



September 25, 2008

Dr. Arthur Weissman
President
Green Seal
1001 Connecticut Avenue NW
Washington, D.C. 20036-5525

Dear Dr. Weissman:

I am writing on behalf of several industry stakeholders to express our dissatisfaction with Green Seal's process to revise the Standard for Industrial and Institutional Cleaners, as well as with the final GS-37 Standard issued on August 29, 2008.

At the time we decided to join the GS-37 revision process as "Stakeholders," we were led to believe that the process would be "open, credible and transparent." We were further informed the process would be based on stakeholder input and there would be a concerted attempt to reach consensus, recognizing of course that the final Standard would rest with the Green Seal Executive Committee. Regrettably, the process that was followed was neither open nor transparent. Further, Green Seal's decision to bypass its own established ballot process removed any possible chance of reaching consensus.

Like many of the other Stakeholders, we devoted considerable time to this initiative. Both individually and collectively, we provided explicit technical comments as well as highlighted our concerns with the overall process. We recognized from the very beginning that developing a consensus-based standard would not be easy given Green Seal's hazard-based approach. Nonetheless, we strived to promote an open dialogue, based on our understanding that Green Seal was serious about following an ISO-style process to achieve consensus, as specified on Green Seal's own website. We took comfort in Green Seal's public statements of striving to achieve "science-based environmental certification standards."

After the first ballot, when it became clear that there were several issues of "sustained opposition," we were cautiously optimistic when Green Seal retained Resolve. We thought there was going to be movement towards a process that included serious dialogue with Stakeholders in an effort to achieve a consensus based standard.

Regrettably, those of us in the business community who have gone through ISO certification believe that Green Seal failed to comply with its very own statement that "Green Seal follows the Guiding Principles and Procedures for Type I Environmental Labeling adopted by the International Organization for Standardization (ISO 14024)." The lack of serious consideration to achieve consensus is most evident by Green Seal's decision to diverge from the process described in its January 18, 2008 Update, which highlighted the important role for Stakeholder input:

"Voting by Registered Stakeholders is an important component of the process, as well as resolution of issues that are raised through public and stakeholder comment"

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*periods... Upon issuance of the draft final revised standard, Registered Stakeholders will review, comment (if necessary), **and vote (emphasis added)** on the draft final revised standard within 21 days of receipt of the final draft."*

It appears that Green Seal simply chose, unilaterally, to short circuit its own stated process by releasing the Final GS-37 Revised Standard late in the afternoon on August 29, the Friday before the long Labor Day holiday weekend.

Many of us now share the view that our efforts were not only frustrating and a waste of time and financial resources, but that there was never going to be any serious considerations of any scientifically-based views or assessments outside of what is acceptable to Green Seal. Green Seal's strict adherence to a hazard-based approach, and rejection of the basic principles of science-based risk assessment accepted around the world, were at the very core of our philosophical differences and would impede any chance of a consensus-based standard.

In conclusion, we believe the Green Seal revision process and the final product ***did not*** represent a consensus-based process. **Rather, what occurred was an elaborate process that ultimately served to justify a predetermined hazard-based conclusion.**

Accordingly, for the record, this letter serves as notice to Green Seal that we cannot support the Final GS-37 Revised Standard as it was issued, and further do not consent to any statement made by Green Seal that our respective organizations support the Final GS-37 Revised Standard.

We sincerely regret the need for this letter, but we feel it is important that Green Seal recognize the rationale that will drive our organizations to oppose any efforts by Green Seal to have the Final GS-37 Revised Standard adopted by any State or other governmental agency.

Thank you for your time and attention to this matter.

Sincerely,



Stephen M. Rosario
Executive Director

cc: GS-37 Executive Committee
Commissioner John C. Egan, New York State Office of General Services (OGS)

On Behalf Of:

New York State Chemical Alliance
Alkylphenols & Ethoxylates Research Council
American Chemistry Council
Carpet and Rug Institute
Consumer Specialty Products Association

Fragrance Materials Association
Reckitt Benckiser, Inc.
SI Group, Inc.
The Soap & Detergent Association
Zep, Inc.