

October 15, 2009, Revised 03.22.10 by adding footnotes 1 & 2

To: Scott Ogden, EHS

Re: Chemicals Policy; addition to ISO 14001

From: Howard Williams

The demand for environmentally responsible and relevant building products is growing rapidly. Building owners, Architects, contractors and building occupants want products made with chemicals that have low to no toxicity and which at the end of the product lifecycle are used to create new products and/or materials.

As we daily seek to fulfill our Corporate Mission to become a "*World Leader of quality specialty building products and services*", following our vision, "*Creating products that make buildings better*", we herein subscribe to these four primary guiding principles as the foundation of our Chemicals Policy.

1. **Know and disclose¹ product chemistry.** We will identify the substances associated with and used in our products across their lifecycle and will increase as appropriate the transparency of the chemical constituents of our products, including public disclosure of chemicals of high concern and 3rd-party certification(s).
2. **Assess and avoid hazards.** We will determine the hazard characteristics of chemical constituents and formulations in our products, use chemicals with inherently low hazard potential, prioritize chemicals of high concern for elimination, minimize exposure when hazards cannot be prevented, and redesign products and processes to avoid the use and generation of hazardous chemicals.
3. **Commit to continuous improvement.** We will establish operational governance structures; policies and practices that create a framework for the regular review of product and process chemistry, and that promote the use of chemicals, processes, and the redesign/creation of products with inherently lower hazard potential.
4. **Support public policies and industry standards that:** advance the implementation of the above three principles, ensure that comprehensive hazard data are available for chemicals on the market, take action to eliminate or reduce known hazards and promote a greener economy, including support for green chemistry research and education.

The above four principles shall be managed and acted upon within our ISO 14001 structure and audited accordingly for ongoing compliance.

The above will be implemented² as per the attached plan/schedule.

¹ C/S reserves the right to disclose, or not disclose, its Confidential Business Information. It is the intent of this Chemicals Policy that products requiring CBI protection be vetted by our 3rd Party Certification consultant to ensure alignment with this Policy. 3rd Party Certifications may be made available upon written request.

² Implementation will occur over a period of time.

Know & Disclose



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BUILDING PRODUCT TRANSPARENCY LABEL

Goal. It is our belief that building products that are harmful to humans, animals, and the environment should be avoided when there are reasonable alternatives. To that end, we seek to create a means that allows people to make informed decisions when they fabricate, specify, install, use, and dispose of building products.

Approach. We believe that collaboration is imperative for market transformation. Accordingly, Perkins+Will and Construction Specialties formed a partnership to create a labeling system that we hope makes environmental and health disclosure easier for any manufacturer who chooses to adopt the template.

Outcome. This labeling system is a forthright declaration of the make-up of a product and its potential impacts, presented in multiple formats. It strives to be comprehensive, relevant, verifiable, and able to evolve as products and processes change.

LINKS

- [Healthy Building Network](#)
- [ChemSec SIN List](#)
- [Safer Chemicals Healthy Families](#)
- [Business-NGO](#)
- [Practice Greenhealth](#)
- [Health Care Without Harm](#)
- [Construction Specialties](#)
- [Perkins + Will](#)
- [Perkins+Will Precautionary List](#)
- [MBDC: Cradle To Cradle](#)
- [The Pharos Project](#)
- [University of BATH ICE Standards](#)
- [GC3](#)

VIEW MY PRODUCT'S LABEL

Pedisystems Entrance Flooring®

PediTred®

- [G4 \(Nylon Carpet\) - v.G4-1a](#)
- [G4 \(Polypropylene Carpet\) - v.G4-2a](#)
- [G4 \(Recycled Rubber Inserts\) - v.G4-3a](#)
- [G7 \(Serrated Aluminum\) - v.G7-1a](#)

Pedigrid®

- [G1 \(Nylon Carpet\) - v.G1-1a](#)
- [G1 \(Polypropylene Carpet\) - v.G1-2a](#)
- [G1 \(Recycled Rubber Inserts\) - v.G1-3a](#)
- [G8 \(Serrated Aluminum\) - v.G8-1a](#)

Acrovyn® 4000 Wall Protection

Rigid Sheet (with adhesive)

- [Solid Colors - v.SS-1a](#)
- [Chameleon™ Patterns - v.SC-2a](#)

Wall Guards (full aluminum retainer)

- [Solid Colors - v.WS-1a](#)
- [Chameleon™ Patterns - v.WC-2a](#)

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<http://transparency.c-sgroup.com/>

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► CERTIFICATIONS

- Product:**
- Cradle to Cradle Products Innovation Institute*: Certified Silver⁴
 - [Material Health Criteria](#)
 - [Material Criteria Matrix](#)
 - [Certification Outline](#)
 - [Chemical Evaluation Criteria](#)
 - [Cradle to Cradle Certification Report](#)
 - [Cradle to Cradle Certificate](#)
- CA 01350 IAQ Protocol compliant
- [Acrovyn CA 01350 Report](#)

