

# EWG VERIFIED<sup>™</sup>: Cleaning Products Criteria



## **Overview**

EWG scientists and researchers have developed strict standards to be met by makers of cleaning products that bear the EWG VERIFIED™ mark. The mark shows consumers that a product meets our strictest criteria both for the ingredients it contains and how those ingredients are disclosed to customers. To earn the mark, products must meet each of our health and transparency standards. Those standards are detailed in the pages that follow, but here is a general summary.

First, to be considered for the mark, products must fall into a category we have approved for licensing. They must also score an A or a B in EWG's Guide to Healthy Cleaning.

Next, cleaning products cannot contain any ingredients on EWG's "Unacceptable" list of ingredients with health, ecotoxicity or contamination concerns. They also cannot contain any ingredients on our "Restricted" list without first fully substantiating that the appropriate conditions have been met.

#### Products that earn the mark must:

- i. Be formulated to minimize the potential for harm to people and the environment.
- ii. Disclose all intentionally added ingredients, including those used in fragrance.
- iii. Disclose all fragrance allergens and nanomaterials.
- iv. Meet air quality standards.
- v. Pass microbial challenge tests to ensure they will be shelf stable for an appropriate period of time.

#### Manufacturers must:

- i. Disclose results of efficacy testing
- ii. Follow standard ingredient naming guidelines.
- iii. Develop and follow best manufacturing practices.
- iv. Commit to submitting all information on potential substantial product hazards to the Consumer Product Safety Commission, or CPSC (or to the Environmental Protection Agency if the product is a registered, or conditionally registered, disinfectant), and to EWG.

#### In addition, manufacturers must agree to these stipulations:

- i. EWG has the right to perform random product testing to ensure that products meet the provisions in this document.
- ii. Licensed products will be added to EWG's Guide to Healthy Cleaning.
- iii. EWG's Guide to Healthy Cleaning is dynamic, and the scoring system may change.
- iv. EWG's "Unacceptable" and "Restricted" lists for ingredients in cleaning products may be reviewed annually and updated as needed, with a phase-in period to allow companies to comply with updates required to maintain use of the EWG VERIFIED mark.
- v. EWG has the right to approve of the use of the EWG VERIFIED mark on licensed products.

## **Detailed Criteria for EWG VERIFIED: Cleaning Products**

To be eligible to receive the EWG VERIFIED mark, products must meet the following health and transparency criteria:

## 1) Products must fall under one of the EWG-approved product categories.

All-purpose and multisurface cleaner Anti-static and wrinkle remover Baby bottle detergent, soap and cleaner Barbecue and grill cleaner Bathroom cleaner Bleach Carpet cleaner Carpet stain treatment Counter and surfaces cleaner Deck and patio cleaner Degreaser Dishwasher cleaner Dishwasher detergent Dishwasher rinse aid Disinfectant cleaner or sanitizer Drain opener and clog remover Fabric softener Fabric and upholstery cleaner Fabric and upholstery stain prevention and treatment Floor cleaner Floor wax and polish Furniture duster Glass and window cleaner Grout cleaner Hand dishwashing detergent and soap



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EWG will license cleaning products that fall within one of the following categories only:

Hard water stain and mineral remover Jewelrv cleaner Kitchen cleaner Laundry additive Laundry detergent Laundry detergent, for delicates and hand washing Laundry stain remover Leather cleaner Leather conditioner Metal cleaner Mold and mildew remover Odor reducer Oven cleaner Shower cleaner Soap-scum remover Stain remover, for carpets, fabric and upholstery Starch treatment Stove top cleaner Toilet bowl cleaner Toy, highchair and surface cleaner Tub, tile and sink cleaner Washing machine cleaner Wood cleaner, for floors and furniture Wood wax and polish, for floors and furniture

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### EWG will not license products in the following categories:

Air fresheners

Automobile products

Candles

Continuous- or timed-release odor reducers (including melts, plug-ins, solid countertop or small-spaces units)

Disinfectant or sanitizing aerosol sprays

Disinfectant or sanitizing wipes

Industrial products

Liquid dishwashing pods or packets

Liquid laundry pods or packets

Toilet deodorizer

Product types not eligible for inclusion in the Guide to Healthy Cleaners (for more details, see ewg.org/guides/cleaners/content/methodology)

### 2) Products must score an A or B in EWG's Guide to Healthy Cleaning.

EWG will license only products that score As or Bs in EWG's Guide to Healthy Cleaning. Products rated in the Guide are scored on an A to F scale using a comprehensive weight of evidence evaluation of ingredient hazards and ingredient disclosure.

### 3) Products cannot contain any ingredients on EWG's "Unacceptable" list.

### EWG's "Unacceptable" list of ingredients for cleaning products includes:

- i. Certain ingredients with health, ecotoxicity and/or contamination issues. These include, but are not limited to, ingredients that score an F in EWG's Guide to Healthy Cleaning database; and
- ii. Substances that fall within any of the following categories based on scientific safety evaluations (with specified, limited exceptions):
  - a. Chemicals associated with an increased risk of cancer, including known, probable and possible carcinogens and genotoxic substances designated by:
    - State of California (as listed on the Proposition 65 registry).
    - International Agency for Research on Cancer.
    - National Toxicology Program's Report on Carcinogens.
    - EPA's IRIS program.
    - Globally Harmonized System of Classification and Labeling of Chemicals, or GHS.
  - b. Chemicals classified as reproductive toxicants by:
    - State of California (as listed on the Proposition 65 registry).
    - EU (substances classified as Category 1 endocrine disruptors).
    - GHS.

- and Environmental Clinics, with the exception of enzymes.
- human organisms.

