

New Jersey Sanitary Supply Association

ISSUE ALERT



Green Seal Releases Proposed Revised GS-37 Standard for Public Comment

Green Seal released its proposed revised environmental GS-37 standard for public comment on November 16. NJSSA encourages its members to review the proposed revised GS-37 and to submit their comments to ISSA so that the association can incorporate member comments into its official submission to Green Seal. Contact bill@issa.com with your comments by January 9, 2008.

Overview of the Proposed Revisions

A number of the proposed revisions to GS-37 are likely to cause concern for ISSA members, particularly formulators. Therefore, ISSA encourages member companies to review the full text of the proposed revised GS-37 and the background document issued by Green Seal. In the meantime, the following is a brief recitation of the major areas of proposed revisions to GS-37:

- Green Seal proposes to expand products covered by GS-37 to include carpet spot removers, dry erase board cleaners and toilet bowl cleaners.
- The definition of concentrate has been revised to increase the required level of concentration for products to 1:32.
- A broader menu of acceptable performance tests has been recommended, in addition to deletion of certification of performance through comparison to other products.
- The oral toxicity has been increased in the revision to an Oral LD50 \leq 5,000 mg/kg.
- **Inhalation toxicity** is introduced as a criterion. The proposed approach requires the evaluation of acute toxicity of the product through inhalation either through **small chamber testing** or through a weighted average calculation of the individual constituents in the product formulation, with the additional requirement of emissions testing for products that fail the initial acute toxicity screening.
- The revised standard proposes to have the **undiluted** product evaluated for skin corrosion, serious eye damage and skin sensitization **whether the product is designed to be used in a dispensing system or not**.
- Green Seal proposes to prohibit ingredients that are "known to cause asthma" by virtue of referencing the **AOEC list of asthmagens**.
- Thresholds for allowable VOC content for products have been adjusted to restrict "unnecessary VOC emissions."
- The revised standard proposes to prohibit additional ingredients such as **phtalates, nitro-musks, polycyclic musks, 2-butoxyethanol**, and an ingredient class Green Seal references as "**formaldehyde-donors**." In addition Green Seal proposes to adopt the U.S. EPA Design for the Environment's approach in regard to acceptable levels of **limonene**.