



Corrections and Clarifications Report

October 2022

The following Green Seal standards underwent non-substantive changes on October 28, 2022.

- GS-11, Edition 4.0, Paints, Coatings, Stains, and Sealers
- GS-41, Edition 2.4, Hand Cleaners and Hand Sanitizers for Industrial and Institutional Use
- GS-44, Edition 4.3, Soaps, Cleaners, Hand Sanitizers, and Shower Products
- GS-53, Edition 2.8, 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.green Seal.org/green-seal-standards/library>

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

1. VOC Content Limits, Reference List, Correction

In September 2021, Green Seal revised the GS-11 Standard for Paints, Coatings, Stains, and Sealers so that its volatile organic compound (VOC) requirements were aligned with those in LEED v4 and LEED v4.1:

“Edition 4.0 will fully align with the low-emitting materials requirements the US Green Building Council’s LEED v4 & LEED v4.1, in addition to the WELL building certification, which reference the LEED requirements for these products.”

In that revision, Green Seal eliminated any exemptions for VOC limits for product categories from the CARB Suggested Control Measure for Architectural Coatings (2007), which are referenced in LEED, to align fully with those requirements. However, some of the exemptions were for product categories that did not exist in CARB, but instead follow the South Coast Air Quality Management District (SCAQMD) Rule 1113, effective June 3, 2011. LEED requirements state that –

“All paints and coatings wet-applied on site must meet the applicable VOC limits of the California Air Resources Board (CARB) 2007, Suggested Control Measure (SCM) for Architectural Coatings, or the South Coast Air Quality Management District (SCAQMD) Rule 1113, effective June 3, 2011”

As a result, because LEED requires alignment with either CARB 2007 or SCAQMD Rule 1113 from 2011, the language has been corrected to note that when a product does not align with an existing, or similar CARB category, it must align with limits set by its product category in SCAQMD Rule 1113 issued in 2011.

Updates to the Text

3.4 Volatile Organic Compounds (VOCs) Content Limits. The *VOC* content of the product shall not exceed the content limits for its product category as set by CARB Suggested Control Measure for Architectural Coatings (2007).¹

Exception: For *low-solids coatings*, the CARB *VOC* limit for *low-solids coatings* shall apply instead of the *VOC* limit that would otherwise apply for the product category (as mandated by CARB).²

Exception: Products labeled as *industrial maintenance coatings* shall meet the *VOC* limits for their relevant product category.³

Exception: Products sold in containers equal to or smaller than 1 liter are not exempted from the *VOC* content limit for their product category (even though exempted by CARB).⁴

¹ See Appendix 2 for the *VOC* limits specified in California Air Resources Board Suggested Control Measure for Architectural Coatings (2007).

² Note that *low-solids coatings* have a separate *VOC* limit and that their *VOC* content is calculated differently.

³ That is, they will not be allowed to meet the higher *VOC* limits set by CARB for *industrial maintenance coatings*. This standard is not intended to establish leadership criteria for *industrial maintenance coatings* per se (see Section 1.0).

⁴ CARB currently grants an exemption from *VOC* limits to products sold in containers equal to or smaller than 1 liter (known as the Small Container Exemption).

For other product categories not regulated by CARB, the *VOC* level shall not exceed a limit set by CARB for a similar product category. **If no CARB category, or similar CARB product category exists, the *VOC* limit shall not exceed the limit for the applicable product category in the South Coast Air Quality Management District (SCAQMD) Rule 1113, effective June 3, 2011.**

Final Text

3.4 Volatile Organic Compounds (VOCs) Content Limits. The *VOC* content of the product shall not exceed the content limits for its product category as set by CARB Suggested Control Measure for Architectural Coatings (2007).¹

Exception: For *low-solids coatings*, the CARB *VOC* limit for *low-solids coatings* shall apply instead of the *VOC* limit that would otherwise apply for the product category (as mandated by CARB).²

Exception: Products labeled as *industrial maintenance coatings* shall meet the *VOC* limits for their relevant product category.³

Exception: Products sold in containers equal to or smaller than 1 liter are not exempted from the *VOC* content limit for their product category (even though exempted by CARB).⁴

For other product categories not regulated by CARB, the *VOC* level shall not exceed a limit set by CARB for a similar product category. If no CARB category, or similar CARB product category exists, the *VOC* limit shall not exceed the limit for the applicable product category in the South Coast Air Quality Management District (SCAQMD) Rule 1113, effective June 3, 2011.

¹ See Appendix 2 for the *VOC* limits specified in California Air Resources Board Suggested Control Measure for Architectural Coatings (2007).

² Note that *low-solids coatings* have a separate *VOC* limit and that their *VOC* content is calculated differently.

³ That is, they will not be allowed to meet the higher *VOC* limits set by CARB for *industrial maintenance coatings*. This standard is not intended to establish leadership criteria for *industrial maintenance coatings* per se (see Section 1.0).

⁴ CARB currently grants an exemption from *VOC* limits to products sold in containers equal to or smaller than 1 liter (known as the Small Container Exemption).