* Cradle to Cradle Certified™ is a certification mark of MBDC exclusively licensed to Cradle to Cradle Products Innovation Institute™

- Manufacturer:**
- ISO 9001:2008
 - ISO 14001:2004

- Other:**
- Construction Specialties utilizes EPA SmartWay™ Transport Partners.
 - Construction Specialties is an EPA WasteWise Partner



Manufacturer's Notes: 4. Cradle to Cradle Certification applies to the complete standard offering of solid colored wall guards. The color pigments determine Gold versus Silver certification; visit www.c-sgroup.com/acrovyn/wall-protection/finish/Acrovyn+Solid+Colors to view gold and silver designations.



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Assess & Avoid



Cradle to Cradle^{CM} Certified
 Construction Specialties, Inc. Acrovyn[®] 4000 Wall Protection- Profile

COMPONENT	MANUFACTURER	ASSESSMENT	COMMENTS
PROFILES			<p>GOLD CERTIFIED</p> <p>MUST USE COLORANTS THAT ARE YELLOW OR GREEN TO BE ELIGIBLE FOR GOLD</p> <p>CS Group will indicate Gold eligible colors on company web site and maintain list for consumer information</p>
Base Resin (PETG)	CONFIDENTIAL	B	This is a preferred material
Base Resin (PETG)	CONFIDENTIAL	B	This is a preferred material
FR	CONFIDENTIAL	C	This material is acceptable for use.
ABS	CONFIDENTIAL	C	This material is acceptable for use.



Assess & Avoid

Materials

All materials present in the Acrovyn® 4000 Wall Protection-Profile were assessed for their impact on human and environmental health. The following table lists the component assessments.

Table 1: Acrovyn® 4000 Wall Protection- Profile

CONFIDENTIAL			
Various pigment masterbatches		Confidential	
NUMBER	COLOR	ASSESSMENT	COMMENTS
100	Eggshell	C	This material is acceptable for use.
101	French Cream	C	This material is acceptable for use.
102	Desert Sand	C	This material is acceptable for use.
103	Beige	C	This material is acceptable for use.
105	Mocha	C	This material is acceptable for use.
106	Brown	X	This material is X due to a problematic pigment Excluded from Gold level certification
108	Black	C	This material is acceptable for use.
129	Yale Blue	X	This material is X due to a problematic pigment Excluded from Gold level certification
136	Pearl Gray	C	This material is acceptable for use.
162	Charcoal	C	This material is acceptable for use.
186	Champagne	C	This material is acceptable for use.
187	Tan Bark	C	This material is acceptable for use.



Commit to Continuous Improvement



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Product certification

- Material Health**
- Material Reutilization
- Renewable Energy
- Water Stewardship
- Social Fairness

Material Health

VERSION 3.0



The Cradle to Cradle® design protocol calls for materials to be defined as technical or biological nutrients that are safe and healthy for humans and the environment.

Working with the product manufacturer and suppliers, each product formulation is broken down into its chemical constituents. Through the certification process an assessor collaborates with a company's entire supply chain to identify every chemical in the product above 0.01% (or 100ppm). These chemicals are then evaluated against 24 hazard endpoints for human and environmental health and given a hazard rating of Red, Yellow, or Green. Material assessments combine chemical hazard ratings, potential exposure information, and material cyclability information into an overall assessment for each material in the product.

Safe and Healthy Materials

Cradle to Cradle is an innovative approach that models human industry on the processes of nature's biological nutrient metabolism integrated with an equally effective technical nutrient metabolism, in which the materials of human industry safely and productively flow within the two metabolisms in a fully characterized and fully assessed way. Products that are designed as services are made from materials that cycle in the technical metabolism at the end of their use cycle. Consumption products, those that naturally end up in the environment (biological cycle) during or post-use, are made from materials that are inherently safe for the biosphere.

For Basic level certification, all materials are identified and defined as intended biological or technical nutrients; as such they are assessed within the appropriate use context in higher levels of certification.

Document Downloads

- [C2C Certified V3.0 Material assessment methodology \(PDF, 76p, 2.7MB\) »](#)
- [C2C Certified V3.0 Banned lists of chemicals \(PDF, 6p, .2MB\) »](#)



Support Public Policies & Industry Standards . . .

Public Policies

- Senate Testimony in support of TSCA Reform
- House Testimony in support of TSCA Reform
- Hill visits to key Senators & Representatives
- House Staff Briefings
- OpEds
- UNEP; SAICM, 2010, 2011, 2012
- SXSW Eco; Toxic Chemicals Are Already the Next “Big” Issue
- The Human Experiment, a documentary

Industry Standards

- Transparency
- USGBC LEED v4
- Sustainability Presentations

