



TOXSERVICES

TOXICOLOGY RISK ASSESSMENT CONSULTING



U.S. EPA Safer Choice Certification: Recent Updates and Success Strategies

OVERVIEW

ToxServices has partnered with the U.S. Environmental Protection Agency's Safer Choice program as a third-party profiler to evaluate a wide range of consumer products for Safer Choice-certification. ToxServices is a global scientific consulting firm headquartered in Washington, D.C. that applies science to resolve complex human health, environmental sustainability, and regulatory compliance issues and to promote safer products. Our expert toxicologists include Diplomates of the American Board of Toxicology (DABT) and U.K./Eurotox Registered Toxicologists (ERT).



TIPS TO SUCCESSFULLY NAVIGATE THE CERTIFICATION PROCESS

Before submitting a product to a third-party profiler for a cost quote to begin the Safer Choice Initial Review process, a company may want to first take the preliminary step of pre-screening their product formulation against chemicals and ingredients approved for use in Safer Choice-certified products. There are a number of resources to use for this in-house prescreen:

- EPA Safer Chemical Ingredients List (SCIL)
 - <https://www.epa.gov/saferchoice/safer-ingredients>
 - List of chemicals, organized by functional class, that meet the Safer Choice Criteria.
- CleanGredients
 - <https://cleangredients.org>
 - Online subscription database with tradename specific ingredients that have been reviewed and approved for use in Safer Choice-certified product formulations.
- Ingredient Suppliers
 - Your ingredient suppliers are a valuable resource; many can provide feedback on whether they expect their ingredient to be acceptable for use in Safer Choice-certified product formulations.
- Safer Choice and Third-Party Profilers (TPP)
 - Safer Choice and the Third-Party Profilers are always willing to assist potential partners and give feedback on product formulations.

After a product is submitted for quote and the cost of a review is agreed upon with a TPP, the product is ready to be submitted for formal review. While preparing to submit for formal review, the product manufacturer will want to build a successful submission packet. To build a successful submission packet, the product manufacturer should review the Safer Choice and Design for the Environment (DfE) Standard, available at: <https://www.epa.gov/saferchoice/standard>.

GENERAL SAFER CHOICE REQUIREMENTS

Endpoint Evaluated	Typical Documentation Submitted to Fulfill Requirement	Applicable Safer Choice Standard Section
Product Formulation	Reported in Safer Choice Community formal review submission	Section 3.2.1
Ingredient SDS	Manufacturer prepared SDS for each ingredient	Section 3.2.1
General Product Information	This information (e.g. form of finished product, dilution, etc.) is entered into the Safer Choice Community formal review submission	Section 3.2.1

GENERAL SAFER CHOICE REQUIREMENTS, CTD.

Endpoint Evaluated	Typical Documentation Submitted to Fulfill Requirement	Applicable Safer Choice Standard Section
Ingredient Communication	Product label with listing of ingredients or listing of URL where ingredients are found	Section 3.8
VOCs	EPA restricts product VOC-content based on the most stringent government criteria.	Section 4.2.6
Product Performance	Performance test report performed in accordance with product class criteria specified in the Safer Choice Standard	Section 4.2.1
Primary Packaging	Statement from packaging manufacturer that the product packaging meets the requirements	Section 4.2.5
Flammability	Reported in Safer Choice Community formal review submission	Section 4.2.7
pH	Reported in Safer Choice Community formal review submission	Section 4.2.2
End User Education	Product safety data sheet (SDS)	Section 3.4

Endpoint Specific Guidance - Packaging and Ingredient Communication

The communication of ingredients to consumers is important for increased chemical transparency and is a requirement under the Safer Choice and DfE Standard. Product packaging sustainability and packaging ingredients make up another important endpoint of the Safer Choice and DfE Standard and one that recently underwent an update in the 2024. Below we provide additional guidance for both of these endpoints.

SAFER CHOICE INGREDIENT COMMUNICATION

Major Requirements	Description
Listing Order	Ingredients present at over 1% should be listed in descending order, with the ingredient present at the highest amount listed first. Ingredients present at 1% or less can be listed in any order at the end of the disclosure.
Chemical Name	Acceptable nomenclature: CAS name, Household & Commercial Products Association (HCPA) Ingredient Dictionary name, International Nomenclature of Cosmetic Ingredients (INCI), International Union of Pure and Applied Chemistry (IUPAC) name.
CAS Number	Typically found in Section 3 of ingredient SDS.
Trade Secret Ingredients	Ingredients regarded as “Trade Secret”, such as colorants or preservatives, should be listed with a chemically descriptive name and the CAS number can be omitted and listed as “Proprietary”. Fragrances may be listed as “Fragrance” and along with the Proprietary designation the listing should reference where detailed information can be found, for example IFRA’s website (https://ifrafragrance.org/).
Location	Ingredient communication should be listed on the product label, product website, or at a toll-free number available 24/7. If the product ingredients are communicated in a location other than the product label, the product label should list the location of the disclosure, for example: “For ingredients, please visit www.productname.com/ingredients .”
Special Considerations	<p>Dermal sensitizers from Annex III of the EU Cosmetics Regulation are allowed under the Safer Choice Fragrance Criteria, but they are required to be listed in accordance with the Safer Choice Ingredient Communication requirements of the Safer Choice and DfE Standard.</p> <p>Enzymes are required to be listed on the product label.</p> <p>Certain product types (e.g. powder pod products with a film, wipe products, etc.) are sold enclosed in a material or saturated on a material. This material is considered part of the product formulation and should be included in your product formulation and ingredient disclosure.</p>

SAFER CHOICE PRIMARY PACKAGING

Major Requirements	Description
Recyclable and Post Consumer Recycled Content (PCR) <u>or</u> Reusable	Packaging should be recyclable and meet a certain PCR use threshold (by weight) or the packaging should be designed for reuse. PCR use thresholds are set by material and are as follows: Plastic (15% minimum PCR), Glass (25% minimum PCR), Fiber/Cardboard/Paper (50% minimum PCR), Metal (30% minimum PCR).
Label Compatibility and Instructions	The product label should not affect the recyclability of the product packaging and it should provide the consumer with clear instructions how to recycle or reuse the packaging, or there should be a link to the online instructions with this information.
Primary Packaging Ingredients	The packaging, including coatings, may not contain the following intentionally added chemicals: cadmium, lead, mercury, hexavalent chromium, per- and polyfluoroalkyl substances (PFAS), bisphenol-A (BPA), 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), diisodecyl phthalate (DIDP), any other bisphenol-based chemicals (e.g. bisphenol-S (BPS), bisphenol-F (BPF), etc.).



CONTACT INFORMATION

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