Presenters

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Zoom Webinar: Q&A and Chat
Chemical Footprint Project (CFP)
Chemical Footprint Project (CFP) Survey Webinar Series

- January 17: Management Strategy
- January 24: Chemical Inventory
- January 31: Footprint Measurement
- February 7: Public Disclosure & Verification
- All webinars: 11:00am-12:30pm EST
  - Note: calls may not go full 90 minutes depending on number of questions
- All materials at: www.chemicalfootprint.org
Today’s Webinar & EDF Webinar (1/30)

• Today: Management Strategy pillar
  – Introduction to the CFP Survey
  – Management Strategy:
    • M1: corporate policy
    • M2: business strategy
    • M3: external advocacy
    • M4: accountability
  – Q&A

• EDF webinar on CFP – value proposition from investor & retailer perspective on 1/30 - https://register.gotowebinar.com/register/4941577286161225987
CFP SIGNATORIES
Investors, Health Care, Governments, NGOs, and Retailers

Investors include ...
- Bank J Safra Sarasin
- BNP Paribas Investment Partners
- Boston Common Asset Management
- Calvert Research & Management
- Impax Asset Management
- Legal & General Investment Management
- Rhode Island Treasury
- The Sustainability Group of Loring, Wolcott & Coolidge
- Trillium Asset Management

Health Care & Retail includes ...
- CVS Health, Staples, Target, & Walmart
- Dignity Health, Kaiser Permanente, & Vizient
3R’s of “Chemical Risks”

- Regulatory Risks
- Reputation Risks
- Redesign Risks
Participants in 2017 Survey

- **Building / Furnishings**: Construction Specialties, Herman Miller, Humanscale, Kimball Hospitality, Milliken, Naturepedic, Nora Systems
- **Cleaning / Personal Care**: Beautycounter, California Baby, Ecolab, GOJO Industries, RB, Sealed Air Corp / Diversey, Seventh Generation
- **Medical devices/supplies**: BD, Case Medical, J&J
- **Technology**: HP Inc., Seagate Technology
- **Retail**: Walmart
- **Toys**: Radio Flyer
Value of CFP

• Common language
• Quantitative metric to measure progress
• Gap analysis
• Alignment with leading business practices & investors
• Systemic framework that supports compliance with standards & eco-labels
March 31, 2019: Survey Closes
CFP Survey:
19 Questions = 100 points
Management Strategy

- Chemical Inventory
- Public Disclosure
- Footprint Measurement
CFP Survey Questions
Management Strategy (4 Qs – 20 pts)

M1. Does your company have a **chemicals policy** that aims to avoid chemicals of high concern (CoHCs) and includes a stated preference for the use of safer alternatives? (8 points)

M2. Is reducing the use of CoHCs and advancing safer alternatives beyond regulatory requirements integrated into your company’s **business strategy**? (4 points)

M3. How does your company **advocate externally** for the use of safer chemicals? (4 points)

M4. What means of **accountability** does your company have in place to ensure implementation of your chemicals policy? (4 points)
Why focus on Management Strategy?
Management Strategy Improvements

- 2015: 37% (not shown)
- 2016: 52%
- 2017: 73%

- 2015: 42%
- 2016: 45%
- 2017: 67%
M1: Corporate Chemicals Policy

Does your company have a chemicals policy that aims to **avoid CoHCs** and includes a stated preference for the use of **safer alternatives**? (8 points)

- **Scope**: products, facilities, manufacturing, supply chain, & packaging
- **Publicly available**?

**New**: Combined old M1 & old M2, added facilities
Alignment with other frameworks

EPEAT
1. Mobile Phones, UL 110: 7.3.1
2. Servers, NSF 426: 6.2.5, 6.2.6
4. PV, NSF 457: 5.1.5, 5.1.6
For further details on the EPEAT standards, see Appendix E.
Definition: Chemical of High Concern (CoHC)

- carcinogen, mutagen, or reproductive toxicant (CMR)
- persistent, bioaccumulative and toxic substance (PBT)
- any other chemical for which there is scientific evidence of probable serious effects to human health or the environment that give rise to an equivalent level of concern
- a chemical whose breakdown products result in a CoHC that meets any of the above criteria

Aligns with GHS criteria and GreenScreen Benchmark 1 criteria

Definition: Safer Alternative

A chemical that, due to its inherent chemical and physical properties, exhibits a lower propensity to persist in the environment, accumulate in organisms, and induce adverse effects in humans or animals than chemicals in current use

- Must deliver needed function
- In some cases, process or product redesign may eliminate need for chemical
Definition: Chemicals in Facilities

Chemicals in products used in offices, retail space, laboratories, distribution centers, and outdoor space (excluding those used directly in manufacturing).

e.g., cleaning products, landscaping products, furniture, building products, etc.
## M1: 4 Components

<table>
<thead>
<tr>
<th>Scope</th>
<th>Reduce CoHCs</th>
<th>Preference for Safer Alternatives</th>
<th>Publicly Available (provide web link)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Products</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manufacturing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Facilities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supply chain</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Packaging</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Elements of Comprehensive Chemicals/Materials Policies

- Active and ongoing evaluation of ingredients
- Details on applicability, scope, and actions to be taken
- Purchasing, product stewardship
- Preference for safer alternatives is specified
HP Inc.’s Chemicals & Materials Management Policy

Commitments include:

• “Proactively evaluate materials and chemicals in HP’s products and supply chain ...”
• “Redesign products and processes to avoid the use of chemicals of concern.”
• “Collaborate with supply chain partners to drive innovation in the development and adoption of environmentally preferable alternatives.”

