

# TIPS FOR A SUCCESSFUL SAFER CHOICE REVIEW FOR PRODUCT FORMULATORS



## HOW TO PICK INGREDIENTS THAT ARE MOST LIKELY TO BE ACCEPTABLE

- > **SCIL and CleanGredients:** If possible, use ingredients from the Safer Chemical Ingredient List (SCIL), [www.epa.gov/saferchoice/safer-ingredients](http://www.epa.gov/saferchoice/safer-ingredients), and CleanGredients, [www.cleangredients.org](http://www.cleangredients.org). (See additional notes under *Important considerations when you are formulating your product*).
- > **Contact your Supplier(s):** Ask your suppliers ahead of time if the ingredient has been reviewed for Safer Choice. If it has, ask if there are use limits, if it contains VOCs, and whether it will pass the direct release criteria (if applicable).
- > **Formulation Only Reviews:** Ask NSF for a *formulation only* review before you conduct performance testing, submit labels, packaging, etc.

## IMPORTANT CONSIDERATIONS WHEN FORMULATING YOUR PRODUCT

- > **Volatile Organic Chemicals in the Product:** VOC levels in your products must meet the **California Air Resources Board Consumer Products regulations** at [www.arb.ca.gov/consprod/regs/2015/article\\_2\\_final\\_1-22-15.pdf](http://www.arb.ca.gov/consprod/regs/2015/article_2_final_1-22-15.pdf). Even if you don't sell into California, the Safer Choice Standard requires compliance with these regulations for both consumer and I&I products.
- > **Limit on Certain Ingredients:** If your product contains *Yellow Triangle* ingredients (as indicated on SCIL and CleanGredients – see SCIL for the definition), the total combined amount of **yellow triangle ingredients may not exceed 10% of the finished formulation**.

- > **Special Requirements for *Direct Release (Outdoor Use) Products:*** If your product label indicates the potential for the product to be used outdoors in a manner that could result in a *direct release* to the environment (i.e., a release that is not directed to a wastewater treatment plant), then your product would be considered a **Direct Release product, and will require additional review**. Ingredients in *direct release* products must meet more stringent criteria. Note that the SCIL list does not indicate whether an ingredient is acceptable for *direct release* products, but CleanGredients does.
- > **Additional Review of SCIL Chemicals:** Even if a CAS number is listed on SCIL, the ingredient **may need additional review** to evaluate residuals and other auxiliary components (e.g. sodium chloride, titanium dioxide, ethyl alcohol, hydrogen peroxide, sodium percarbonate, surfactants, colorants, etc.).
- > **Things You Must Consider When Using CleanGredients:** When using ingredients from CleanGredients, click on the product to get details about *Direct Release* acceptability, VOC levels, % Target for Improvement and use limits (**maximum allowable amount of this ingredient that can be used in your product**). In addition, look at the Approval Date; **if it is more than 3 years old, it should be considered "under review" by Safer Choice**, and the review may take longer.



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## REPORTING YOUR FORMULATION TO NSF INTERNATIONAL

- > **Report ALL ingredients:** Report all ingredients in your **starter formulation**. There is no **de minimus**. All intentionally added ingredients must be disclosed, including fragrances, preservatives, pH adjusters, etc. The formulation should match the records that will be examined during the desk audit and onsite audit.
- > **Report 100% of the Formulation:** The formulation submitted **must add up to 100%** (or encompass 100% when ranges are reported). Be sure to include all possible alternate ingredients and mark them as alternates.
- > **Ingredient Trade Names:** When completing your submission, use the **trade names on the ingredient SDSs**. If the SDS covers a variety of products (such as multiple grades of hydrogen peroxide or ethyl alcohol), please obtain the ingredient's exact trade name from the supplier. It is important to report the exact trade name so that when we reach out to the supplier, we will obtain the correct formulation information.
- > **Mixtures:** If an ingredient is a mixture, please just enter the trade name and supplier of that component, and provide the SDS. Do not list all ingredients in the mixture.
- > **Use Ingredient Ranges:** Unless you are using pinpoint manufacturing, audits are less likely to result in corrective actions when ranges of ingredient percentages are reported instead of pinpoint levels.
- > **Ingredient Suppliers:** Report both the manufacturer and distributor (if used) of all ingredients.
- > **Function:** Don't forget to include the function for every ingredient.
- > **Ingredient SDSs:** Provide all SDSs so NSF can verify the trade names. In some cases, supplying SDSs will allow us to forgo contacting the supplier for formulation information.
- > **Wipes and Pods:** Include wipe substrate and PVC films in the formulation, if used. A percentage is not needed.



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## PROVIDING PRODUCT INFORMATION TO NSF INTERNATIONAL

- > **Product Trade Name:** The trade name of the product reported to NSF should be the same as on the label and product SDS. If there are multiple trade names, we need all of the labels and SDSs.
  - > **Ingredient Disclosure:** Read the FAQ about ingredient disclosure at [www.epa.gov/saferchoice/safer-choice-guidance-ingredient-disclosure-requirements](http://www.epa.gov/saferchoice/safer-choice-guidance-ingredient-disclosure-requirements). Lack of familiarity often results in the need to re-draft labels and can cause delays in the review.
  - > **Performance Testing:** For performance testing, use standard methods listed in the Safer Choice Standard, Section 4.2.1, when available. Ensure the test report provides a detailed description of the test substance, test method, test parameters, analytical procedures, results and conclusion.
- > **Packaging:** You may wish to ask NSF for a packaging supplier letter template to more easily obtain information on sustainability, phthalates, Bisphenol A, and heavy metals. Make sure the documents from your packaging supplier include all of the required elements (see packaging FAQ at [www.epa.gov/saferchoice/safer-choice-guidance-packaging-requirements](http://www.epa.gov/saferchoice/safer-choice-guidance-packaging-requirements)).

For more information on the Safer Choice program or other NSF services email [sustainability@nsf.org](mailto:sustainability@nsf.org)

## NSF INTERNATIONAL

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