### 4) Products cannot contain any ingredients on EWG's "Restricted" list without adequate substantiation.

EWG's "Restricted" list of ingredients includes substances classified as hazardous or persistent by national and international governments, authoritative bodies and certain cosmetics and fragrance industry institutions. Note that the EWG "Restricted" list includes only restrictions that, in EWG's assessment, are relevant to the ingredient's use in cleaning products. Should the guidance of these bodies differ, EWG shall use the most health protective.

## The restrictions include, but are not limited to, acceptable product-use categories, organizations and frameworks:

- i. GHS.
- ii. International Fragrance Association.
- iii. FDA.
- iv. EU (as listed in the European Commission Cosing database).
- v. Health Canada.
- vi. Japan's Ministry of Health, Labour and Welfare.
- vii. Personal Care Products Council's Cosmetics Ingredient Review.

### In lieu of established restrictions for ingredients as used in cleaning products, EWG will apply cosmetic restrictions, whenever relevant, as follows:

- laundry detergents).



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c. Chemicals that present acute, dermal, respiratory and/or neurological toxicity.

d. Substances designated as sensitizing asthmagens by the Association of Occupational

e. Substances that do not pass established aquatic toxicology guidelines, such as those identified in the European Detergent Ingredient Database or recognized by authoritative bodies as persistent, bio-accumulative or inherently toxic to non-

f. Microplastics, which are defined as insoluble plastic particles smaller than 5 mm.

g. Colorants not approved by the Food and Drug Administration, or FDA.

h. Cosmetic ingredients banned by the FDA, Health Canada or the European Commission.

concentration limits, contamination restrictions and EWG maximum-use concentrations based on hazard classifications as established by the following authoritative bodies,

i. Cosmetics restrictions defining contamination concerns apply to all product categories.

ii. Concentration limits for ingredients in rinse-off products apply to product categories where prolonged dermal contact occurs (i.e., hand dishwashing soaps and hand wash

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### 5) Products must be formulated to minimize the potential for harm to humans and the environment.

EWG will license only products that are not acutely toxic, sensitizing or irritating. EWG sets strict limits on the potential contamination of the final product and requires that the use of non-biodegradable polymers and plastics not exceed a certain percentage of the total formulation. The final product must meet these criteria:

- i. It must not cause acute harm and, as such, should have a calculated average LD50 greater than 5000 mg/kg (as specified by GHS mixtures).
- ii. It must have a pH within the range 2.0-11.5 as sold, except for liquid hand dishwashing soaps and hand laundry detergents, which must have a pH within the range 3.0-9.5.
- iii. The concentration of each sensitizing ingredient, based on GHS classification and labeling, must be limited to 0.1 percent of the final product formulation.
- iv. Persistent chemicals, i.e., those with a half-life of more than 60 days, and/or listed as persistent in the European Detergent Ingredients Database, must be limited to 2 percent of the product formulation.
- v. The fragrance component of a product must not exceed 1 percent of the final formulation.
- vi. Powdered enzymes must be encapsulated, with a minimum diameter of 0.15 mm.
- vii. Concentrated products must meet the criteria as sold. EWG will not license concentrated products in ready-to-use containers.

Product manufacturers must follow best practices for reducing product contamination. This includes, but is not limited to, ensuring ingredient purity and verifying that suppliers are not using ingredients of concern in the production, preparation or preservation of ingredient mixtures. Manufacturers must also certify that the final product does not contain, or is not expected to contain, any of the contaminants, or "nonfunctional constituent[s]" listed in California's Cleaning Product Right to Know Act of 2017 above reportable levels. The "nonfunctional constituent[s]" and their reportable levels are identified in Appendix III.

### 6) Products must disclose all intentionally added ingredients, including those used in fragrance. If the product includes nonchemical materials or substrates, such as wipes, that material must also be disclosed.

EWG will license only those products that disclose their ingredients to the public. This provision includes, but is not limited to, complete disclosure of all specific substances within chemical classes (e.g., "alcohol ethoxylates") and functional groups (e.g., "surfactants," "cleaning agents," "preservative(s)" and "dye(s)"/"colorant(s)"). An ingredient is "any substance used in the preparation of the product that is still present in the final commercial product." Products that include non-chemical materials or substrates, such as wipes, must include that material in the ingredient list.

All intentionally added ingredients in a product's fragrance mixture must be disclosed to EWG and publicly disclosed down to 0.01 percent. In cases in which a product's fragrance mixture

is five ingredients or fewer, the company must list all the fragrance ingredients on the product package. If the fragrance mixture comprises more than five ingredients, the company must include, on the product's package, either 1) a disclosed fragrance ingredient list down to 0.01 percent, or 2) the term "fragrance" followed by an asterisk, referring to a note listing the first five ingredients in the fragrance mixture (based on concentration) and instructions about where to find the disclosed list of ingredients, directly beneath the ingredient list (see example below for details on placement and wording). The company must include the disclosed ingredient list, including fragrance ingredients down to 0.01 percent, in EWG's Guide to Healthy Cleaners and on the relevant product webpage on the company's website.

#### Example of a product ingredient list:

Ingredients: Water, Hydrogen Peroxide, Fragrance.\*

(See full fragrance ingredient list on company website.)

"Intentionally added ingredients" are defined as substances that manufacturers have intentionally added to their formulation that have a functional or technical effect in the product. This does not include components of intentionally added fragrance ingredients. For example, if an essential oil is added to the formulation, the essential oil, not the specific components of that essential oil, should be disclosed as an ingredient (unless those components must be disclosed based on Criterion 7).

To allow companies to protect its confidential business information about the product and fragrance formulation, EWG does not require disclosure of the weight or amount of an intentionally added ingredient outside of certifications necessary to satisfy concentration restrictions.

