

TIPS TO NAVIGATE SUCCESSFULLY THE CERTIFICATION PROCESS

Step 1: Review the Safer Choice and Design for the Environment (DfE) Standard at: <https://www.epa.gov/saferchoice/standard>, and Steps to Get Your Safer Choice Label at: <https://www.epa.gov/saferchoice/steps-get-safer-choice-label-your-product>.

Step 2: Before submitting a product to a third-party profiler for a quote for the Safer Choice Initial Review, a company should first pre-screen the formulation against the list of approved chemicals and ingredients for Safer Choice-certified products. Several resources are available for this in-house pre-screen:

EPA Safer Chemical Ingredients List (SCIL)
<https://www.epa.gov/saferchoice/safer-ingredients>
 List of chemicals, organized by functional class, that meet Safer Choice Criteria.

CleanGredients
<https://cleangredients.org>
 Online subscription database with trade name-specific ingredients that have been reviewed and approved for use in Safer Choice-certified product formulations.

Ingredient and Fragrance Suppliers
 Your ingredient and fragrance 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.



SAFER CHOICE PRIMARY PACKAGING (Future Criteria)

Major Requirements	Description
Recyclable and Post Consumer Recycled Content (PCR) <u>or</u> Reusable	Packaging should be recyclable and meet a set PCR threshold or be designed for reuse. PCR use: 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 should provide consumer with clear instructions how to recycle or reuse packaging, or there should be a link to this information.
Primary Packaging Ingredients	The packaging, including coatings, may not contain intentionally added cadmium, lead, mercury, hexavalent chromium, per- and polyfluoroalkyl substances (PFAS), bisphenol-A (BPA), phthalates such as DBP, DIBP, BBP, DnPP, DEHP, DnOP, DINP, DIDP, and any other bisphenol-based chemicals (e.g. BPS, BPF), etc.

SAFER CHOICE PRIMARY PACKAGING (Current Criteria**)

Major Requirements	Description
25% of Primary Packaging Meets Minimal SPC Criteria	25% of primary packaging must meet 1 of the 6 Sustainable Packaging Coalition sustainability criteria.
No intentionally added heavy metals, BPA, or phthalates	Primary packaging must not contain intentionally added heavy metals, BPA, or phthalates.

** https://www.epa.gov/sites/default/files/2015-02/documents/packaging_guidance.pdf



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 products for Safer Choice-certification, including cleaning products, pet care products, home care, car care, and institutional products.

ToxServices is a global scientific consulting firm that applies science to resolve complex human health, environmental sustainability, and regulatory compliance issues and promote safer products. Our expert toxicologists include Diplomates of the American Board of Toxicology (DABT) and U.K./Eurotox Registered Toxicologists (ERT).



CONTACT INFORMATION

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GENERAL SAFER CHOICE REQUIREMENTS*

Endpoint Evaluated	Typical Documentation
Ingredient SDS	Submit your supplier’s SDS for each ingredient and alternate in Safer Choice Community for formal review
Product Formulation	Upload formulation with SDS in Safer Choice Community for formal review
General Product Information	Enter product type, intended function, form of finished product, dilution, etc. into the Safer Choice Community for formal review
Ingredient Communication	Submit Product Label with listing of ingredients or URL where ingredients are disclosed.
VOCs	EPA restricts product VOC-content based on the most stringent government criteria.
Product Performance	Submit performance test report conducted in accordance with product class criteria specified in the Safer Choice Standard.
Primary Packaging	Submit statement from packaging manufacturer that the product packaging meets requirements (currently 2015 Safer Choice and DfE Standard requirements).
Flammability	Report in Safer Choice Community for formal review.
pH	Report in Safer Choice Community for formal review.
End User Education	Submit formulation-level safety data sheet (SDS) in Safer Choice Community for formal review.

Endpoint Specific Guidance - Ingredient Communication

The communication of ingredient-related information is important for increased chemical transparency and is a requirement under the Safer Choice and DfE Standard.



SAFER CHOICE INGREDIENT COMMUNICATION REQUIREMENTS

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 and CAS Number	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. Ingredient CAS numbers are typically found in Section 3 of an ingredient SDS.
On-line Sources for Ingredient Disclosure	CAS Name: http://www.commonchemistry.org/index.aspx HCPA name: https://www.productingredients.com INCI name: https://ec.europa.eu/growth/tools-databases/cosing/ IUPAC Name: https://pubchem.ncbi.nlm.nih.gov/ (search under Section 2 of chemical’s Pubchem record)
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 of Ingredient Communication	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	Dermal sensitizers from Annex III of the EU Cosmetics Regulation are allowed under the Safer Choice Criteria for Fragrances, but they must be listed following Safer Choice Ingredient Communication requirements of the Safer Choice and DfE Standard (Section 3.8). Enzymes are required to be listed on the product label (Safer Choice and DfE Standard, Section 5.10). 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.

*Requirements are specified in EPA’s Safer Choice and DfE Standard (2024), with exception of Primary Packaging requirements, which are still from Safer Choice (2015) Standard.