



THE MARK OF ENVIRONMENTAL RESPONSIBILITY

Guide to GS-1 Certification

**Green Seal's Standard
for Sanitary Paper Products**

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For questions about GS-1 or any Green Seal Standard, call (202) 872-6400, email certification@greenseal.org, or visit www.greenseal.org

To apply for certification, review the steps at <http://greenseal.org/getcertified/index.cfm>

INTRODUCTION

The purpose of this document is to provide guidance for product manufacturers seeking certification or re-certification under the Green Seal™ Standard GS-1 Sanitary Paper Products. This document does not replace the standard as the source of information and requirements for certification. Please refer to the complete Green Seal Standard for Sanitary Paper Products, GS-1 for additional details.

(<http://www.greenseal.org/GreenBusiness/Standards.aspx?vid=ViewStandardDetail&cid=0&sid=25>).

The layout of this document corresponds to the criteria in the Green Seal Standard for Sanitary Paper Products, GS-1, Third edition issued December 15, 2010. The criterion of the standard is listed in bold and then any notes/tips or documentation that is required will be listed and should be submitted as part of the certification or re-certification application. Data submission will be done electronically through a web-based system. Please review the *Green Seal Client Portal User Manual* (this manual will be provided to you by your Project Manager in their introductory email) and discuss the process with your assigned Certification Project Manager.

ORGANIZATION

Documentation of the manufacturing facility, including the company organizational chart, facility description, employee and production capacity, and process flow chart or diagram is a requirement of the facility audit. See the certification checklist for more details.

DOCUMENTATION NEEDED:

Provide copies of the company organizational chart, facility description, employee production capacity, and process flow chart or diagram to the site auditor by uploading these documents through the client portal. For re-certification, this material has already been provided to Green Seal, so only a review and update is required.

FOREWORD - COMPLIANCE WITH REGULATIONS

The requirements in the standard are based on an assessment of the environmental, health, or social impacts associated with the products, services, or organizations covered in the scope of the standard. The requirements included in the standard are subject to revision. Provisions for safety have not been included in this standard. This standard neither modifies nor supersedes laws and regulations. Compliance with this Standard is not a substitute for, and does not assure, compliance with any applicable law or regulations. This standard (and any corresponding conformity assessment) presumes compliance with all applicable laws and regulations.

DOCUMENTATION NEEDED:

Provide an attestation letter on company letterhead regarding any environmental regulation violations in the prior 6 months. For re-certification, this letter should already have been provided to Green Seal, so only a review and update is needed.

1.0 SCOPE

This standard establishes environmental, health, and social requirements for sanitary paper products including paper towels, general-purpose wipes, paper napkins, bathroom tissue, facial tissue, toilet seat covers, placemats, tray liners, table coverings, and other sanitary paper products. The standard covers products for institutional as well as retail markets. This standard does not include nonwoven sanitary products, general-purpose disposable and flushable wipes containing cleaning agents or fragrances, disposable diapers, or sanitary napkins and tampons.

Examples of products included and excluded in the scope of GS-1

Products included in GS-1	Products excluded from GS-1
<ul style="list-style-type: none"> • Paper towels (hardwound, folded, or kitchen roll) • Napkins (beverage, luncheon, dinner) • General-purpose wipes that do not contain any added cleaning agents or fragrances • Bathroom tissue • Facial tissue (flat box and cube box) • Toilet seat covers • Placemats or tray liners • Table coverings 	<ul style="list-style-type: none"> • Nonwoven sanitary products • General purpose disposable and flushable wipes that contain added cleaning agents or fragrances • Facial tissue (travel packs) • Cotton balls, cosmetic pads • Disposable diapers • Sanitary napkins and tampons • Printing and writing paper (covered in GS-7) • Newsprint (covered in GS-15) • Paper products used in the preparation of food (covered in GC-8) • Coated printing paper (covered in GS-10)

DOCUMENTATION NEEDED:

Make sure that the product(s) you want Green Seal to certify meet the scope. Provide name and type of product, with corresponding SKU numbers, in application. Products already certified to GS-1 (1992) and GS-9 (1993), undergoing re-certification, are likely to meet the scope requirements.

