



Corrections and Clarifications Report

October 2023

The following Green Seal standards underwent non-substantive changes on October 27, 2023.

- GS-11, Edition 4.0, Paints, Coatings, Stains, and Sealers
- GS-34, Edition 2.2, Cleaning and Degreasing Agents
- GS-37, Edition 7.8, Cleaning Products for Industrial and Institutional Use
- GS-40, Edition 2.5, Floor-Care Products for Industrial and Institutional Use
- GS-44, Edition 4.3, Soaps, Cleansers, Hand Sanitizers, and Shower Products
- GS-48, Edition 1.7, Laundry Care Products for Household Use
- GS-50, Edition 1.3, Personal Care and Cosmetic Products
- GS-51, Edition 1.8, Laundry Care Products for Industrial and Institutional Use
- GS-52, Edition 2.7, Specialty Cleaning Products for Household use
- 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.greenseal.org/green-seal-standards/library>

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

1. Clarification, Packaging Requirements, Addition of Defined Term - Primary Packaging

In October 2015, Green Seal issued Edition 3.2 of GS-11, which added the definition of ‘primary packaging’ to Annex A. This inclusion was intended to update the language in Section 4.0 Packaging Requirements from referring to general product packaging to specifically the primary product packaging. However, this language was not updated in the text of the relevant criterion.

The term ‘primary packaging’ has been added to the section and italicized to indicate a defined term.

Updates to the Text

4.0 PACKAGING REQUIREMENTS

4.1 Packaging. The ~~packaging~~ *primary packaging* shall be one of the following:

- contain a minimum of 20% *recovered material* content.
- recyclable as part of a manufacturer’s *take-back program*.
- a *source-reduced package*.

Final Text

4.0 PACKAGING REQUIREMENTS

4.1 Packaging. The *primary packaging* shall be one of the following:

- contain a minimum of 20% *recovered material* content.
- recyclable as part of a manufacturer’s *take-back program*.
- a *source-reduced package*.

Standard for Cleaning and Degreasing Agents, GS-34

1. Editorial, Annex B and C, Section Numbering

In September 2011, Green Seal issued Edition 2.0 of GS-34. In this edition, the Test Method for Evaluating the Cleaning Effectiveness of Degreasing Agents (formerly Annex A) was moved to Annex B, and the Test Method for Evaluating the Oil Separation Ability of Aqueous Degreasers (formerly Annex B) was moved to Annex C. This was due to the updating of the standard structure, in which Annex A in every standard is always the definition list.

When this edit was made, the internal references within the new Annexes B and C were not updated correctly. Several references to Sections A were noted in Annex B, and two incorrect references to Section B were identified in Annex C. These references have been updated to the correct Annex.

Updates to Text

B.2.1 Materials

Eight 304 stainless steel coupons. The coupons should measure 0.3175 cm thick with a surface area of 7.0 cm by 5.0 cm. Tests also require either a 0.5 cm diameter hole in the coupons or tabs measuring 1.5 cm by 1.5 cm with a hole measuring 0.5 cm in diameter in the middle of the tab (Figure B.1). The tabs, centered on top of the coupons, enable them to be suspended in liquid without touching the sides of the beaker. The coupons should be made of 304 stainless steel according to metal characterization guidelines set forth by the American Society for Metals (ASM). The coupons should be free of soils, stains, or surface imperfections. Furthermore, all coupons should have similar surface characteristics. Sources for test coupons can be found in Table A-2 B.2.

B.4 Soil/Degreaser Combinations

The steps presented in Sections A-6 B.6 to A-9 B.9 must be repeated for each soil type. In other words, the steps must be completed once for the maintenance soil, and once for the production soil.

B.5 Preparation of the Ultrasonic Tank

The 5-gallon ultrasonic tank should be filled with water up to about 5 cm from the top when four 400 mL beakers are suspended in the water (Figure A-2 B.2). To do this, fill the tank halfway with water, place the beakers in holders over the water, and then adjust the water level (5 cm below the top of the tank and so that the water from the ultrasonic tank does not enter the beaker). Fill the four beakers half way with reagent-grade 2-propanol. Suspend each coupon in a beaker so that it does not come into contact with the beaker. Adjust the level of the 2-propanol to make certain it covers the entire coupon.

