



January 16, 2024

Melanie Adams
Lead Chemist
Safer Choice Program
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1201 Constitution Ave. N.W.
Washington, DC 20004

Re: Comments on the Modifications to the Safer Choice Standard and Potential Implementation of a Safer Choice Cleaning Service Certification Program, EPA–HQ–OPPT–2023– 0520

Dear Dr. Adams:

Thank you for the opportunity to submit the following comments on the U.S. Environmental Protection Agency's (EPA) proposed modifications to the Safer Choice Standard.¹ The Asthma and Allergy Foundation of America (AAFA) is the leading patient organization for people with asthma and allergies and the oldest asthma and allergy patient group in the world. AAFA's mission is to save lives and reduce the burden of disease for people with asthma and allergies through support, advocacy, education and research.

We applaud EPA's efforts to strengthen the certification program by proposing new packaging requirements to set an evidence-based and up-to date standard for sustainable packaging. We also support the agency's proposal to create a Safer Choice Cleaning Service Certification for cleaning service

¹ U.S. Environmental Protection Agency, "Modifications to the Safer Choice Standard and Potential Implementation of a Safer Choice Cleaning Service Certification Program; Notice of Availability, Webinar and Request for Comment" (Nov. 14, 2023). Available at <https://www.federalregister.gov/documents/2023/11/14/2023-24988/modifications-to-the-safer-choice-standard-and-potential-implementation-of-a-safer-choice-cleaning>; U.S. Environmental Protection Agency, "Proposed Revisions to EPA's Safer Choice Standard" (Nov. 2023). Available at <https://www.epa.gov/system/files/documents/2023-11/proposed-changes-to-epas-safer-choice-standard.pdf>



providers that use Safer Choice–certified products for cleaning and environmentally responsible products for disinfecting.

Our comments are detailed below.

Proposed Changes to Existing Safer Choice Standard

Entering or Exiting a Product Class (Section 3.4)

EPA is proposing additional detail to the Standard on its process for entering and exiting product classes. AAFA supports this additional detail. For example, it is important for EPA to have the flexibility to terminate a product from the program if newly available information about a class of products indicates the products pose unanticipated serious adverse health or environmental effects.

On-Site Audit (Section 3.6.2)

AAFA believes that on-site audits play an essential role in ensuring that products continue to meet EPA’s requirements and conditions of partnership. Currently, EPA requires audits on a yearly basis throughout the partnership, including one on-site audit in the first or second year of the partnership cycle. EPA is proposing that the first audit for a new partner must be an on-site audit. AAFA supports this proposal. Requiring that the first audit for a new partner be on-site will provide important oversight and help establish clear communication and a meaningful relationship with the partner.

Products in Solid or Particulate-Generating Form (Section 4.6)

EPA is proposing to require that, upon request, manufacturers of products in particulate-generating or solid form provide information to determine that the product does not contain or generate a substantial portion of particles that are respirable (10 microns or less). AAFA supports this new requirement. Solid products can be associated with particulates, which may be harmful to human health if inhaled, depending upon size. Adverse effects are possible if the product produces byproducts that are of concern. Disclosure of this important information is particularly important for individuals with asthma or allergies, both of which can be triggered or made worse by certain particles.



Establishment of a Safer Choice Cleaning Service Certification (Section 7)

EPA requests comment on whether the Agency should establish a voluntary Safer Choice Cleaning Service Certification for cleaning service providers that use Safer Choice-certified products for cleaning and DfE-certified products for disinfecting. Residential and commercial cleaning service providers, as well as facility owners, managers, and government entities that provide in-house cleaning would be eligible for this certification. Program certification would require organizations and businesses to use exclusively Safer Choice-certified products for cleaning and DfE-certified products for disinfecting, in product categories with Safer Choice- and DfE-certified products, to the maximum extent possible.

As EPA notes,² use of cleaning products made with safer chemicals can improve environmental health and the health and safety of workers and the public who use products or may come in contact with them.

Many cleaning supplies or household products can irritate the eyes or throat, or cause headaches and other health problems. Some products release dangerous chemicals, including [volatile organic compounds \(VOCs\)](#) that vaporize at room temperature.³ VOCs and other chemicals released when using cleaning supplies contribute to chronic respiratory problems, and can trigger asthma and allergic reactions and headaches.⁴

AAFA supports the establishment of this new program and recognizes the significant impact the program could have on cleaning service providers who have asthma and allergies.

People of color are overrepresented in many occupations within frontline industries, including the cleaning industry. One 2020 analysis found that over 40%

² U.S. Environmental Protection Agency, "Proposed Revisions to EPA's Safer Choice Standard" (Nov. 2023). Available at <https://www.epa.gov/system/files/documents/2023-11/proposed-changes-to-epas-safer-choice-standard.pdf>

³ U.S. Environmental Protection Agency, "Technical Overview of Volatile Organic Compounds" (Updated March 14, 2023). Available at <https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds>

⁴ AAFA, "Sources of Air Pollution in Your Home That May Cause Asthma and Allergy Symptoms" (July 28, 2021). Available at <https://community.aafa.org/blog/sources-of-air-pollution-in-your-home-that-may-cause-asthma-and-allergy-symptoms>



people who work in Building Cleaning Services are of Hispanic origin (40.2%); the same analysis found that nearly 30% of Building Cleaning Service workers have no health insurance.⁵

In the U.S., asthma sits squarely at the intersection of profound structural racial inequities and ongoing inequities in healthcare access and health outcomes. As we detail in our *Asthma Disparities in America: A Roadmap to Reducing the Burden on Racial and Ethnic Minorities* report,⁶ among the 27 million Americans living with asthma, there are serious and persistent racial and ethnic disparities in the burden of illness. Among many findings, our report highlights the importance of safe cleaning services and products.

The asthma & allergy friendly® Certification Program

As EPA strengthens the Safer Choice standard and considers the establishment of a new Safer Choice Cleaning Service Certification for cleaning service providers, we would like to share our experience creating the “asthma & allergy friendly®” Certification Program.⁷

A lack of regulation across household cleaning supply products allows manufacturers to make false or exaggerated claims regarding allergen control. In 2005, we joined with Allergy Standards Limited (ASL) to create the asthma & allergy friendly® Certification Program. This partnership tests and certifies products and services – including soft surface cleaners, hard surface cleaners, and laundry detergent – to improve the air quality and health of homes. To date, more than 40 companies’ products have met our strict scientific standards and have received the asthma & allergy friendly® Certification Mark.

Our program focuses on household products, and we are encouraged that EPA’s program will strengthen standards and participation for commercial products

⁵A Basic Demographic Profile of Workers in Frontline Industries, Center for Economic and Policy Research (2020). Available at found at: <https://cepr.net/wp-content/uploads/2020/04/2020-04-Frontline-Workers.pdf>

⁶ Asthma and Allergy Foundation of America, “Asthma Disparities in America” (2020). Available at <https://www.aafa.org/asthma-disparities-burden-on-minorities.aspx#pdf>

⁷ “Certified asthma and allergy friendly.” Available at <https://www.asthmaandallergyfriendly.com/USA/>



and service providers. We would be happy to facilitate a meeting with AAFA and our technical partners to further discuss lessons learned.

Conclusion

Thank you for the opportunity to comment. AAFA strongly supports EPA's work to promote stronger standards for cleaning products and to implement a new Safer Choice Cleaning Service Certification program for cleaning service providers, and we stand ready to collaborate on these efforts. Please do not hesitate to contact me at kmendez@aafa.org with any questions.

Sincerely,

Kenneth Mendez
President and Chief Executive Officer
Asthma and Allergy Foundation of America