3.0 PRODUCT-SPECIFIC PERFORMANCE REQUIREMENTS

3.1 Product Performance. Product performance requirements shall be consistently measured on either the unconverted (parent roll) or converted product depending on facility procedures. Testing shall be conducted under controlled and reproducible laboratory conditions. In addition to the measured performance requirements, the product shall be made in accordance with reasonable industry practice.

3.1.1 Basis Weight (grammage). Basis weight (grammage) shall be measured according to Technical Association of the Pulp and Paper Industry (TAPPI) T 410, or International Organization for Standardization (ISO) 536 and shall meet the requirements in the standard when measured as grams per square meter (g/m^2 , SI Units) or pounds/ream (lbs/ream, English units).

3.1.2 Tensile Strength (Dry and Wet). Product characteristics shall be measured for tensile strength in the machine direction (MD) and cross direction (CD) using the methods described in either section 3.1.2.1 or section 3.1.2.2.

3.1.2.1 Tensile strength using TAPPI T 494/456. Product characteristics shall meet the requirements in standard when tested according to TAPPI T 494 or ISO 1924/3 (dry tensile strength) and TAPPI T 456 (wet tensile strength), as measured in gram force/inch (gf/in, English units)

3.1.2.2 Tensile strength using TAPPI T 576. Product characteristics shall meet the requirements in the standard when tested according to TAPPI T 576 (dry and wet tensile strength), as measured in gf/3 in (English units).

3.1.3 Stretch and Water Absorbency. Product characteristics shall be measured for or water absorbency when tested according to TAPPI T 494 or ISO 1924/3 or TAPPI T 576 for stretch; and TAPPI T 432 for water absorbency; and shall meet the requirements in the standard, as measured in % stretch or seconds of water absorbency.

DOCUMENTATION NEEDED:

Provide product performance test results for basis weight, tensile strength (wet and dry), stretch, and water absorbency. Test results should be for the products to be certified and units should be included. Provide, as applicable, the test report stating the test method used, date of test, product ID, testor ID, whether the testing was done on the unconverted or converted sheet, and any testing results summary. Please use the Product Information and Product Performance templates to transmit your data. These templates can be found in the Your Documents tab in the client portal. This is a new requirement in the standard, so all data are needed for those companies seeking certification or re-certification.

3.0 PRODUCT-SPECIFIC PERFORMANCE REQUIREMENTS

3.2 Alternative Product Performance. Alternative test methods may be allowed for sanitary paper products or categories not specified in this standard. A manufacturer must provide documented rationale for use of the method. The method must be an objective, scientifically-validated method, conducted under controlled and reproducible laboratory conditions. The results of the testing must meet performance ranges that are considered reasonable industry practice.

DOCUMENTATION NEEDED:

The alternative product performance section allows the user flexibility in testing requirements, if a different method is used, or if the product category is not listed in the tables in the standard. Data submittal is similar to those for section 3.1, but requires complete documentation of the test method used, as well as a presentation of available industry test results to show the results fall within reasonable industry range.

3.3 Product Specifications. Products must contain the minimum material specifications, (i.e., minimum product per roll/package) listed in the standard. Note that the conversion basis, consisting of the number of sheets and the sheet size, is provided so that a manufacturer can convert between the product in square feet and sheets per roll. Any combination of sheet size and number of sheets is acceptable, as long as the minimum product per roll/package is met. Alternatively, different sizes that generate better package or shipping efficiency may be permitted provided that the manufacturer submits specifications to demonstrate that they have improved the packaging and shipping efficiency.

DOCUMENTATION NEEDED:

Provide the material specification of square feet of product per roll/package for each product SKU that is submitted for certification or re-certification. Include the size of the individual sheet and the number of sheets per roll/package. Please use the Product Information template available in the Your Documents tab in the client portal for data submission.