Note that EWG reserves the right to perform random product testing, including through qualified third-party testing services, to ensure that products fully disclose all ingredients on the label.

### 7) **Products must disclose all fragrance allergens and nanomaterials.**

As with the EU requirement for cosmetics companies, EWG requires cleaning product manufacturers to indicate the presence of any of 26 fragrance allergens in the list of ingredients when they are present above a given concentration, regardless of whether they were added directly as an ingredient or are present as a component of a fragrance ingredient. Due to increased exposure concerns, allergens in liquid hand dishwashing soap and hand laundry detergent will require disclosure at the 0.001 percent level. All other products require allergen disclosure at the 0.01 percent level. The allergens and their Chemical Abstract Service, or CAS, numbers are attached in Appendix IV.

EWG requires that companies list all fragrance allergens meeting the above criteria at the end of the ingredient list on a product's packaging.

In addition, EWG requires manufacturers to identify the full list of known and probable contact allergens present in a product, as recommended by the EU Scientific Committee on Consumer Safety. This extended list (identified in Appendix V) should be disclosed on a product's website when the concentration exceeds 0.001 percent for hand dishwashing liquid and hand laundry detergents, and 0.01 percent for all other products.



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\* Fragrance ingredients include: Citrus Paradisi (Grapefruit) Extract, Citrus Limon (Lemon) Extract, Lavandula Angustifolia (Lavender) Extract, Camellia Sinensis (Green Tea) Extract, Mentha Piperita (Peppermint) Leaf Extract, and others.

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Please note that whenever EU requirements for labeling fragrance allergens are updated, EWG's licensing criteria will be updated accordingly. Companies will be given 18 months to comply with any such changes.

EWG requires that all licensed products follow the European Union 2009 labeling guidelines for nanomaterials in cosmetics. EWG uses the EU's 2011 definition:

'Nanomaterial' means a natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 percent or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm.

This criterion requires manufacturers using ingredients that meet the definition of nanomaterials (as outlined above) to identify these ingredients on a product's packaging. The ingredient name must be followed by the word "nano" in parentheses.

For more information on the EU's guideline for nanomaterials in cosmetics products, see: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:342:0059:0209:en:PDF.

### 8) Products must meet EWG's air quality standards.

Volatile Organic Compound restrictions

EWG will license only products that meet volatile organic compound, or VOC, concentration limits. EWG's VOC restrictions are based on California's Air Resources Board, or CARB, Consumer Products Regulations (https://www.arb.ca.gov/consprod/regs/regs.htm), with a few modifications to ensure greater health protection. The CARB VOC category limits are shown in Appendix VI. For the purpose of these restrictions, the product category is determined by following the CARB regulations and, for products that can be categorized in two or more categories, the more stringent limit will apply. Unlike the CARB limit, the EWG VOC limits include fragrance compounds in the overall assessment and do not exempt low vapor pressure VOCs (as defined in 17 CCR § 94508) or other exempted compounds from the total VOC concentration.

For product categories and forms not regulated by CARB, the VOC level (of the product as used) shall not exceed 0.5 percent by weight.

Aerosol restrictions

### Aerosol products must meet EWG's restrictions on propellants, particle size and nanoparticles:

- i. Acceptable propellants are limited to compressed air, nitrogen and carbon dioxide.
- ii. Aerosol products must not release more respirable particles than an average pump spray product does. As such, no more than 0.7 percent of the sprayed mass of an aerosol product can be under 10 microns in size when measured using ASTM-E1260 or an equivalent standard test method.
- iii. Aerosol products must not contain nanomaterials (see applicable definition in Criterion 7).

For the purpose of this program, aerosol products are those that are pressurized, through the use of a propellent or mechanical force, to dispense product. This definition of aerosol does not include pump spray products.

## 9) Products must pass microbial challenge tests.

EWG will license only products that have passed microbial challenge tests for the finished product (current formulation) according to the U.S. Pharmacopoeia, or USP, (See USP Anti-Microbial Effectiveness Testing for the relevant challenge test). Companies must also have protocols in place to repeat the tests to address potential changes in the product formulation, manufacturing process and/or packaging.

In keeping with International Organization for Standardization, or ISO, standard 29621, products with the following characteristics are considered to present a low risk of microbial contamination and are therefore exempt from this criterion:

Physico-Chemical Characteristics	Limits
Η	< 3.0
На	> 10.0
Ethanol or other alcohol	> 20%
Filling temperature	> 65.0 °C
Water activity (aw)	< 0.75ª
Solvent based products	
Oxidizing products	
Aluminium chlorohydrate	> 25%

EWG will exempt disinfectant/sanitizer products registered and conditionally registered with the EPA under the Federal Insecticide, Fungicide, and Rodenticide Act, provided the company attests it complies with FIFRA's requirements.

## 10) Product manufactures must disclose efficacy testing.

EWG will license only products that disclose specifics about completed efficacy testing. Disclosed details should include international standards that have been met, such as ASTM or NSF, or in-house testing that validates statistically significant efficacy. If no efficacy testing has been conducted, that must be disclosed as well.

In addition, manufacturers of odor-eliminating products must provide experimental data showing that their products effectively reduce malodors in a fragrance-free formulation. Scent-based variations of the product may be verified without the provision of additional efficacy data, as long as the odor-reduction active ingredients are used at equivalent or higher concentrations.



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### 11) Products must follow standard ingredient-naming guidelines.

