

Frequently Asked Questions about Safer Choice Product Performance Criteria (11/2024)

Below, we provide answers to questions frequently asked about Safer Choice program product performance criteria. If you have other questions or need further clarification, please contact your third-party profiler or Safer Choice.

What do I need to submit?

Partners need to submit:

- Appropriate test results for product-class-specific standardized test methods demonstrating efficacy to an acceptable performance level;

OR

- Results for equivalent performance tests or other demonstration of performance agreed upon in advance by Safer Choice before testing is conducted
 - The alternative method must be objective and scientifically validated, conducted under controlled and reproducible laboratory conditions, include controls when appropriate, and produce quantitative results. Safer Choice must approve the acceptable performance level; or
 - The product must perform comparably to a conventional, nationally recognized product in its class and at equivalent product-specific use directions.

Where can I find a list of standardized product performance test methods?

A list of standardized product performance test methods, including acceptable performance levels, is referenced in the [Safer Choice Standard](#) (Section 4.2.1). Please note that the test methods and other references listed in this section may have been revised by their original authors. Please ensure that you consult the latest version of any referenced documents.

What if my product has multiple dilution levels depending on soil level?

For cleaning products, for example, each product shall effectively clean common soils and surfaces in its class at the most diluted/least concentrated manufacturer-recommended dilution level for routine cleaning, as measured by the applicable standard test methods.

Do I need to provide new performance data if I reformulate?

It depends on the extent of the reformulation and will be determined on a case-by-case basis. Please note that all formulation changes need to be formally submitted for Safer Choice review.

New performance data is generally not needed for minor formulation changes, including:

- minor ingredient range changes;
- addition/removal of auxiliary components (i.e., colorants, fragrances); or changes in ingredient suppliers.

New performance data may be needed for major formulation changes, including:

- changes to a major functional component (i.e., surfactant, solvent, chelant); or
- major ingredient range changes.

I manufacture several products in the same product class with the same base formulation but different colorants and fragrances. Do I need to conduct testing for each formulation variation?

If the only difference between the formulations is auxiliary components (e.g., colorants, fragrances), you do not need to submit performance testing for each formulation variation. For example, if you manufacture a free & clear laundry detergent and a lavender laundry detergent – and the only formulary difference is the fragrance – you only need to conduct performance testing for the base formulation.

I manufacture several products with the same base formulation but for different product classes. Do I need to submit testing for each formulation product class?

If the same base formulation is used for various product categories, the performance testing should indicate that the formulation performs effectively in each product class. For example, if the base formulation is used in a glass cleaner, a degreaser, and a toilet bowl cleaner, performance testing must demonstrate that the product functions effectively in all three product classes. This extends to private label products marketed for a different product class than the parent product.

What if my product does not meet the acceptable performance level (e.g., achieves <80% cleaning)?

To move forward with certification, you will need to demonstrate that your product performs comparably to a conventional, nationally recognized product and commit to improving the product performance to meet the acceptable performance level by the next renewal (i.e., 3 years).

What if there is no performance standard for a specific product class?

Partners and candidate partners must consult Safer Choice or an authorized third-party profiler concerning product classes not specifically addressed by a standard method.

Are customer testimonials or sales data accepted in lieu of product performance testing?

Customer performance testimonials are accepted for industrial/institutional products only. We do not accept sales data as a proxy for demonstrating product efficacy.

What should the customer testimonial documentation look like?

The testimonials should be on the customer's letterhead and signed and should provide 2-3 sentences on the efficacy of the specific product(s) – and include the product name(s).

What are the performance requirements for antimicrobial products?

Performance for Design for the Environment (DfE)-certified products related to antimicrobial label claims should be demonstrated through the registration process. A

company manufacturing a DfE-certified product with label claims for performance such as degreasing or cleaning – in addition to those regulated under FIFRA – must provide performance testing to Safer Choice to support those claims.

Other questions?

Please contact saferchoice@epa.gov.