4.0 PRODUCT-SPECIFIC SUSTAINABILITY REQUIREMENTS

4.1 Fiber Requirements. The fiber source shall meet one of the following:

- a) **The product shall be made from 100% recovered material;**
- b) **The product shall be made from up to 85% agricultural residue, with the balance made from post-consumer material as required in section 4.2 herein;**
- c) **The product shall be made from any combination of recovered material and agricultural residue, and the balance of the product shall meet the post-consumer material requirement in section 4.2 herein.**

DOCUMENTATION NEEDED:

Green Seal will require documentation from suppliers regarding the sources of fiber. Options include an attestation letter from the supplier, or a combination of representative attestation letters and purchasing specifications/purchase orders providing descriptions of the sources (if dealing with multiple suppliers). For re-certification, this documentation should already have been provided to Green Seal, so only a review and update is needed, if any sources of fiber have changed.

For integrated mills where whitewater and/or wastewater recovery may cause contamination of the incoming recovered material furnish (stock), reclaimed mixed fibers containing virgin material may be acceptable as long as it can be shown, through mass balance calculations, that the amount of virgin fiber in the reclaimed mixed fibers is less than 0.5% of the incoming recovered material furnish (stock).

DOCUMENTATION NEEDED:

Provide detailed mass balance calculations to show that the virgin fiber addition from the whitewater or wastewater recovery is less than 0.5% of the incoming furnish. Please include a detailed process flow diagram and be prepared to walk through the calculations with the Certification Project Manager during the review.

For agricultural residue, the manufacturer shall document the original source of the material and the agricultural residue shall originate from a crop certified to the Rainforest Alliance Sustainable Agriculture Standard, or other approved third-party certification program.

DOCUMENTATION NEEDED:

If agricultural residue is being used for any portion of the fiber, provide documentation from the supplier, such as an attestation letter, documenting the original source of the material (e.g. Company X is using bagasse as a fiber source, which originated from sugar cane fields in Florida.) Also provide the certificate or other documentation showing that the originating crop (e.g. the sugar cane fields in Florida) are certified to the Rainforest Alliance Sustainable Agriculture Standard, or other approved third-party certification program (e.g. the Better Sugar Cane Initiative).

4.0 PRODUCT-SPECIFIC SUSTAINABILITY REQUIREMENTS

4.2 Post-Consumer Material Requirements. Products made from recovered material shall meet the following requirements:

Product Type	Post-Consumer Material Requirement (%)
Paper Towels, General-Purpose Wipes, and Napkins	50%
Bathroom Tissue	25%
Facial Tissue	15%
Toilet Seat Covers	25%
Placemats/Tray liners	40%
Table Coverings	40%

4.3 Post-Consumer Material Calculations. The percentage of post-consumer material shall be calculated and certified based on the fiber weight of the paper. The calculation of recycled content based on fiber weight shall be performed using the following formula for post-consumer material:

$$\frac{\text{Post-consumer Material} \times \text{Yield}_{\text{PC}}}{\text{Recovered Material or Agricultural Residue} \times \text{Yield}_{\text{R}}}$$

Yield will depend on the product manufactured, the raw material, the level of contaminants and the cleaning and deinking technology employed. The percentage yield shall be calculated by dividing the total material output by the total material input. The percentage of recovered material or agricultural residue and post-consumer material shall be calculated based on a weighted average of the materials used for a period of time not to exceed the previous three months.

DOCUMENTATION NEEDED:

Green Seal will require documentation from suppliers regarding the sources of fiber and the grades of material that are post-consumer. Options include an attestation letter from the supplier or a combination of representative attestation letters and purchasing specifications/purchase orders providing descriptions of the sources (if dealing with multiple suppliers). Provide the data to be used for the post-consumer material calculations, including run records documenting the material usage and yield data. Provide the most recent three month average for the data. If the product is made less frequently than 3 months and only 1 run is done within 3 months, that run should meet the post-consumer content requirement. The calculation of percentage post-consumer material will be made by the Certification Project Manager.