We are committed to ensuring the principles outlined in this policy are integrated into our business operations. This includes conducting assessments, defining performance goals and metrics, reviewing results with senior management regularly, and publicly reporting on our continual improvement in areas covered by this policy.

Judy Glazer
Global Head of Sustainability and Product Compliance

https://www.chemicalfootprint.org/results/2017-report
BizNGO Chemicals Policy Template for Brands and Manufacturers

Six elements:

- Intent
- Scope
- Supply Chain Transparency
- Safer Chemistry
- Informed Consumers
- Public Commitment

https://www.bizngo.org/safer-chemicals/corporate-policies
M2. Is reducing the use of CoHCs and advancing safer alternatives beyond regulatory requirements integrated into your company’s business strategy? (4 points)

**Intent**
This question inquires about whether your company integrates into its business strategy an approach for addressing human health and environmental impacts of chemicals beyond regulatory requirements.

**Alignment with Other Frameworks**
EPEAT
1. Servers, NSF 426: 6.2.6
2. PV, NSF 457: 5.1.6
For further details on the EPEAT standards, see Appendix E.
M2: Integration in Business Strategy

Changed from open-ended, short answer to multiple choice

Check all that apply:

a. **Screen**: We screen for CoHCs in **product** design and/or procurement.

b. **Prefer**: We have a list of safer chemicals or safer materials that are preferred in **product** design and/or procurement.

c. **Avoid**: We avoid the use of CoHCs in **manufacturing** processes.

d. **Not applicable**: We do not manufacture products.

e. **Marketing**: Our company highlights the use of safer chemicals and materials in its **product** marketing.

f. None of the above.
M2a: Screen for CoHCs in product design/procurement

- What is your process for screening chemicals?
- What are your criteria for screening chemicals?
- Note: this is not about RSLs, which is addressed in Chemical Inventory

Using the best available sources, we screen every potential ingredient for information on specific hazards like cancer, developmental toxicity, hormone disruption, and infertility.
M2b: Prefer safer chemicals in product design/procurement

<table>
<thead>
<tr>
<th>Substance name</th>
<th>CAS</th>
<th>Flame retardant</th>
<th>Plasticiser</th>
<th>Benchmark</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aluminum diethylphosphinate</td>
<td>225789-38-8</td>
<td>Yes</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Aluminum Hydroxide</td>
<td>21645-51-2</td>
<td>Yes</td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Ammonium Polyphosphate</td>
<td>68333-79-9</td>
<td>Yes</td>
<td></td>
<td>3</td>
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<tr>
<td>Bisphenol A diposphate</td>
<td>181028-79-5; 5945-33-5</td>
<td>Yes</td>
<td>Yes</td>
<td>2</td>
</tr>
<tr>
<td>Magnesium Hydroxide</td>
<td>1309-42-8</td>
<td>Yes</td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Melamine Polyphosphate</td>
<td>15541-60-3; 218768-84-4</td>
<td>Yes</td>
<td></td>
<td>2</td>
</tr>
</tbody>
</table>

- What is your list of preferred chemicals?
- How was it created?
- How is it integrated into product design and/or procurement?
M2c: Avoid CoHCs in manufacturing operations (or M2d – no manufacturing)

- Only relevant if you have manufacturing operations; does not apply to supply chain.
- What is your list of CoHCs (it could be an MRSL)?
- What are your criteria for identifying CoHCs?
- How is the avoidance process implemented? E.g., all cases or only under certain situations
M2e: Use of safer chemicals and materials in product marketing
M3. How does your company advocate externally for the use of safer chemicals? (4 points)

Intent
This question evaluates your company’s engagement in external initiatives that promote collecting and publishing data on chemical hazards, prioritize chemicals for reduction based on their inherent hazard, reduce the use of CoHCs, develop and use safer alternatives, and disclose information on CoHCs in products.
Check all that apply. Our company engages in external initiatives that clearly promote the:

- **“External initiatives”**
  - Public policy initiatives: legislation, regulation, executive order, procurement specification
  - Standards and ecolabels: EPEAT, HPDC, LEED, etc.
  - NGO initiatives: BizNGO, Green Chemistry & Commerce Council, etc.