B.7 Cleaning Procedure

The four beakers should then be suspended in the ultrasonic tank (Figure A-2 B.2). Note that the size and configuration of the beakers in the ultrasonic tank must be consistent throughout the testing.

C.1 Scope

This method measures the ability of a mixture of soil and an aqueous degreaser to separate from water. This is an important characteristic for a degreaser because good separating ability enables the degreaser and water to be reused and recycled. Conduct each degreaser test described in Sections C-2 B.2 to C-4 B.4 three times to ensure repeatability.

Final Text**B.2.1 Materials**

Eight 304 stainless steel coupons. The coupons should measure 0.3175 cm thick with a surface area of 7.0 cm by 5.0 cm. Tests also require either a 0.5 cm diameter hole in the coupons or tabs measuring 1.5 cm by 1.5 cm with a hole measuring 0.5 cm in diameter in the middle of the tab (Figure B.1). The tabs, centered on top of the coupons, enable them to be suspended in liquid without touching the sides of the beaker. The coupons should be made of 304 stainless steel according to metal characterization guidelines set forth by the American Society for Metals (ASM). The coupons should be free of soils, stains, or surface imperfections. Furthermore, all coupons should have similar surface characteristics. Sources for test coupons can be found in Table B.2.

B.4 Soil/Degreaser Combinations

The steps presented in Sections B.6 to B.9 must be repeated for each soil type. In other words, the steps must be completed once for the maintenance soil, and once for the production soil.

B.5 Preparation of the Ultrasonic Tank

The 5-gallon ultrasonic tank should be filled with water up to about 5 cm from the top when four 400 mL beakers are suspended in the water (Figure B.2). To do this, fill the tank halfway with water, place the beakers in holders over the water, and then adjust the water level (5 cm below the top of the tank and so that the water from the ultrasonic tank does not enter the beaker). Fill the four beakers half way with reagent-grade 2-propanol. Suspend each coupon in a beaker so that it does not come into contact with the beaker. Adjust the level of the 2-propanol to make certain it covers the entire coupon.

B.7 Cleaning Procedure

The four beakers should then be suspended in the ultrasonic tank (Figure B.2). Note that the size and configuration of the beakers in the ultrasonic tank must be consistent throughout the testing.

C.1 Scope

This method measures the ability of a mixture of soil and an aqueous degreaser to separate from water. This is an important characteristic for a degreaser because good separating ability enables the degreaser and water to be reused and recycled. Conduct each degreaser test described in Sections B.2 to B.4 three times to ensure repeatability.

Standard for Cleaning Products for Industrial and Institutional Use, GS-37

1. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-37, GS-52, and GS-53 all include 'Restroom Cleaners' in their definition list. The definitions are identical other than the use of the word 'cleaners' in GS-37 where the more specific phrase 'cleaning products' is used in GS-52 and GS-53. In order to harmonize definitions across standards, the more specific wordings used in GS-52 and GS-53 have been used to update the term 'Restroom Cleaner' in GS-37.

Updates to the Text

Restroom Cleaner. A product used to clean hard surfaces in a restroom such as counters, walls, floors, fixtures, basins, tubs, toilets, urinals, and tile. Other terms used for these ~~cleaners~~ **cleaning products** may include bathroom ~~cleaners~~ **cleaning products**, toilet bowl cleaners, or urinal cleaners.

Final Text

Restroom Cleaner. A product used to clean hard surfaces in a restroom such as counters, walls, floors, fixtures, basins, tubs, toilets, urinals, and tile. Other terms used for these cleaning products may include bathroom cleaning products, toilet bowl cleaners, or urinal cleaners.