- i. Each ingredient name should be listed using the Household & Commercial Products Association, or HCPA, nomenclature as detailed in the Consumer Product Ingredients Dictionary. The nomenclature conventions are based on the International Nomenclature for Cosmetics Ingredients labeling, with a primary purpose of providing simple chemical names that consumers can use. (For more information on HCPA nomenclature conventions, see: https://www.productingredients.com/docs/nomenclature\_ convention.pdf). If there is no applicable HCPA name, manufacturers should use the ingredient's International Nomenclature of Cosmetic Ingredients, or INCI, name. If there is no INCI name either, manufacturers should use the chemical's common name.
- ii. Mixtures must be listed by their individual component names.
- iii. All botanicals should include the scientific name followed by the chemical modification, such as extract or oil. A company may decide whether it will also list the common name. The general naming structure should be as follows:
  - a. [Botanical name] [(Common name), optional]
  - b. [Name of relevant plant part, such as leaf or stem, if applicable]
  - c. [Chemical modification]
  - d. For example, Aloe Barbadensis (Aloe Vera) Leaf Extract
- iv. Colorants must be listed using Food, Drug and Cosmetic Act names as listed in the Code of Federal Regulations (CFR) Title 16, Part 73 and Part 74.

### 12) Product manufacturers must have a quality control system in place.

EWG requires that manufacturers of licensed products develop, follow and submit documentation detailing the use of a quality control system.

### These practices include but are not limited to:

- i. Maintenance of documentation and records.
- ii. Procedures for analysis of product specifications and quality.
- iii. Process for internal audits.
- iv. Assessment of the suitability of buildings, facilities and equipment.
- v. Adequate training of all personal.
- vi. Maintenance of adequate cleanliness and pest controls.
- vii. Compliance of suppliers and raw materials.

## **Criteria for Companies To License** the EWG VERIFIED Mark

### For its products to bear the EWG VERIFIED mark, a company must agree to all of the following:

EWG requires companies with licensed products to submit all reports suggesting a substantial product hazard resulting from, or that may result from, the use of any of the company's licensed products to the CPSC through the Safer Products site https://www.saferproducts.gov/CPSRMSPublic/Section15/). For EPA-registered products, companies should follow the Voluntary Guidance (https://www.epa.gov/ pesticide-incidents/voluntary-incident-reporting-forms-and-instructions). Companies should also submit those reports, with all personally identifiable information (e.g., names, addresses) redacted, to EWG.

### Product problems include but are not limited to:

- a. Product contamination.
- b. A defect in packaging.
- c. Questionable stability.
- d. Labeling concerns.

### Serious injury includes:

- a. Death.
- b. A life-threatening event.
- c. Hospitalization.
- d. A disability or permanent damage.
- e. A congenital anomaly or birth defect.
- provisions outlined in EWG's Licensing Criteria.





i. Commit to submitting to the Consumer Protect Safety Commission (or to the Environmental Protection Agency if the product is a registered disinfectant) and to EWG all information on reportable noncompliance and/or defects that could create a substantial product hazard or unreasonable risk of serious injury or death (as obligated by the Consumer Product Safety Act and in accordance with reporting provisions set forth in the Code of Federal Regulations (CFR) Title 16, Part 1115). All personally identifiable information (e.g., names, addresses) should be redacted from such reports.

f. Disfigurement, including serious and persistent rashes and infections.

ii. Acknowledge and agree that EWG has the right to perform random product testing, audits of production practices, and site visits to ensure that all products meet the

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EWG requires companies with licensed products to acknowledge that it has the right to perform random product testing, which may include the use of qualified third-party services, to ensure that products bearing the EWG licensed mark meet the provisions highlighted in this document.

iii. Acknowledge that EWG's "Unacceptable" and "Restricted" lists may be reviewed annually and updated as needed. A phase-in period will be provided to allow companies to comply with any updates.

EWG may review and update its "Unacceptable" and "Restricted" lists annually to reflect the latest in science, regulations and other relevant considerations. If EWG makes changes, it will alert companies that a new list is pending 2 months beforehand. Companies will be granted 18 months from the time the new lists are publicly announced to make the necessary changes to their formulation and packaging. At the end of the 18-month period, companies will no longer be able to manufacture or distribute products with EWG's licensed mark that do not comply with the new "Unacceptable" or "Restricted" lists. If companies continue to distribute non-compliant products with EWG's licensed mark, this will be treated as a breach of the license agreement. In the rare event that scientific evidence emerges demonstrating that a cleaning product ingredient may pose significant harm to human health, EWG reserves the right to request that companies either remove the ingredient or cease distribution of the relevant products with EWG's licensed mark in a shorter time frame than specified above.

- iv. Companies must sign a disclosure agreement acknowledging that as a condition of the company's participation in the licensing program, EWG will add all of its licensed products to EWG's Guide to Healthy Cleaning if it does not already rate them.
- v. Acknowledge that EWG's Guide to Healthy Cleaning is dynamic, and the scoring algorithm may change over time.

EWG strives to make all of its consumer databases as robust as possible. For this reason, EWG's Guide to Healthy Cleaning is dynamic: Product and ingredient scores are subject to change over time due to both emerging science and scoring algorithm improvements. If changes to the EWG Guide to Healthy Cleaning scoring system render a company's product out of compliance with EWG's licensing criteria, the company will have 18 months either to regain compliance or to remove the EWG licensed mark from its product packaging and associated materials.

- vi. Companies must acknowledge that EWG has the right to approve, in advance, any use of the EWG VERIFIED mark in advertising, marketing, artwork, packaging, point-ofsale materials, website content, promotion and other materials. Prior to public use or distribution, companies must submit to EWG samples of the final licensed product, including all packaging, product inserts and other materials accompanying such licensed product or otherwise bearing the trademarks.
- vii Companies must acknowledge that, although product claims are not addressed in EWG's Licensing Criteria. EWG reserves the right to disallow use of the EWG VERIFIED mark on any product that uses claims that would harm or discredit EWG or the EWG VERIFIED program.
- viii. Companies must acknowledge whether their products are required to be registered with the EPA under FIFRA, and if so, whether the product's label complies with FIFRA's requirements.

