



Date: April 26, 2021

To: Green Seals Standards (standards@greenseal.org)

From: Andrea Mojica, Vice President, Regulatory Affairs at the Household & Commercial Products Association (HCPA)

Re: Comments on Proposed Revisions to Criteria for Microbial-Based Cleaning Products

The Household & Commercial Products Association (HCPA) appreciates the opportunity to provide comment on Green Seal's proposed revisions to the standards for microbial-based cleaning products<sup>1</sup>. HCPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution, and sale of more than \$180 billion annually in the U.S. of familiar and trusted consumer products that help household and institutional customers create cleaner and healthier environments. Our membership manufactures, supplies, and incorporates microorganisms into end-use products.

HCPA supports Green Seal for allowing products containing bacterial spores of class 1 organisms to be approved under the following standards: GS-8 / GS-37 – Green Seal Standards for General Purpose Cleaners; GS-48 / GS-51 – Green Seal Standards for Laundry Care Products; and GS-52 / GS-53 – Green Seal Standards for Specialty Cleaners. However, HCPA would urge that microbes that are sprayed would have a completed risk assessment evaluating this application method to ensure that they will not cause negative effects in a respirable form. HCPA members are particularly encouraged by the changes to labeling requirements which will reduce consumer confusion and allow products to be better received in the market. These changes to the Standard will continue to bolster support for these products.

Thank you for the opportunity to provide comment on this topic.

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<sup>1</sup> [https://greenseal.org/storage/standards/March%202021/MBCPs\\_Revision\\_Summary\\_03\\_01\\_2021.pdf](https://greenseal.org/storage/standards/March%202021/MBCPs_Revision_Summary_03_01_2021.pdf)