



Radio Flyer
Publicly available CFP 2019 Survey Responses
Web links and public documents

Survey Question	Response
Management Strategy	
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? Check all that apply. Our company has:	
a. has a policy that addresses the reduction of CoHCs in our products.	x
a preference for safer alternatives in our products.	x
a policy that addresses the reduction of CoHCs in our manufacturing.	x
a preference for safer alternatives in our manufacturing.	x
a policy that addresses the reduction of CoHCs in our facilities.	x
a preference for safer alternatives in our facilities.	x
a policy that addresses the reduction of CoHCs in our supply chains.	x
a preference for safer alternatives in our supply chains.	x
a policy that addresses the reduction of CoHCs in our packaging	x
a preference for safer alternatives in our packaging.	x
c. does not have manufacturing operations.	
d. has no established policy at this time.	
M2. Is reducing the use of CoHCs and advancing safer alternatives beyond regulatory requirements integrated into your company's business strategy? Check all that apply.	
a. We screen for CoHCs in product design and/or procurement.	x
b. We have a list of safer chemicals or safer materials that are preferred in product design and/or procurement.	x
c. We avoid the use of CoHCs in our manufacturing processes.	x
d. We do not manufacture products.	
e. Our company highlights the use of safer chemicals and materials in its product marketing.	
f. None of the above.	
M3. How does your company advocate externally for the use of safer chemicals? Check all that apply. Our company engages in external initiatives that clearly promote the:	
a. prioritization of chemicals for reduction based on their inherent hazards.	x
b. the reduction in the use of CoHCs.	x
c. development and adoption of safer alternatives, including green chemistry solutions.	
d. public disclosure of CoHCs or other chemical ingredients in products.	
e. none of the above.	
M4. What means of accountability does your company have in place to ensure implementation of your chemicals policy? Check all that apply. Our company:	
a. delineates chemicals management responsibilities in job descriptions and individual annual performance metrics.	x

b. assigns member(s) of senior management responsibility for meeting chemical policy goals and objectives.	x
c. has financial incentives for senior management to meet corporate sustainability goals. These goals include reducing the use of some or all CoHCs.	x
d. has Board level engagement in the implementation of our chemicals policy.	
e. none of the above.	
Chemical Inventory	
I1. What is the scope of chemicals of concern you restrict in your products and manufacturing processes? Our company:	
a. uses our RSL(s) to manage legal compliance within each market where it operates. Our RSL(s) include(s) only chemicals that are legally restricted in each market.	
b. uses a single RSL 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).	x
c. uses a single RSL that reflects the strictest regulation in all locations worldwide.	
d. uses a single RSL 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 from its products.	
e. has developed an MRSL.	x
f. uses a list of chemicals identified for reduction beyond regulatory requirements. Our company may or may not <i>require</i> suppliers to eliminate these chemicals in products, parts, or components.	x
g. uses none of the above.	
I2. What actions does your company take to ensure that its requirements (as selected in I1) are current and implemented effectively? Check all that apply. Our company:	
a. delineates compliance requirements in contracts with suppliers.	x
b. trains suppliers about how to comply with our requirements.	x
c. updates our RSL/MRSL/ other requirements at minimum on an annual basis.	x
d. engages external stakeholders such as non-governmental organizations (NGOs), business customers, and consumers in the development of our RSL/MRSL/ other requirements.	x
e. publicly discloses our RSL/MRSL/other requirements.	
f. uses none of the above.	
I3. What chemical information does your company, either directly or through a respected third-party, collect from suppliers? Our company:	
a. requires suppliers to confirm that they comply with our RSL.	
b. requires suppliers to confirm that they comply with our RSL and to provide information on chemicals on our Watch List, which includes 1 – 50 chemicals.	x
c. requires suppliers to confirm that they comply with our RSL and to provide information on chemicals on our Watch List, which includes more than 50 chemicals.	
d. requests that suppliers to provide full chemical ingredient information.	x
e. requires suppliers to provide full chemical ingredient information.	

