

# TOXSERVICES

TOXICOLOGY RISK ASSESSMENT CONSULTING

## U.S. EPA Safer Choice Program: Starting the Process & FAQs

As part of preparing a Safer Choice submission, please assemble the following:

- Final Formulation of Product (i.e., all intentionally added ingredients, including tradenames, supplier names, CAS #, and functional use)
- MSDS for individual ingredients, including alternate ingredient suppliers
- Packaging template, filled out by the primary packaging supplier
- Performance testing report
- Product labels, including the Safer Choice logo mock-up, so that we can verify correct use
- Ingredient disclosure



The first two items on the above list are required for a cost quote from a third-party profiler, as cost is dependent upon the number and type of ingredients and CAS numbers. Please take the time to read to the Safer Choice Standard for Safer Products (accessed via the Safer Choice web link, below), and ask us if you have any questions!

### Frequently Asked Questions (FAQs) about Safer Choice

- **What is the U.S. EPA's Safer Choice Label?**

*U.S. EPA's label for safer chemical products was initially known as Design for the Environment, or "DfE." In March, 2015, DfE officially became the Safer Choice label! Please visit the Safer Choice website to learn about the history of this great program: <http://www2.epa.gov/saferchoice>*

- **Where can I find ingredients already approved for use in Safer Choice products?**

*You can find ingredients that may be acceptable for use in Safer Choice recognized products on the Safer Chemical Ingredients List (SCIL) (<http://www2.epa.gov/saferchoice/safer-ingredients>) or on CleanGredients (<http://www.cleangredients.org/home>). Both list ingredients by their functional class.*

- **Who may I contact at ToxServices to obtain a Safer Choice quote or to answer a Safer Choice Question?**

*Please contact ToxServices' Safer Choice Coordinator, Erica Harriman at 202-429-8789 or [eharriman@toxservices.com](mailto:eharriman@toxservices.com)*

- **How can my formulation qualify for the Safer Choice Fragrance Free Label?**

*Safer Choice's fragrance-free certification is a companion to U.S. EPA's Safer Choice label. If a product qualifies for the Safer Choice label and does not use any fragrance materials, the program will allow the manufacturer to add a "fragrance-free" notation to the Safer Choice label. To qualify for the fragrance-free label, a product must only contain ingredients on or eligible for the U.S. EPA's Safer Chemical Ingredients List (SCIL) **and** must not contain any fragrance materials. For more information about the Fragrance Free Label, please see:*

*<http://www2.epa.gov/saferchoice/safer-choice-criteria-fragrance-free-products>*

- **What is acceptable performance testing for Safer Choice products?**

*Acceptable performance testing methods can be found in Section 4.2.1 of the Safer Choice Standard (<http://www2.epa.gov/sites/production/files/2013-12/documents/standard-for-safer-products.pdf>). If the product is a concentrate, performance testing should be done at the most dilute level of product recommended for consumer use. If a product type is not listed in the standard with recommended performance testing, then the performance testing should demonstrate that the product is as effective as a nationally recognized brand, of similar use.*

- **How and where should ingredients be disclosed?**

*For Safer Choice recognition, ingredients may be disclosed on the product label, at a 24 hour toll-free number, or on the product website. If listed at a toll-free number or on the website, the consumer should be directed to either the URL or the toll-free number from the product label. All intentionally added ingredients should be listed in descending order, except for ingredients present at less than 1%, which may be listed in any order, at the end of the ingredient listing. Additional ingredient listing information can be found in Section 3.8 of the Safer Choice Standard: <http://www2.epa.gov/sites/production/files/2013-12/documents/standard-for-safer-products.pdf>*

- **How do I meet Safer Choice's packaging criteria, and what is primary packaging?**

*Primary packaging is the inner container or the material that comes in contact with the product ingredients. The packaging criteria, addressed in section 4.2.6 of the Safer Choice Standard, states that the primary packaging should meet one of the following packaging goals, or a combination of the following, at a total level of 25%.*

- *Is sourced, manufactured, transported, and recycled using renewable energy*
- *Optimizes the use of renewable or recycled source materials*
- *Is manufactured using clean production technologies and best practices*
- *Is made from materials healthful in all probable end-of-life scenarios*
- *Is physically designed to optimize materials and energy*
- *Is effectively recovered and used in biological and/or industrial closed-loop cycles*

*Additionally, the primary packaging should not contain heavy metals, BPA, or the following phthalates (dibutyl phthalate (DBP), diisobutyl phthalate (DIBP), butyl benzyl phthalate (BBP), di-n-pentyl phthalate (DnPP), di (2-ethylhexyl) phthalate (DEHP), di-n-octyl phthalate (DnOP), diisononyl phthalate (DINP), and diisodecyl phthalate (DIDP)).*

*The third-party profiler can provide you with a template for your packaging supplier to document this information.*

- **What is the threshold for Safer Choice ingredient reviews?**

*All intentionally added ingredients must be reviewed for functional class compliance, regardless of percent composition. Additionally, residuals and by products at or above 0.01% in the product as sold must be reviewed as well.*

- **How are CleanGredients and the Safer Choice SCIL different?**

*U.S. EPA's Safer Chemical Ingredients List (SCIL) contains CAS numbers that have been previously reviewed and approved for use in Safer Choice recognized products. These CAS numbers have associated symbols next to them, whose definitions can be found at the top of the website page, and warn formulators against possible use restrictions of some ingredients. These CAS numbers are not an automatic pass, because there are variations between manufacturers, and some variations of the same chemical could contain residuals or additional intentionally added ingredients that are not acceptable. CleanGredients is a trade name specific database. The trade names listed on CleanGredients, associated with a specific supplier, have been reviewed by a third-party profiler and have been found to be acceptable for use in Safer Choice recognized products.*

### **Relevant Websites**

U.S. EPA Safer Choice Program: <http://www2.epa.gov/saferchoice>

CleanGredients: [www.cleangredients.org](http://www.cleangredients.org)