Corrections and Clarifications Report

October 2020

The following Green Seal standards underwent non-substantive changes.
Details of those changes are included herein.

- GS-8, Edition 5.5, Cleaning Products for Household Use
- GS-37, Edition 7.6, 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-48, Edition 1.5, Laundry Care Products for Household Use
- GS-51, Edition 1.6, Laundry Care 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 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 60-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, https://greenseal.org/green-seal-standards/library#section26

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Cleaning Products for Household Use, GS-8

1. Microorganism Annex, Correction

Section of Standard: Annex D, Microorganisms (Normative)

Test Method Correction
Green Seal has corrected the name of the accepted susceptibility test for microorganisms used in cleaning products. The name of the test has been updated to the Kirby-Bauer disk method. The previous reference was to a commercial product that can be purchased to perform the Kirby-Bauer disk method.

E. Effective Prevention Measures and Treatment. All *microorganisms* shall be demonstrated to be susceptible to the following prevention and treatment measures:

An *antimicrobial agent*, as demonstrated by testing the microbial strain against an acceptable substance (i.e., an EPA general disinfectant, Center for Disease Control low-level disinfectant, or a registered *antimicrobial agent* by Health Canada) in accordance with the EPA/Office of Pesticide Programs Standard Operating Procedure (SOP) or the AOAC International Use Dilution Method for Testing Disinfectants, SOP Number: MB-05-04.

One of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline, and fluoroquinolones), as demonstrated by testing the microbial strain in accordance with the Kirby-Bauer disk ~~Beckman Dickinson BBL antimicrobial susceptibility dise~~ method.

Cleaning Products for Industrial and Institutional Use, GS-37

1. Microorganism Annex, Corrections

Section of Standard: Annex E, Microorganisms (Normative)
In 2014, Green Seal proposed a revision to the Microorganisms Annex in all standards. Annex E in the GS-37 Standard was intended to be updated.

Text from 2014 Revision Proposal:

> "Green Seal is proposing a revision to one of the requirements in Annex B – Microorganisms. This requirement is currently included in several other Green Seal standards (i.e., GS-37, GS-48, GS-51). The Microorganisms Annex currently requires that microorganisms be susceptible to "each of the five major antibiotic classes." Green Seal is proposing to change this and require that microorganisms be susceptible to "one of the five major antibiotic classes." Green Seal has conducted additional research on the issue of antibiotic susceptibility and has concluded that it is infeasible and unnecessary for microorganism strains to be susceptible to all five of the major antibiotic classes. The proposed revision is consistent with the intent of the standard, which was to ensure that the strains could be treated if necessary. An editorial revision to the antimicrobial agent language is also proposed, clarifying that the testing needs to be conducted on one antimicrobial agent."

Test Method Correction
Green Seal has corrected the name of the accepted susceptibility test for microorganisms used in cleaning products. The name of the test has been updated to the Kirby-Bauer disk method. The previous reference was to a commercial product that can be purchased to perform the Kirby-Bauer disk method.

With these changes, this criterion in GS-37 is now consistent with all other Microorganism Annexes.

E. Effective Prevention Measures and Treatment. All *microorganisms* shall be demonstrated to be susceptible to the following prevention and treatment measures:

An *antimicrobial agent*~~s~~, as demonstrated by testing the microbial strain against an acceptable substance (i.e., an EPA general disinfectant, Center for Disease Control low-level disinfectant, or a registered *antimicrobial agent* by Health Canada) in accordance with the EPA/Office of Pesticide Programs Standard Operating Procedure (SOP) or the AOAC International Use Dilution Method for Testing Disinfectants, SOP Number: MB-05-04.

~~Each~~ One of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline, and fluoroquinolones), as demonstrated by testing the microbial strain in accordance with the Kirby-Bauer disk ~~Beckman Dickinson BBL antimicrobial susceptibility dise~~ method.

