### Question I1: Restricted Substance List (RSL)/ Manufacturing RSL - Products

#### Scoring Rubric

<table>
<thead>
<tr>
<th>CFP 2021 Survey</th>
<th>Manufacturer</th>
<th>No Manufacturing</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Formulated Products &amp; Articles</td>
<td>Formulated Products</td>
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#### Question I1
1. What is the scope of chemicals of concern you restrict in your products and manufacturing processes?

- **a.** Our company has developed a list of chemicals of concern.
  - Formulated Products & Articles: n/a
  - Formulated Products: n/a
  - Articles: n/a
  - Formulated Products & Articles: n/a
  - Formulated Products: n/a
  - Articles: n/a

- **b.** Our company has not developed a list of chemicals of concern.
  - Formulated Products & Articles: n/a
  - Formulated Products: n/a
  - Articles: n/a
  - Formulated Products & Articles: n/a
  - Formulated Products: n/a
  - Articles: n/a

2. Our company: (Follow up to question 1)

Choose one option for "a - d," and/or "e" and/or "f" if applicable.

- **a.** Uses a restricted substances list (RSL) or lists for products to manage legal compliance within each market where it operates. Our RSL(s) include(s) only chemicals that are legally restricted in each market.
  - Formulated Products & Articles: 0.00
  - Formulated Products: 0.00
  - Articles: 0.00
  - Formulated Products & Articles: 0.00
  - Formulated Products: 0.00
  - Articles: 0.00

- **b.** Uses an RSL for products that reflects the strictest regulation in all of the countries or markets in which the brand operates and sells products (e.g., regulations that apply to manufacturing, marketing, and sales locations).
  - Formulated Products & Articles: 2.00
  - Formulated Products: 2.00
  - Articles: 2.00
  - Formulated Products & Articles: 2.00
  - Formulated Products: 2.00
  - Articles: 2.00

- **c.** Uses an RSL for products that reflects the strictest regulation in all locations worldwide.
  - Formulated Products & Articles: 3.00
  - Formulated Products: 3.00
  - Articles: 3.00
  - Formulated Products & Articles: 3.00
  - Formulated Products: 3.00
  - Articles: 3.00

- **d.** Uses an RSL for products that includes voluntary limits or bans of chemicals beyond what is covered in the most restrictive global regulations, or it includes chemicals that may not be subject to regulation but which the registrant has voluntarily chosen to limit or ban.
  - Formulated Products & Articles: 4.00
  - Formulated Products: 4.00
  - Articles: 4.00
  - Formulated Products & Articles: 5.00
  - Formulated Products: 5.00
  - Articles: 5.00

- **e.** Our company has developed a manufacturing restricted substances list (MRSL) for manufacturing process chemicals.
  - Formulated Products & Articles: 1.00
  - Formulated Products: 1.00
  - Articles: 1.00
  - Formulated Products & Articles: n/a
  - Formulated Products: n/a
  - Articles: n/a

- **f.** Uses a list of chemicals identified for reduction beyond regulatory requirements. Our company may or may not require suppliers to eliminate these chemicals in products, parts, or components.
  - Formulated Products & Articles: up to 3
  - Formulated Products: up to 3
  - Articles: up to 3
  - Formulated Products & Articles: up to 3
  - Formulated Products: up to 3
  - Articles: up to 3

**I1 Maximum Points**
- Formulated Products & Articles: 5.00
- Formulated Products: 5.00
- Articles: 5.00
- Formulated Products & Articles: 5.00
- Formulated Products: 5.00
- Articles: 5.00
Question I1: Restricted Substance List (RSL)/ Manufacturing RSL - Products

Explanation
This question seeks to understand the scope of chemicals restricted in your products and manufacturing processes beyond legal requirements.

CFP defines a restricted substances list (RSL) as a list of chemicals restricted by a company in products, parts, or components from its suppliers. An RSL may include only chemicals that are currently restricted by regulation. It may also include chemicals that are not yet legally restricted but have been identified as being of concern because of scientific evidence that they may cause harm to human health or the environment.

Option I1.2.a: The scope of an RSL, at minimum, includes chemicals that are currently restricted or banned in finished products because of a regulation or law; that is, legally restricted substances. Because jurisdictions have different chemical restrictions, a company may maintain separate RSLs for each jurisdiction where it operates. Select option “a” if your RSL(s) do(es) not include restrictions on chemicals that go beyond legal compliance for any jurisdiction where you operate. Requiring suppliers to assure that products or components do not contain chemicals on an RSL designed for legal compliance is a first and significant step in a transition to safer chemicals use.

Option I1.2.b: A company may develop an RSL that meets the most stringent legal restrictions for all jurisdictions where it operates. As a result, the RSL will likely include restrictions that are beyond legal compliance for some jurisdictions with less stringent regulations.

Option I1.2.c: Some companies adopt an RSL for all substances legally restricted by any jurisdiction, even though they may not sell or operate in that jurisdiction.

