

Call for Comment on Proposed Revisions to GS-8, Household Cleaners
August 14, 2006

Dear Reviewer:

Well before Green Seal entered the arena of institutional and industrial housekeeping, it had staked a claim in the consumer or household cleaning market with its introduction back in 1993 of an environmental leadership standard for household cleaners. Given the nature of the market at that time and through most of the rest of the 1990s, there was limited acceptance of the household cleaners standard (GS-8) by manufacturers, and individual consumers had not yet shown much concern about cleaning chemicals in the marketplace.

The situation has changed considerably in recent years, spurred by a number of factors, including the green revolution in the institutional cleaning industry, the sustainable building movement, and the growing awareness of the relationship between personal and family health and the home environment. Consequently, there is now considerable interest on the part of some household cleaner manufacturers in demonstrating that their products meet leadership environmental levels.

Green Seal is therefore proposing herein an updating of GS-8 so that it will reflect environmental leadership among consumer cleaning chemicals in the current market. Green Seal is basing this revision on criteria in GS-37, the Industrial and Institutional Cleaners Standard, adapted and modified to household cleaners. Given this approach, Green Seal seeks comment on the proposed revisions with the goal of insuring that GS-8 reflects leadership levels among household cleaners today. Green Seal especially appreciates comment on areas not addressed in this proposal where objective, scientifically-based criteria may be available and valuable in defining leadership in protecting health and environment.

While GS-37 itself may be undergoing revision as it is re-evaluated in the coming year, Green Seal believes that its current, strict criteria serve as a good baseline for revising GS-8 in the meantime. Should additional areas of concern arise in any future revision of GS-37, corresponding modifications may be made in GS-8.

***Stakeholder comments should be submitted in writing and received no later than
September 25, 2006.***

In addition to any general remarks, please refer to specific sections on which you have comments and include any relevant supporting documentation. Your comments will become part of Green Seal's public record. Please send your comments to:

Green Seal, Inc.
Attn: Household Cleaners
1001 Connecticut Avenue, NW, Suite 827
Washington, DC 20036

Or by fax: (202) 872-4324 (please fax no more than 10 pages)
Or by e-mail: greenseal@greenseal.org

By participating in the process of setting environmental standards, you play an important role in our efforts to encourage the design, manufacture, and use of environmentally responsible products and services. If you have any questions, please contact Green Seal at (202) 872-6400. Thank you in advance for your participation. We look forward to receiving your comments.

Sincerely,

Arthur B. Weissman, Ph.D.
President & CEO