american cleaning institute®

April 26, 2021

Brie Welzer
Director, Science & Standards Development
Green Seal

Dear Ms. Welzer,

I write on behalf of the American Cleaning Institute[1] (ACI) to Green Seal, to provide comment on Green Seal's Proposed Revisions to Criteria for Microbial-Based Cleaning Products.

ACI is an industry leader in serving the cleaning products industry, advancing the health and quality of life of people and protecting our planet. We focus on the advancement, promotion, and utilization of science to drive informed dialogue and decision making. We are pleased to have the opportunity to provide comment to the proposed revisions to Green Seal Standards GS-8, GS-37, GS-48, GS-51, GS-52, and GS-53, as relevant.

Green Seal Proposed Revision: Deletion of Prohibition on Spray Packaging.

ACI offers the following response on Green Seal's proposed revision on the *Deletion of Prohibition on Spray Packaging*:

In review of the proposed standard revision of deleting the prohibition of "microorganisms" that are sold in spray packaging, ACI seeks to provide additional input for consideration. Biosafety level 1 (BSL-1) organisms can be diverse, and some may present health hazards through inhalation, including risks to immunocompromised and sensitive populations, as noted in multiple references to the proposal for revision to the Standard presented by Green Seal.

ACI recommends a risk and safety assessment be conducted on spray products before commercialization. Referencing the Panel on Microbial Ecology of the Norwegian Scientific Committee for Food and Environment report provided by Green Seal[2] , there are important considerations when

[1] The American Cleaning Institute® (ACI – www.cleaninginstitute.org) is the Home of the U.S. Cleaning Products Industry® and its members include the manufacturers and formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and chemical distributors.

[2] Current knowledge of the health and environmental risks of microbial-based cleaning products: https://www.vkm.no/english/riskassessments/allpublications/healthandenvironmentalassessmentofmicrobialbasedcleaningproducts.4.1aaadf0516963f003a25dde5.html

determining hazardous properties or risk factors of viable microorganisms and their inclusion in cleaning products. Recommendations may include but are not limited to:

- Identification of species and strains
- Characterization of species and strains
- Pathogenic potential- cytotoxin production profiles, virulence genes
- Resistance profiles (AMR—anti-microbial resistance)
- Application/intended use- exposure assessment of product during use (considering frequency, duration, and dose)

Green Seal Proposed Revision: Deletion of Burdensome and Unnecessary Labeling requirements

ACI offers the following response on Green Seal's proposed revision on the *Deletion of Unnecessary and Burdensome Labeling Requirements*:

ACI proposes that if a product risk assessment is conducted that supports product safety, then reduced labeling requirements may be appropriate for those products. While this reduction in burden on formulators will be appreciated, ACI emphasizes that the consideration of human health effects, in particular sensitive populations (e.g. immunocompromised individuals), are essential as it concerns product application and use. As the organisms employed in microbial based cleaning products will differ between manufacturers, it is important to recognize that certain organisms though normally considered non-pathogenic, may opportunistically infect individuals with compromised immune systems. These items are important to consider for consumer awareness and safety.

ACI thanks you for consideration of our input during this public comment period. We are happy to provide more clarity or input on any additional questions you may have as you revise your standards. Please contact me at aqueen@cleaninginstitute.org or 202.441.0617 if I can be of further assistance.

Best regards,

Ashley Queen, Ph.D.
Director, Microbiology and Public Health