



October 14, 2011

**COMMENTING PERIODS RESULTS: Green Seal™ Standard for Commercial and Institutional Cleaning Services, GS-42, Criteria Revisions: 4.1.2 Trash Can Liners; 5.4 Entryways; and 8.0 Certification and Labeling Requirements**

Green Seal proposed criteria revisions for 4.1.2 Trash Can Liners; 5.4 Entryways; and 8.0 Certification and Labeling Requirements in the Green Seal Standard for Commercial and Institutional Cleaning Services, GS-42. Comments from the public were solicited through an online forum from September 9, 2011 until September 23, 2011.

Included in this document are the comments received on the proposed criteria revisions along with Green Seal responses. No changes were made to the proposed criterion revision for the issued Second Edition of GS-42.

By participating in Green Seal's standard setting process, the following organizations that provided comments 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.

**Commenting Organizations:**

Revolution Bag  
Webster Industries  
And individuals

The language from the proposed criteria revisions is included, followed by comments, and Green Seal's response to the comments. *Issued Standard language is provided in italics.*

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

**Comment:**

Since can liners are mfg. by ton of pellets not by exact thickness ( label claims are far from actual thickness) I have used a micrometer to check and the thickness varies a great deal  
Why do we want to open this can of worms?  
What about large (55 gal ) liners?

**Response:**

The standard is written primarily for the cleaning service provider or for customers of cleaning service providers. These audiences purchase trash can liners based on their gauge/thickness rather than a ton of pellet. The gauge information is typically what is included in the technical specifications for these products (ton of pellet is not provided). As a result, the reference to gauge/thickness (via mils) will be maintained.

If more durable trash can liners are needed for a particular purpose than the 0.7 mils or less thickness allows, then the bags will need to have a minimum of 10% post-consumer recycled content. A survey of the market demonstrated that there are options available in a range of sizes that meet this updated requirement (including 55 gallon).

**Comment:**

We welcome the involvement of Green Seal in leading the way for new standards in green cleaning and particularly can liners which have been often overlooked and misunderstood.

We have been manufacturing recycled can liners since 1974 and were the first manufacturer to seek and receive 3rd party certification in 2007. While we applaud all initiatives by government and non-profit organizations to develop standards defining environmentally conscious can liners, as industry and manufacturing experts we feel that these standards (10% PC) do not go nearly far enough.

With the upmost respect we disagree with the statement related to the limited availability of post consumer can liners on the market today. These can liner products are readily available in all shapes, sizes and colors as outlined by the submitted product information sheet for our products. 10% post consumer content is achievable by all manufacturers of can liners and does not go nearly far enough. It is our opinion that the standard be changed to 50% total recycled content; 10% of which being post consumer for all low density bags of .7 Mil and greater. There is ability to manufacture can liners with much greater than 10% PC and even 50% total recycled content but we propose 50% recycled content as a new standard to allow the market to transition. We propose leaving the post consumer content at 10% based on the tight market for post consumer recycled plastics but it is our hope that these materials will become more available as demand continues to rise allowing for increased PC content. Post industrial recycled plastic is available and has equal benefits for the environment and can easily fill the 40% of content we propose.

In regards to products that are less than .7 Mil... it is quite feasible to manufacture this product with 10% post consumer as demonstrated by our 10% Post Consumer High Density products. There are limits to the recycled content with this category of product given its thin gauge and required strength but 10% is quite feasible. Recycled content can liners that are less than .7 Mil is less common in the market but we

would like to see that change.

We ask that you please take a close look at our suggestions and hope that you will value our 50+ years experience as a can liner manufacturer and nearly 40 years manufacturing recycled can liners. We are readily available to elaborate on our input, please feel free to contact us if we can be of any further assistance in setting these guidelines.

**Response:**

The standard represents leadership in the marketplace, but not the top niche of the marketplace. This means that the standard provides direction on the preferable practices and procedures of cleaning services. It doesn't aim to identify the best possible practices and procedures of cleaning services. As a result, the trash can liner requirement outlines the preferable products that should be used rather than the best possible products that could potentially be used. While 50% (or more) post-consumer content may be available in the marketplace, it is not very common; it is more representative of the top niche or a best possible option, rather than the preferable option. Further, the 10% post-consumer content level aligns with the U.S. Environmental Protection Agency's guidance as well as the guidance in the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) rating systems for preferable trash can liner products. We agree that having more products available with higher levels of post-consumer content or thinner bags with recycled content would be desirable. However, there aren't enough of these products available for a leadership standard like this one to require them. As a result, the 10% post-consumer content level will remain the same.

