



October 9, 2007

PROJECT SCOPE & STAKEHOLDER INVITATION FOR PARTICIPATION: New Green Seal Environmental Standard for Soaps and Shower Products, GS-44

The scoping phase of the Green Seal Environmental Standard for Soaps and Shower Products, GS-44, standard development has been completed. This standard is being developed to help consumers identify and choose environmentally preferable products and services. The scoping process was intended to identify specific areas of the standard to be included. Comments were solicited on the scope of this new standard from the diverse stakeholders including producers, users, and general interest groups. This document includes a summary of the comments received.

By participating in Green Seal's standard setting process, the following organizations played an important role in Green Seal's effort to encourage the design, manufacture and end use of environmentally superior products. Their assistance and involvement is greatly appreciated.

Comments received from these organizations:

GOJO Industries, Inc.
TerrEssentials

Comments (verbatim):

Product in standard ("Scope")

I believe that, as the intention herein is to compile a potential GREEN standard for "soap", it would be in the best interests of consumers and the environment to clearly define "soap" as a traditional vegetable oil-based castile soap. It is of importance to note that the Swedish Society for Nature Conservancy has already identified castile soap as THE most environmentally-friendly cleansing agent as it is the most readily biodegradable and least toxic surfactant known. Castile soap also has the least environmental impact in its manufacturing, particularly when comparing castile soap-making processes to the more complicated and environmentally-invasive new detergent manufacturing technologies/processes.

In addition, classic traditional castile (real) soap has a long history of safe use going back centuries, whereas new man-made surfactants have limited safety data and require the use of much energy and toxic reactive inputs -- the use of extreme temperatures, heavy metal catalysts and strong acids.

Even though the FDA was lobbied and now permits synthetic detergents to be identified as "soap", many consumers feel that this labeling practice is misleading. A Green Standard for "soap" should exclude detergents/surfactants.

Ideally, the golden level of green-ness should be awarded to a USDA certified organic castile soap made simply with certified organic vegetable oils, purified water and sodium and/or potassium hydroxide and, perhaps, certified organic essential oils or certified organic botanical extracts or certified organic ground botanical materials. The truly Green soap would be a traditional castile soap, minimally-processed, without synthetic biocides/preservatives, synthetic fragrances, chelating agents, synthetic colorings, petrochemical reacted cellulose or carbomer or hydrolyzed protein thickeners, synthetic or petrochemical super-fattening emollient oils, etc.

Aquatic safety

Synthetic biocides/preservatives widely used in conventional detergent products are highly controversial compounds with potential for serious health effects and should be prohibited in Green Label soaps as there is science that associates these chemical compounds with the promotion of anti-biotic resistant bacteria. In addition, there are chemicals in this category that have been shown to produce hormone disrupting effects. Lastly, government studies have found these chemical compounds to be pervasive and persistent pollutants in our waterways.

There is recent scientific evidence that shows that when some detergent compounds are in our waterways and they mix with chlorine residues and SUNLIGHT, new toxic compounds are formed that are toxic to aquatic life.

Many synthetic chemical fragrance compounds have negative neurological and pulmonary (even carcinogenic -- musk compounds) effects and have been identified by governmental agencies worldwide as persistent air and waterway pollutants. Synthetic chemical fragrances should never be used in Green soap products. They are unhealthy for humans and wildlife, unnecessary, and unsustainable as the industrial manufacturing processes used to produce synthetic fragrance and/or "nature identical" compounds involve the use of many toxic and environmentally-unfriendly petrochemicals materials.

The Swedish Society for Nature Conservancy has determined that castile soap is the most environmentally-friendly cleansing agent as it is the most readily biodegradable cleanser, and has not been shown to have harmful environmental waterway effects.

The Danish EPA states:

"Surfactants are the active substances found in the highest concentrations in the products. The vast majority of surfactants used in cosmetics are readily biodegradable but are often highly acutely toxic to aquatic organisms. Furthermore, some surfactants are potentially bioaccumulative. Many preservatives are toxic to aquatic organisms in very low concentrations and are also very difficult to degrade due to their toxic effect on the degrading bacteria."