Hand Cleaners and Hand Sanitizers for Industrial & Institutional Use, GS-41

1. Alcohol Concentration, Correction

Section of Standard: Annex B, Hand Sanitizers (Normative)

Green Seal has corrected the description of "60 percent" ethyl alcohol, and "70 percent" isopropyl alcohol to include the phrase "by volume" which was previously omitted. The intent of the criteria development was to align with the requirements set by the Food and Drug Administration (FDA). In the 1994 Tentative Final Monograph for Health-Care Antiseptic Drug Products, the FDA specified an acceptable percentage of alcohol "by volume"[1] In a temporary guidance document released in March 2020, the FDA signified finished hand sanitizer formulas should contain the recommended amount of alcohol by volume set by the World Health Organization[2]. With this change, Green Seal's requirements are in line with the FDA's requirements, and set clear instructions for manufacturers.

A. Alcohol Concentration. Documentation shall be provided to demonstrate the following:

Ethyl alcohol-based *hand sanitizers* shall be formulated with at least 60 percent ethyl alcohol by volume, which shall be ~~which is~~ Specially Denatured Alcohol (SDA). Documentation must also demonstrate a purity that meets or exceeds USP certification levels.

Isopropyl alcohol-based *hand sanitizers* shall be at least 70 percent isopropyl alcohol by volume.

[1] Tentative Final Monograph for Health Care Antiseptic Drug Products. 1994. https://www.govinfo.gov/content/pkg/FR-1994-06-17/html/94-14503.htm

[2] Temporary Policy for Preparation of Certain Alcohol-Based Hand Sanitizer Products During the Public Health Emergency (COVID-19). 2020. https://www.fda.gov/media/136289/download

Commercial and Institutional Cleaning Services, GS-42

1. Building-Specific Cleaning Plans, Clarification

Green Seal has made the following changes to GS-42 to improve clarity of this section.

2.1 Building-Specific Cleaning Plans. The cleaning service shall have a written cleaning plan for each building, which describes the following:

~~**2.1.1.** The plan shall describes how the cleaning service will address the following issues:~~

Standard Operating Procedures that address:
- cleaning and waste collection (Sections 2.2, 2.3, 2.4).
- handling, tracking, and storage of cleaning products (Sections 2.7.1, 4.4).
- equipment operation procedures and maintenance (Sections 2.3.3, 2.7.2).
- waste disposal (Sections 2.4, 2.7.3).
- communications with management and occupants of the building (Section 3.2).

Schedules for:
- routine cleaning operations, detailing the minimum frequency required for each (Section 2.2 and
- all other areas to be cleaned).
- activities performed periodically (Section 2.2).
- equipment maintenance (Section 2.7.2).

Schedules of cleaning operations shall be reviewed at least twice a year and adjusted as needed in response to the changing needs of the building and its occupants.

Details that are specific to each building including:

- contact people, contact information, location of resources and rooms for use by cleaning personnel.
- vulnerable populations: their location, vulnerability, and measures to be taken (Section 2.5).
- seasonal changes to the building operations (e.g., school closings).
- indoor sources of contaminants or pollution.
- potentially hazardous materials, fixtures, and infrastructure.
- areas with special concerns.
- schedule of cleaning and maintenance operations
- general procedures to follow in the event of an accident.

Activities that should be implemented when non-routine events occur (e.g., renovations, construction, new installations, emergencies, malfunctions, etc.)

~~**2.1.12**~~ Cleaning plans shall be reviewed for possible revisions at least once a year.

~~**2.1.3 Schedules of cleaning operations shall be reviewed at least twice a year and adjusted as needed in response to the changing needs of the building and its occupants.**~~

~~**2.1.4**~~ The cleaning plan shall be made available to all cleaning personnel and *clients*.

Soaps, Cleansers, Hand Sanitizers, and Shower Products, GS-44

1. Alcohol Concentration, Clarification

Section of Standard: Annex C, Hand Sanitizers (Normative)

Green Seal has specified the description of "60 percent" ethyl alcohol, and "70 percent" isopropyl alcohol to include the phrase "by volume" which was previously omitted. The intent of the criteria development was to align with the requirements set by the Food and Drug Administration (FDA). In the 1994 Tentative Final Monograph for Health-Care Antiseptic Drug Products, the FDA specified an acceptable percentage of alcohol "by volume"[1] In a temporary guidance document released in March 2020, the FDA signified finished hand sanitizer formulas should contain the recommended amount of alcohol by volume set by the World Health Organization[2]. With this change, Green Seal's requirements are in line with the FDA's requirements, and set clear instructions for manufacturers.