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

1. Manufacturing Disclosure Requirements, Annex B – Hand Sanitizers, Clarification

In September 2020, Green Seal issued new criteria for hand sanitizers. These criteria included a requirement for manufacturers to disclose their establishment registration number, labeler code, and National Drug Code (NDC) of their finished product. The intent of including this criterion was to allow Green Seal to confirm ingredient disclosure via the National Institute of Health’s DailyMed registry and verify that the manufacturing site would undergo a U.S. Federal and Drug Administration (FDA) audit at some time after its release into the marketplace to ensure product safety and lack of contamination. However, after further review, it has been determined that this criterion is not necessary or appropriate as a standard requirement because verification of the information is unlikely to result in safer products through the current federal registration process. The current process for over-the-counter drugs such as hand sanitizers is unlikely to result in preventing product contamination and is therefore not useful for Green Seal to require in the standard. Also, this criterion is redundant because of the language in the standard foreword noting product must comply with any relevant regulations and laws:

“Any conformity assessment to this standard requires compliance with all applicable laws and regulations for the manufacturing and marketing of the products.”

As a result, this criterion has been removed from the standard. For brevity, the updates to the criteria numbering for the rest of Annex C are not displayed here. All final text can be seen in the standard version on Green Seal’s website.

Updates to Text

ANNEX B – HAND SANITIZERS (Normative)

Hand sanitizers. *Hand sanitizers* shall meet the requirements and undergo evaluation according to the stipulations below.

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 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.

~~**B. Manufacturing Disclosure Requirements.** The following documentation shall be provided: Establishment Registration Number; Labeler code; and National Drug Code (NDC) of the finished product.~~

~~**BC. Ingredient Prohibitions.** *Hand sanitizers* shall not contain any of the following ingredients, in addition to those listed in Criterion 3.4, herein:~~

~~Butylated hydroxytoluene~~

~~Endocrine Disruptors~~

~~The heavy metals lead, hexavalent chromium, or selenium, both in the elemental form or compounds~~

Methyldibromo glutaronitrile
Monoethanolamine (MEA) and Diethanolamine (DEA)
Nitromusks
Parabens
Phthalates
Polycyclic musks

Final Text

ANNEX B – HAND SANITIZERS (Normative)

Hand sanitizers. *Hand sanitizers* shall meet the requirements and undergo evaluation according to the stipulations below.

B. 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 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.

B. Ingredient Prohibitions. *Hand sanitizers* shall not contain any of the following ingredients, in addition to those listed in Criterion 3.4, herein:

Butylated hydroxytoluene
Endocrine Disruptors
The heavy metals lead, hexavalent chromium, or selenium, both in the elemental form or compounds
Methyldibromo glutaronitrile
Monoethanolamine (MEA) and Diethanolamine (DEA)
Nitromusks
Parabens
Phthalates
Polycyclic musks

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

1. Manufacturing Disclosure Requirements, Annex C – Hand Sanitizers, Clarification

In September 2020, Green Seal issued new criteria for hand sanitizers. These criteria included a requirement for manufacturers to disclose their establishment registration number, labeler code, and National Drug Code (NDC) of their finished product. The intent of including this criterion was to allow Green Seal to confirm ingredient disclosure via the National Institute of Health’s DailyMed registry and verify that the manufacturing site would undergo a U.S. Federal and Drug Administration (FDA) audit at some time after its release into the marketplace to ensure product safety and lack of contamination. However, after further review, it has been determined that this criterion is not necessary or appropriate as a standard requirement because verification of the information is unlikely to result in safer products through the current federal registration process. The current process for over-the-counter drugs such as hand sanitizers is unlikely to result in preventing product contamination and is therefore not useful for Green Seal to require in the standard. Also, this criterion is redundant because of the language in the standard foreword noting product must comply with any relevant regulations and laws:

“Any conformity assessment to this standard requires compliance with all applicable laws and regulations for the manufacturing and marketing of the products.”

As a result, this criterion has been removed from the standard.

Updates to Text

ANNEX C – HAND SANITIZERS (Normative)

Hand sanitizers. *Hand sanitizers* shall meet the requirements and undergo evaluation according to the stipulations below.

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 Specially Denatured Alcohol (SDA). Documentation must also demonstrate a purity that meets or exceeds USP grade requirements.
- Isopropyl alcohol-based *hand sanitizers* shall be at least 70 percent isopropyl alcohol by volume.

~~**B. Manufacturing Disclosure Requirements.** The following documentation shall be provided: Establishment Registration Number; labeler code; and National Drug Code (NDC) of the finished product.~~

~~**BC. Evaluation level.** *Hand sanitizers* shall be evaluated according to all criteria, herein, based on evaluations of the product as a whole or each of the *ingredients*; chemicals in the product at less than 100 ppm shall not be restricted or prohibited.~~

~~**CD. Ingredient Prohibitions.**~~

- ~~(1) *Hand sanitizers* shall not contain the following *ingredients*:~~
- ~~(i) *Endocrine Disruptors*~~

Final Text

ANNEX C – HAND SANITIZERS (Normative)

Hand sanitizers. *Hand sanitizers* shall meet the requirements and undergo evaluation according to the stipulations below.