Standard for Floor Care Products for Industrial and Institutional Use, GS-40

1. Editorial, Product-Specific Health and Environmental Requirements, Packaging Requirements

In September 2017, a major revision of GS-40 significantly expanded the scope of Section 3.0, Product-Specific Health and Environmental Requirements. This included the addition of four subsections that specifically refer to packaging requirements. However, in all other Green Seal standards, packaging requirements are contained in their own section to allow for ease of identification.

Subsections 3.10-3.13 have been moved to their own Section, titled Section 4.0 Packaging Sustainability Requirements. The numbering of Section 3 has been edited, moving 3.14 to 3.10, and so on. The prior Section 4 (User Information and Product Label Requirements) has been edited to Section 5. This numerical shift now continues to the end of the standard. The full re-numbering of items in the standard is not listed here for brevity.

Updates to the Text

Alternative Evaluation Options: Substances that Do Not Exhibit Ready Biodegradability.

For organic *ingredients* in the *product as used* that do not exhibit ready biodegradability, one of the following options may be acceptable:

1. The manufacturer may demonstrate biodegradability in sewage treatment plants using the Coupled Units Test found in OECD 303A by demonstrating DOC removal > 90%.
2. The manufacturer may demonstrate that the compound has low aquatic toxicity (acute LC50 ≥ 100 mg/L for algae, daphnia, or fish) and exhibits inherent ultimate biodegradability with biodegradation rates above 70% (measured as BOD, DOC, or COD), per ISO test methods 9887 or 9888 or OECD 302A-C.

Note: Testing is not required for any ingredient for which sufficient information exists concerning its biodegradability, either in peer-reviewed literature or databases. In the absence of experimental data, Quantitative Structure-Activity Relationship data from EPA's BioWin (EpiSuite) models may be considered.

3.10 Plastic Package. ~~A plastic *primary package* shall be one of the following:~~

- ~~• A *source-reduced package*~~
- ~~• *Recyclable*~~
- ~~• Contain at least 25% *post-consumer material*~~
- ~~• A *refillable package* with an effective take-back program~~
- ~~• An alternative approach that has been independently proven to have a similar life cycle benefit as one of the options listed above~~

3.10.1 Resin Identification Code. ~~The package must be marked with the appropriate Resin Identification Code.~~

3.11 Non-Plastic Package. ~~For materials other than plastic, the *primary package* shall contain at least 25% *post-consumer material* or be *recyclable*.~~

3.12 Heavy Metal Restrictions. ~~The heavy metals lead, mercury, cadmium, and hexavalent chromium shall not be *intentionally introduced to the primary package*. Further, the sum of the concentration levels of these metals shall not exceed 100 ppm by weight (0.01%); an exception is~~

~~allowed for *refillable packages* or packages that would not exceed this maximum level but for the addition of *post-consumer material*.~~

~~**3.13 Other Restrictions.** Phthalates, bisphenol A, and chlorinated packaging materials are prohibited from *being intentionally introduced to plastic primary packaging*. An exception is allowed for *primary packaging* that would not have added phthalates, bisphenol A, or chlorinated packaging material but for the addition of *post-consumer material*.~~

3.14 3.10 Prohibited Ingredients. The product shall not contain the following *ingredients*:

- Alkylphenol ethoxylates
- Phthalates
- The heavy metals arsenic, zinc, lead, cadmium, cobalt, chromium, mercury, nickel, or selenium
- *Optical brighteners*
- *Ozone-depleting compounds*

3.15 3.11 Fragrances. Manufacturers shall identify any fragrances on their material safety data sheets. Any *ingredient* added to a product as a fragrance must follow the Code of Practice of the International Fragrance Association.

3.16 3.12 Animal Testing. To avoid new animal testing, previous test results will be accepted as evidence of meeting a criterion. When existing data are not available, the preferred methods for new testing include methods that replace, reduce, or refine animal use, particularly those recommended by the Interagency Coordinating Committee on the Validation of Alternative Methods or the European Centre for the Validation of Alternative Methods, unless indicated otherwise. In addition, other non-animal (in vitro) test results, modeling data, data from structural analogs, and other lines of evidence may be accepted, provided that the methods are peer-reviewed and applicable. Specific in vitro or modeling methods may be noted in the standard, but additional options may be accepted by the certification program.

