

Corrections and Clarifications Report April 2022

The following Green Seal standards underwent non-substantive changes on April 29, 2022.

- GS-11, Edition 4.0, Paints, Coatings, Stains, and Sealers
- GS-20, Edition 2.1, Environmental Innovation
- GS-52, Edition 2.6, Specialty Cleaning Products for Household Use
- GS-53, Edition 2.7, Specialty Cleaning Products for Industrial and Institutional 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 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 (currently, January, April, July, and October). These reports are available on Green Seal's website.¹

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 text of 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.

¹ Green Seal Standards Documents Library, http://www.greenseal.org/green-seal-standards/library

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

1. Dry Film Products, Scope, Clarification

In 2015, Green Seal combined the standards GS-11 Paints and Coatings, and GS-47 Stains and Finishes into the standard – GS-11 Paints, Coatings, Stains, and Sealers. The original definition of a Coating before the standards were combined included the language "liquid, liquefiable, or mastic composition that is converted to a solid adherent film after application to a substrate…" To clarify the intent of the scope for GS-11 as products that are wet-applied, the product category "dry film products" has been added to the list of excluded products in the GS-11 Appendix 1 – Scope.

Updates to Text

APPENDIX 1 – SCOPE (Informative)

Products excluded from GS-11

- products sold in aerosol cans
- industrial, marine, or automotive coatings
- paint strippers
- bituminous coatings
- concrete curing compounds
- anti-graffiti coatings
- mastic texture coatings
- reactive penetrating sealers (as defined by SCAQMD)
- graphic arts coatings (sign paints)
- recycled latex paint (covered in GS-43)
- floor finish and finish strippers for industrial and institutional use (included in GS-40)
- graffiti remover (included in GS-52 and GS-53)
- dry film products

Final Text

APPENDIX 1 – SCOPE (Informative)

Products excluded from GS-11

- products sold in aerosol cans
- industrial, marine, or automotive coatings
- paint strippers
- bituminous coatings
- concrete curing compounds
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- reactive penetrating sealers (as defined by SCAQMD)
- graphic arts coatings (sign paints)
- recycled latex paint (covered in GS-43)
- floor finish and finish strippers for industrial and institutional use (included in GS-40)
- graffiti remover (included in GS-52 and GS-53)
- dry film products

Standard for Environmental Innovation, GS-20

1. Alternative Performance Testing, Performance, Correction

In 2019 Green Seal revised the GS-20 Standard for Environmental Innovation. During this revision, Green Seal noted that the intent of measuring product performance for a product that claimed improved design – i.e., a "30% reduction of one or 20% in each of two or more significant environmental or human health impacts" was to confirm that an applicant demonstrated a product functioned as marketed. At the time, Green Seal mistakenly did not re-include both of the two options from GS-20 Edition 1.0 for performance testing in which an applicant could demonstrate –

- A product works as well as or better than a nationally recognized or market leading product in its product class; or
- A product meets existing performance standard thresholds using industry accepted test methods.

The omission has been corrected by adding back into the functional performance section that a product may demonstrate effective performance through either of the options mentioned above, while documenting sufficient evidence around test methods.

Updates to the Criterion Text

4.0 EVALUATION OF FUNCTIONAL PERFORMANCE AND FITNESS FOR PURPOSE

- **4.1 Product Performance.** Applicant shall demonstrate effective performance through one of the options below.
- **4.1.1** 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.
- **4.1.2** The product meets existing performance standards for the product type. The applicant shall provide evidence that the test is used as an industry standard, and that any referenced thresholds are accepted as sufficient to demonstrate performance in that product category.
- **4.2 4.1 Test Methods.** If available for the product category, test methods shall comply with relevant industry standards, American National Standards, ASTM standards, ISO standards, or other equivalent methodology. Alternatively, if standard test methods are unavailable and the applicant is demonstrating performance through option 4.1.1 above, another objective, scientifically validated method conducted under controlled and reproducible laboratory conditions may be used, subject to Green Seal approval. Test methodology and results must be documented in sufficient detail for this determination to be made.

Final Text

4.0 EVALUATION OF FUNCTIONAL PERFORMANCE AND FITNESS FOR PURPOSE

4.1 Product Performance. Applicant shall demonstrate effective performance through one of the options below.

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- **4.1.1** 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.
- **4.1.2** The product meets existing performance standards for the product type. The applicant shall provide evidence that the test is used as an industry standard, and that any referenced thresholds are accepted as sufficient to demonstrate performance in that product category.
- **4.2 Test Methods.** If available for the product category, test methods shall comply with relevant industry standards, American National Standards, ASTM standards, ISO standards, or other equivalent methodology. Alternatively, if standard test methods are unavailable and the applicant is demonstrating performance through option 4.1.1 above, another objective, scientifically validated method conducted under controlled and reproducible laboratory conditions may be used, subject to Green Seal approval. Test methodology and results must be documented in sufficient detail for this determination to be made.

