



american cleaning institute®

July 16, 2021

Brielle H. Welzer  
Director, Science and Standards Department  
Green Seal Headquarters  
1717 K St NW, Suite 900  
Washington, DC 20006

**Re: Comments of the American Cleaning Institute on Green Seal’s “Healthy Green Schools and Colleges Standard for K-12 School Districts and Higher Education Institutions”**

Dear Ms. Welzer:

I write on behalf of The American Cleaning Institute® (ACI)<sup>1</sup> regarding the draft “Healthy Green Schools and Colleges Standard for K-12 School Districts and Higher Education Institutions” (the Standard). ACI’s member companies represent manufacturers, formulators, suppliers and distributors of cleaning products in the United States who are dedicated to the safe, effective, and sustainable use of cleaning products.

## **Section 2: Training**

ACI applauds the clear messaging the Standard takes in regard to training. Proper training for cleaning, sanitizing and disinfecting is essential in protecting the health of workers and those that use an institution’s facilities. Training programs for using cleaning, sanitizing and disinfecting products should have a clear emphasis on reading product labels. Labels contain important information on how to use products safely and effectively. Users that understand how to read a label, warnings to be aware of, and the correct personal protective equipment (PPE) to use for any given product are more likely to use them safely, and to ensure that any given product is used in a way that it is most effective. Reading the label helps ensure that unfamiliar products are also used correctly, and that users are paying attention to how a new formulation of a familiar product can be used.

ACI understands the importance of training and safety. For this reason, we have developed several informational pieces on the topic of product labels. You can find our “How to Read a Cleaning Product Label” infographic [here](#) along with a short video on “How to Read a Label.” We are also currently working on a “How to Read a Disinfecting Product Label” infographic which should be available in the

---

<sup>1</sup>ACI represents the \$60 billion U.S. cleaning product supply chain. ACI members include the manufacturers and formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and chemical distributors. ACI serves the growth and innovation of the U.S. cleaning products industry by advancing the health and quality of life of people and protecting our planet. ACI achieves this through a continuous commitment to sound science and being a credible voice for the cleaning products industry.

coming weeks. These products are for anyone using cleaning products either in a home-use setting or industrial and institutional (I&I) settings, pointing out what to pay attention to on product labels.

#### **Section 4: Procurement**

##### Disinfecting Products:

The Standard as it is currently written identifies a specific set of disinfectants that should be used. This list leaves out many effective active ingredients important for disinfection, which are found safe for use by the Environmental Protection Agency (EPA). The Standard specifically identifies combination products of peroxyacetic acid (peracetic acid or PAA) and hydrogen peroxide (H<sub>2</sub>O<sub>2</sub>) as products to avoid. This is shortsighted for two reasons. First, PAA products only exist in combination with H<sub>2</sub>O<sub>2</sub>. Second, PAA/H<sub>2</sub>O<sub>2</sub> products are on EPA's Safer Chemical Ingredient List. Active ingredients on the Safer Chemical Ingredient List go beyond standard EPA safety testing and meet high levels for both safe use and sustainability.

All EPA registered products meet the Agency's high standards for safety. EPA requires a wide variety of scientific data for every active ingredient in disinfecting products, including acute and chronic studies on how it may affect human health and the environment when used. Data gathered includes information on skin, eye, and inhalation toxicity and irritation. EPA's process for approval is one of the most data-intensive regulatory systems, which ensures that registered products pose no unreasonable risks to humans of all ages. By eliminating registered products and chemistries, this list is limiting the tools available for schools to protect those that use their facilities.

The Standard currently precludes any Quaternary Ammonium Compound (Quat/QAC) products from use. Approximately half of the List N products (EPA's list of products proven effective against SARS-CoV-2) contain a Quat ingredient. These ingredients represent an important chemistry, especially for the ongoing fight against the novel coronavirus, for which many students are still unable to be vaccinated. Reducing the possible tools to fight the pandemic may impact a facility's ability to keep occupants safe. These products are also important tools for fighting a variety of pathogens where surfaces play a role in transmission and are thus an important tool to protecting the health of those using facilities. Additionally, as noted previously, EPA registered products containing Quats are proven safe and effective when used as directed on the label.

The Standard does point out EPA's Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing; however, it does not identify EPA's Safer Choice program as an exemplary label to help identify products that meet high safety and sustainability standards. It is also the only reputable ecolabel to certify disinfecting products. We believe this to be an oversight of the Standard. Although EPA does include Safer Choice on its list, it is important to specifically acknowledge this program in the Standard, especially for cleaning and disinfecting products.

Additionally, many of the labels on EPA's list may not pertain to cleaning and disinfecting practices, so it may be important for Green Seal to explicitly name which labels are found on appropriate products and meet Green Seal's intended goals in the Standard, since each label has a different objective and standard that must be met.

##### Hand Sanitizers:

Section 4 of the Standard directs users to Hand Sanitizing Products certified by Green Seal or that fall under EPA's Recommendations for Federal Purchasing. It is critical to note here that the Food and Drug Administration (FDA), not EPA, regulates hand sanitizing products as Over-The-Counter (OTC) Drugs

under the Monograph System. In these monographs, FDA details the safety and efficacy studies needed for active ingredients to be determined as Generally Recognized as Safe and Effective (GRASE). During the pandemic, the FDA allowed an expansion of hand sanitizer production, bringing a wide variety of new manufacturers to the market. With this change, many sanitizers entered the market with harmful ingredients such as methanol and 1-propanol. Guidance on hand sanitizers in the Standard should make special note of FDA's guidance on [recalled](#) hand sanitizing products.

**ACI tools:**

The American Cleaning Institute has a variety of tools on cleaning and hygiene protocols especially created for schools. We encourage Green Seal to consider and/or reference these in the Standard.

[Healthy Schools, Healthy People](#) is a joint initiative between ACI and the Centers for Disease Control and Prevention (CDC) dedicated to supporting school systems nationwide with tools to help reinforce hand hygiene and cleaning practices to prevent the spread of infectious disease and reduce related absenteeism. The initiative has information and materials designed for nurses, educators, parents, administrators, and students.

As part of the Healthy Schools Healthy People initiative, there is a [Commit to Clean Toolkit](#), which offers resources for school administrators and educators to help communicate the importance of cleaning, disinfecting and hand hygiene for a healthy and successful academic year. All materials align with key public health guidelines and can help keep students safe, healthy, and learning.

Thank you for your attention to comments and interests of the members of the American Cleaning Institute.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Sell", written in a cursive style.

Nathan Sell  
Director, Regulatory Science