**Question M2: Business strategy**

**Scoring Rubric**

<table>
<thead>
<tr>
<th>CFP 2021 Survey</th>
<th>Manufacturer</th>
<th>No Manufacturing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Formulated Products &amp; Articles</td>
<td>Formulated Products</td>
</tr>
<tr>
<td>Question M2</td>
<td></td>
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<tr>
<td>1. Is reducing the use of chemicals of high concern and advancing safer alternatives beyond regulatory requirements integrated into your company’s business strategy? (4 points)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. Our company has integrated strategies listed in question 2, below, into our business strategy.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>b. Our company has not integrated strategies listed in question 2, below, into our business strategy.</td>
<td>n/a</td>
<td>n/a</td>
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<tr>
<td>2. We have integrated the following into our company’s business strategy: (Follow up to question 1) Choose all that apply.</td>
<td></td>
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</tr>
<tr>
<td>a. We screen for chemicals of high concern in product and/or packaging design and/or procurement.</td>
<td>1.00</td>
<td>1.00</td>
</tr>
<tr>
<td>b. We have a list of safer chemicals or safer materials that are preferred in product and/or packaging design and/or procurement.</td>
<td>1.00</td>
<td>1.00</td>
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<tr>
<td>c. We avoid the use of chemicals of high concern in our manufacturing processes.</td>
<td>1.00</td>
<td>1.00</td>
</tr>
<tr>
<td>d. Our company highlights the use of safer chemicals and materials in its product marketing.</td>
<td>1.00</td>
<td>1.00</td>
</tr>
<tr>
<td><strong>M2 Maximum Points</strong></td>
<td><strong>4.00</strong></td>
<td><strong>4.00</strong></td>
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</tbody>
</table>
Chemical Footprint Project 2021 Survey Guidance

Question M2: Business strategy

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

Integration can occur as part of product design, the product development process, manufacturing process, marketing, etc. Integration is most effective when CoHCs are identified and a strategy for reduction and elimination of CoHCs and use of safer alternatives is developed that includes specified deadlines. It is important that suppliers and vendors are informed of these requirements. For option M2.2.d, specify how your organization includes information on safer chemicals and materials in marketing materials for customers. This information should not appear only on the sustainability page or equivalent.

Examples

Option M2.2.a
_Apparel and Footwear_ NIKE has set an ambitious goal of Zero Discharge of Hazardous Chemicals. Its [2020 Chemistry Playbook & RSL](#) describes in detail its approach for screening out chemicals of concern.

_Levi Strauss & Co_, has developed and implemented a Screened Chemistry Program that screens chemical formulations against human and environmental health hazard endpoints _before_ chemicals enter the supply chain. This approach manages “chemistry upfront during the design phase instead of in the middle or at the end of the manufacturing process.”

_Building Products and Furnishings_ Herman Miller’s Design for Environment protocol (DfE) “goes beyond regulatory compliance to thoroughly evaluate new product designs.” Product designs are evaluated in four key areas: material chemistry & safety of inputs, disassembly, recyclability and Life Cycle Analysis (LCA). “During the new product design process, the DfE team meets with the designers and engineers to review material chemistry, disassembly and recyclability as well as incoming packaging, and potential waste generation.”

_Household & Personal Products_ Seventh Generation formulates products “using the precautionary principle: if an ingredient has a suspected risk of harming people or the planet, we search for a better option.” _Inside Seventh Generation: Product Science_

_Beautycounter_ screens "every potential ingredient for information on specific hazards like cancer, developmental toxicity, hormone disruption and infertility.” The Beautycounter Never List™ is a list of 1,800 questionable ingredients currently used in the industry that are prohibited in Beautycounter products. Beautycounter uses an “ever-evolving toolbox of clean, more sustainable ingredients that have been screened by our safety and sustainability experts to create innovative formulas that deliver results – safely.” Refer to "**What we Mean by Clean**" for more information.

_Electronics_. The HP Green Chemistry Timeline highlights HP’s actions in proactive chemicals management. [HP materials and chemical management policy](#) highlights HP’s commitments for materials and chemical management that go beyond regulatory requirements. HP “proactively evaluates materials and chemicals in HP’s products and supply chain and prioritizes them for restriction based on published
lists of chemicals of concern, customer preference, and sound scientific analysis that reveals a potential impact to human health or the environment. “HP uses a precautionary approach to reduce hazard by replacing hazardous chemical constituents and formulations in products, packaging, and manufacturing processes with less hazardous alternatives.

Option M2.2.b

**Building Products and Furnishings** Naturepedic leads “the industry when it comes to eliminating questionable chemicals in favor of natural, organic and non-toxic materials. In short, we strive for a higher standard.” “From luxurious fabrics to fluffy fill, Naturepedic uses organic cotton throughout its products. Organic wool is also used for its comfortable moisture wicking properties and splendid natural bounce. Organic latex provides pressure point relief and a smooth luxurious feel. Finally, organic cotton encased coils provide an amazing breathable support system.” “What is in an organic mattress?” (Naturepedic.com)

**Household and Personal Products** Seventh Generation prioritizes plant-based or mineral ingredients in order to produce safe products using safer materials. Plant-based products minimize release of volatile organic compounds (VOCs) and are more sustainable than products made from carbon, while still providing the efficacy consumers are looking for. Seventh Generation also uses scents from real essential oils and botanical ingredients and avoids synthetic fragrances or dyes. Inside Seventh Generation: Ingredient Science

Option M2.2.c

A company can avoid the use of chemicals of concern in manufacturing by using products designated with the US EPA Safer Choice label or other third-party certifications that evaluate and ensure ingredient safety.

**Apparel and Footwear** To avoid the use of CoHCs in the manufacturing process, companies can adopt the Zero Discharge of Hazardous Chemicals (ZDHC) Manufacturing Restricted Substances List (MRSL) for the apparel and footwear industry (ZDHC MRSL).

**Levi Strauss & Co** provides regular public updates on its commitment to the Zero Discharge of Hazardous Chemicals.

**Building Products and Furnishings** Herman Miller works deep within its "supply chain, manufacturing processes, and products to clean up problematic materials in our aim for cleaner chemistry." The DFE protocol “requires that SDS and chemical formulations be reviewed for chemicals and materials used in manufacturing.”

Option M2.2.d

**Building Products and Furnishings** Herman Miller frequently uses the tool Ecomedes to communicate the use of safer chemicals and materials. Ecomedes contains information on sustainability attributes, certifications, and building conformance documents for customers to view.

**Household and Personal Products** Beautycounter identifies its products that are EWG certified on the Beautycounter website and includes labels on certified products.

**Retail** Target "highlights the use of safer chemicals and materials in its product marketing by leveraging Target’s Wellness icon program” and Target Clean, a symbol for products that meet Target's standards
of clean (i.e. formulated without certain harmful chemicals). The Wellness icons and Target Clean allow consumers to identify products formulated without ingredients they wish to avoid.

**Supporting documentation**
Provide links to or copies of any relevant company documents. For option M2.2.d, provide marketing materials that include either avoided materials or safer chemistries.