4.0 PRODUCT-SPECIFIC SUSTAINABILITY REQUIREMENTS

4.4 Source Reduction. Reserved.

DOCUMENTATION NEEDED:

Not applicable.

4.5 Material Processing.

DOCUMENTATION NEEDED:

The material processing criteria relate to the papermaking additives (chemicals) used to manufacture the products to be certified. Submit a summary of all papermaking additives used at the manufacturing facility, including chemical name, CAS#, and quantity used (this may vary by requirement). Supplier contact data (name, phone number, email address) is also required. This data will be used to evaluate each of the criteria in section 4.5. Please use the Papermaking Additives template available in the Your Documents tab of the client portal.

4.5.1 Processed Chlorine Free (PCF). The papermaking process used to produce the products shall be PCF.

DOCUMENTATION NEEDED:

Provide an attestation letter on company letterhead documenting that the entire papermaking process is processed chlorine free. This attestation letter will also be supported by the papermaking additive submittal which should show no use of chlorine-containing chemicals. If your company has obtained third-party certification regarding PCF, also submit that certificate.

4.5.2 Water Disinfection. Chlorine derivatives and biocides may be used to disinfect the incoming fresh water supply and recycled process water. Product testing is not required, as long as the residual concentration of the chlorine derivatives and biocides used for disinfection is below the applicable maximum residual disinfectant levels (MRDLs) in the National Primary Drinking Water Regulations found in 40 CFR, Part 141 at any location where chlorine derivatives and biocides are added to the papermaking process. Biocides must be registered with the EPA or the Pest Management Regulatory Agency (PMRA).

DOCUMENTATION NEEDED:

In addition to providing the papermaking additive summary mentioned previously, provide the calculations showing the quantity of disinfectant used (e.g. chemical used, pounds or milligrams, quantity of water treated, liters or million gallons, water concentration) so that the Certification Project Manager can verify the concentration. Alternately, provide testing data for any location where chlorine derivatives and biocides are added to the papermaking process documenting the residual concentration(s). Also provide the necessary registration documentation for any biocides. See the example calculation template provided in the Your Documents tab.

4.0 PRODUCT-SPECIFIC SUSTAINABILITY REQUIREMENTS

4.5.3 Carcinogens, Mutagens, and Reproductive Toxins. The papermaking process shall not contain any papermaking additives or contaminants that are carcinogens, mutagens or reproductive toxins or that are known to produce or release carcinogens, mutagens, or reproductive toxins. An exception shall be made for titanium dioxide and carbon black used in colorants.

DOCUMENTATION NEEDED:

No additional documentation is needed beyond the papermaking additive summary mentioned previously.

4.5.4 Optical Brighteners. Optical brighteners may be used as a papermaking additive at a dosage not to exceed 200 parts per million (0.02%) by weight as added to the papermaking process. This level does not include any optical brighteners that may be present in the furnish through the use of recovered materials.

DOCUMENTATION NEEDED:

In addition to providing the papermaking additive summary mentioned previously, provide the calculations showing the quantity of optical brightener used (e.g. chemical use per furnish batch, pounds or milligrams, quantity of process water in furnish batch, liters or million gallons, concentration in process water) so that the Certification Project Manager can verify the dosage concentration. Please see the example calculation template provided in the Your Documents tab.

4.5.5 Colorants. The product shall not contain any colorants as papermaking additives; an exception shall be made for products that would not contain colorants but from the addition of recovered materials.

Further, paper towels and general-purpose wipes, paper napkins, and placemats and other table coverings may be printed with colorants provided that these colorants contain a sum concentration of less than 100 parts per million, by weight (0.01%), of heavy metals including lead, mercury, cadmium, and hexavalent chromium.

DOCUMENTATION NEEDED:

In addition to providing the papermaking additive summary mentioned previously, provide documentation that colorants are not used as papermaking additives, through an attestation letter or other method. A converter would need to obtain documentation from their paper supplier if they are not manufacturing the paper themselves.

