

Understanding the Relationship Between the EPA, Green Seal and EcoLogo Registrations & Certifications



ENVIROX[®]
a healthier way to clean[™]
(800) 281-9604
www.enviroxclean.com



Relationship Between EPA Registration and Third Party Green Certifications

In 2006, the EPA (Environmental Protection Agency) issued a statement clarifying that any regulated antimicrobial product (any EPA registered product) is forbidden by federal law to use the Green Seal label, EcoLogo label or any such similar labeling or endorsements, even if it meets the certification requirements.

The EPA further clarified that “advertising and collateral literature or verbal claims for the product must not substantially differ from any claims made on the label or labeling.” See 40 CFR 12(a)(1)(B). *

In response to this clarification, Envirox LLC has decided to remove all reference to Green Seal or EcoLogo in conjunction with our EPA registered products and cannot apply for Green Seal or EcoLogo on any of our EPA registered products.

When You Need EPA vs. When You Need Green Seal/EcoLogo

- Facilities that require sanitizing or disinfecting need an EPA registered product.
- Facilities that require specific kill claims against viruses and bacteria need an EPA registered product.
- Facilities that want a green certification, but do not require kill claims, need a Green Seal or EcoLogo certified product.

Understanding EPA Toxicity Definition

The EPA has its own method for defining a product's toxicity level. Its system categorizes products into four toxicity categories based on six toxicity studies:

- 1) acute oral
- 2) acute dermal
- 3) dermal sensitization
- 4) acute inhalation
- 5) primary eye irritation
- 6) primary skin irritation

Products that are most toxic in these studies are considered Category I which requires the DANGER signal word, and those that are the least toxic are Category IV and do not require any cautionary labeling. Products in Category III require a CAUTION signal word, but require no special handling or protective equipment.

Important Definitions

EPA- Environmental Protection Agency. This government agency monitors many sectors of business including chemical manufacturing. The EPA regulates the use of bacteria and virus kill claims that manufacturers can use on cleaning chemicals. If a product has a kill claim for a specific virus or bacteria this means it has been registered with the U.S. EPA.

Green Seal- This third party organization certifies chemicals and many other products based on a variety of environmental and health standards. If a product has Green Seal this means that it meets the highest standards of environmental responsibility.

EcoLogo (TerraChoice)- This third party organization, originally based out of Canada, certifies chemicals and many other products based on a variety of environmental and health standards. If a product has EcoLogo this means that it meets the highest standards of environmental responsibility.

Procurement Exceptions for Green Seal and EcoLogo

We understand that with this EPA policy, purchasing programs that require Green Seal or EcoLogo certification as procurement criteria will need to introduce exceptions to that rule for the purchase of EPA registered products.

Envirox, LLC is a leader in educating our customers regarding these EPA regulations, as well as keeping abreast of any additional requirements that impact purchasing criteria. We also provide the tools necessary for purchasing agents to adjust their Environmentally Preferred Product (EPP) purchasing programs to accommodate the EPA regulations while still maintaining the ability to identify and purchase antimicrobials that meet the highest standards of safety and environmental consciousness.

EPA Labeling Requirements

The EPA requires that all chemicals regardless of toxicity and usage are labeled with precautionary warnings such as “Keep Out of Reach of Children” and other signal words.

Envirox products have low toxicity ratings, and are very safe to use around children and animals- however they are still chemicals and must be regulated.

Envirox EPA registered products:	HMIS ratings:
Concentrate 118	1, 0, 0
H ₂ Orange ₂ Concentrate 117	1, 0, 0
H ₂ Orange ₂ One	0, 0, 0
Dish San*	3, 0, 0
Critical Care	0, 0, 0

*HMIS for Dish San use dilutions is: 1, 0, 0