Criteria for Certification Environmental Innovation, Sub-Category: Pesticides – Contact-Kill Insecticides, GS-20

1. Alternative Performance Testing, Performance, Correction

The GS-20 Environmental Innovation Program functions by creating specific criteria documents for each product applicant. The criteria documents include direct text from the GS-20 Standard, as well as information specific to the criteria development for the product category, specific product claims, etc. As a result, an update to standard text for GS-20 (noted on page 5 above) should also be reflected in criteria documents for product currently undergoing certification review. Updates to criteria documents for currently certified GS-20 products are not necessary as re-certification for GS-20 occurs every four years, at which time products will be evaluated against the most recent edition of the GS-20 standard.

Updates to the Text

4.0 EVALUATION OF FUNCTIONAL PERFORMANCE AND FITNESS FOR PURPOSE

Test Methods

Applicant shall meet the requirements in this section to demonstrate the product functionally performs at least as well as or better than at least one nationally recognized or market leading product of its type, to be approved by Green Seal. Alternatively, the applicant shall demonstrate the product meets existing performance standards for the product type. The applicant shall provide evidence that the test is used as an industry standard, and that any referenced thresholds are accepted as sufficient to demonstrate performance in that product category.

Final Text

4.0 EVALUATION OF FUNCTIONAL PERFORMANCE AND FITNESS FOR PURPOSE

Test Methods

Applicant shall meet the requirements in this section to demonstrate the product functionally performs at least as well as or better than at least one nationally recognized or market leading product of its type, to be approved by Green Seal. Alternatively, the applicant shall demonstrate the product meets existing performance standards for the product type. The applicant shall provide evidence that the test is used as an industry standard, and that any referenced thresholds are accepted as sufficient to demonstrate performance in that product category.

Criteria for Certification Environmental Innovation, Sub-Category: Cleaning Equipment – Single Use Dust Sheets, GS-20

1. Alternative Performance Testing, Performance, Correction

The GS-20 Environmental Innovation Program functions by creating specific criteria documents for each product applicant. The criteria documents include direct text from the GS-20 Standard, as well as information specific to the criteria development for the product category, specific product claims, etc. As a result, an update to standard text for GS-20 (noted on page 5 above) should also be reflected in criteria documents for product currently undergoing certification review. Updates to criteria documents for currently certified GS-20 products are not necessary as re-certification for GS-20 occurs every four years, at which time products will be evaluated against the most recent edition of the GS-20 standard.

Updates to the Text

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. Alternatively, the applicant shall demonstrate the product meets existing performance standards for the product type. The applicant shall provide evidence that the test is used as an industry standard, and that any referenced thresholds are accepted as sufficient to demonstrate performance in that product category. including test methods and test reports submitted during the Certification Phase.

Final Text

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. Alternatively, the applicant shall demonstrate the product meets existing performance standards for the product type. The applicant shall provide evidence that the test is used as an industry standard, and that any referenced thresholds are accepted as sufficient to demonstrate performance in that product category.

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

1. Holding and RV Tank Treatment Products, Appendix, Correction

Holding and RV tank treatment products were added to the Scope and Appendix 1 in the January 2022 Correction and Clarifications Report. Holding tank treatment products were incorrectly not removed from the "Products Excluded" section of Appendix 1. This typo has been corrected.

Updates to the Text

APPENDIX 1 – Scope (Informative)

Products Excluded from GS-52

- Air fresheners (designed to mask odor)
- Cleaners/degreasers marketed as suitable for cleaning soils in production and maintenance applications without *enzymes* or *microorganisms* (included in GS-34)
- Dry erase board cleaning products (included in GS-37)
- Floor finish and finish strippers for industrial and institutional use (included in GS-40) and for household use
- General-purpose, restroom, glass and carpet cleaners for industrial and institutional use with or without *enzymes* or *microorganisms* (included in GS-37)
- General-purpose, bathroom, glass, and carpet cleaner products marketed specifically for *household use* with or without *enzymes* or *microorganisms* (included in GS-8)
- Hand cleaning products for industrial and institutional use (covered in GS-41) or *household use* (covered in GS-44)
- Hand dish cleaning products formulated with antimicrobial agents to support antimicrobial claims
- Holding tank treatment products
- Industrial and institutional versions of those included on the left column
- Laundry care products (included in the standard in development, GS-48)
- Paint remover/thinner products
- Products that contain *enzymes* and are sold in, or designed for use in, *spray packaging*
- Pump and sewer treatment products
- Sterilizers or high level disinfectants for critical medical devices

Final Text

APPENDIX 1 – Scope (Informative)