Also document that heavy metals are present at less than 100 ppm by weight in colorants used for printing of towels, napkins, placemats and other table coverings. The Certification Project Manager may need to contact the supplier of the printing inks/colorants to obtain this information.

4.0 PRODUCT-SPECIFIC SUSTAINABILITY REQUIREMENTS

4.5.6 Biodegradability. Any papermaking additives used in the papermaking process, except for inorganic compounds, polymers, optical brighteners, and biocides, shall exhibit ready biodegradability in accordance with the Organization for Economic Co-operation and Development (OECD) definition, as follows. Biodegradability shall be measured according to any of the following methods: ISO 7827, 9439, 10707, 10708, 9408, 14593; OECD Methods 301A – F; or OECD 310. Specifically, within a 28-day test, the ingredient shall meet one of the following criteria:

- Removal of Dissolved Organic Carbon (DOC) > 70%
- Biochemical Oxygen Demand (BOD) >60%
- % of BOD of Theoretical Oxygen Demand (ThOD) > 60%
- % Carbon Dioxide (CO₂) evolution of theoretical > 60%

For papermaking additives that do not exhibit ready biodegradability in these tests the manufacturer may demonstrate biodegradability in sewage treatment plants using the Coupled Units Test found in OECD 303A by demonstrating DOC removal > 90%.

An exception shall be made for papermaking additives that do not exhibit ready biodegradability, if the additive has low aquatic toxicity (acute LC50 ≥ 100 mg/L for algae, daphnia, or fish) and exhibits inherent biodegradability per ISO test methods 9887 or 9888 or OECD 302A-C.

DOCUMENTATION NEEDED:

In addition to the papermaking additive summary mentioned previously, additional data or testing may be required if the Certification Project Manager cannot find publically available biodegradability data.

4.5.7 Additional Prohibited Substances. The papermaking process shall not contain the following substances as papermaking additives or contaminants:

- Chlorophenolic Biocides
- Fragrances
- Heavy metals, including but not limited to lead, chromium, or selenium both in the elemental form or compounds
- Ozone-depleting compounds

DOCUMENTATION NEEDED:

No additional documentation is needed beyond the papermaking additive summary mentioned previously.

5.0 MANUFACTURING SUSTAINABILITY REQUIREMENTS

5.1 Social Responsibility. Documentation must be provided that the production of the product meets the following social responsibility requirements:

5.1.1 Freedom of Association and Collective Bargaining. Workers shall have the right to join or form trade unions of their own choosing and their right to bargain collectively shall be recognized and respected.

5.1.2 Freedom of Labor. There shall not be forced or bonded labor or use of child labor.

5.1.3 Freedom from Discrimination. There shall not be discrimination in terms of race, color, sex, religion, age, disability, gender, marital status, sexual orientation, union membership, political opinion, national extraction or social origin such that it affects the opportunity or treatment in employment and there shall be no support or tolerance of corporal punishment, physical or verbal coercion, sexual or other harassment, intimidation or exploitation.

5.1.4 Occupational Health and Safety. A safe and hygienic workplace environment shall be provided with access to potable water. Adequate steps shall be taken to minimize the hazards of the workplace and workers shall receive health and safety training to prevent accidents and injury.

5.1.5 Conditions of Employment. Workers shall work under fair conditions of employment. Wages, working hours and overtime shall meet at a minimum the national legal or industry benchmark standard and regular employment shall be provided.

DOCUMENTATION NEEDED:

Provide an attestation letter on company letterhead documenting social responsibility requirements. Also provide a copy of your company policy referring to such matters. If your company has obtained certification under the International Labor Organisation, also submit that certificate. A converter and paper supplier may need to submit separate data.

5.0 MANUFACTURING SUSTAINABILITY REQUIREMENTS

5.2 Manufacturing and Converting Reporting Requirements. The following information shall be reported for processes including re-pulping, deinking, papermaking, product converting, and waste treatment (on-site or off-site facilities), on an annual basis or when any changes are made to the processes. If a manufacturer only does converting, then the supplier of the parent rolls will be required to provide additional relevant data. The facility shall also provide their total annual production of paper data as tons.

