

Good Housekeeping

Good Housekeeping Research Institute

I am writing from the Good Housekeeping Research Institute, home to both the Good Housekeeping Seal and the Green Good Housekeeping Seal. As an organization devoted to consumer product testing and consumer advocacy, we would like to commend the FTC on its proposed revisions to the Green Guides. We believe these new guidelines will help minimize the greenwashing and consumer confusion prevalent in today's marketplace.

The Good Housekeeping Seal was launched in 1909 and now, 101 years later, it is one of the most trusted consumer icons in America. In order for a product to earn the Good Housekeeping Seal, it must be evaluated by the scientists at the Good Housekeeping Research Institute for a range of criteria including meeting performance expectations for the product category and general safety in use. The Seal is a representation of the two-year limited warranty that Good Housekeeping offers consumers: If a Seal product proves defective within two years of purchase, Good Housekeeping will replace the product or provide a refund.

Last year, Good Housekeeping introduced the Green Good Housekeeping Seal, a green overlay to our primary Seal. In response to consumers who told us they were confused by the multitude of environmental claims in the marketplace, we have worked with consultants from Brown & Wilmanns Environmental to develop environmental criteria on a category-by-category basis. To date, we have finalized criteria and applications for the Cleaning Products, Beauty Products and Paints and Coatings Products categories and have seven more product categories in beta testing. You can find a detailed summary of the Green Good Housekeeping Seal application at <http://www.goodhousekeeping.com/greenghseal>. Our goal with the Green Good Housekeeping Seal is to help consumers cut through the muddle of modern day green advertising.

The Green Good Housekeeping Seal application includes an evaluation (and verification) of a broad range of environmental criteria, some of which is common to all product categories and some of which is specific to some categories. All applications include an evaluation of the materials, ingredients and composition of a product, energy, and water usage and waste generation associated with the manufacturing process, the packaging and distribution of the product, and

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corporate social responsibility. Product category-specific issues range from energy and water efficiency in use to end of life management. In light of the approach we have taken, which is similar to several other multi-attribute labels that recognize environmental and/or social responsibility performance, we would like to submit the following comment about the FTC's proposed Green Guides and multi-attribute seals and certifications:

- The Green Good Housekeeping Seal is based on a multi-attribute point system covering a broad range of criteria, some of which are applicable to all product categories and some of which are category specific. A product needs to earn the primary Good Housekeeping Seal and perform well across many criteria for the Green Good Housekeeping Seal in order to earn the latter.
- We believe that the consumer will not be well served if manufacturers must highlight one environmental aspect in which it excels when it uses the Green Good Housekeeping Seal. That would send the message that being environmentally responsible in one area is sufficient, and diminishes other areas in which the product or company may (or may not) be taking significant environmental steps.
- Good Housekeeping agrees that identifying one or more specific environmental benefits in conjunction with a general claim for environmental performance makes sense for most products. However, we believe it should not apply to multi-attribute seals and certifications, such as the Green Good Housekeeping Seal, that encompass a broad range of environmental factors.

In light of the above, we recommend that the proposed Green Guides be amended to address multi-attribute seals/certifications. We suggest that the FTC should require manufacturers who use a multi-attribute label or certification logo on product packaging and marketing materials to include the following statement: "This product meets (the name of the issuing organization)'s definition of Green. See [website]." This requirement could be inserted at section 260.6(e) of the proposed guides

For more information on the Green Good Housekeeping Seal please visit <http://www.goodhousekeeping.com/greenghseal>. As you can see, on our website we detail the criteria used for each product category because we believe transparency is in the best interest of the consumer.

Thank you for considering our comments and please feel free to contact me at address submitted if you would like to discuss this further.

Sincerely

Stacy Genovese