

# CPA – IC2 Principles for Chemical Ingredient Disclosure

July 14, 2021

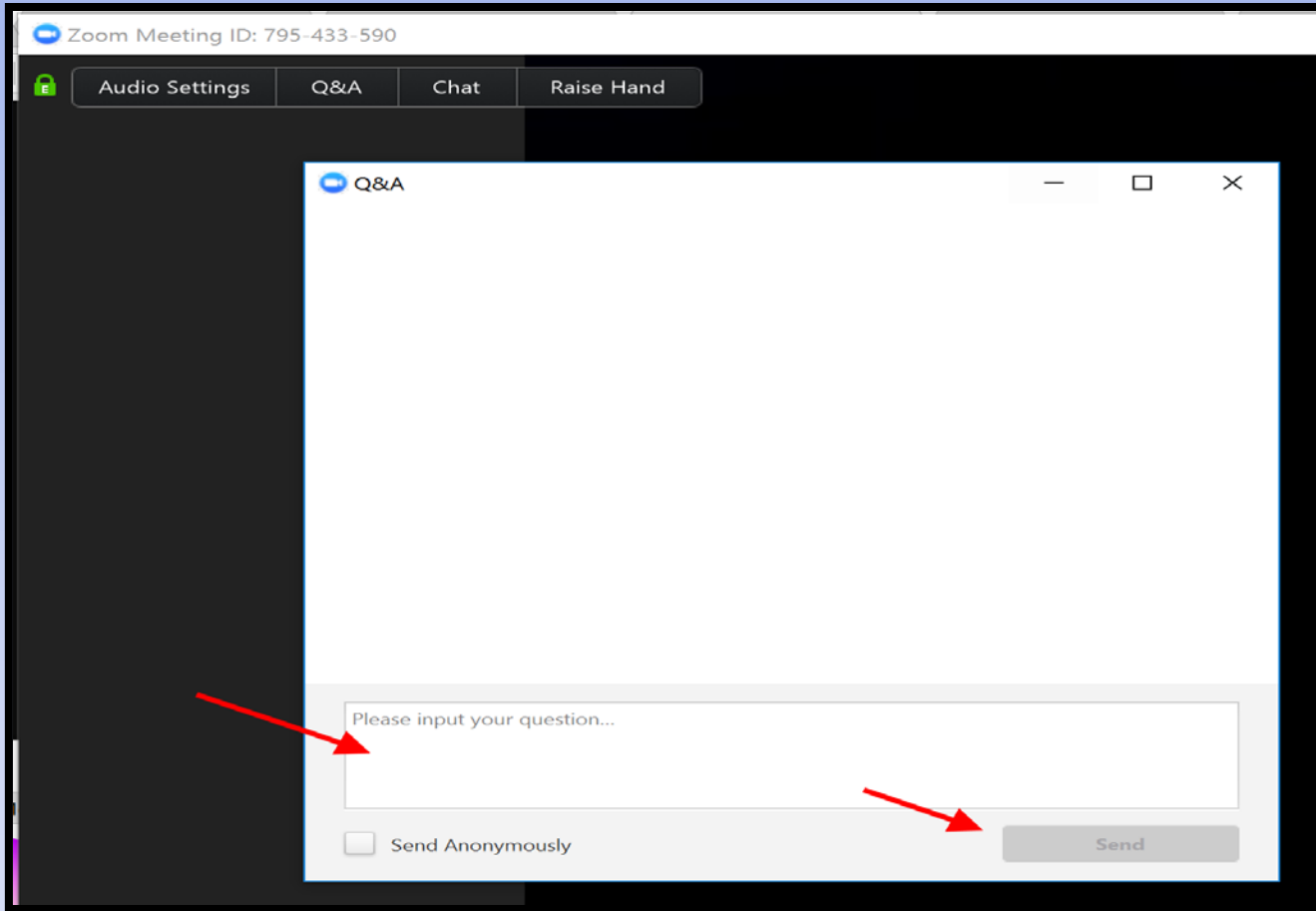


# Learning objectives

- What are the Principles for Chemical Ingredient Disclosure.
- Why organizations developed and endorsed the Principles.
- The need for and value diverse stakeholders see in chemical transparency.
- How organizations foresee using the Principles.
- How you can support chemical transparency.



