

**Unified Green Cleaning Alliance
Summary of Meeting V - DRAFT
Longhouse Cultural and Learning Center, Evergreen State College
Olympia, WA
February 20, 2003
8:15-12:00**

The meeting began at 8:20am with facilitator Marsha Willard welcoming the group and thanking George Leago, Facilities Services Manager, Evergreen State College for providing the meeting space and Dale Burson, President, Dynamic Research Corp for sponsoring lunch. She also extended a welcome to special guests Mark Petruzzi from Green Seal, Kirsten Ritchie from Scientific Certification Systems and Scot Case from The Center for a New American Dream.

Marsha briefly described the two main parts of the agenda:

- 1) Continue voting and discussion for prioritizing attributes; and
- 2) Focus on how the attributes should be used for developing and selecting cleaning products. Presentations by Green Seal, Scientific Certification Systems and The Center for a New American Dream were designed to provide information on currently available certification systems, verification and certification models and examples of how attributes or cleaning product criteria could be used to develop environmentally preferable purchasing specifications.

The concept of sustainability was reviewed. A sustainable product was defined as one that does not...

- Contribute to accumulation of manmade substances from the earth's crust in the biosphere;
- Contribute to the degradation of nature (species or habitat);
- Impede the ability of people to survive and thrive; or
- Unfairly or inefficiently consume resources.

It was explained that after this meeting the Zero Waste Alliance (ZWA) would prepare and submit a first draft of a final report. The group will be asked to review the document and to make comments. Meeting VI will be used as a forum to discuss the draft. A revision of the report will be made including a minority report, if necessary. Completion of the report is not expected to extend more than a couple of weeks past Meeting VI.

In the next 1.5 hours, Round IV of voting was completed followed by an exercise to separate the "Deal-breakers" from the "Tie-breakers". Deal-breakers were defined as attributes that are critical and must be included in the attribute set in order for UGCA members to accept that the product can be called sustainable. Tie-breakers may be defined as attributes that are not necessarily critical for the definition of a sustainable product, but that are desirable and may distinguish a good product from a great product. Tie-breaking attributes are those that may be preferred but not mandatory for product acceptance.

UGCA members proceeded to vote. Each organization received 10 dots. Members were divided into the following stakeholder groups and were asked to use appropriately colored dots:

Blue:	Institutional Purchasers
Red:	Product Users
Orange:	Formulators and Manufacturers
Green:	Policy Makers and Environmental Groups

The following attributes received the greatest number of round 4 votes:

HH3:	Must not contain teratogens
HH4:	Must not be mutagenic
T1:	Safety training
T2:	ANSI formatted MSDS

Discussion:

With respect to safety training, one UGCA member noted that the attribute, safety training was vague in meaning and asked about its impact on small and large companies. In response, it was argued that the burden of safety training should be on the distributor company. It is difficult for small formulators to put together training unless required by law. If you're a purchaser you may want training from formulators. The issue is that even with training materials from a formulator, it is still the purchaser's responsibility to train. Purchasers must make certain that sustainability or safety training from the manufacturer is consistent with organization that it is selling to. Training needs can differ greatly – by location, etc and it is important to ensure that the structure of the training meets the purchaser's needs. One member noted that some companies don't want you to train them – that they don't want people to see the dangers and MSDS sheets, and so on.

Marsha summarized the discussion as training should be consistent and made available by the formulator or distributor.

With respect to the attribute, Efficacy E#1: Effective when diluted, it was noted that sometimes dilution instructions are misleading because they make the product appear concentrated. But the product may not be effective at the recommended dilution, leading people to use more, which goes against our group's efforts.

The questions was asked by a manufacturer/formulator of the purchasers as to whether or not they rely on the labels and manufacturers recommendations or on their own testing to determine dilution rates. The response was that users tend to believe the label. Purchasers and users rely on the manufacturer's label at least initially. Custodians/users will provide feedback on the effectiveness within a short time. Dilution information is important because users must be trained and need to know the dilution rate. It needs to be simple.

It was recommended that the attribute should be reworded to read "...effective at ready-to-use concentration...". It was noted that the idea that the "product works at recommended dilution"

(efficacy#1) really refers to efficacy. The idea of dilution also implies the use of a concentrate which is a different issue.