B. 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 Specially Denatured Alcohol (SDA). Documentation must also demonstrate a purity that meets or exceeds USP grade requirements.
- Isopropyl alcohol-based *hand sanitizers* shall be at least 70 percent isopropyl alcohol by volume.

B. Evaluation level. *Hand sanitizers* shall be evaluated according to all criteria, herein, based on evaluations of the product as a whole or each of the *ingredients*; chemicals in the product at less than 100 ppm shall not be restricted or prohibited.

C. Ingredient Prohibitions.

- (2) *Hand sanitizers* shall not contain the following *ingredients*:
- (i) *Endocrine Disruptors*

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

1. Enzyme-Based Cleaning Products, Concentrates and Dosing, Clarification

In previous Correction and Clarification Reports, Green Seal noted that microbial-based cleaning products meant for cleaning drains, septic tanks, holding tanks, and recreational vehicle treatment tanks were able to be sold in ready-to-use form. For clarity, the language has been updated to note that microbial means “microorganisms” and “enzymes.”

Updates to the Text

3.24 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 and enzyme-based drain cleaning products*
- *Microbial and enzyme-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*

Final Text

3.24 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 and enzyme-based drain cleaning products*

- Microbial and enzyme-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. Crème/Cream Cleansers, Appendix 1 - Scope, Clarification

Crème/cream cleansers are specialty cleaning products often used for surfaces such as tubs that require less-abrasive cleaners. The product category of Crème/cream cleansers is in the scope of the GS-53 Standard, as evidenced by its status as a specialty cleaning product, and its inclusion in criteria 3.24 for Concentrates and Dosing. For clarity, this product category has been added to Appendix 1 – Scope.

Updates to the Text

APPENDIX 1 – SCOPE (Informative)

Examples of products included in or excluded from the scope of GS-53:

Industrial and Institutional Products Included in GS-53

- *Adhesive remover products*
- *Boat cleaning products* (e.g., hull or bilge)
- *Boat wax, polish, sealant, or glaze products*
- *Chewing gum remover product*
- **Crème/cream cleansers**
- *Deck, siding and outdoor furniture cleaning products*
- *Dish cleaning products* (e.g., hand dish, automatic dish, rinse agent products)
- *Antimicrobial pesticide products* (e.g., disinfectant and sanitizer products)
- *Drain additive/cleaning products*
- *Dusting aid products*
- *Electronic cleaning products*
- *Fruit and vegetable wash products*
- *Furniture polish products*
- *Graffiti remover products*
- *Grout cleaning products*
- *Holding tank treatment products*
- *Leather cleaning product*
- *Metal cleaning products*
- *Mold and mildew stain remover products*
- *Motor vehicle cleaning products*
- *Motor vehicle dressing products*
- *Motor vehicle windshield washing fluid products*
- *Motor vehicle wax, polish, sealant or glaze products*
- *Odor remover products*

- *Optical lens cleaning products*
- *Oven cleaning products*
- *Pressurized gas dusting products*
- *Printing press cleaning products*
- *Products that contain microorganisms*
- *Products that contain enzymes and are sold and/or designed for use in non-spray packaging*
- *Recreational vehicle tank treatment products*
- *Rust stain remover products*
- *Septic tank treatment products*
- *Stone cleaning products*
- *Tire and wheel cleaning products*
- *Upholstery cleaning product*
- *Waterless motor vehicle cleaning products*

Final Text

APPENDIX 1 – SCOPE (Informative)

Examples of products included in or excluded from the scope of GS-53:

Industrial and Institutional Products Included in GS-53

- *Adhesive remover products*
- *Boat cleaning products* (e.g., hull or bilge)
- *Boat wax, polish, sealant, or glaze products*
- *Chewing gum remover product*
- *Crème/cream cleansers*
- *Deck, siding and outdoor furniture cleaning products*
- *Dish cleaning products* (e.g., hand dish, automatic dish, rinse agent products)
- *Antimicrobial pesticide products* (e.g., disinfectant and sanitizer products)
- *Drain additive/cleaning products*
- *Dusting aid products*
- *Electronic cleaning products*
- *Fruit and vegetable wash products*
- *Furniture polish products*
- *Graffiti remover products*
- *Grout cleaning products*
- *Holding tank treatment products*
- *Leather cleaning product*
- *Metal cleaning products*
- *Mold and mildew stain remover products*
- *Motor vehicle cleaning products*
- *Motor vehicle dressing products*
- *Motor vehicle windshield washing fluid products*
- *Motor vehicle wax, polish, sealant or glaze products*
- *Odor remover products*
- *Optical lens cleaning products*
- *Oven cleaning products*
- *Pressurized gas dusting products*

- *Printing press cleaning products*
- Products that contain *microorganisms*
- Products that contain *enzymes* and are sold and/or designed for use in *non-spray packaging*
- Recreational vehicle tank treatment products
- *Rust stain remover products*
- Septic tank treatment products
- Stone cleaning products
- *Tire and wheel cleaning products*
- *Upholstery cleaning product*
- *Waterless motor vehicle cleaning products*