or better than at least one nationally recognized or market-leading benchmark product of its type. The benchmark product shall be approved by Green Seal.

The applicant’s criteria document states:

**Section 4.0 Evaluation of Functional Performance and Fitness for Purpose:** This section details the requirements to demonstrate that the applicant product functionally performs as well as or better at surface clearing than at least one nationally recognized or market-leading product of its type, to be approved by Green Seal, including test methods and test reports submitted during the Certification Phase.

The intent behind this requirement is to ensure that the product functions sufficiently for the designed and advertised purpose; the product is not required to out-perform the existing competition. We reference relevant industry standards, American National Standards, ASTM standards, ISO standards, or other equivalent publicly available protocols, if available, and also allow for comparison testing as an option for demonstrating effective functional performance. This is generally consistent across Green Seal Standards.

All currently certified Environmental Innovation Participants have been certified using this approach, unless they were certified under the previous edition of the GS-20 Standard, which included the Improved Functional Performance conformance pathway.

The GS-20 Standard defines comparable alternatives in Section 1.0 of the applicant’s Criteria Document. This Criteria Document specifies alternatives as single-use cotton and plastic-based cloths and reusable cotton and microfiber cloths that require laundering after use, such as those that attach to flat floor tools. This group of comparable alternatives has several nationally recognized competing products. The applicant product can be tested against any comparable alternative in order to achieve certification.

Green Seal has not identified arguments from the commenter that call into question the validity of the test protocols or controls defined within the applicant Criteria Document. Therefore, no substantive changes have been made to the Final Criteria Document to address the comment.

## **2. CLARIFICATION TO INNOVATION CRITERIA**

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### **Comment Summary:**

Commenters stated concern that the applicant product does not demonstrate environmental improvements across the product lifecycle and state that the applicant’s product underperforms in certain comparison tests, and therefore cannot result in an overall reduced environmental impact.

### **Comment Excerpts:**

*“In discussions with Green Seal about 3M’s previous application process for their Easy Trap dusting sheets, [Green Seal] was very specific that ‘3M’s claims of environmentally beneficial products on the front end of the life cycle were insufficient; 3M would need to prove a benefit at “all stages of the life cycle”’. The fact remains that these dusting cloths are being disposed of in a landfill; 3M’s Easy Trap dusting cloth has no enhanced biodegradation properties and, therefore, no environmental benefit at the end of its lifecycle[...]*

*It would be antithetical for Green Seal to certify any product that categorically underperforms against the preeminent glue-impregnated dusting cloth in the marketplace today. Given that Americo’s TrapEze dusting cloth is the most effective solution in dust pickup in the market today, and given that an independent laboratory has validated the significant superiority of Americo’s TrapEze dusting cloth over 3M’s Easy Trap dusting cloth, the notion that almost twice as many Easy Trap dusting cloths are needed to pick up as much dirt as TrapEze should, in and of itself, nullify any claims by the applicant that their product (Easy Trap) is better for the environment.”*

## **RESPONSE:**

Green Seal appreciates the opportunity to clarify the environmental innovation requirements in the Environmental Innovation Standard (GS-20) and this applicant’s Criteria Document.

Participants in this program are required to demonstrate that their innovative product results in reductions of significant health and environmental impacts, compared to the stated available alternatives.

The GS-20 Standard specifically states:

**3.0 Environmental Innovation Review:** The applicant shall demonstrate that a product is environmentally innovative via the following process: the applicant shall provide evidence demonstrating that a specific new approach to the product results in reductions of significant health or environmental impacts with at least a 30% reduction of one or 20% in each of two or more significant environmental or human health impacts, as identified in Section 2.0, as compared to available alternatives.

No applicant is required to demonstrate reductions across “all stages of the life cycle.”

Green Seal summarized the significant life cycle impacts for this product category in Section 2.0 of the Criteria Document. We identified significant impacts in resource extraction, manufacturing, and waste management/disposal of the product for this product category. Per the requirement in Section 3.0 (above), the applicant must demonstrate a 30% reduction in one of these areas or 20% in each of two or more areas.

The applicant’s criteria are written to certify that their innovation claims, using 90% post-consumer recycled content polyethylene terephthalate (PET), achieve a minimum of a 30% reduction of greenhouse gas emissions associated with the resource extraction, resin production, and manufacturing lifecycle phases associated with this product category which would meet Green Seal’s Environmental Innovation impact reduction requirements. Based on our market analysis, no competing products meet these thresholds. The estimated impact reduction specified in the applicant’s Criteria Document has been updated to reflect the requirements in the GS-20 Standard (Criterion 3.0).

The GS-20 Standard also states:

**3.4 Mitigates Burden Shifting.** As needed, the applicant shall implement mitigation requirements, as determined by Green Seal, to account for burden shifting that results from the innovation.

As is described in section 3.4 of the applicant’s Criteria Document “This single use, petroleum-based product creates two main environmental burdens when compared to reusable alternatives: greenhouse gas emissions within the resource extraction and manufacturing phase, as well as solid waste generation from ongoing disposal. To mitigate these burdens, the applicant must address both product design (to reduce the greenhouse gas impacts embedded within the product) and the environmental impacts of the manufacturing process (to reduce the impacts associated with product manufacturing).”

The required reductions in life cycle impacts from manufacturing (water and energy use, air emissions, and waste), specified in **5.21.4** of the applicant’s Criteria Document, reduce the environmental burdens of a single use, petroleum-based product.

Green Seal has not identified arguments from the commenter that call into question the validity of the criteria to evaluate the applicant’s impact reduction associated with post-consumer recycled content and manufacturing reductions in water and energy use, air emissions, and waste. Therefore, no substantive changes have been made to the Final Criteria Document as a result of this feedback.