# Zoom Protocol



- Webinar will be recorded and made available at [www.bizngo.org](http://www.bizngo.org) and [www.theic2.org](http://www.theic2.org)
- Chat or use Q&A for questions/comments



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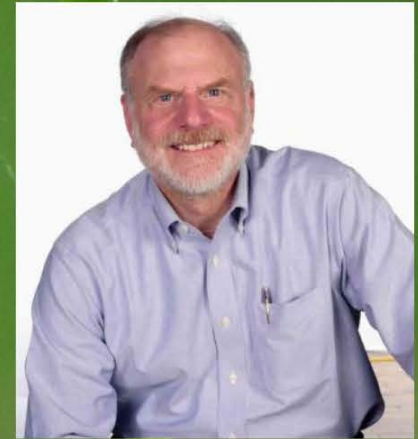
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Director,  
Sustainability & Authenticity,  
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# Goals of the Initiative

Find common ground among key stakeholders on chemical ingredient transparency principles to inform future programs

Facilitated by Clean Production Action (CPA) & the Interstate Chemicals Clearinghouse (IC2)

# December 2019 Kick-Off Meeting

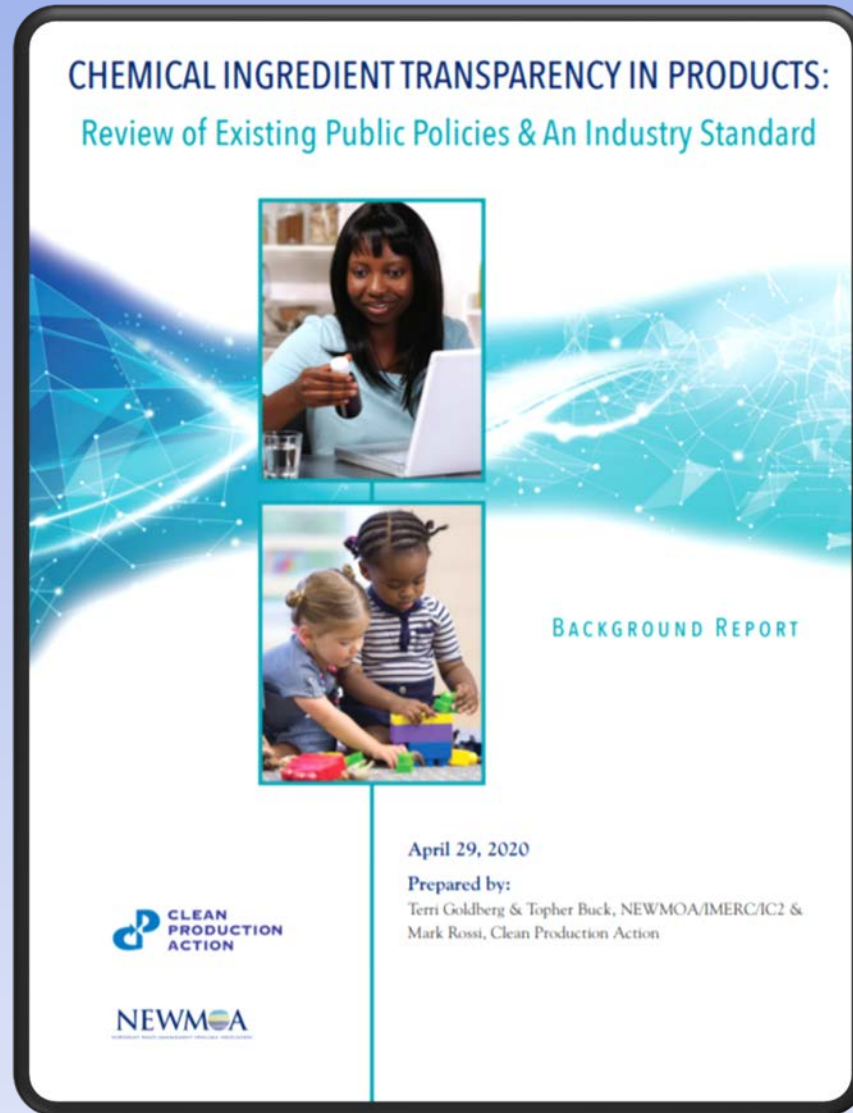
- **Purpose:** To initiate the development of a set of principles for ingredient disclosure to help inform future programs & policies to which a wide array of stakeholders can agree
- Successful stakeholder meeting in Cambridge, MA to initiate process
- Held 4 webinars prior to the meeting to help prepare participants
- Participants:
  - State & local representatives
  - Companies
  - NGOs