**Comment:**

We are a manufacturer of a full line of EPA compliant plastic trash can liners. Our EPA compliant standard product line includes more than one hundred sizes and gauges, many of which are less than 0.70 mil. Our compliant product line includes sizes and gauges for all of the most common trash cans and containers encountered by institutional cleaners. Our recycled post-consumer content resin is certified by SCS (Scientific Certification Systems). And, our compliant trash can liners are being sold from New York to California, and are just as strong as any virgin bag, and don't weigh any more than virgin bags, and don't cost any more.

We applaud Green Seal GS-42 for providing a much needed component of the green movement.

We hereby requests Green Seal reconsider the wording and scope of its proposed change to GS-42, 4.1.2 Plastic Trash Can Liners.

**Rationale and Recommendations**

It would seem that a national standards organization such as Green Seal would not in effect advocate circumventing the nationally accepted EPA definition of compliant plastic trash can liners and elect to align with one single state especially when there is already ample exception language provided within the EPA Comprehensive Procurement Guidelines. Language that provides exceptions to the requirement of having to buy EPA compliant plastic trash bags whenever they are not readily available, do not perform, do not meet buyer specifications, or are not competitively priced. Thus simply adding this language to Green Seal's existing GS-42, 4.1.2 is all that is necessary and it will avoid much needless conflict and confusion that will accompany Green Seal's change as currently proposed.

Conflict and confusion between Institutional Cleaning Services and their clients and their clients' facilities management that align and comply with LEED, and conflict and confusion between Institutional Cleaning Services and the thousands of Federal and State buildings that are required to follow EPA Comprehensive Procurement Guidelines, and conflict and confusion for institutional cleaners and facility

management in other states that may have their own state regulations to contend with, and needless conflict and confusion for distributors and manufacturers.

We hereby requests Green Seal to consider the following wording to be used in its proposed revision to GS-42, 4.1.2. This wording accomplishes all of Green Seals stated objectives and maintains consistency and alignment with LEED and EPA Comprehensive Procurement Guidelines:

4.1.2 Plastic trash can liners shall contain a minimum of 10% post-consumer recycled content except in the following circumstances.

- + Where not readily available,
- + Where not available in the required size or other job critical specification,
- + Where fairly determined to be of lesser strength,
- + Where not available at competitive pricing,
- + In California and States that adopt California Public Resources Code Section 42290-42298 that defines “regulated trash bags” as having a thickness of 0.70 mils or greater, thus exempting trash bags that have a thickness of less than 0.70 mils.

We believe this to be a more neutral, more consistent and more accurate position for Green Seal to follow especially in view of the following:

- + even with the 4.1.2 change as currently proposed by Green Seal, trash bags that have a thickness of less than 0.70 mils and do contain 10%-100% post consumer content will still be considered the Environmentally Preferred Products, and that will cause even more confusion,
- + several of Green Seal’s “Background and Implementation Considerations” are incorrect,
- + the 4.1.2 change as currently proposed by Green Seal could be considered as showing favorable bias to the interests of the large trash bag manufacturers that openly promote bags made from virgin resin as being most preferable and consider bags with recycled content a necessary evil,
- + Green Seal’s proposed change to GS-42, 4.1.2 Plastic Trash Can Liners, as currently written, causes undo harm to manufacturers that produce EPA compliant bags that are readily available, come in all the same sizes as virgin bags, are just as strong as virgin bags, don’t weigh any more than virgin bags, and don’t cost any more.

We thank Green Seal for considering the foregoing issues.

**Response:**

The exceptions are included in the EPA Comprehensive Procurement Guidelines where post-consumer content is the only option. Since the proposed criterion offers an alternative path of using bags with less material, thin gauge, the exceptions are not necessary. Further, the standard should include the most objective criteria possible. The addition of exceptions as suggested would make the criterion subjective and the criterion would be difficult to understand for users and verify for certification. As the criterion was proposed, it was aligned not only with the State of California but also the drafted revisions for the U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED) rating systems. As a result, the criterion will not be changed.

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**5.4 Entryways Cleaning. 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.

**Comment:**

A really good change, this solves the ongoing problem of "owner won't do it" or can't do it.

**Response:**

Your comment is acknowledged

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**General Comments**

**Comment:**

These changes are certainly improvements!!!

**Response:**

Your comment is acknowledged