The question was raised as to whether or not efficacy should be an attribute of a sustainable cleaning product. It was noted that the products submitted for consideration by the Massachusetts RFR (Request for Response, i.e., purchasing specifications) were all being tested using standardized tests by the Toxics Use Reduction Institute in Lowell, MA to see if they are effective at the manufacturer's recommended dilution rates. In response, it was noted that efficacy is integral to sustainability and that testing can be nebulous and problematic. Products may pass a standardized testing protocol but not be effective in real-life applications. It costs a lot to test products to meet the criteria. Facilities and types of soil vary greatly. Consider the difference between a locker room, a Chinese restaurant and a nursing home with respect to the removal of grease, for example. As a counterpoint, it was noted that there is a perception that green products do not work. Standardized performance testing provides minimum assurance that a product meets minimal claims. However, it is possible that a product meets the defined standard but the users will say it does not work. There are also different performance standards that can be met. For MA, it made sense to pick one and to let the buyer beware with respect to how the product is actually used. To summarize, products can make a claim based on standardized performance testing, but at some point performance will depend on use.

With respect to the issue of concentrates, it was noted that purchasers would like concentrated products because otherwise you are shipping water. Both criteria are needed. A manufacturer argued that there is a need for flexibility with respect to concentrates; that the buyer must assume some responsibility.

The discussion was summarized as follows. The product must be effective and efficacy is an important issue to be included in the report (Dealbreaker). While it is important, ultimately the market decides on what products will be used. The issue of concentration concerns more sustainable shipping and packaging but there still is a need for "ready to use" products in the marketplace. It was recommended that we note that concentrates are "preferred".

With respect to concentrates, it was recommended that we also need to encourage "no chemical contact systems" for both concentrates and ready-to-use products. It's a current trend that benefits both cost and safety.

After Round IV of voting, the group broke into stakeholder groups to review the complete list of possible attributes and to determine if there were any attributes listed that must be included in the attribute set, i.e., dealbreakers. The groups were instructed to look at UGCA selections both by specific attributes and by broad categories and to identify attributes or categories that are dealbreakers or tiebreakers or neither. The group was asked to add notes where appropriate. Some attributes are broad, and others are more specific and prescriptive. The idea behind this exercise was to identify both specific attributes and/or general categories or principles that are dealbreakers and to make note of them. The results were collected and will be compiled in preparation for Meeting VI.

The rest of the meeting was devoted to presentations by the guest speakers and discussion that followed. Copies of all of the presentations from this meeting can be found at the UGCA website (<http://www.zerowaste.org/ugca.htm#meetings>). Attendees were provided with a set of questions to consider in light of the presentations. The questions were:

How can a certification program or product standard:

1. promote sustainability and not just environmental benefits
2. encourage continual improvement in product development
3. be flexible enough to adapt with innovations, new information and new discoveries
4. be inclusive (including cost which is an issue for small manufacturers)
5. recognize superior performance
6. provide purchasers and users with confidence that the product meets the claimed criteria and is truly more sustainable and safe for humans and ecosystems.

The first presenter was Mark Petruzzi, V.P. of Certification at Green Seal. Mark noted that Green Seal is classified as an environmental education organization. He noted that the use of an ecolabel such as the Green Seal is just one component of a sustainability program and that Green Seal is a member of the Global Ecolabeling Network.

Kirsten Ritchie Director, Environmental Claims Certification for Scientific Certification systems presented second. She stressed that definitions of the attributes are critical. If the claims are not defined clearly and in a manner in which they can be tested and verified, then the definition is not effective. She noted the problems that arise with vague claims and illustrated some non-verifiable claims that would be called “spurious” at best. Words like ‘green’ and ‘non-toxic’ should be avoided because they cannot be adequately verified.