Products Excluded from GS-52

- Air fresheners (designed to mask odor)
- Cleaners/degreasers marketed as suitable for cleaning soils in production and maintenance applications without *enzymes* or *microorganisms* (included in GS-34)
- Dry erase board cleaning products (included in GS-37)
- Floor finish and finish strippers for industrial and institutional use (included in GS-40) and for household use
- General-purpose, restroom, glass and carpet cleaners for industrial and institutional use with or without *enzymes* or *microorganisms* (included in GS-37)
- General-purpose, bathroom, glass, and carpet cleaner products marketed specifically for *household use* with or without *enzymes* or *microorganisms* (included in GS-8)

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- Hand cleaning products for industrial and institutional use (covered in GS-41) or *household use* (covered in GS-44)
- Hand dish cleaning products formulated with antimicrobial agents to support antimicrobial claims
- Industrial and institutional versions of those included on the left column
- Laundry care products (included in the standard in development, GS-48)
- Paint remover/thinner products
- Products that contain *enzymes* and are sold in, or designed for use in, *spray packaging*
- Pump and sewer treatment products
- Sterilizers or high level disinfectants for critical medical devices

Standard for Specialty Cleaning Products, Industrial & Institutional Use, GS-53

1. Microbial-Based Tank Treatment Products, Concentrates and Dosing, Correction

The GS-53 Standard explicitly sets certification requirements for holding, septic, and recreational vehicle (RV) tank treatment 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... holding tank treatment products...recreational vehicle tank treatment products; septic tank treatment products..."

Prior to April 29, 2022, holding, septic, and RV tank treatment products formulated with microorganisms were 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 this requirement is not a reflection of leadership in this product category. Microbial-based holding, septic, and RV tank treatment products are considered a healthier, green chemistry alternative to conventional cleaning ingredients such as solvents and surfactants that pose health risks including acting as skin irritants and allergens, and reproductive toxins. Due to the lack of conventional cleaning chemicals that often require dilution, microbial-based holding, septic, and RV tank treatment products are mainly sold as "ready-to-use" (RTU).

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 "microbial-based septic, holding, and recreational vehicle tank treatment products" to the list of products that are eligible to be certified when sold as RTU products.

Updates to the Text

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*
- Microbial-based drain cleaning products
- Microbial-based septic, holding, and recreational vehicle tank treatment 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

 $^{^{1}\} Contact\ allergens\ and\ irritants\ in\ household\ washing\ and\ cleaning\ products.\ https://doi.org/10.1111/j.1600-0536.2009.01647.x$

² ECHA Classification and Labeling Inventory Database. https://echa.europa.eu/information-on-chemicals/cl-inventory-database

- Rust stain remover products
- Upholstery cleaning products solely labeled as spot or stain removers
- Waterless motor vehicle cleaning products

Final Text

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*
- Microbial-based drain cleaning products
- Microbial-based septic, holding, and recreational vehicle tank treatment 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

2. Holding and RV Tank Treatment Products, Appendix, Correction

Holding and RV tank treatment products were added to the Scope and Appendix 1 in the January 2022 Correction and Clarifications Report. Holding tank treatment products were incorrectly not removed from the "Products Excluded" section of Appendix 1. This typo has been corrected.

Updates to the Text

APPENDIX 1 – Scope (Informative)

Industrial and Institutional Products Excluded in GS-53

- Air fresheners (designed to mask odor)
- Cleaners/degreasers marketed as suitable for cleaning soils in production and maintenance applications without *enzymes* or *microorganisms* (included in GS-34)
- Dry erase board cleaning products (included in GS-37)

- Floor finish and finish strippers for industrial and institutional use (included in GS-40) and for household use
- General-purpose, restroom, glass and carpet cleaners for industrial and institutional use with and without *enzymes* or *microorganisms* (included in GS-37)
- General-purpose, bathroom, glass, and carpet cleaner products marketed specifically for *household use* with and without *enzymes* or *microorganisms* (included in GS-8)
- Hand cleaning products for industrial and institutional use (covered in GS-41) or *household use* (covered in GS-44)
- Hand dish cleaning products formulated with antimicrobial agents to support antimicrobial claims
- Holding tank treatment products
- Household versions of those included on the left column
- Laundry care products (included in the standard in development, GS-48)
- Paint remover/thinner products
- Products that contain enzymes and are sold in, or designed for use in, spray packaging
- Pump and sewer treatment products
- Sterilizers or high-level disinfectants for critical medical devices

Final Text

APPENDIX 1 – Scope (Informative)

Industrial and Institutional Products Excluded in GS-53

- Air fresheners (designed to mask odor)
- Cleaners/degreasers marketed as suitable for cleaning soils in production and maintenance applications without *enzymes* or *microorganisms* (included in GS-34)
- Dry erase board cleaning products (included in GS-37)
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- Pump and sewer treatment products
- Sterilizers or high-level disinfectants for *critical medical devices*