## **Documenting Compliance with EWG's Health and Transparency Criteria for Cleaning Products**

To verify a product meets EWG's standards for health and transparency, a company must submit the following documentation for each EWG VERIFIED criteria.

### CRITERIA 1, 2, 3, 11:

- 1. Must be in one of the approved licensing product categories.
- 2. Must score an A or B in EWG's Guide to Healthy Cleaning.
- 3. Be free from ingredients on the EWG "Unacceptable" list.
- 11. Follow standard ingredient-naming guidelines.

**DOCUMENTATION:** Companies must submit to EWG a completed Product Submission Form with the product name, ingredients listed on the package, and ingredients listed on a publicly accessible website, as well as any additional package text. Companies must also submit applicable product safety data sheets and legible images or pictures of their package (as they appear on actual products for sale) for verification purposes. In cases where the package text and/or artwork has yet to be finalized, EWG will review proof images during the application process. However, companies must submit final package images for EWG's approval before the mark will be approved for use.

Product Submission Forms can be downloaded from the application page.

EWG will upload product information to an internal platform that will highlight whether the product to be licensed meets the EWG criteria specified above.

### CRITERION 4: Products cannot contain any ingredients on EWG's "Restricted" list for cleaning products that do not meet the restriction set by authoritative bodies, industry institutions and EWG.

**DOCUMENTATION:** EWG will require companies to complete and submit a Safety Substantiation Notice form to acknowledge that EWG requires additional information to substantiate relevant restrictions outlined in EWG's Licensing Criteria.

For concentration restrictions, companies must provide a certification that any restricted ingredient present in the product meet the relevant concentration restrictions. A company may meet this requirement by certifying that the concentration used is below relevant standards.

For any relevant contamination restrictions, companies must submit laboratory test results showing that the restricted ingredient meets the relevant contamination limits set by authoritative bodies and industry institutions.



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### CRITERION 5: Products must be formulated to minimize the potential for harm to people and the environment.

DOCUMENTATION: EWG will require companies to submit a material safety data sheet for the product identifying known hazards and showing that the pH is within the range 3.0-9.5 for liquid hand dishwashing soaps and hand laundry detergents, and pH 2-11.5 for all other product categories.

EWG will require companies to submit documentation of safety substantiation proving the attributes of the final product formulation. The Product Safety Substantiation will require that the total concentration of persistent chemicals be limited to 2 percent of the product formulation. The fragrance component of a product must not exceed 1 percent of the final formulation. Additionally, a calculation of the weighted LD50 will need to be provided and be above 5,000 mg/kg to ensure that the final product is not acutely toxic.

EWG will require companies to submit a signed affidavit verifying that all ingredients and mixtures purchased from third parties do not intentionally contain any phthalates or preservatives on the EWG "Unacceptable" list.

### CRITERION 6: Products must disclose all intentionally added ingredients, including those used in fragrance.

DOCUMENTATION: Companies must submit a signed affidavit stating that they have disclosed all the product's intentionally added ingredients, including those used in fragrance, to EWG and they have labeled or otherwise disclosed on the product's webpage all non-fragrance ingredients as well as all fragrance ingredients down to 0.01 percent as outlined in criterion 6. EWG will supply companies with the necessary form.

The Master Cleaning Products Affidavit can be downloaded from the application page.

### CRITERION 7: Products must fully disclose fragrance allergens and nanomaterials.

**DOCUMENTATION:** EWG will require companies to sign an affidavit that they will identify on the product packaging the presence of any of 26 fragrance allergens (Appendix IV), similar to the EU requirement for cosmetics labeling, and the full list of known and probable contact allergens (Appendix V) on the product's webpage. EWG will additionally review product ingredients and assess whether fragrance allergens are likely present, whether as a directly added ingredient or as a component of a fragrance ingredient. If EWG discovers that fragrance allergens may be present, companies must either label them appropriately or submit a signed affidavit from their ingredient supplier stating that no allergen is present or, if present, all fragrance allergens meet the concentration restrictions of 0.01 percent, except for hand dishwashing liquid and hand laundry detergent, in which fragrance allergens must be disclosed down to 0.001 percent. EWG will supply companies with the necessary form.

EWG requires companies to sign an affidavit that they will follow EU labeling guidelines for nanomaterials in cosmetics. EWG will require companies either to label nanoscale ingredients or submit affidavits from ingredient suppliers stating that none of the ingredients in the licensed product is considered a nanomaterial according to the EU 2011 recommended definition outlined in Criterion 7. EWG will supply companies with the necessary form.

The Master Cleaning Products Affidavit can be downloaded from the application page.

### CRITERION 8: Products must meet air quality standards.

**DOCUMENTATION:** EWG requires that all products meet the EWG VOC concentration restrictions using Test Method 310. "Standard Operating Procedure for the Total Volatile Measurement of Consumer Products," as specified by California's Air Resources Board, or CARB, or an equivalent test method. The EWG VOC limit includes fragrance compounds in the overall assessment and does not exempt low vapor pressure VOCs or other exempted compounds from the total VOC concentration. For product categories and forms not regulated by CARB, the VOC level (of the product as used) shall not exceed 0.5 percent by weight.

For aerosol products, EWG requires that the product not contain nanomaterials and that testing data be submitted verifying that no more than 0.7 percent of the sprayed mass of the product be under 10 microns in size when measured using ASTM-E1260 or an equivalent test method.

The Master Cleaning Products Affidavit can be downloaded from the application page.