f. does none of the above.	
14. For what percentage of products sold by your company do you collect full chemical ingredient information?	
a. <i>formulated products</i> : For what percentage of formulated products sold by your company is full chemical ingredient information collected? _____ percent	
b. <i>articles</i> : For what percentage of articles sold by your company is full chemical ingredient information collected? _____ percent	
15. What capabilities does your company have for managing data on chemical ingredients in its products? In your documentation, please include a description of your data system. Check all that apply. Our company has:	
a. an internal named point(s) of contact or outside contractor who communicates with suppliers concerning our chemical information requirements.	x
b. a data system (either internal or third party) to manage an inventory of chemicals in products.	
c. a data system (either internal or third party) that links our inventory of chemicals in products to chemical hazard information.	
d. a data system for generating reports on chemical/material ingredient declarations to customers.	
e. none of the above.	
16. How does your company ensure conformance with your chemicals requirements? Check all that apply. Our company:	
a. has an audit program to verify supplier submitted data.	x
b. requires suppliers to test parts in third party approved labs and provide results.	x
c. trains suppliers on how to comply with reporting requirements.	x
d. routinely tests parts, components, or products to assure conformance with reporting requirements.	x
e. has none of the above.	
Footprint Measurement	
F1. Has your company set goals for reducing CoHCs in the products you sell and measured progress toward these goals? Check all that apply in "a - d" or answer only "e" or "f". Our company:	
a. has set goal(s) for reducing CoHCs by count or mass.	x
b. publicly discloses the goal(s).	x
c. publicly discloses specific CoHC(s) included in the goal(s).	x
d. publicly reports annually on progress towards meeting goals, OR	x
e. has no CoHCs in our products and publicly discloses this information, OR	
f. has none of the above.	
F2. How does your company measure its baseline chemical footprint for the most recent year for which you have data? Choose either response option "a," options "a" and "b" or option "c" or option "d". Our company:	
a. had intentionally added CoHCs/SVHCs in its products = _____ CoHCs/SVHCs by count and/or	x
b. had intentionally added CoHCs in its products = _____ CoHCs/SVHCs by mass (kg), or	
c. had no intentionally added CoHCs in its products or	

d. is unable to answer this question at this time.	
Enter the count of intentionally added CoHCs/SVHCs	10
Enter the mass (kg) of intentionally added CoHCs	
Please indicate which reference list you are using:	SVHC
F3. Over the most recent year for which you have data, how much have intentionally added CoHCs in your products changed?	
a. Our company's difference in the number of intentionally added CoHCs/SVHCs in products: (total number of COHCs/SVHCs at beginning of reporting period minus total number of CoHCs/SVHCs at end of reporting period) _____ CoHCs/SVHCs by count.	1
b. Our company's difference in the mass of intentionally added CoHCs in products: (total mass of COHCs/SVHCs at beginning of reporting period minus total mass of CoHCs/SVHCs at end of reporting period) _____ CoHCs/SVHCs by mass (kg).	
c. Our company is unable to calculate baseline chemical footprint for beginning of reporting period. However, the number and/or mass of intentionally added CoHCs changed by the following amount over the reporting period _____.	
d. Our company's products did not contain intentionally added CoHCs for the reporting period.	
e. Our company is unable to answer this question at this time.	
Please indicate which reference list you are using:	SVHC
F4. How does your company assess the hazards of chemicals in its products and for what percent of your products has your company assessed these hazards?	
a. Our company uses a system or tool (internal or third party) to evaluate chemical hazards. Identify the system or tool: _____.	x
b. Our company asks suppliers to provide their evaluations of chemical hazards in the products they sell to us.	
c. For what percentage of products has your company assessed these hazards, using methods in a and/or b? _____.	
d. Our company does not currently assess the hazards of chemicals in its products beyond regulatory requirements.	
F5. How does your company encourage the use of safer alternatives to CoHCs? Check all that apply in "a - f" or answer only "g" or "h". Our company:	
a. has developed a definition for a safer alternative that is consistent with the CFP definition, and we include such criteria in our business processes.	
b. communicates about and asks suppliers to use our company's criteria for a safer alternative.	x
c. rewards suppliers that use safer alternatives.	
d. has integrated our company's criteria for a safer alternative into our product development process (e.g., through our design and safety processes).	x
e. has established a goal and is tracking progress to improve the profile of chemicals across our products, consistent with our company's criteria for a safer alternative.	
f. publicly discloses our company's definition for a safer alternative and our approach to integrating it into our business practices.	

g. does not have products that contain CoHCs (please describe in documentation how it ensures that the safest chemicals available are used).	
h. does none of the above	
Disclosure and Verification	
D1. What information does your company disclose about the chemical ingredients in its products? Enter the percentages for all that apply.	
D1.a. For formulated products, our company publicly discloses:	
Chemical identity beyond legal requirements for ____ percentage of sales at the SKU level.	
All intentionally added chemicals including fragrances, flavors, and preservatives in products for ____ percentage of sales at the SKU level.	
We do not publicly disclose information about chemical ingredients in our formulated products beyond legal requirements.	x
i. (for products) Percentage of sales at the SKU level for which chemical identity beyond legal requirements is disclosed.	
ii. (for products) Percentage of sales at the SKU level for which chemical identity of all intentionally added chemicals including fragrances, flavors, and preservatives in products is disclosed.	
D1.b. For articles, our company publicly discloses:	
Generic material content for 95% by mass of chemicals in products for ____ percentage of sales or spend at the SKU level.	
Chemical identity for 95% by mass of chemicals in products for ____ percentage of sales or spend (e.g., Health Product Declaration).	
We do not publicly disclose information about chemicals in our articles beyond legal requirements.	x
i. (for articles) Percent of sales or spend at the SKU level for which, at a minimum, chemicals on the EU's Candidate List of SVHCs in products are disclosed.	
ii. (for articles) Percentage of sales or spend at the SKU level for which chemical identity for 95% by mass of chemicals in products is disclosed	
D2. Does your company agree to publicly disclose its responses to the CFP Survey?	
Yes.	x
No.	
D3. Does your company agree to publicly disclose its score on the CFP website?	
Yes.	
No.	x
D4. Have any of your company's responses to the Survey questions been verified by an independent third party? Check only one. Our company's response options have been verified by a an independent third party for:	
a. none to one of our response options.	
b. two to four of our response options.	
c. at least eight of our response options.	

d. at least twelve of our response options.	x
e. all response options except D2, D3, and D4.	