5.1.1 Air Monitoring. Air monitoring data shall be reported as required by the facility's air permit. The data shall be reported at the frequency and units specified in the permit and the associated permit limits for monitored parameters shall be provided.

5.1.2 Wastewater Monitoring. Wastewater monitoring data shall be reported as required by the facility's wastewater permit. The data shall be reported at the frequency and units specified in the permit and the associated permit limits for monitored parameters shall be provided.

5.2.3 Solid Waste. Solid waste shall be reported as the tons of material entering an external solid waste disposal stream as an annual total. Solid waste such as waste packaging materials that cannot be recycled, shall be reported as tons based on the as disposed weight. Solid waste such as wastewater solids shall be reported as dry tons (i.e., wet tons multiplied by the fractional solids content).

DOCUMENTATION NEEDED:

Provide air monitoring, wastewater monitoring, and solid waste data as required by your facility permits. Include the frequency and units consistent with permit requirements and also provide the permit limits. The data may be submitted in any format that your facility uses, but should be a format that is readable and understandable by the Certification Project Manager.

5.0 MANUFACTURING SUSTAINABILITY REQUIREMENTS

5.3 Effective as of January 1, 2012, Manufacturing and Converting Requirements – Water and Energy Use. Manufacturers shall meet the following fresh water and energy use criteria, for combined processes including re-pulping, deinking, papermaking, product converting, and waste treatment (on-site or off-site facilities). If a manufacturer only does converting, then the energy and water use for the other processes (re-pulping, deinking, papermaking, and waste treatment) shall be supplied by the manufacturer of the parent roll. If a manufacturer purchases market de-inked pulp (MDIP), then the supplier of the MDIP will be required to provide the energy and water use data associated with production of the MDIP.

The data shall represent either the total annual resource used divided by the total annual production of paper, or the total annual resource used to produce all grades of certified paper divided by the total annual production of all grades of certified paper. This implies that estimation and allocation methods are acceptable.

Fresh Water Use (gallons/ton of final product) ^(a)	Total Energy Use (millions BTUs/ton of final product) ^(b)
19,250	17.0

(a) gallons/T = 0.00417 m³/MT

(b) millions of British Thermal Units (BTUs)/T = 1.16 Gigajoules (GJ)/MT = 323.2 kilowatt-hour (kwh)/MT

DOCUMENTATION NEEDED:

Provide energy and water use data for your facility for the processes listed in the standard. You may need to contact suppliers or your local wastewater treatment plant to gather data, so please allow enough time. You may either report the total resource used or allocate it to certified grades of paper. Please use the Energy and Water template available in the Your Documents tab in the client portal for data submission.

5.4 Distribution. Reserved.

DOCUMENTATION NEEDED:

Not applicable.

6.0 PACKAGING SUSTAINABILITY REQUIREMENTS

6.1 Primary and Secondary Packaging. Primary and Secondary packaging shall meet the following requirements, based on the packaging material type:

- Packaging made from paper or paperboard shall be recyclable, and made from 100% recovered material.
- Packaging made from containerboard (corrugated cardboard) shall be recyclable and made from at least 30% recovered material.
- Packaging made from plastic shall be recyclable, or source-reduced by 20%, or shall contain 25% recovered material content (pre- or post-consumer). Where a product's packaging is below these levels, the manufacturer must demonstrate that efforts have been made to use the maximum available pre- or post-consumer material in packaging. An exception shall be made for packaging with an effective take-back program.

DOCUMENTATION NEEDED:

Provide a letter from your supplier(s) documenting the type of packaging and the amount of recovered or pre-/post-consumer materials. If the level for plastic packaging is below the requirement you must provide a letter from your supplier stating that they are using the most pre-/post-consumer material that is practicable. For plastic packaging, only SPI code number 1, number 2, and number 4 plastic are considered recyclable based on FTC requirements. If source reduction is the claim for plastic packaging, please provide the weight of the current package and the weight of the comparable marketplace package. The weights must be for comparable product units (e.g. 4-roll package of bathroom tissue).