Option I1.2.d: A company may take additional actions to identify chemicals of concern in addition to those that are legally restricted. For example, a company may decide to identify and begin to restrict chemicals designated by the International Agency for Research on Cancer (IARC) as known or probable human carcinogens, even if there are no current legal restrictions on those substances for its products. The types of hazard characteristics that are of concern—for example, endocrine disruption, skin sensitization, respiratory sensitization, or ecotoxicity—will vary depending on a product category.

Once a company has created an RSL that goes beyond compliance, it will want to evaluate its products against this list. A company may conduct research to better understand which of these chemicals are likely to be in its products and may also conduct product testing. A company may ask suppliers to report directly on whether these chemicals are contained in products or it may ask suppliers to report this information to a third-party service provider as a way to protect confidential business information. Supplier reporting is addressed in question I3.

Option I1.2.e: In addition to an RSL, which restricts chemicals of concern in products, parts, or components, a company may also develop a manufacturing restricted substances list (MRSL). An MRSL is a list of chemicals banned from intentional use in facilities that process materials, components and/or products. An MRSL establishes acceptable concentration limits for substances in chemical formulations used within manufacturing facilities.
Option I1.2.f: Some companies do not restrict chemicals beyond regulatory requirements, but work with suppliers in other ways to identify and encourage the use of safer alternatives. This may include preferring suppliers that demonstrate the use of safer alternatives, working with suppliers to develop safer alternatives, or other approaches.

Choose one response option, I1.2.a – d to describe your RSL and, if you have an MRSL, option I1.2.e, or choose I1.2.f.

Examples
Option I1.2.a
RSLs designed to achieve only legal compliance typically relate to specific products and/or sectors, such as the European Union’s Restriction of Hazardous Chemicals (RoHS) Directive, which restricts chemicals used in electronics.

Option I1.2.c
**Apparel and Footwear** The American Apparel & Footwear Association’s (AAFA) Restricted Substances List (RSL) identifies chemicals that are restricted or banned in finished home textile, apparel, and footwear products anywhere in the world. In each case, the RSL identifies the most restrictive regulation. The AAFA updates its Restricted Substances List on a regular basis. This tool is useful for assuring environmental compliance with global regulations and may also be used to call attention to substances that may be of concern in this industry sector but are not yet widely regulated.

**Electronics** HP materials and chemical management policy specifies that HP "complies with laws and regulations where HP does business and adopt and apply international standards where laws are less stringent." HP also proactively evaluates materials and chemicals in their products and supply chain and "prioritize them for restriction based on published lists of chemicals of concern, customer preferences, and sound scientific analysis that reveals a potential impact to human health or the environment." For more information read HP General Specification for the Environment and HP Materials and Chemicals Management Policy.

Option I1.2.d
A company may expand its RSL beyond legally restricted chemicals in several ways. It may review lists that have been created by NGOs, such as ChemSec, which has developed the SIN List. The chemicals on the Sin List have been identified by ChemSec as Substances of Very High Concern based on the criteria established by the EU REACH chemicals regulation. Some companies may review additional authoritative lists such as the State of California’s Proposition 65 List to identify additional chemicals of concern. Companies may also review “green” product standards such as those identified by ecolabelling organizations to identify chemicals that are restricted in these products. If resources allow, a company may employ a toxicologist to keep abreast of the latest scientific literature on chemicals of concern in consumer products. It is important that an RSL be updated on an annual basis at minimum, as new scientific evidence may reveal additional chemicals of concern.

**Apparel and Footwear** NIKE’s RSL includes both legally restricted and chemicals that are of concern, but not legally restricted.

**Household and Personal Products** The cosmetics company, Beautycounter, has an extensive Restricted Substances List that it calls “The Never List.” [https://www.beautycounter.com/the-never-list](https://www.beautycounter.com/the-never-list)
Medical Devices and Supplies The Becton Dickinson and Co. (BD) Materials of Concern List (BD MOC List) contains substances that BD put special emphasis on and chosen to avoid and/or eliminate from BD products, for example PVC, Phthalates and BPA. The BD MOC list contains both regulated and non-regulated substances that are materials of concern for BD and is usually updated twice a year.

Option I1.2.e

Apparel and Footwear The ZDHC MRSL V1.1 is a list of chemical substances banned from intentional use in facilities that process textile materials and trim parts in apparel and footwear. The MRSL establishes acceptable concentration limits for substances in chemical formulations used within manufacturing facilities.

Levi Strauss & Co. provided input for the ZDHC MRSL and adopted ZDHC’s MRSL, aligning it with its own MRSL in 2016.

Option I1.2.f

Retail Walmart has identified a list of high priority and priority chemicals. It has set a goal to reduce its chemical footprint for consumables based on this list by 10 percent by 2022. Walmart asks its suppliers of formulated consumable products to provide full online ingredient disclosure by product; to disclose, at minimum, Walmart Priority Chemicals on packaging beginning in 2018; to disclose full product formulations to the WERCS; to complete the Sustainability index to track performance on chemical disclosure, risk assessment and hazard avoidance; to reduce, restrict and eliminate use of high priority and priority chemicals; and to verify purity of ingredients where contaminants of concern may exist.

Supporting documentation
Provide a copy and/or a link to your RSL and, if available, MRSL or other applicable list.