



Date: August 6, 2021

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

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

Re: Microbial-based Cleaning Products (MBCP) Criteria Revision

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to provide input on the updated criteria for the microbial-based cleaning products. We value the collaborative discussions with Green Seal and appreciate the chance to review the updated proposal.

To reiterate our April 26th comments, 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.

HCPA supports the following additional criteria for microbial cleaning products sold in spray packaging: (1) that microbial ingredients in the product shall be restricted to those included in the European Food Safety Authority's (EFSA) Qualified Presumption of Safety (QPS) List or (2) that the product shall demonstrate, via inhalation exposure testing, an airborne concentration of microbes at or below 1×10^4 CFU/m³. Testing parameters shall be in alignment with the A.I.S.E. spray protocol (2020). HCPA recommends that the option to only put precautionary language on the label be removed. The addition of precautionary language, absent of other requirements, could potentially lead to unintended health consequences.

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

¹ 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.