



September 9, 2011

PROPOSED REVISION: Green Seal™ Standard for Commercial and Institutional Cleaning Services, GS-42: 4.1.2 Trash Can Liners; 5.4 Entryways; and 8.0 Certification and Labeling Requirements

Green Seal issued the first comprehensive green cleaning standard in 2006, the Green Seal Standard for Commercial and Institutional Cleaning Services, GS-42. GS-42 has provided guidance on environmentally preferable cleaning of commercial and institutional facilities, and many businesses have implemented green cleaning in their facilities using over 60 Green Seal-certified cleaning service providers. During this widespread implementation, several specific issues with the original criteria have been identified. It was found that some facilities require the use of clear trash can liners as a security measure, and many facilities require a wide range of bag sizes. Also, not all facility managers are able or willing to use entryway matting, despite its clear benefits. However, the requirements for trash can liners and entryways in GS-42 are quite specific and strict, and they do not necessarily reflect current market practices. Further, GS-42 outlined details about Green Seal's certification process that are not needed in the standard. This document proposes revisions to address these issues.

Background and Implementation Considerations

Trash Can Liners: Green cleaning service providers use environmentally preferable supplies including cleaning products, janitorial paper, equipment, and trash can liners. Environmentally preferable trash can liners were defined by the Environmental Protection Agency in the Comprehensive Guideline for Procurement of Products Containing Recovered Materials and the Issuance of the Recovered Materials Advisory Notice in 1995 to be those with at least 10% post-consumer recycled content. GS-42 adopted this definition due to its national acceptance¹. However, some bag types are not widely available with post-consumer recycled content. In particular, clear bags and some unique (usually smaller) bag sizes are not readily available with post-consumer content. There are also limitations on the quality of post-consumer resin for bag production. The bags, however, can be made thinner and thus with less material than conventional bags so as to provide a similar environmental advantage as bags with post-consumer content (i.e., less reliance on new plastic material). The State of California has recognized this in their regulations for recycled content trash bags by not requiring thinner bags (those less than 0.70 mil) to meet the 10% post-consumer recycled content requirements enforced by the state². Green Seal is proposing a revision to the trash can liner requirement to be aligned with the State of California's position of not requiring thin bags to meet the post-consumer recycled content levels.

Entryways: Entryway mats help prevent dirt and harmful contaminants from getting past the entry and throughout the rest of the building³. However, there are some building types with small entryways that do not have the space for the recommended matting system to most effectively prevent the entry of dirt and contaminants, especially the size mandated by GS-42. Further, some building owners or operators prefer not to use such matting, and the Cleaning Service Provider has limited-to-no control over that decision. Yet, the GS-42 requirement prescribes use of a specific mat system size regardless of space or facility considerations. Green Seal is proposing a revision to the entryway matting requirements to include consideration of these factors and require implementation of matting to the extent feasible.

¹ U.S. Environmental Protection Agency. 2007. Consolidated Recovered Materials Advisory Notice (RMAN). <http://www.epa.gov/osw/conservation/tools/cpg/pdf/consolrman.pdf>

² State of California. Article 5. Recycled Content Trash Bag Program. <http://www.calrecycle.ca.gov/Laws/Regulations/Title14/ch4a5.htm#top>

³ Roberts, JW; Camaan, DE; Spittler, TM. 1991. Reducing lead exposure from remodeling and soil track-in in older home. Presented at Air and Waste Management Association, 84th Annual Meeting. http://hero.epa.gov/index.cfm?action=search_new.view&reference_id=667774

Certification and Labeling Requirements: Green Seal's standards are used for several purposes. One is for Green Seal certification, but other uses include guidance for facility managers and companies developing a green cleaning program, a reference for specifiers and standard developers to incorporate green cleaning in their programs, and an educational tool for those interested in learning about green cleaning, among other uses. As a result of the multiple uses of the standard, inclusion of the Green Seal certification process, currently in GS-42, is not needed. Green Seal is proposing the revision to the certification and labeling requirements to eliminate this extra information. In addition, these requirements will be updated to be more aligned with other Green Seal standards.

Proposed Revisions

Trash Can Liners:

Current version:

4.1.2 Plastic trash can liners shall contain a minimum of 10% post-consumer recycled content.

Proposed revision:

4.1.2 Plastic trash can liners shall contain a minimum of 10% post-consumer recycled content **or have a thickness of less than 0.7 mils.**

Entryways:

Current version:

5.4 Entryways Cleaning Service Providers shall:

5.4.1 Keep outside entryways clean and free of debris through daily cleaning.

5.4.2 Ensure the use of walk-off matting both inside and outside building entryways that, at a minimum, meets the following requirements: 6-10 feet of scraper/wiper matting, followed by 6-10 feet of wiper matting, for an overall total of 12-20 feet of matting for every entry point to the building.

5.4.3 Vacuum matting daily or more frequently, if required (e.g., high traffic areas) to prevent migration of contaminants into the building.

Proposed revision:

5.4 Entryways Cleaning Service Providers shall:

5.4.1 Keep outside entryways clean and free of debris through daily cleaning.

5.4.2 **Implement, to the extent feasible,** the use of walk-off matting both inside and outside building entryways that, at a minimum, meets the following requirements: 6-10 feet of scraper/wiper matting, followed by 6-10 feet of wiper matting, for an overall total of 12-20 feet of matting for every entry point to the building. **Smaller mat sizes may be acceptable when the entry space does not allow for the required size. If a facility owner/operator does not allow the use of the required matting, the Cleaning Service Provider shall document that all reasonable efforts were made to inform the facility owner/operator of the reasons for using matting and how to obtain appropriate matting.**

5.4.3 Vacuum matting daily or more frequently, if required (e.g., high traffic areas) to prevent migration of contaminants into the building.