Scot Case, Director of Procurement Strategies at the Center for a New American Dream presented third. He described the process by which he facilitated a group of purchasers to agree on environmentally preferable cleaning product attributes. Scot also talked about the development of the Massachusetts environmentally preferable cleaning product purchasing specifications (MA RFR) and the status of submissions. He emphasized the importance of having one standard everyone agreed on, but noted that initially everyone thought their’s was best. His working group agreed on 12 mandatory criteria based on GS-37 developed by Green Seal. The MA purchasing specifications expanded beyond GS-37 by applying GS-37 to more products than are currently certifiable and by including both mandatory and desirable criteria. An example of a desirable criterion is that the manufacturer provide information on whether or not there are asthmagens in the formulation. Scot noted that once the award is made in Massachusetts the Center for a New American Dream will provide a list of organizations/products that meet the criteria on their website.

A lively discussion followed. Some of the key points raised in the discussion are described below.

Mark was asked if it is possible for Green Seal to certify a product if the formulator provides a list of the ingredients. The response was yes. In other words, where there are already human

and ecological data available for chemicals, just disclosing the list of ingredients can avoid the need for testing. Green Seal assumes that the impacts of all ingredients are additive and that there are no synergistic effects. Therefore, review of the ingredients can lead to certification.

When asked about the organization itself, Mark noted that Green Seal currently employs 8 people and there are no test centers on site. Technically Green Seal is not classified as a standard creating organization or a certifying body but as an environmental education organization. They are also working to create demand on the institutional side.

It was repeated that if a product meets MA RFR, the Center for a New American Dream will include the manufacturer's claim on their website that they meet the standard whether their product is the winning bid or not.

Scot was asked if the stakeholder process he convened included governmental purchasing representatives only. The reply was yes, and that the government said no to inviting manufacturers or private purchasers. The group felt it had the experience to develop criteria without engaging manufacturers or private purchasers. The goal was to get everyone to agree. It was noted that in contrast, the UGCA includes a broad and diverse group of stakeholders.

It was pointed out that the MA RFR provided an example of how to be creative with criteria and to allow people to locally define what is important to them by including both mandatory and desirable criteria. One participant noted that he believes it is human nature that when there are both mandatory and desirable criteria, the desirable eventually becomes mandatory.

Scot noted that the MA RFR supports national environmental criteria but regional testing if desired and that the desirables tend to be social aspects not related to product formulation. (However, this is not always the case, i.e. asthma reporting)

Marsha then turned the discussion toward how to proceed with a select group of attributes so that they are accessible and affordable to manufacturers and verifiable and flexible over time.

One member noted that each stakeholder group has a different perspective and that the Center for a New American Dream left out other parties, i.e, manufacturers, users etc.

The costs of certification and testing get passed through to the consumer and the cost of Green Seal certification is a lot – prohibitive to small entrepreneurial companies. Testing may be required to achieve certification and it is possible that full aquatic toxicity testing of product ingredients for example may result in costs as high as \$50-100K to get a product certified. Therefore it is important to keep in mind costs, because certification should be accessible.

It was noted that it is socially responsible to test the products and that it is necessary to know the attributes that back up claims for an environmentally preferable or more sustainable product. Verification is key.

Mark was asked if Green Seal can verify a product without testing. His response was yes, and that some manufacturers are doing that, by verifying a list of ingredients.

Scot stressed that a national standard is important because it saves having to perform different tests in different regions thus adding costs.

One formulator/manufacturer noted that it is interesting to compare North America with Europe with respect to available information on ingredients. In Europe it is mandated that you must know what is in the ingredients. Here it's not mandated. It is difficult to go back to the chemical manufacturer because historically it is not mandated for them to provide information. Now, the end user is ahead of the curve but the information on criteria for chemicals used in these products is not there. That is where the cost comes in. It is necessary to close the gap.

Thus cost should be on the source, not on the formulator and manufacturer of products. Currently formulators only have had to provide EPA with how they will use the chemicals.

The question was asked if the availability of information is trickling down and becoming more available. Mark noted that some companies have information but not on their websites. He suggested that availability of the information should be an issue of sustainability and social responsibility. We should avoid extra tests if the information is there.

The question was raised about fees associated with certification to GS-37. Mark noted that Green Seal charges an upfront fee of \$7,500 per product because they do not take a percentage later. There is an annual certification continuation fee of \$5,000 per product. Green Seal will try to accommodate companies with respect to the fees as possible (i.e., redundant formulations can help leverage reduced certification costs). But, if it gets you business, it's a marketing cost because economic incentive is there. The Green Seal is essentially a marketing tool.

