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Green Seal Position on Its Standards for Antimicrobial Cleaning Products

Founded in 1989, Green Seal has developed leadership standards that provide criteria for more sustainable products and services in hundreds of categories. These standards establish benchmarks for product development, assist purchasers and consumers in making purchasing decisions, serve as a basis for certification, promote leadership in the market to enable transformation, and educate the public about more sustainable products. Recently, Green Seal issued new standards addressing specialty cleaning products for household use (GS-52) and for industrial and institutional use (GS-53). The scopes of these new standards include antimicrobial cleaning products such as disinfectants and sanitizers.

Antimicrobial cleaning products are frequently required in institutional settings such as healthcare facilities, child-care centers, schools, hospitals, long-term care facilities (such as nursing homes), military installations, and prisons. The opportunity for transmission of infectious agents is high due to the long periods of time spent by residents/occupants in these institutional settings. The long exposure period is compounded by the constantly changing nature and range of pathogenic microorganisms and also by their highly opportunistic behavior.

However, the use of some antimicrobial cleaning products may create conditions for the development of resistant bacteria. As a result, antimicrobial cleaning products should be limited to uses where there is a demonstrated benefit or where there is a strong theoretical rationale. For example, the United States Centers for Disease Control and Prevention (CDC) suggest routine use of surface disinfectants only on high-touch surfaces for the non-critical care areas in hospitals. This is because the transfer of microorganisms from environmental surfaces to patients is largely via hand contact with the surface. Although hand hygiene is important to minimize the impact of this transfer, cleaning and disinfecting environmental surfaces as appropriate is fundamental in reducing their potential contribution to the incidence of healthcare-associated infections (and other similar settings).

The United States Environmental Protection Agency (EPA) regulates antimicrobial cleaning products under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The EPA Office of Pesticide Programs (OPP) registers products that meet the requirements under this law, namely, efficacy against target microorganisms. Registered products must have labeling which is accepted by EPA, and to date, EPA has prohibited certain terms, phrases, and graphics on products, including claims that a product is more sustainable or even that it meets a leadership sustainability certification

standard; in addition, the use of such certification marks or logos on product labels or literature is prohibited. However, EPA is in the process of considering ways to allow for designations of environmental preferability through a pilot program. The pilot program began in late 2009 within the EPA (no external certification groups were involved in the pilot) and is currently projected to end in May 2013.

At this time, no products have successfully completed review through the EPA pilot. However, the use of antimicrobial products such as disinfectants and sanitizers is required in some settings, and purchasers have continued to express a desire for using more sustainable options in these situations. As a result, the current EPA policy has left purchasers and users uncertain of which products to use.

To address this need, and after more than six years of dialogue with stakeholders and observing marketplace developments, Green Seal developed stakeholder-based, open, and transparent leadership standards for more sustainable antimicrobial cleaning products, GS-52 and GS-53. Purchasers can use the criteria in the standards to evaluate antimicrobial cleaning products and choose the best products for their needs. Further, experience shows that the standards will also be used to drive development of preferable products by providing key life-cycle considerations for these products, internal benchmarking tools for manufacturers and raw material suppliers, and educational tools for purchasers and organizations promoting more sustainable procurement.

The standards include stringent criteria on sustainability considerations for the product, including those that are intended to protect the environment and human health, especially vulnerable populations. For demonstration of pesticidal performance of antimicrobial cleaning products, Green Seal relies on the EPA registration process and the relevant FIFRA regulations. Minimum risk pesticides, which do not have to go through the EPA registration process, will still need to demonstrate cleaning performance and pesticidal performance (as noted in the standards). It is not Green Seal's intent that the standards identify products for all possible antimicrobial product needs (some exceptions are specifically noted in the standard). Therefore, Green Seal understands that there may be circumstances in which purchasers and users may need to select products that cannot meet these standards.

Green Seal believes that its standards do not conflict with or violate the EPA's current approach to regulating antimicrobial products under FIFRA. This is explicitly noted in the Foreword of all Green Seal standards, which states that the standard neither modifies nor supersedes applicable laws and regulations. At this time, the use by manufacturers of the Green Seal standards for certification of FIFRA-registered products may be limited by EPA's policies regarding the labeling and marketing of such products. Nonetheless, Green Seal believes there is still significant value in providing stakeholder-based, open, and transparent leadership criteria for more sustainable antimicrobial products.