4.0 PACKAGING SUSTAINABILITY REQUIREMENTS

4.1 Plastic Package. A plastic *primary package* shall be one of the following:

- *A source-reduced package*
- *Recyclable*
- Contain at least 25% post-consumer material
- *A refillable package with an effective take-back program*
- An alternative approach that has been independently proven to have a similar life cycle benefit as one of the options listed above

4.1.1 Resin Identification Code. The package must be marked with the appropriate Resin Identification Code.

4.2 Non-Plastic Package. For materials other than plastic, the primary package shall contain at least 25% *post-consumer material* or be *recyclable*.

4.3 Heavy Metal Restrictions. The heavy metals lead, mercury, cadmium, and hexavalent chromium shall not be *intentionally introduced* to the *primary package*. Further, the sum of the concentration levels of these metals shall not exceed 100 ppm by weight (0.01%); an exception is allowed for *refillable packages* or packages that would not exceed this maximum level but for the addition of *post-consumer material*.

4.4 Other Restrictions. Phthalates, bisphenol A, and chlorinated packaging materials are prohibited from being *intentionally introduced* to plastic *primary packaging*. An exception is allowed for *primary packaging* that would not have added phthalates, bisphenol A, or chlorinated packaging material but for the addition of *post-consumer material*.

4.0 5.0 USER INFORMATION AND PRODUCT LABEL REQUIREMENTS

4.1 5.1 Training. The product manufacturer, its distributor, or a third party shall offer training or training materials in the proper use of the product. These shall include step-by-step instructions for the proper dilution, use, disposal, the use of equipment, and proper ventilation. Manufacturers shall have product-labeling systems to assist non-English-speaking or illiterate personnel.

Final Text

Alternative Evaluation Options: Substances that Do Not Exhibit Ready Biodegradability.

For organic *ingredients* in the *product as used* that do not exhibit ready biodegradability, one of the following options may be acceptable:

1. The manufacturer may demonstrate biodegradability in sewage treatment plants using the Coupled Units Test found in OECD 303A by demonstrating DOC removal > 90%.
2. The manufacturer may demonstrate that the compound has low aquatic toxicity (acute LC50 ≥ 100 mg/L for algae, daphnia, or fish) and exhibits inherent ultimate biodegradability with biodegradation rates above 70% (measured as BOD, DOC, or COD), per ISO test methods 9887 or 9888 or OECD 302A-C.

Note: Testing is not required for any *ingredient* for which sufficient information exists concerning its biodegradability, either in peer-reviewed literature or databases. In the absence of experimental data, Quantitative Structure-Activity Relationship data from EPA's BioWin (EpiSuite) models may be considered.

3.10 Prohibited Ingredients. The product shall not contain the following *ingredients*:

- Alkylphenol ethoxylates
- Phthalates
- The heavy metals arsenic, zinc, lead, cadmium, cobalt, chromium, mercury, nickel, or selenium
- *Optical brighteners*
- *Ozone-depleting compounds*

3.11 Fragrances. Manufacturers shall identify any fragrances on their material safety data sheets. Any *ingredient* added to a product as a fragrance must follow the Code of Practice of the International Fragrance Association.

3.12 Animal Testing. To avoid new animal testing, previous test results will be accepted as evidence of meeting a criterion. When existing data are not available, the preferred methods for new testing include methods that replace, reduce, or refine animal use, particularly those recommended by the Interagency Coordinating Committee on the Validation of Alternative Methods or the European Centre for the Validation of Alternative Methods, unless indicated otherwise. In addition, other non-animal (in vitro) test results, modeling data, data from structural analogs, and other lines of evidence may be accepted, provided that the methods are peer-

reviewed and applicable. Specific in vitro or modeling methods may be noted in the standard, but additional options may be accepted by the certification program.