# Stakeholder Process

- From January 2020 – June 2021 a group of stakeholders that emerged from the December 2019 meeting met nearly monthly to develop a set of Principles that the members of the group could agree upon
- Participants: Governments; companies; & NGOs
- Collaborative process – all participants eager to reach agreement
- Solicited endorsers from May through June
- Issued press release at the end of June w/list of endorsers

# IC2 – CPA Report

[https://www.theic2.org/article/download-pdf/file\\_name/IC2-CPA\\_ChemicalDisclosure\\_ReviewPaper\\_FINAL.pdf](https://www.theic2.org/article/download-pdf/file_name/IC2-CPA_ChemicalDisclosure_ReviewPaper_FINAL.pdf)





# Spreadsheet

Download from <https://www.theic2.org/publications>

A	B	C	D	E	F
Category	Building Products	Children's Products			
Requirements	Health Product Declaration (HPD) Open Standard, Version 2.2	New York Toxic Chemicals in Children's Products	Oregon Toxic-Free Kids Act (TFKA)	Vermont Chemical Disclosure Program for Children's Products	Washington State Child (CSPA)
<p><b>Products covered:</b> Definition</p>	<p>"The HPD Open Standard provides a framework for product manufacturers and their ingredient suppliers to report and disclose information about product contents and associated health information."</p> <p>The HPD Open Standard was developed within the context of the building products industry and is focused on building products and accessories and suppliers to building product manufacturers. However, the framework of the "open standard" is applicable to other categories as well.</p>	<p>"Children's product" means a consumer product primarily intended for, made for, or marketed for use by children, such as baby products; toys; car seats; school supplies; personal care products; a product designed or intended by the manufacturer to help a child with sucking or teething, to facilitate sleep, relaxation, or the feeding of a child; and children's novelty products; children's jewelry; children's bedding, furniture, furnishings, and apparel. "Children's product" does not include (a) batteries; (b) consumer electronic products and their component parts including but not limited to personal computers, audio and video equipment, calculators, wireless phones, game consoles, video toys that can be connected to a video screen and are operated at a nominal voltage exceeding twenty-four volts and handheld devices incorporating a video screen, used to access interactive software and their associated peripherals, accessories and peripherals to children's electronic products including plugs, keyboards and headphones, interactive software, intended for leisure and entertainment, such as</p>	<p>Definition includes: toys; children's clothing &amp; footwear; children's cosmetics; children's jewelry; products designed or intended to facilitate sucking, teething, sleep, relaxation, feeding, or drinking; &amp; child car seats. Definition excludes food, consumer electronics, sports equipment, etc.</p>	<p>Definition includes: toys; children's clothing &amp; footwear; children's cosmetics; children's jewelry; products designed or intended to facilitate sucking, teething, sleep, relaxation, feeding, or drinking; &amp; child car seats. Definition excludes packaging, food, consumer electronics, snow sports equipment, etc.</p>	<p>Definition includes: toys; c footwear; children's cosme jewelry; products designed facilitate sucking, teething, feeding, or drinking; &amp; chil excludes packaging, food, c sports equipment, etc.</p>