#### CRITERION 9: Products must pass basic microbial challenge tests.

**DOCUMENTATION:** EWG will require companies to sign an affidavit that their product either satisfies the requirements for exemption from this criterion or passed basic microbial challenge tests. EWG also reserves the right to request documentation proving that the product meets the requirements for exemption or documentation of the challenge tests results.

The Master Cleaning Products Affidavit can be downloaded from the application page.

#### CRITERIA 10: Product manufacturers must disclose efficacy testing data.

**DOCUMENTATION:** For each product, EWG will require companies to submit details of any efficacy tests, including the test methods used and a summary of the results. Applicable test methods include but are not limited to ASTM or NSF standards met and any in-house testing. If no efficacy tests were performed, a company must explicitly disclose that information to EWG.

For odor eliminator products, experimental data substantiating efficacy in a fragrance-free version of the formulation must be completed and submitted.

Companies must agree that EWG will publicize whether they have completed efficacy testing and the test methods used in our Guide to Healthy Cleaning.

### CRITERION 12: Develop, follow and document the use of a quality control system.

**DOCUMENTATION:** EWG will require companies to submit documentation detailing the quality control system it is using.





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## **APPENDICES**

Appendix I: EWG's Unacceptable List: Cleaning Products Note: This is a summary list.

## Quaternary ammonium compounds

Concern: asthma and reproductive toxicity Benzalkonium chloride

Dodecyldimethylammonium chloride

Ester quats

### **Polyacrylates**

Concern: persistence and environmental toxicity Sodium polyacrylate

Acrylic acid copolymer

Acrylic acid and maleic acid copolymer

### EDTA, its salts and similar chemicals

Concern: persistence and environmental toxicity DTPA

Trisodium HEDTA

### Ethanolamines, their salts and alkanolamide surfactants

<i>Concern: asthma and carcinogenicity; contamination</i> MEA
DEA
TEA
MEA citrate
Cocamide DEA
Cocamide MEA
Lauramide MEA

## **Glycols, Glycol ethers and esters**

Concern: reproductive toxicity, respiratory toxicity and neurotoxicity Ethylene glycol Ethylene glycol monomethyl ether Ethylene glycol monoethyl ether Ethylene glycol diethyl ether Ethylene glycol monobutyl ether Propylene glycol monomethyl ether

### Halogenated solvents and organic compounds

Concern: carcinogenicity, endocrine disruption and environmental toxicity TCE

Chloroform

Triclosan

Symclosene

Troclosene sodium

### Aromatic solvents

Concern: Carcinogenicity and neurotoxicity Benzene

Toluene

Ethylbenzene

Xylene

## Alkylphenol ethoxylates and alkylphenols

Concern: endocrine disruption and environmental toxicity Nonoxynol

Nonylphenol



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## Formaldehyde and formaldehyde-releasing preservatives

<i>Concern: carcinogenicity and contact dermatitis</i> DMDM hydantoin
Imidazolidinyl urea
Diazolidinyl urea
Quaternium-15
Bronopol (2-bromo-2-nitropropane-1,3 diol)
5-Bromo-5-nitro-1,3-dioxane

### **Optical brightening ingredients**

Concern: persistence, environmental toxicity, potential endocrine disruption FWA-1 FWA-5

### **Phthalates**

Diethylhexyl phthalate

Concern: reproductive toxicity Dibutyl phthalate Dimethyl phthalate Diethyl phthalate Benzyl Butyl phthalate

## **Phosphates and phosphonates**

Concern: eutrophication/environmental toxicity Sodium tripolyphosphate Tris-2-butoxyethyl phosphate Sodium pyrophosphate

## Nitro- and polycyclic musks

Concern: persistence, environmental toxicity and endocrine disruption Musk xylene Musk ketone Galaxolide

### **Cyclic siloxanes**

Concern: environmental toxicity and end
D3
D4
D5
D6
D7
Cyclomethicone

## Per- and polyfluorinated compounds (PFAS)

### Zinc salts

Concern: environmental toxicity Zinc chloride

Zinc sulfate

Zinc carbonate

### **Petroleum distillates**

Concern: carcinogenicity and respiratory toxicity

### Isothiazolinones

Concern: sensitization; contact dermatitis Methylisothiazolinone

Benzisothiazolinone

Methylchloroisothiazolinone

Octylisothiazolinone

## Sodium and calcium hypochlorite

Concern: dermal, respiratory and environmental toxicity





docrine disruption

Concern: persistence, bioaccumulation, endocrine disruption and immunotoxicity

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Silver compounds Concern: environmental toxicity

Glutaral Concern: asthma

Benzotriazole Concern: persistence and environmental toxicity

Polyhexanide Concern: persistence and environmental toxicity

Thymol Concern: suspected asthmagen

## Appendix II: EWG's Restricted Ingredient List Note: This is a summary list of ingredients that are permitted for use if concentration limits are met.

### **Boron-containing compounds**

Concern: reproductive and developmental toxicity Boric acid

Sodium borate

Disodium tetraborate

Acetic acid/vinegar Concern: respiratory toxicity and skin irritation

Hydrogen peroxide Concern: respiratory toxicity and skin irritation

Sodium/potassium hydroxide Concern: skin irritation

### Enzymes

Concern: respiratory toxicity, asthma

Amylase

Lipase

Protease

Mannanase

Subtilisin

Fragrance and volatile organic compounds

Concern: indoor air quality and respiratory toxicity

## Sensitizing allergens

Concern: contact dermatitis, respiratory toxicity

See additional appendices





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## **Chelating agents**

Concern: contamination Tetrasodium glutamate diacetate

Methylglycine diacetic acid

### Polymers: non-aerobically degradable

## *Concern: environmental persistence* Siloxanes and Silicones Paraffin Hydroxypropyl methycellulose Hydroxyethylcellulose Block polymers