4.0 PACKAGING SUSTAINABILITY REQUIREMENTS

4.1 Plastic Package. A plastic *primary package* shall be one of the following:

- A *source-reduced package*
- *Recyclable*
- Contain at least 25% *post-consumer material*
- A *refillable package* with an effective *take-back program*
- An alternative approach that has been independently proven to have a similar life cycle benefit as one of the options listed above

4.1.1 Resin Identification Code. The package must be marked with the appropriate Resin Identification Code.

4.2 Non-Plastic Package. For materials other than plastic, the *primary package* shall contain at least 25% *post-consumer material* or be *recyclable*.

4.3 Heavy Metal Restrictions. The heavy metals lead, mercury, cadmium, and hexavalent chromium shall not be *intentionally introduced* to the *primary package*. Further, the sum of the concentration levels of these metals shall not exceed 100 ppm by weight (0.01%); an exception is allowed for *refillable packages* or packages that would not exceed this maximum level but for the addition of *post-consumer material*.

4.4 Other Restrictions. Phthalates, bisphenol A, and chlorinated packaging materials are prohibited from being *intentionally introduced* to plastic *primary packaging*. An exception is allowed for *primary packaging* that would not have added phthalates, bisphenol A, or chlorinated packaging material but for the addition of *post-consumer material*.

5.0 USER INFORMATION AND PRODUCT LABEL REQUIREMENTS

5.1 Training. The product manufacturer, its distributor, or a third party shall offer training or training materials in the proper use of the product. These shall include step-by-step instructions for the proper dilution, use, disposal, the use of equipment, and proper ventilation. Manufacturers shall have product-labeling systems to assist non-English-speaking or illiterate personnel.

Standard for Soaps, Cleansers, and Shower Products, GS-44

1. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-41 and GS-44 both included ‘Endocrine Disruptors’ in their definition list. The use of the plural possessive pronoun ‘their’ indicates that the preceding noun should be plural (i.e., ‘Chemicals’), which is correct in GS-41. GS-44 incorrectly used a singular noun (‘A chemical’) at the sentence start and has been corrected to the plural noun as used in GS-41.

Updates to the Text

Endocrine Disruptor. ~~A chemical~~ **Chemicals** identified by the U.S. Environmental Protection Agency (EPA) List of Chemicals for Tier 1 Screening due to their ability to disrupt hormones (e.g., have estrogen-or androgen-mediated effects), as tested according to the EPA Series 890 - Endocrine Disruptor Screening Program Test Guidelines.

Final Text

Endocrine Disruptor. Chemicals identified by the U.S. Environmental Protection Agency (EPA) List of Chemicals for Tier 1 Screening due to their ability to disrupt hormones (e.g., have estrogen-or androgen-mediated effects), as tested according to the EPA Series 890 -Endocrine Disruptor Screening Program Test Guidelines.

Standard for Laundry Care Products for Household Use, GS-48

1. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-48, GS-50, GS-51, GS-52, and GS-53 all include references to the USDA's National Organic Program (NOP) in their definition of 'Certified-Organic Components'. However, GS-48 failed to identify the acronym in its definition. Most grammatical guidelines and citation styles require the acronym to be spelled out in full before used in shorthand. The full term for NOP has been added to GS-48.

In addition, the grammatical structure of the listed certifications is incorrect in GS-48. The definition in GS-50, GS-52, and GS-53 correctly lists the two ways a component can be certified as organic;

- 1) either by a USDA-accredited certifying agent,
- 2) or by an external program that is determined to be equivalent or has as agreement with the USDA NOP.

However, the structure of the definition in GS-48 leads the reader to believe that there are three ways;

- 1) by a USDA-accredited certifying agent,
- 2) a program determined to be equivalent (to the certifying agent and not the NOP),
- 3) or programs that have agreements with the NOP.

This is due to the omission of the word 'or' after 'certifying agent', and the use of "by those that" after the word 'equivalent'. The inclusion of 'of' and deletion of 'by those that' will make the definition refer succinctly to the two pathways instead of three. Both inconsistencies were corrected in the definitions used in GS-50, GS-52 and GS-53. Therefore, these same grammatical edits have been made to GS-48.