One manufacturer noted that it is great to have national criteria, if even for international work on this issue. There are a lot of criteria related to chemicals. The challenge is to setup a national database of information on chemicals to reduce costs, administration of data, and to make a list of chemicals that meet criteria available so manufacturers can use the list to make products. The end user wants certification but formulators just blend chemicals and do not want to test them – the supplier should do this. So to develop a database is necessary to reduce burden on both small and large manufacturers.

The database is necessary to avoid unnecessary testing (including testing on animals).

The idea of a national database was reinforced by a second manufacturer/formulator who suggested we should put in the UGCA report the suggestion of a database. The EPA Design for the Environment Program (EPA DfE) has the framework to make this happen. Already the DfE Formulator Initiative provides assessments of a relatively small number of individual ingredients (not in extensive detail, but it is a framework).

Thus a national database can help manufacturers verify claims leading to identification of preferable products.

One UGCA member noted that his group looked at the UGCA criteria and noted that there is a significant amount of overlap with what has already been done. However, he noted that he thinks we have a responsibility to push the criteria a little further with the report we put out. “The Northwest is seen as a leader in many areas, and this should be one too. We agree with the Massachusetts RFR and, GS-37, etc, but need to weigh in on other criteria too because small manufacturers can be innovative, and have a great product and be leaders – let’s push the envelope.”

The point was made that it is one thing to get products into a purchasing contract, but different to get them to actually buy it. How can we do this?

Kirsten responded that there are different marketing avenues in retail and in government. Green products can mean less training required, equipment, etc. so this can be used as a benefit. From the purchasing perspective, you can choose based not only on cost. Environmental requirements can serve as a baseline that the purchaser wants to meet, or see met. In retail it’s important to get rid of extraneous non-verifiable claims. The consumer can see the difference when they use the product.

Scot noted that the Center for a New American Dream strives to teach individual consumers and large institutional purchasers to do the right thing. The Center would recommend the development of a database and would agree that EPA’s DfE Program is where it should be housed. “I hope that the other UGCA participants will push that message as well.”

Another member noted that “price is so important to large and small generators, but more important really, is the safety issue. This process we are going through is so important, even if we come up with same questions as other groups that have been through this, we need to experience the mind-shift for ourselves.”

Another member noted that, this process is important, regardless of the criteria. Claims made against a product must meet the criteria and not be frivolous claims. “We must also consider a standard for claims. We are drawing a line in the sand that means you are in or out. Our company does react to lines in the sand by focusing on continual improvement. We can’t immediately satisfy all these criteria with all products but we can work towards continually improving.”

From another member, “There is power in this room. We can have influence.”

You can make a claim, and defend it against a standard. The market dictates by which standard.

“Yes, we should push standards, push Green Seal to upgrade otherwise we (Center for a New American Dream) will, with a group of purchasers. That’s the power of the group’s efforts.”

With respect to the final report, it was noted that we need to capture the concerns about verification of data and the definitions of criteria. However, we are not writing a standard but a report, and have to move forward. The selection of criteria represent the values of the group.

Marsha noted that the final report will be written as an opinion report to identify and resolve issues. Based on today's discussion,

- There are obstacles to the identification of preferable products. Formulators want to verify but it's expensive, alternative avenues for certification/verification need to be explored
- Green Seal, MA RFR will accept disclosure of chemical components without testing if there is adequate data available
- A national database is needed to avoid redundant and expensive testing and to provide consistent information to support both formulation and certification
- Standards for environmental and other claims are needed.

It was apparent that expecting formulators to bear the full cost of testing and verifying products seemed both unreasonable and unrealistic to the group. A national database of chemical profiles for cleaning product ingredients would help to alleviate this obstacle. There was consensus that it should be recommended as a project of EPA's DfE program.

UGCA Meeting VI is scheduled for March 18, 2003 at PGE's Earth Advantage National facility in Portland. A draft report will be distributed to the group prior to the meeting. There will be ample time for review, feedback and discussion and a minority report will be generated if necessary.