

New York State Green Procurement Program
Response to Comments on

Proposed Specification on Laundry Detergent

Background: The proposed new specification for “Laundry Detergent” was first considered by the Interagency Committee in November 2020 and tentatively approved for public comment. Based on comments received during 2020/2021, the specification has not been revised.

Commenting Entities: American Cleaning Institute

Issues raised by the American Cleaning Institute (ACI) During the Comment Period:

1. **1,4 dioxane limits will impact the availability of laundry detergent**

Comments: ACI expressed concern that revisions to Environmental Conservation Law (ECL) Articles 35 and 37 concerning 1,4-dioxane limits for household cleansing, personal care and cosmetic products would impact the availability of laundry detergent as the DEC interprets these laws to cover consumer and commercial/institutional products.

Response: This specification only references ECL Article 35 and the ACI should direct comments on ECL Articles 35 and 37 to the Department of Environmental Conservation as they are the entity implementing these laws.

Recommendation: Keep the requirement that laundry detergent follow the 1,4 dioxane concentration limits set by ECL Article 35.

Commenting Entities: Seventh Generation

Issues Raised by Seventh Generation During the Comment Period:

1. **Including Safer Choice as a third-party certification program accepted in the specification**

Comments: Addition of US EPA Safer Choice recognition would add significant credibility to the NYS Specification for Laundry Detergent (and other cleaning products), and strengthen the NYS Sustainability and Green Procurement program.

Response: The GreenNY team will engage EPA about this program to learn more about it and see if they have addressed concerns that the team had with Safer Choice in the past. Concerns included not prohibiting certain chemicals of concern and the ability of a manufacturer to use the label before undergoing an audit of their product’s ingredients.

Recommendation: To not add Safer Choice as a third-party certification to the specification now as talks begin with EPA on the program to see if it will be incorporated at a future date.

Commenting Entities: Clean and Healthy New York, Sierra Club Atlantic Chapter, Seventh Generation, and the Great Neck Breast Cancer Coalition
Issues Raised by Clean and Healthy New York, Sierra Club Atlantic Chapter, Seventh Generation, and the Great Neck Breast Cancer Coalition:

1. **There should be a clear preference for re-usable packaging over recyclable or composting.**

Comments: These groups would prefer preferences be expressed for reusable packaging to the greatest extent practicable and only opting for recycling or composting as a secondary choice.

Response: The packaging language that is included in all specifications currently sets a preference for reusable packaging where practicable.

Recommendation: To keep the current packaging language.