Chemical Footprint Project 2021 Survey Guidance

Question I3: Data collection - Packaging

Scoring Rubric

<table>
<thead>
<tr>
<th>CFP 2021 Survey Question</th>
<th>Packaging</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. What chemical information on packaging does your company collect from suppliers?</td>
<td>n/a</td>
</tr>
<tr>
<td>a. Our company collects chemical ingredient information from suppliers.</td>
<td>n/a</td>
</tr>
<tr>
<td>b. Our company does not collect chemical ingredient information from suppliers.</td>
<td>n/a</td>
</tr>
<tr>
<td>2. Our company: (Follow up to question 1)</td>
<td>5.00</td>
</tr>
<tr>
<td>Choose all that apply.</td>
<td></td>
</tr>
<tr>
<td>a. Our company requires suppliers to confirm that they comply with our packaging RSL.</td>
<td>1.00</td>
</tr>
<tr>
<td>b. Our company requires suppliers to confirm that they comply with our packaging RSL and to provide information on chemicals on our Watch List, which includes at least 10 chemicals.</td>
<td>2.00</td>
</tr>
<tr>
<td>d. Our company requests that suppliers to provide full chemical ingredient information for packaging.</td>
<td>3.00</td>
</tr>
<tr>
<td>e. Our company requires suppliers to provide full chemical ingredient information for packaging.</td>
<td>5.00</td>
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</tbody>
</table>

I3 Maximum Points 5.00

Explanation
This question seeks to understand the scope of information collected from your suppliers on chemicals in packaging.

Requirements for sharing chemical information should be specified in contract agreements. The first step in this process will be to receive assurance from suppliers that chemicals listed on an RSL are not in packaging. A company may ask suppliers to report directly on whether these chemicals are contained in packaging or it may utilize a third-party service provider to collect this information as a way to protect confidential business information.

Beyond compliance with a RSL, companies may ask about the presence of chemicals on a Watch List. CFP defines a Watch List as a list of chemicals of concern that your company does not currently prohibit, but is considering prohibiting in the future due to scientific evidence that a chemical may cause harm to human health or the environment. Sources for developing a Watch List are similar to those for developing an RSL beyond regulatory compliance, as described in I1.

A company 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 the State of California’s Proposition 65 List to identify additional chemicals of concern. Companies may also review “green” packaging standards such as those identified by ecolabelling organizations to identify chemicals that restricted. If resources allow, a company may employ a toxicologist to keep abreast of the latest scientific literature on chemicals of concern in consumer packaging. A company may also engage stakeholders such as its business customers and environmental health NGOs in developing its Watch List. It is important that a Watch List be updated on an annual basis at minimum, as new scientific evidence may reveal additional chemicals of concern.
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Companies may ask their suppliers to provide complete information about the chemical ingredients in packaging. Some companies refer to this as “full materials disclosure” or “full materials declaration.” When full materials disclosure is required, suppliers will often utilize a third party service provider to protect confidential business information. For CFP, the phrase "full chemical ingredient information" is synonymous with "full materials disclosure."

CFP defines full chemical ingredient information for packaging as follows: a company knows 95% of the intentionally added substances by mass and any likely impurities that are both a CoHC and present at 1000 ppm or higher in a homogeneous material.

Note that you can check all that apply.

Examples

Option I3.2.a
Six responders on the 2020 CFP Survey require suppliers to verify that they are in compliance with the packaging RSL. One responder holds supply chains for packaging to the same chemical standards and certification requirements as finished products, thereby requiring all suppliers to comply with the RSL.

Electronics HP clearly sets supplier expectations in complying with the RSL in the HP General Specification for the Environment (GSE) and the HP Supplier Code of Conduct on substances and materials restrictions, including specific packaging chemical requirements. The GSE applies to HP brand and HP-owned brand products, including parts, materials, components, and packaging. Suppliers are required to follow these chemical restrictions outlined in the HP GSE for manufacturing process chemical use.

Options I3.2.b and c
Medical Devices and Supplies All Becton Dickinson and Co. suppliers are required to "identify and disclose to BD all chemicals in their products and product sub-components that are regulated by the governments and/or competent authorities in regions where they are being used and are deemed hazardous, toxic or carcinogenic" These include, but are not limited to, Waste Electrical and Electronic Equipment (WEEE), Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Restriction of Hazardous Substances (RoHS), Conflict Minerals and Materials of special interest to BD. BD Supplier Expectations

Option I3.2.d
Retail Walmart “encourages all Walmart U.S. and Sam’s Club U.S. stores national and private brand suppliers of formulated consumables to:
   1. Disclose full product formulations to The WERCS through WERCSmart, above and beyond what is required by law
   2. Disclose all product ingredients online by product
   3. Specifically, for household cleaning products, disclose information required to be disclosed under California’s Cleaning Product Right to Know Act of 2017 on-pack
   4. Encourage online and on-pack disclosure internationally”

Walmart Sustainable Chemistry Commitment
**Option I3.2.e**

**Apparel and Footwear** All chemical suppliers to Levi Strauss & Co. “must disclose product formulation ingredients (CAS numbers and ingredient percentages) to ToxServices, which provides a hazard score for chemical formulation.”


**Household and Personal Products** Beautycounter collects full chemical and materials information in order to ensure “every formula ingredient, including known components of fragrances, flavors, and intentionally added preservatives are listed on our product labels or on Beautycounter.com.”

https://www.beautycounter.com/transparency

**Supporting documentation**

Options I3.2.a, b and c: Provide documentation demonstrating required confirmation of compliance. Options I3.2.b and c: Attach a copy of and/or URL for your Watch List. Options I3.2.d and e: Provide documentation demonstrating your request or requirement for full chemical ingredient information.