6.2 Colorants. Packaging may be printed using colorants provided that these colorants contain a sum concentration of less than 100 parts per million, by weight (0.01%), of lead, mercury, cadmium, and hexavalent chromium.

DOCUMENTATION NEEDED:

For colorants used in packaging, provide the colorant MSDS and any documentation that you may have showing that the heavy metals are less than 100 ppm by weight. The Certification Project Manager may have to contact suppliers on a confidential basis to obtain data.

6.0 PACKAGING SUSTAINABILITY REQUIREMENTS

6.3 Heavy Metal Restrictions. Heavy metals, including lead, mercury, cadmium, and hexavalent chromium, shall not be intentionally introduced in packaging. Further, the sum of the concentration levels of these metals present shall not exceed 100 parts per million by weight (0.01%); an exception shall be made for packages that would not exceed this maximum level but for the addition of recovered materials. Further, intentional introduction does not include the use of one of the metals as a processing aid or intermediate to impart certain chemical or physical changes during manufacturing, where the incidental retention of a residual of that metal in the final packaging or packaging component is not desired or deliberate, if the final packaging or packaging component complies with the incidental concentration restrictions of 100 ppm.

6.4 Other Restrictions. Phthalates, bisphenol A, and chlorinated packaging material are prohibited from being intentionally introduced in packaging; an exception shall be made for packages with added phthalates, bisphenol A, or chlorinated packaging material solely from the addition of post-consumer material.

DOCUMENTATION NEEDED:

Provide a letter or letters from your packaging supplier(s) documenting that heavy metals, phthalates, bisphenol A, and chlorinated packaging material are not being intentionally introduced. Suppliers may modify the Conference of Northeastern Governors (CONEG) Sample Certificate of Compliance letter (http://www.toxicsinpackaging.org/certificates_of_compliance.html) to include the additional requirements beyond heavy metals or submit separate letters.

7.0 LABELING REQUIREMENTS

7.1 Disposal. The manufacturer's label shall include a statement encouraging proper disposal of the product and encouraging recycling of appropriate packaging.

If plastic, the packaging must be marked with the appropriate Society of the Plastics Industry symbol to identify the type of plastic for recycling. If the symbol is in a conspicuous location, the appropriate qualification of recyclability is required, as referenced in 6.1, such as "This product may not be recyclable in your area, see if accepted by your local program" or "only a few communities accept this package for recycling, check with your local program."

DOCUMENTATION NEEDED:

Submit your labels electronically for review. Proper disposal language may include "Please recycle excess or unused product. Used product should be discarded." Encourage recycling of number 1, number 2, and number 4 plastic, paper, paperboard, and containerboard (corrugated cardboard). See the FTC guidelines for assistance with appropriate language http://www.ftc.gov/bcp/edu/microsites/energy/about_guides.shtml.

7.2 Statement of Basis of Certification. Whenever the product claims to be certified to this standard, it shall be based on a third-party certification program with an on-site auditing program, and shall state, unless otherwise approved in writing by Green Seal:

"This product meets the Green Seal™ Standard for Sanitary Paper Products, GS-1, manufactured using environmentally and socially responsible processes, and made from YY with a minimum of XX% post-consumer material."

[Where YY is the material used (i.e. 100% recovered material, 85% agricultural residue), and where XX is the verified minimum level of post-consumer material].

DOCUMENTATION NEEDED:

Green Seal does not require the use of the Green Seal certification mark. However, use of the certification mark or other claims regarding certification to this standard shall be qualified with this statement. Green Seal may allow alternate language for the basis of certification statement, but any changes must be approved first in writing. Note that the percentages of material allowed to be stated will be based on consistently documentable results (e.g. if you often use 45% post-consumer material in the manufacture of bathroom tissue, but sometimes only use 30%, then you will only be allowed to state the 30%).