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[2] Temporary Policy for Preparation of Certain Alcohol-Based Hand Sanitizer Products During the Public Health Emergency (COVID-19). 2020. https://www.fda.gov/media/136289/download

2. Exempt Criteria, Correction

Section of Standard: Annex C, Hand Sanitizers (Normative)

Green Seal has removed the Exempt Criteria from the Hand Sanitizers Annex (Annex C) in GS-44 because this text is informative rather than normative. Therefore, the text has been converted into an Appendix that provides a list of all criteria for which hand sanitizers are exempt.

~~**D. Exempt Criteria.** *Hand sanitizers* are exempt from the following criteria:~~

~~**Health and Environmental Criteria**: Exemption of ethyl alcohol from carcinogens prohibition (3.2); Skin absorption (3.5); Volatile Organic Compound Content (3.8); Chronic Inhalation Toxicity (3.9); Optical Brighteners (3.19);~~

~~**Packaging and Labeling:** Secondary Packaging (4.2); Antimicrobial Claims (5.1); Allergen Labeling (5.5); Consumer Communication (5.6); Use Labeling (5.7); Disposal Labeling (5.8).~~

Appendix 3, Exempt Criteria for Hand Sanitizers (Informative)

Hand sanitizers are exempt from the following criteria:

Product-Specific Health and Environmental Requirements
Skin absorption (3.5)
Volatile Organic Compound Content (3.8)
Chronic Inhalation Toxicity (3.9)
Optical Brighteners (3.19).

Ingredient-Specific Exemption
Ethyl alcohol shall be exempt from the carcinogens prohibition (3.2)
Triethanolamine shall be exempt from the asthmagens prohibition (3.6)
Triethanolamine is noted as exempt for hand sanitizers in the Prohibited Components list (3.14)

Packaging Requirements
Secondary Packaging (4.2)

Labeling Requirements
Antimicrobial Claims (5.1)
Allergen Labeling (5.5)
Consumer Communication (5.6)
Use Labeling (5.7)
Disposal Labeling (5.8)

Additionally, each section where hand sanitizers are exempt now clearly states this, with the following sentence at the end of each criterion.

Hand sanitizers are exempt from this requirement.

Laundry Care Products for Household Use, GS-48

1. Microorganism Annex, Correction

Section of Standard: Annex D, Microorganisms (Normative)

Test Method Correction
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One of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline, and fluoroquinolones), as demonstrated by testing the microbial strain in accordance with the Kirby-Bauer disk ~~Beckman Dickinson BBL antimicrobial susceptibility dise~~ method.

2. Ingredient Line, Clarification

To align with California Senate Bill 258 and Green Seal's other standards that set ingredient line disclosure requirements, Green Seal has added in a clarification sentence that was previously deleted from this section.

6.5 *Ingredient Line. The product label shall list the product ingredients using the naming convention of the International Nomenclature of Cosmetic Ingredients (INCI), or the HCPA Dictionary, in order of predominance. Where an INCI name does not exist for an ingredient, alternative nomenclature may be used.[1] Ingredients in concentrations of less than 1% may be listed in any order after those in concentrations of more than 1%. A chemical function or chemical class descriptor may be used to protect trade secret information.

Laundry Care Products for Industrial and Institutional Use, GS-51

1. Microorganism Annex, Correction

Section of Standard: Annex F, Microorganisms (Normative)

Test Method Correction
Green Seal has corrected the name of the accepted susceptibility test for microorganisms used in cleaning products. The name of the test has been updated to the Kirby-Bauer disk method. The previous reference was to a commercial product that can be purchased to perform the Kirby-Bauer disk method.

E. Effective Prevention Measures and Treatment. All *microorganisms* shall be demonstrated to be susceptible to the following prevention and treatment measures:

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One of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline, and fluoroquinolones), as demonstrated by testing the microbial strain in accordance with the Kirby-Bauer disk ~~Beckman Dickinson BBL antimicrobial susceptibility dise~~ method.