- **“Clearly”**
  - Public evidence that the organization supports relevant initiatives
M3: External Advocacy

Our company engages in external initiatives that clearly promote the:

a. prioritization of chemicals for reduction based on their **inherent hazards**. Examples:
   - BizNGO Principles for Safer Chemicals: implementation of Principle #2: “assess and avoid hazards”
   - U.S. EPA Safer Choice Program
   - California Safer Consumer Product Regulations
   - Massachusetts Toxics Use Reduction Act
   - UNIDO/UNEP Cleaner Production Programs
M3: External Advocacy

Our company engages in external initiatives that clearly promote the:

b. **reduction in the use of CoHCs.** Examples:

- Any restriction of a CoHC:
  - Local or state: e.g., Washington State restriction of PFAS chemicals in food packaging or fire fighting foam
  - National or Regional: US EPA (TSCA), EU REACH (SVHCs)
- BizNGO Principles for Safer Chemicals: implementation of Principle #2: “assess and avoid hazards”
- U.S. EPA Safer Choice Program
- UN Stockholm POPs: support addition of new chemicals
M3: External Advocacy

Our company engages in external initiatives that clearly promote the:
c. development and adoption of **safer alternatives**, including green chemistry solutions. Examples:

- California Safer Consumer Product Regulations
- Standards with alternatives assessments: e.g., EPEAT
- BizNGO Principles for Safer Chemicals: implementation of Principle #2: “assess and avoid hazards”
- U.S. EPA Safer Choice Program
- Sweden KemI – toxic-free everyday program
M3: External Advocacy

Our company engages in external initiatives that clearly promote the:

d. public disclosure of CoHCs or other chemical ingredients in products. Examples:

- California Cleaning Right to Know Act
- Health Product Declaration Collaboration
- BizNGO Principles for Safer Chemicals: implementation of Principle #1: “know and disclose”
- U.S. EPA Safer Choice Program
- UNEP Chemicals in Products Programme
M3a,b,c,&d:
Support US EPA Safer Choice Program

Companies write urging Pruitt to back Safer Choice

Signatories include Walmart, Levi Strauss, Henkel and P&G

23 March 2017 / Cleaning products, Green chemistry, Personal care, Retail, Textiles & apparel, United States

More than 180 organisations have written to US EPA administrator Scott Pruitt to support the agency’s Safer Choice programme. Among signatories to the letter are the Consumer
M3a,b,c,&d: BizNGO Principles for Safer Chemicals

1. Know and disclose 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). Please note that substances deemed confidential will not be identified or disclosed to the public.

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

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.
M3d: California Cleaning Product Right to Know Act

Governor Brown Signs Cleaning Product Right to Know Act to Create First-in-Nation Label Law for Consumers

Leading manufacturers of cleaning products also embraced the Cleaning Product Right to Know Act, including California-based Honest Company and WD-40, Seventh Generation, Procter & Gamble, SC Johnson, Reckitt Benckiser, Unilever, Eco Lab, fragrance maker Givaudan, and the Consumer Specialty Products Association, the trade association representing major manufacturers.

SACRAMENTO, CA – Today Governor Brown signed the Cleaning Product Right to Know Act of 2017, authored by Senator Ricardo Lara (D-Bell Gardens). The Cleaning Product Right to Know Act makes California the first state to require ingredient labeling both on product labels and online for cleaning products used by millions of consumers and workers.
### M3a,b,c,&d: Seventh Generation

- Co-founder of the Companies for Safer Chemicals Coalition
- Signatory to the BizNGO Principles for Safer Chemicals and active participant in the BizNGO Public Policy & Advocacy Work Group
- Partners with NGOs Safer Chemicals Healthy Families, Breast Cancer Fund, and Women’s Voices for the Earth
- Took progressive position on TSCA reform and commented publicly
- Supported California Cleaning Product Right to Know Act
M4: Accountability

What means of accountability does your company have in place to ensure implementation of your chemicals policy?

**Intent**

The purpose of this question is to evaluate whether the implementation of your chemicals policy is clearly delineated in the work responsibilities of your company’s employees, senior management, and/or board members.
Our company:

a. delineates chemicals management responsibilities in job descriptions and individual annual performance metrics

b. assigns member(s) of senior management responsibility for meeting chemical policy goals and objectives

c. has financial incentives for senior management to meet corporate sustainability goals. These goals include reducing the use of some or all CoHCs.

d. has board level engagement in the implementation of our chemicals policy

e. none of the above
Key Elements of Accountability

- Explicit support
- Metrics
- Regular reporting
- Cross-functional teams
- Active engagement and questioning
Options for getting started

• Use Survey as a self-assessment tool
• Participate anonymously
• Calculate footprint for one or a few product categories
• Use the shorter chemicals of high concern reference list (EU SVHC)
Timeline

• January 1, 2019  
  Survey opened
• January-February 2019  
  CFP webinar series
• **March 31, 2019**  
  **Survey closes**
• Q2/Q3 2019  
  Scores reported & Annual Report released
Questions?

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