The following quote is also from the Danish Environmental Protection Agency and is relevant to safeguarding waterways:

"Chelating agents such as EDTA and NTA are not readily degradable, and the environmental concerns have been related to the possible potential of EDTA and NTA to remobilize metals from aquatic sediments. Furthermore, the International Agency for Research on Cancer has evaluated NTA as possibly carcinogenic to humans [IARC Monographs, Vol. 48, World Health Organization, Lyon, France]. It is proposed that EDTA and NTA shall not be used in eco-labelled products (see 4.1.6). This is in accordance with the ecological criteria for all-purpose cleaners and cleaners for sanitary facilities and for hand dishwashing agents. The existing ecological criteria for laundry detergents prescribe that EDTA cannot be used in eco-labelled products."

Prohibited and restricted ingredients

The Swedish Society for Nature Conservancy has already identified castile soap as THE most environmentally-friendly cleansing agent as it is the most readily biodegradable and least toxic surfactant known.

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Castile soap also has the least environmental impact in its manufacturing, particularly when comparing castile soap-making processes to the more complicated and environmentally-invasive new detergent manufacturing technologies/processes.

In addition, classic traditional castile (real) soap has a long history of safe use going back centuries, whereas new man-made surfactants have limited safety data and require the use of much energy and toxic reactive inputs -- the use of extreme temperatures, heavy metal catalysts and strong acids.

Even though the FDA was lobbied and now permits synthetic detergents to be identified as "soap", many consumers feel that this labeling practice is misleading. A Green Standard for "soap" should exclude detergents/surfactants.

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Biocide and preservative use

Synthetic biocides/preservatives are highly controversial compounds with potential for serious health effects and should be prohibited in Green soaps as there is science that associates these chemical compounds with the promotion of anti-biotic resistant bacteria. In addition, there are chemicals in this category that have been shown to produce hormone disrupting effects. Lastly, government studies have found these chemical compounds to be pervasive and persistent pollutants in our waterways.

Of course, one should also consider the negative environmental impact (see EPA Toxic Release Inventory reports) of the industrial manufacturing processes used to create the synthetic biocides/preservatives.

Most importantly, washing with real castile soap alone has been proven to be very effective, in fact, just as effective, and even more effective in some studies at killing bacteria than conventional detergent products with added biocides, but without the potential for negative health and environmental effects.

Lastly, there is evidence that thorough washing with simple coconut oil-based castile soap and hot water is so effective that it can destroy diphtheria, streptococci, pneumococci, even typhoid.

Dye and coloring use

Synthetic chemical dyes should never be used in Green soap products. They are unnecessary and unsustainable.

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Ideally, the golden level of green-ness should be awarded to a USDA certified organic castile soap made simply with certified organic vegetable oils, purified water and sodium and/or potassium hydroxide and, perhaps, certified organic essential oils or certified organic botanical extracts (for their skin-soothing or aromatic or coloring effects) or certified organic ground botanical materials.

Fragrance use

Synthetic chemical fragrances should never be used in Green soap products. They are unhealthy for humans and wildlife, unnecessary, and unsustainable as the industrial manufacturing processes used to produce synthetic fragrance and/or "nature identical" compounds involve the use of many toxic and environmentally-unfriendly petrochemicals materials.

Many synthetic chemical fragrance compounds have negative neurological and pulmonary (even carcinogenic -- musk compounds) effects and have been identified by governmental agencies worldwide as persistent environmental air and waterway pollutants.

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Manufacturing considerations

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Consumer education and label information

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Optional verification claims

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General comments

In my opinion, the published requirements for GS-41 are appropriate for the scope of products to be covered by GS-44. I propose the development of GS-44 product-specific health and environmental requirements are limited to those of GS-41.