# Overall Questions

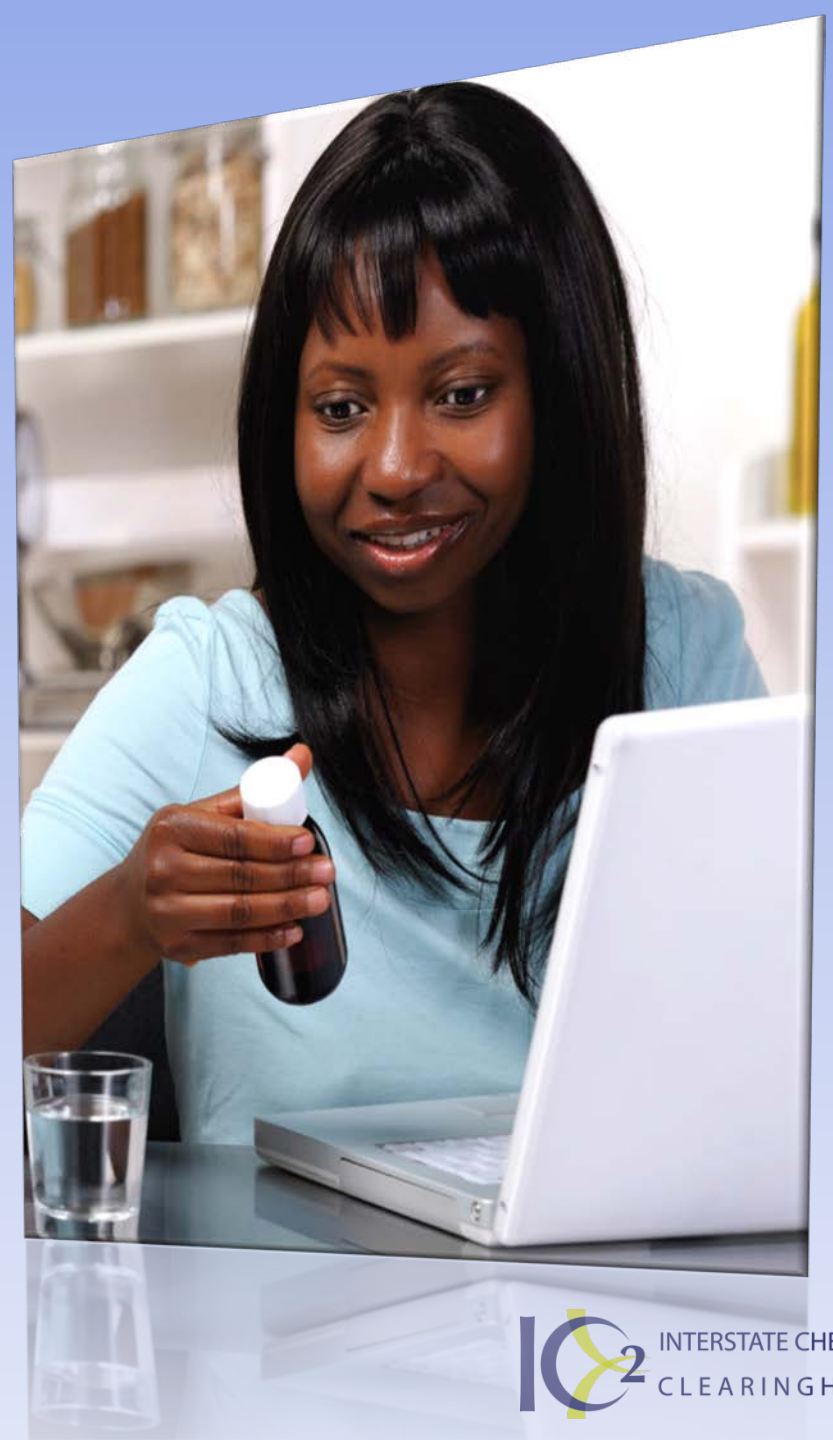
- Aspirational?
- How operational?
- Definitions of key terms?
- Challenges with information flow/access within supply chains?
- **Result were the Principles plus Guidance**

# Preamble

- We aspire to a marketplace of products made from safe & healthy chemical ingredients. To this end, all stakeholders have a fundamental right to know the chemicals in products & the functions of those chemicals. Of particular concern is the presence of chemicals that may harm human health or the environment.
- Disclosure is the sharing of chemical ingredient information with the public & across supply chains. It is critical to promoting the use of safer chemicals & products. Signatories to these Principles recognize the need to protect confidential business information (CBI) in limited situations when protection of the information is justified & substantiated.
- To advance an economy where the production & use of chemicals are healthy for people & the planet, responsible organizations should expeditiously adopt & implement the following guiding Principles for Chemical Ingredient Disclosure.

# Principle #1

**Disclose all intentionally added chemical ingredients.** Disclosure comprises identity of the chemical ingredient, including name(s), CAS registry number, function, presence on specified lists of chemicals of concern, and other chemical hazard characteristics of the ingredient. Chemicals of concern, i.e., substances that are known or suspected hazards to human health or the environment, including carcinogens, mutagens, reproductive/developmental toxicants, endocrine disruptors, asthmagens, & allergens, are not confidential business information.



