



Response to Comments

Revised Standard for Plastic Trash Bags and Can Liners (GS-60)

Overview

August 20, 2024

Plastic trash bags and can liners are a daily necessity in our homes, offices, schools, and other indoor spaces. No alternatives currently perform as well as plastic liners for strength, odor control, and sanitation. Unfortunately, single-use plastic liners have large environmental impacts: they require high amounts of energy to produce, create greenhouse gas emissions, and contribute to the problem of plastic waste pollution.

In 2023, Green Seal issued Edition 1.0 of the Standard for Plastic Trash Bags and Can Liners to recognize products that exhibit health and environmental leadership. The criteria include requirements for achieving virgin plastic source reduction and incorporating recycled content without the loss of functional performance. In addition, the standard sets minimum thresholds for packaging sustainability and restricts the use of hazardous chemicals and fragrances.

In 2024, Green Seal performed a review of the virgin plastic reduction criteria that involved a market scan, outreach to stakeholders, and environmental impacts research. Based on this review, Green Seal proposed to update the standard criteria related to the maximum amount of virgin plastic permitted in certified trash bags and liners. These adjustments are based on the collection of additional product data that strengthens our understanding of the top 30% of products on the market.

From June 18, 2024, to July 18, 2024, Green Seal held a public comment period and solicited responses from manufacturers, advocacy groups, industry associations, testing laboratories, and consumers on the proposed criteria of the new standard. Listed below are the names of organizations and individuals (collectively referred to as stakeholders) who provided feedback throughout the standard revision process, as well as the formal comments received during the public comment period. Green Seal's responses to stakeholder feedback can be found in the sections below.

Stakeholder Participants

The following organizations and individuals provided recommendations, shared technical and market expertise, or submitted statements of approval or substantive objections. Green Seal greatly appreciates the time and expertise volunteered by these stakeholders during this initiative.

Association for the Advance of Sustainability in Higher Education

Association of Plastic Recyclers

Berry Global

Brady Plus

Building Management Services

Chaz Miller

EFS Plastics

Gateway Liners

Northeast Recycling Council

Novolex

Responsible Purchasing Network

Revolution Bags

Sandra Cannon, EcoPurchasing Consultant

The Commonwealth of Massachusetts Operational Services Division

The Plastics Industry Association

University of Virginia

Whole Foods

Document Guide

This document contains the comments that were submitted by stakeholders during the public comment period: June 18, 2024, to July 18, 2024, and contains Green Seal's responses to those comments. To review the proposals and other revision documentation, visit Green Seal's website.

Section 1. Summary of Stakeholder Input

Section 2. Comments Submitted During the Public Comment Period

Section 3. Green Seal's Response to Comments

Section 1. Summary of Stakeholder Input

Stakeholder Support and/or Concern During Revision Proposal Development

In June 2024, Green Seal published the revision proposal for public comment. Green Seal had discussions during the development of this proposal and widely solicited technical input and general feedback from a balanced group of stakeholders including industry experts, manufacturers, and green procurement professionals.

The majority of participating stakeholders expressed strong support for the following features of Green Seal’s revised standard for trash bags and can liners:

- Reducing the amount of virgin plastic in products
- Maintaining a minimum post-consumer recycled content requirement to drive the development of end markets for recycled films
- Recognizing bags based on plastic efficiency, as opposed to using only post-consumer material as a measure of sustainability

A minority of stakeholders expressed concern about the inclusion of a minimum post-consumer recycled content requirement. One stakeholder noted the maximum allowed virgin material thresholds would require manufacturers to incorporate more than 10% post-consumer recycled content or produce a very thin liner which they noted could negatively impact product performance.

Summary of Stakeholder Support and/or Concern During Public Comment Period

One stakeholder expressed support for the inclusion of performance criteria, requirements to reduce virgin plastic use in trash bags and can liners, and the minimum post-consumer recycled material requirement in the standard. The same stakeholder expressed concern that the standard includes exemptions for prohibited components in recycled content and noted that all standards must restrict these components so recycled feedstocks may eventually be free of these substances.