Certification and Labeling Requirements:

Current version:

8.0 CERTIFICATION AND LABELING REQUIREMENTS

This standard provides a benchmark for environmentally responsible cleaning services as well as a basis for evaluating and certifying such services in Green Seal's Certification Program. The Certification Program has an established procedure for accepting applications for products or services, evaluating them to an applicable Green Seal Environmental Standard, and certifying those that meet all the requirements for certification.

The certification requirements for Cleaning Service Providers include meeting all the criteria provided in this Standard in previous sections. Cleaning Service Providers that apply for certification will have to provide documentation demonstrating compliance with the criteria. In addition, to verify compliance, Green Seal will conduct on-site audits that may include the

Cleaning Service Provider's own facilities, as well as a sample of the facilities cleaned by the Cleaning Service Provider.

Green Seal also conducts monitoring of certified products or services to ensure continued compliance with the requirements of certification. In this case, Cleaning Service Providers will have to maintain compliance with the criteria in this Standard and will be evaluated periodically by Green Seal to demonstrate that they do.

After an applicant goes through the evaluation process, they will be notified if they meet all the requirements for their cleaning service to become Green Seal-certified. Upon certification, the Cleaning Service Provider will be licensed to use the Green Seal Certification Mark with respect to the certified service in accordance with the rules governing use of the Mark.

The Green Seal Certification Mark may appear in the advertising materials of a Cleaning Service Provider with respect to the cleaning service certified under this Standard.

The Green Seal Certification Mark shall not be used in conjunction with any modifying terms, phrases, or graphic images that might mislead consumers as to the extent or nature of the certification. All text and graphics using the Green Seal Certification Mark and Green Seal's name in advertising, brochures, reports, promotional or other materials shall be approved in writing by Green Seal.

Wherever the Green Seal Certification Mark appears, there must be a description of the basis for certification. The description shall be in a location, style, and typeface that are easily readable by the consumer. Unless otherwise approved in writing by Green Seal, the description shall read as follows:

"This cleaning service meets the criteria of the Green Seal™ standard for Cleaning Services for reduced toxicity, waste, and exposure."

For use at specific facilities, unless otherwise approved in writing by Green Seal, the description shall read as follows:

"This facility is cleaned by a service that meets the criteria of the Green Seal™ standard for Cleaning Services for reduced toxicity, waste, and exposure."

Proposed revision:

8.0 CERTIFICATION AND LABELING REQUIREMENTS

Wherever the **cleaning service claims to be certified to this standard, it shall be based on a third-party certification program⁴ with an on-site auditing program, and shall state** unless otherwise approved in writing by Green Seal:

"This cleaning service meets the Green Seal™ Standard for **Commercial and Institutional Cleaning Services, GS-42**, by reducing **waste and avoiding products that are harmful to humans and the environment.**

For Green Seal-certified services, the Cleaning Service Provider will be licensed to use the Green Seal Certification Mark with respect to the certified service in accordance with the rules governing use of the Mark. The Green Seal Certification Mark may appear in the advertising materials of a Cleaning Service Provider with respect to the cleaning service certified under this Standard.

⁴**This will be added to the definition section of the standard: Third-Party Certification Program.** A program without any financial interest or stake in the sales of the product or service being certified, or other conflict of interest. There must be a standard to base the certification upon and the standard must be appropriate and meaningful for its intended purpose. The standard must be publicly available and developed with stakeholder input. Certification to the standard must be completed by an independent party (e.g., not the manufacturer of the product being certified), include site inspections and have a monitoring program to verify ongoing compliance.

Instructions for Commenting:

Green Seal is accepting comments from the public on the proposed revision **until September 23, 2011 at 8PM Eastern.**

Any comments outside of the scope of these changes will not be considered during this review process. The comments received on the revision under review will be responded to with a response to comments document and any outcome that results will be made publicly available. It is not anticipated that a second review will be conducted. There will be no balloting on this revision due to its limited scope and since this process is open to the public at large, rather than a set of registered stakeholders.

Commenting will be conducted through Green Seal's online forum. Once registered on the forum for this project, one can post comments on the proposed revision. All registered users will be able to view all the comments and the username of the commenter. There is a Help section available once you log in to the forum. Green Seal has administrative rights to the forum to ensure proper use of the online forum.

To register for the project and access the forum go to the project web page:
<http://www.greenseal.org/GS42Revision.aspx>

Register for an account; for the username please use first initial and full last name (e.g., J Smith); select "GS-42 Criteria Revisions 2011"; provide all requested information; click Register.

You should receive a welcome email from the Green Seal Forum within one to two business days, please account for this when approaching the commenting deadline.

If you have already registered through the forum, please email forumadmin@greenseal.org with your username and request to be added to the GS-42 Criteria Revisions 2011 project.

If you have any questions, please contact Green Seal at (202) 872-6400 or email standards@greenseal.org

Thank you for your interest and assistance with this process.

Sincerely,
Cheryl Baldwin, Ph.D.
Vice President of Science and Standards