### Surfactants: Non-anaerobically degradable

Concern: persistence and environmental toxicity Linear alkyl benzene sulfonates

Xylene sulfonates Sulpho-fatty acid methyl esters

## Surfactants

Concern: skin irritation and eye damage Alkyl sulfates Alcohol ethoxylates Amine oxides Fatty acid amidopropyl betaines

Nanoparticles Concern: respiratory toxicity

## Appendix III: List of nonfunctional constituents manufacturers must certify are not contained, or are not expected to be contained, in the final product

Chemical name	Reportable level
1, 4 dioxane	0.001%
1,1 dichloroethane	0.01%
Acrylic acid	0.01%
Benzene	0.01%
Benzidine	0.01%
1,3 butadiene	0.01%
Carbon tetrachloride	0.01%
Chloroform	0.01%
Ethylene oxide	0.01%
Nitrilotriacetic acid	0.01%
Butyl benzyl phthalate	0.01%
Butyl decyl phthalate	0.01%
Di(2-ethylhexyl) phthalate	0.01%
Diethyl phthalate	0.01%
Diisobutyl phthalate	0.01%
Di(n-octyl) phthalate	0.01%
Diisononyl phthalate	0.01%
Dioctyl phthalate	0.01%
Butylparaben	0.01%
Ethylparaben	0.01%
Isobutylparaben	0.01%
Methylparaben	0.01%
Propylparaben	0.01%
Formaldehyde	0.01%





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Chemical name	Reportable level
1-(3-chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride	0.01%
DMDM hydantoin	0.01%
Diazolidinyl urea	0.01%
Glyoxal	0.01%
Imidazolidinyl urea	0.01%
Polyoxymethylene urea	0.01%
Sodium hydroxymethylglycinate	0.01%
2-Bromo-2-nitropropane-1,3-diol	0.01%
N-Nitrosodimethylamine	0.01%
N-Nitrosodiethylamine	0.01%

## Appendix IV: List of allergens required for labeling on product packaging

Chemical name	CAS number
Amyl cinnamal	122-40-7
Amylcinnamyl alcohol	101-85-9
Benzyl alcohol	100-51-6
Benzyl salicylate	118-58-1
Cinnamyl alcohol	104-54-1
Cinnamal	104-55-2
Citral	5392-40-5
Coumarin	91-64-5
Eugenol	97-53-0
Geraniol	106-24-1
Hydroxycitronella	107-75-5
Hydroxymethylpentylcyclohexenecarboxaldehyde	31906-04-4
Isoeugenol	97-54-1
Anisyl alcohol	105-13-5
Benzyl benzoate	120-51-4
Benzyl cinnamate	103-41-3
Citronellol	106-22-9
Farnesol	4602-84-0
Hexyl cinnamaldehyde	101-86-0
Lilial	80-54-6
d-Limonene	5989-27-5
Linalool	78-70-6
Methyl heptine carbonate	111-12-6
3-Methyl-4-(2,6,6-trimethyl-2-cyclohexen-1- yl)-3-buten-2-one	127-51-5
Oak moss	90028-68-5
Tree moss	90028-67-4

\* For liquid hand dishwashing soap and hand laundry detergent, disclosure is required at the 0.001 percent level. Use of these chemicals may be additionally restricted based on the "Unacceptable" or "Restricted" lists.



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## Appendix V: Expanded list of allergens required for disclosure on website

Chemical name	CAS number
Acetylcedren	32388-55-9
Amyl salicylate	2050-08-0
Trans-Anethole	4180-23-8
Benzaldehyde	100-52-7
Camphor	76-22-2 / 464-49-3
Beta-caryophyllene	87-44-5
Carvone	99-49-0 / 6485-40-1 / 2244-16-8
Rose keton-4 (damascenone)	23696-85-7
Alpha-damascone (TMCHB)	43052-87-5 / 23726-94-5
Cis-beta-damascone	23726-92-3
Delta-damascone	57378-68-4
Dimethylbenzyl carbinyl acetate (DMBCA)	151-05-3
Hexadecanolactone	109-29-5
Hexamethylindanopyrn	1222-05-5
Linalyl acetate	115-95-7
Menthol	1490-06-4 / 89-78-1 / 2216-51-5
6-methyl coumarin	92-48-8
Methyl salicylate	119-36-8
3-methyl-5-(2,2,3-trimethyl-3-cyclopentenyl)pent- 4-en-2-ol	67801-20-1
Alpha-pinene	80-56-8
Beta-pinene	127-91-3
Propylidene phthalide	17369-59-4
Salicylaldehyde	90-02-8
Alpha-santalol	115-71-9
Beta-santalol	77-42-9
Sclareol	515-03-7
Terpineol (mixture of isomers)	8000-41-7
Alpha-terpineol	100482-56-1 / 98-55-5
Terpinolene	586-62-9
Tetramethyl acetyloctahydronaphthalenes	54464-57-2 / 54464-59-4 / 68155-66-8 / 68155-67-9
Trimethyl-benzenepropanol (Majantol)	103694-68-4
Vanillin	121-33-5