# Intentionally Added Ingredient

“a chemical that a manufacturer has intentionally added to a designated product & that has a functional or technical effect in the designated product, including, but not limited to, the components of intentionally added fragrance ingredients & colorants & intentional breakdown products of an added chemical that also have a functional or technical effect in the designated product” (Source: State of California, Senate Bill No. 258, Cleaning Product Right to Know Act, October 15, 2017).”

# Chemical Hazard Characteristics as defined by

- Globally Harmonized System (GHS) of Classification & Labeling hazard phrases (H-phrases)
- GreenScreen<sup>®</sup> for Safer Chemical & GreenScreen scores
- For example, H-phrases are contained within a GHS compliant Product Safety Sheet &/or can be separately shared; & GreenScreen scores are listed in Health Product Declarations (HPDs)

## Principle #2

**Disclose nonfunctional constituents that are identified on specified lists of chemicals of concern.** This is a general principle to which Signatories agree, though they may hold differing positions on the thresholds for disclosure.



# Nonfunctional Constituent

A chemical that has no functional or technical effect on the designated product & is present as an *incidental component* of an intentionally added ingredient, a breakdown product of an intentionally added ingredient, or a byproduct of the manufacturing process.



# Specified Lists of Chemicals of Concern

- California Cleaning Product Right to Know Act of 2017 (SB 258) Designated List or CA Cosmetic Fragrance & Flavor Right to Know Act (SB 312)
- ChemSec SIN List
- GreenScreen List Translator LT-1 & Benchmark-1 chemicals
- New York State Lists of Chemicals of Concern

# Incidental Component

- (1) a chemical which was added during the manufacturing process at any point in a product, a raw material, or an ingredient's supply chain, but which has no functional or technical effect in the finished product, including an unreacted chemical; or
- (2) a chemical present in the environment as a contaminant which was introduced into a product, a raw material, or a product ingredient at any point in the supply chain for the product, raw material, or ingredient, as a result of the use of an environmental medium, such as a naturally occurring mineral, air, soil, or water, in the manufacturing process.

# Principles #3 + #4

**3. Proactively engage supply chains & interested stakeholders**—including governments, investors, & non-governmental organizations (NGOs)—to increase full chemical ingredient information disclosure. Manufacturers & retailers need reliable documentation to trace chemical information along supply chains.

**4. Advocate for filling data gaps to characterize the hazards of chemicals.**



# Principles #5 + #6

5. Make accurate chemical ingredient information easily accessible to consumers, government agencies, manufacturers, brands, retailers, & others in the supply chain.
6. Support public policies & industry standards that advance the above Principles.



# Concluding Statement

These Principles for Chemical Ingredient Disclosure will help to promote development & use of safer chemicals in products. We support efforts by governments, businesses, universities, & NGOs to fill chemical hazard data gaps with information on the hazards of chemicals that is consistent with scientific best practices & to publicly share the findings.

We recommend that a diverse community of stakeholders, including consumers, NGOs, academia, investors, governments, & businesses use these Principles to: drive avoidance of chemicals of concern; build trust among users & producers; use chemicals with the most comprehensive chemical hazard profiles; & work to reduce hazardous chemicals & their uses in products, across supply chains, & throughout product lifecycles.

For clarifications & definitions of terms used herein see **Principles for Chemical Ingredient Disclosure—Terms & References Document**.

# Business endorsers (34)

- 100% PURE
- Alaska Glacial Essentials Skincare
- Andersen Corporation
- Beautycounter
- Bedrock Sandals
- Brand Geek
- Clear Consumption LLC
- Clearya
- Credo
- Dirty Labs Inc.
- Earth Mama Organics
- Eighty2degrees LLC
- Elavo Mundo Solutions, LLC
- Han Cosmetics
- HNI Corp
- Humanscale
- Innersense
- Organic Beauty Intelligent I-N
- OSEA
- Juice Beauty, Inc.
- Just the Goods
- McFadden & Associates, LLC
- Meliora Cleaning Products
- Milliken & Company
- NakedPoppy
- Natracare LLC
- Naturepedic Organic Mattresses & Bedding
- OSEA Pure Strategies
- PRIMA
- Reckitt Benckiser LLC – US Hygiene
- Repurpose
- Seventh Generation
- Sprout San Francisco
- The Holistic Health Co.