Updates to the Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, **or** by programs determined to be equivalent; ~~or by those that~~ have recognition agreements with the USDA **National Organic Program (NOP)**.

Final Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent by or have recognition agreements with the USDA National Organic Program (NOP).

2. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

Corrections and Clarifications Report

October 2023

GS-48, GS-50, GS-51, GS-52, and GS-53 all reference the Persistent, Bioaccumulative, and Toxic (PBT) Chemicals list from the EPA's Toxic Release Inventory in their definition of 'Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals'. However, GS-48 failed to include the PBT acronym in its definition, while GS-52 and GS-53 do. Most grammatical guidelines and citation styles suggest adding the acronym in shorthand after being spelled out in full. The acronym has been added to GS-48.

Updates to the Text

Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals. The chemicals listed by the EPA on the Toxic Release Inventory as Persistent, Bioaccumulative and Toxic (PBT) Chemicals.

Final Text

Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals. The chemicals listed by the EPA on the Toxic Release Inventory as Persistent, Bioaccumulative and Toxic (PBT) Chemicals.

Standard for Personal Care and Cosmetic Products, GS-50

1. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-48, GS-50, GS-51, GS-52, and GS-53 all include references to the USDA's National Organic Program (NOP) in their definition of 'Certified-Organic Components'. However, GS-50 failed to include the NOP acronym in its definition. Most grammatical guidelines and citation styles suggest adding the acronym in shorthand after being spelled out in full. The acronym has been added to the definition in GS-50.

Updates to the Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent or have recognition agreements with the USDA National Organic Program (NOP).

Final Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent by or have recognition agreements with the USDA National Organic Program (NOP).

2. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-48, GS-50, GS-51, GS-52, and GS-53 all reference the Persistent, Bioaccumulative, and Toxic (PBT) Chemicals list from the EPA's Toxic Release Inventory in their definition of 'Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals'. However, GS-50 failed to include the PBT acronym in its definition, while GS-52 and -53 do. Most grammatical guidelines and citation styles suggest adding the acronym in shorthand after being spelled out in full. The acronym has been added to the definition in GS-50.

Updates to the Text

Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals. The chemicals listed by the EPA on the Toxic Release Inventory as Persistent, Bioaccumulative and Toxic (PBT) Chemicals.

Final Text

Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals. The chemicals listed by the EPA on the Toxic Release Inventory as Persistent, Bioaccumulative and Toxic (PBT) Chemicals.

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

1. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-48, GS-50, GS-51, GS-52, and GS-53 all include references to the USDA's National Organic Program (NOP) in their definition of 'Certified-Organic Components'. However, GS-51 failed to identify the acronym in its definition. Most grammatical guidelines and citation styles require the acronym to be spelled out in full before used in shorthand. The full term for NOP has been added to GS-51

In addition, the grammatical structure of the listed certifications is incorrect in GS-51. The definition in GS-50, -52, and -53 correctly lists two ways a component can be certified as organic;

- 1) either by a USDA-accredited certifying agent,
- 2) or by an external program that is determined to be equivalent or has as agreement with the USDA NOP.

However, the structure of the definition in GS-48 leads the reader to believe that there are three ways;

- 1) by a USDA-accredited certifying agent,
- 2) a program determined to be equivalent (to the certifying agent and not the NOP),
- 3) or programs that have agreements with the NOP.

This is due to the omission of the word 'or' after 'certifying agent', and the use of "by those that" after the word 'equivalent'. The inclusion of 'of' and deletion of 'by those that' will make the definition refer succinctly to the two pathways instead of three. Both inconsistencies were corrected in the definitions used in GS-50, -52 and -53. Therefore, these same grammatical edits have been made to GS-51.

Updates to the Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, **or** by programs determined to be equivalent; ~~or by those that~~ have recognition agreements with the USDA **National Organic Program (NOP)**.

Final Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent by or have recognition agreements with the USDA National Organic Program (NOP).

2. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-51, GS-52, and GS-53 all reference the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) in their definition of ‘Registered Antimicrobial Pesticide Product’. However, GS-51 failed to identify the acronym in its definition, while GS-52 and GS-53 do. Most grammatical guidelines and citation styles require the acronym to be spelled out in full before used in shorthand. The full term for FIFRA has been added to the definition in GS-51.

Updates to the Text

Registered Antimicrobial Pesticide Product. A product registered with the EPA under the **the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA, 7 U.S.C. 136)** or registered with Health Canada’s Therapeutic Products Directorate or Pesticide Management Regulatory Agency (PMRA).

Final Text

Registered Antimicrobial Pesticide Product. A product registered with the EPA under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA, 7 U.S.C. 136) or registered with Health Canada’s Therapeutic Products Directorate or Pesticide Management Regulatory Agency (PMRA).

3. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization , all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-48, GS-50, GS-51, GS-52, and GS-53 all reference the Persistent, Bioaccumulative, and Toxic (PBT) Chemicals list from the EPA’s Toxic Release Inventory in their definition of ‘Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals’. However, GS-51 failed to include the PBT acronym in its definition, while GS-52 and -53 do. Most grammatical guidelines and citation styles suggest adding the acronym in shorthand after being spelled out in full. The acronym has been added to the definition in GS-51.

Updates to the Text

Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals. The chemicals listed by the EPA on the Toxic Release Inventory as Persistent, Bioaccumulative and Toxic **(PBT)** Chemicals.

Final Text

Toxic Release Inventory Persistent, Bioaccumulative, and Toxic Chemicals. The chemicals listed by the EPA on the Toxic Release Inventory as Persistent, Bioaccumulative and Toxic (PBT) Chemicals.

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

1. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization , all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-52 and GS-53 both include the term ‘Air Freshener’ in their definition list. The majority of official Green Seal definitions reference items in the singular tense, unless otherwise indicated. The plural tense used in the GS-52 definition (‘Products’) has therefore been edited to “A product” to match with the definition from GS-53.

Updates to the Text

Air Freshener. ~~Products~~ A product designed or labeled for the purpose of masking odors, freshening, or scenting the air, but providing no cleaning or odor removal function.

Final Text

Air Freshener. A product designed or labeled for the purpose of masking odors, freshening, or scenting the air, but providing no cleaning or odor removal function.

2. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization , all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-48, GS-50, GS-51, GS-52, and GS-53 all include references to the USDA’s National Organic Program (NOP) in their definition of ‘Certified-Organic Components’. However, GS-52 failed to identify the acronym in its definition. Most grammatical guidelines and citation styles require the acronym to be spelled out in full before used in shorthand. The full term for NOP has been added to the definition in GS-52.

Updates to the Text

Certified-Organic Component. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent by or have recognition agreements with the USDA ~~National Organic Program~~ (NOP).

Final Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent by or have recognition agreements with the USDA National Organic Program (NOP).

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

1. Clarification, Annex A- Definitions (Normative), Definition Harmonization

As part of our ongoing work towards standard harmonization, all terms used in official Green Seal standards were compiled and reviewed for grammatical and informational consistency. As a result, several terms were identified as having minor grammatical errors or inconsistencies that could be corrected.

GS-48, GS-50, GS-51, GS-52, and GS-53 all include references to the USDA's National Organic Program (NOP) in their definition of 'Certified-Organic Components'. However, GS-52 failed to identify the acronym in its definition. Most grammatical guidelines and citation styles require the acronym to be spelled out in full before used in shorthand. The full term for NOP has been added to the definition in GS-52.

Updates to the Text

Certified-Organic Component. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent by or have recognition agreements with the USDA **National Organic Program (NOP)**.

Final Text

Certified-Organic Components. A *component* certified as organic (by meeting the USDA organic standards) by a USDA-accredited certifying agent, or by programs determined to be equivalent by or have recognition agreements with the USDA National Organic Program (NOP).