Natural extracts	CAS number
Cananga odorata and ylang-ylang oil	83863-30-3
Cedrus atlantica bark oil	92201-55-3
Cinnamomum cassia leaf oil	8007-80-5
Cinnamomum zeylanicum bark oil	84649-98-6
Citrus aurantium amara flower / peel oil	8016-38-4 / 72968-50-4
Citrus bergamia peel oil expressed	89957-91-5
Citrus limonum peel oil expressed	84929-31-7
Citrus sinensis (syn.: aurantium dulcis) peel oil expressed	97766-30-8 / 8028-48-6
Cymbopogon citratus / schoenanthus oils	89998-14-1 / 8007-02-1 / 89998-16-3
Eucalyptus spp. Leaf oil	92502-70-0 / 8000-48-4
Eugenia caryophyllus leaf / flower oil	8000-34-8
Jasminum grandiflorum / officinale	84776-64-7 / 90045-94-6 / 8022-96-6
Juniperus virginiana	8000-27-9 / 85085-41-2
Laurus nobilis	8002-41-3 / 8007-48-5 / 84603-73-6
Lavandula hybrida	91722-69-9
Lavandula officinalis	84776-65-8
Mentha piperita	8006-90-4 / 84082-70-2
Mentha spicata	84696-51-5
Myroxylon pereirae	8007-00-9
Narcissus spp.	diverse
Pelargonium graveolens	90082-51-2 / 8000-46-2
Pinus mugo/pumila	90082-72-7 / 97676-05-6
Pogostemon cablin	8014-09-3 / 84238-39-1
Rose flower oil (rosa spp.)	diverse
Santalum album	84787-70-2 / 8006-87-9
Turpentine (oil)	8006-64-2 / 9005-90-7 / 8052-14-0
Verbena absolute	8024-12-2

\* For liquid hand dishwashing soap and hand laundry detergent, disclosure is required at the 0.001 percent level. Use of these chemicals may be additionally restricted based on the "Unacceptable" or "Restricted" lists.



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## Appendix VI. California's Air Resources Board Consumer Products VOC limits

The following table has been adapted from 17 CCR § 94509, which should be consulted to ensure compliance with California regulations.

Product category & type	Date	Limit (%)
Product categories and forms not regulated by CARB	EWG set	0.5
Air freshener		
Double phase aerosol	12/31/2012	20
Single phase aerosol	1/1/1996	30
Dual purpose air freshener/disinfectant		
EWG - requires products in this category to follow disinfectant limits		
A shi shakia sugalu sh		
Anti-static product Aerosol	12/31/2008	80
Nonaerosol	12/31/2008	11
Nonderosof	12/31/2000	
Bathroom and tile cleaner		
Aerosol	1/1/1994	7
All other forms	1/1/1994	5
Nonaerosol	12/31/2008	1
Carpet/upholstery cleaner		
Aerosol	12/31/2010	5
Nonaerosol (dilutable)	1/1/2001	0.1
Nonaerosol (ready-to-use)	12/31/2010	1
Disinfectant		
Nonaerosol	12/31/2008	1
Dusting aid		
Aerosol	12/31/2010	17
Nonaerosol	12/31/2010	3

Fabr	ric protectant
Aero	-
Nona	aerosol
Fabr	ric refresher
Aero	sol
Nona	aerosol
Fabri	ic softener – single use dryer produc
Flooi	r maintenance product
Floo	pr polish or wax
Resil	ient flooring material
Nonr	esilient flooring material
Woo	d floor wax
Floo	r wax stripper
Nona	aerosol
Foot	twear or leather care product
Aero	sol
Solid	
All o	ther forms
Furn	iture maintenance product
Aero	sol
All o	ther forms (except solid/paste forms
Nona	aerosol (except solid/paste forms)
<b>C</b>	
	eral purpose cleaner
A	1.731



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Date	Limit (%)
1/1/97	60
12/31/2010	1
	· · · ·
 12/31/2006	15
12/31/2006	6
	See section
	94509(o)
12/31/2010	1
 12/31/2010	1
12/31/2010	1
12/31/2010	70
	See Section
	94509(j)
12/31/2006	75
12/31/2006	55
12/31/2006	15
12/31/2013	12
1/1/1994	7
12/31/2008	3
 12/31/2008	8
12/31/2012	0.5

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Product category & type	Date	Limit (%)
General purpose degreaser		
Aerosol	12/31/2010	10
Nonaerosol	12/31/2012	0.5
Glass cleaner	10/71/0010	10
Aerosol	12/31/2012	10
Nonaerosol	12/31/2012	3
Graffiti remover		
Aerosol	12/31/2006	50
Nonaerosol	12/31/2006	30
Laundry prewash		
Aerosol/solid	1/1/1994	22
All other forms	1/1/2094	5
Laundry starch/sizing/fabric finish product	1/31/2008	4.5
Metal polish or cleanser	1	
Aerosol	12/31/2012	15
Nonaerosol	12/31/2012	3
Multi-purpose solvent		
Aerosol	1/1/2016	10
Nonaerosol	12/31/2013	3
Odor remover/eliminator	10/71/2010	
Aerosol	12/31/2010	25
Nonaerosol	12/31/2010	6
Oven or grill cleaner		
Aerosol/pump spray	1/1/1993	8
Aerosol	1/1/1993	8
Liquid	1/1/1993	5
Nonaerosol	12/10/2011	4

Product category & type
Pressurized gas duster
Rubber/vinyl protectant
Aerosol
Nonaerosol
Sanitizer
Aerosol
Nonaerosol
Spot remover
Aerosol
Nonaerosol
Toilet/urinal care product
Aerosol
Nonaerosol
Wood cleaner
Aerosol
Nonaerosol





Date	Limit (%)	
12/31/2010	1	
1/1/2005	10	
1/1/2003	3	
·		
12/31/2008	70	
12/31/2008	1	
12/31/2012	15	
12/31/2012	3	
	·	
12/31/2006	10	
12/31/2006	3	
12/31/2006	17	
12/31/2006	4	
	12/31/2010 1/1/2005 1/1/2003 12/31/2008 12/31/2008 12/31/2012 12/31/2012 12/31/2006 12/31/2006 12/31/2006	

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