# Government, Health Care, & University endorsers (15) – over \$100 billion in purchasing power

- California Department of Toxic Substances Control
- City of San Francisco Department of Environment
- Hackensack Meridian Health
- King County Hazardous Waste Management Program
- Lowell Center for Sustainable Production
- Massachusetts Toxics Use Reduction Institute
- Minnesota Department of Health
- Minnesota Pollution Control Agency
- Oregon Department of Environmental Quality
- Oregon Health Authority
- University of Tehran/ Sustainable Agriculture and Environment
- Vermont Department of Environmental Conservation
- Vizient
- Washington State Department of Ecology
- Washington State Department of Health

# Investor endorsers (25) -- \$715 billion in Assets Under Management

- Adrian Dominican Sisters, Portfolio Advisory Board
- Arjuna Capital
- Aviva Investors
- Boston Common Asset Management
- Boston Trust Walden
- Clean Yield Asset Management
- Congregation of St. Joseph
- Daughters of Charity Province of St. Louise
- Domini Impact Investments LLC
- Everence and the Praxis Mutual Funds
- Figure 8 Investment Strategies
- First Affirmative Financial Network
- Harrington Investments, Inc.
- Impax Asset Management LLC
- Interfaith Center for Corporate Responsibility
- Mercy Investment Services, Inc.
- Natural Investments
- NorthStar Asset Management, Inc.
- Parnassus Investments
- Safer Made Ventures
- Signity Financial
- Sisters of St. Francis of Philadelphia
- Sonen Capital
- The Sustainability Group of Loring, Wolcott & Coolidge
- Trillium Asset Management
- Trinity Health
- Vancity Investment Management
- Zevin Asset Management



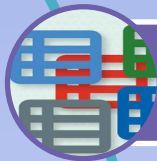
# NGO endorsers (45)

- Alaska Community Action on Toxics
- American Sustainable Business Council
- Arnika - Toxics & Waste Programme
- As You Sow
- Breast Cancer Prevention Partners
- Center for Environmental Health
- ChemFORWARD
- Citizen Environmental Coalition
- Clean and Healthy New York
- Clean Production Action
- Clean Water Action / Clean Water Fund
- ClientEarth
- Coming Clean
- Defend Our Health
- Earthjustice
- Ecology Center
- Environmental Defense Fund (EDF)
- Friends of the Earth
- Green Angel Training
- Green Science Policy Institute
- Healthy Babies Bright Futures
- Healthy Schools Network
- International Campaign for Responsible Technology (ICRT)
- International Pollutants Elimination Network (IPEN)
- Interstate Chemicals Clearinghouse (IC2)
- Mind the Store Campaign
- National Stewardship Action Council
- Natural Resources Council of Maine
- Natural Resources Defense Council (NRDC)
- Northeast Recycling Council
- North American Hazardous Materials Management Association (NAHMMA)
- North Carolina Conservation Network
- Northeast States for Coordinated Air Use Management
- NEWMOA
- Northwest Green Chemistry
- Pacific Northwest Pollution Prevention Resource Center
- Product Stewardship Institute
- Protect Our Breasts
- Regeneration Massachusetts
- Safer States
- Toxic Free NC
- Toxic-Free Future
- Union of Concerned Scientists
- UPSTREAM
- Women's Voices for the Earth
- Zero Waste Washington

# Principles for Chemical Ingredient Disclosure



1. Disclose all intentionally added chemical ingredients



2. Disclose nonfunctional constituents that are identified on specified lists of chemicals of concern



3. Proactively engage supply chains and interested stakeholders



4. Advocate for filling data gaps to characterize the hazards of chemicals



5. Make accurate chemical ingredient information easily accessible



6. Support public policies and industry standards that advance the above Principles

# Spread the Transparency – join the 100+ supporters & endorse the Principles

## Principles for Chemical Ingredient Disclosure

We aspire to a marketplace of products made from safe and healthy chemical ingredients. To this end, all stakeholders have a fundamental right to know the chemicals in products and the functions of those chemicals. Of particular concern is the presence of chemicals that may harm human health or the environment.

**Endorse Principles for Chemical Ingredient Disclosure**

<https://www.bizngo.org/public-policies/principles-for-chemical-ingredient-disclosure>

the need to protect confidential business information (CBI) in limited situations when protection of the information is justified and substantiated.

To advance an economy where the production and use of chemicals are healthy for people and the planet, responsible organizations should expeditiously adopt and implement the following guiding Principles for Chemical Ingredient Disclosure:

# Contacts

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