Green Seal’s Full Response to stakeholder comments can be found in Section 3, herein.

Green Seal’s General Response to All Stakeholder Input

We appreciate the input and recommendations provided by all participating stakeholders. The technical and market expertise and insight have been critical to carrying out evidence-based decision-making. Green Seal standards are designed to reflect today’s environmental leadership on the North American market. Green Seal remains vigilant to address any new or emerging health and environmental risks, and advances in measuring product performance determined by scientific studies, occupational health reports, or industry guidance. As new information arises and as products are designed to be safer and more sustainable, Green Seal moves to update our standards to continue to encourage market transformation that is increasingly protective of human health and our environment.

Section 2. Comments Received During Public Comment Period

During the June 2024 to July 2024 Comment Period, Green Seal received one written comment from the following organizations or individuals.

- Sandra Cannon, EcoPurchasing Consultant

Any formatting in the comments below such as highlighting, text changes, etc. was submitted by the commenter.

Comment, Sandra Cannon, EcoPurchasing Consultant

We appreciate this opportunity to review the revised version of Green Seal GS-60 “Plastic Trash Bags and Can Liners” as well as Green Seal’s responses to our previous comments submitted in 2023. We have no further comments to submit but do have a few remarks:

- We appreciate the final version of the standard requiring the Federal requirement of 10 percent post-consumer recycled content.
- We also appreciate the push to reduce virgin plastic in the liners. The maximum amount of virgin plastic allowed greatly increases the percent of recycled content beyond 10 percent—albeit not particularly post-consumer recycled content.
- We see exemptions for heavy metals, etc. in recycled content. It will only be by all standards restricting heavy metals, toxics, etc. that the recycled content will eventually not contain these materials.
- And again, we greatly appreciate the inclusion of performance standards.

Section 3. Green Seal’s Responses to Written Comments

Topic Categories

- [Product Performance, Maximum Allowed Virgin Material, and Post-Consumer Recycled Content Amount](#)
- [Prohibited Components](#)

Green Seal's responses to comments are shown below. Note: In cases where edits are provided a ~~strikethrough~~ represents that standard text has been deleted, and **red** text notes standard text has been added. Comments have been summarized below by topic. The full comment may be seen in Section 2 above.

Product Performance, Maximum Allowed Virgin Material, Post-Consumer Recycled Content Amount

Sandra Cannon notes support for including performance criteria in the standard. She also notes support for reducing virgin plastic in liners and appreciates that the maximum allowed virgin material thresholds are effectively driving toward higher levels of recycled content. Finally, she notes approval for requiring certified bags to incorporate 10% post-consumer recycled material.

Green Seal Response: We appreciate this feedback on the proposed standard.

Outcome: No actions were taken on the requirements in the standard.

Prohibited Components

Sandra Cannon notes that all standards must restrict heavy metals and other toxins for recycled content to eventually be free of these substances.

Green Seal Response: We appreciate this note. Green Seal has received feedback that it is extremely difficult for manufacturers to both test recycled content for hazardous materials and ensure quality across batches of product due to the contamination in the recycled content stream. Eliminating intentionally added chemicals of concern from products and packaging ensures less human exposure and is a key step in moving toward a more sustainable, optimized recycled feedstock.

Outcome: No actions were taken on the requirements for heavy metals or other prohibited components.

Final Note Acknowledging Participating Stakeholders

Green Seal appreciates our stakeholders' time, expertise, and commitment to constructive collaboration as we pursue common goals: to decrease the health and environmental impacts of single-use plastic liners. We pledge to remain vigilant regarding newly defined hazards or stronger evidence of environmental impacts noted for any product eligible for Green Seal certification and to continuously raise the bar to reflect today's sustainable product leaders on the North American market.