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?

Response options	Response options selected	If publicly available, provide web link:
a. Our company has:		
- has a policy that addresses the reduction of CoHcs in our products .	X	
- a preference for safer alternatives in our products .	X	
- a policy that addresses the reduction of CoHcs in our manufacturing .	X	
- a preference for safer alternatives in our manufacturing .	X	
- a policy that addresses the reduction of CoHcs in our facilities .	X	
- a preference for safer alternatives in our facilities .	X	
- a policy that addresses the reduction of CoHcs in our supply chains .	X	
- a preference for safer alternatives in our supply chains .	X	
- a policy that addresses the reduction of CoHcs in our packaging .	X	
- a preference for safer alternatives in our packaging .	X	
b. no manufacturing operations.		
c. no established policy at this time.		

11. What is the scope of chemicals of concern you restrict in your products and manufacturing processes?

Response options	Response options selected
a. Uses our RSL(s) to manage legal compliance within each market where it operates. Our RSL(s) include(s) only chemicals that are legally restricted in each market.	
b. Uses a single RSL 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).	X
c. Uses a single RSL that reflects the strictest regulation in all locations worldwide.	
d. Uses a single RSL 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 from its products.	
e. Our company has developed an MRSL	X
f. Uses a list of chemicals identified for reduction beyond regulatory requirements. Our company may or may not <i>require</i> suppliers to eliminate these chemicals in products, parts, or components.	X
g. None of the above	

12. What actions does your company take to ensure that its requirements are current and implemented effectively?

Response options	Response options selected
a. delineates compliance requirements in contracts with suppliers	X
b. trains suppliers about how to comply with our requirements	X
c. updates our RSL/MRSL/ other requirements at minimum on an annual basis	X
d. engages external stakeholders such as non-governmental organizations (NGOs), business customers, and consumers in the development of our RSL/MRSL/ other requirements	X
e. publicly discloses our RSL/MRSL/other requirements Provide web link:	
f. None of the above	

F1. Has your company set goals for reducing CoHCs in the products you sell and measured progress toward these goals?

Response options	Response options selected
a. has set goal(s) for reducing CoHCs by count or mass	X
b. publicly discloses the goal(s) (at minimum includes percentage reduction and time period)	X
c. publicly discloses specific CoHC(s) included in the goal(s)	X
d. publicly reports annually on progress towards meeting goals, OR	X
e. has no CoHCs in our products and publicly discloses this information, OR	
f. none of the above	
For options "b," "c," "d," and/or "e," provide web link(s): https://www.radioflyer.com/content/sustainable-materials	

Radio Flyer Sustainability web page: <https://www.radioflyer.com/content/sustainable-materials>

SUSTAINABLE MATERIALS GOALS			
2014	2016	2017 GOAL	ASPIRATION
PRODUCTS THAT MEET RADIO FLYER SUSTAINABILITY CRITERIA			
Groundwork to finalize criteria in 2015	Product Sustainability Criteria has been finalized	For 10% of our products to meet the sustainability criteria	100% of products meet Sustainability Criteria
PVC IN PRODUCTS (NOTE: OUR PACKAGING IS ALREADY PVC-FREE)			
94.4% PVC-FREE	97.8% PVC-FREE Removed 150,000 pounds of PVC from our product line from 2014-2016	99.0% PVC-FREE	100% PVC-FREE

SUSTAINABLE MATERIALS

Safety, durability, quality and aesthetics --- we won't give an inch on any of these, so finding cutting-edge, sustainable materials that meet our cost needs can be challenging. Our goal is to create outstanding, safe kids products and warm memories that last a lifetime.

Designing Sustainable Products

PRODUCT SCORECARD

One of our most exciting recent achievements was creating a tool to help our product development team improve product sustainability. Using the data from Life Cycle Assessment (LCA) studies of some of our large-volume products, we developed our product scorecard which is used to evaluate the sustainability of our products.

With this scorecard we track the Greenhouse Gas emissions, energy use, safe chemistry, renewable materials and recycled content for all of our products. We have developed a product sustainability goal to drive improvement in those areas as well as social compliance.

MARK JOHNSON, DIRECTOR OF PRODUCT DEVELOPMENT:

“I’ve been designing and developing products for 18 years and I’m still learning. The Product Development Scorecard opened my eyes to different ways to make our products more sustainable. I’ve always been laser-focused on designing products that are great quality, durable and affordable and now I have a tool to help me make our products more sustainable, as well.”

PRODUCT SUSTAINABILITY GOAL

From our scorecard work, we have developed a set of sustainability criteria covering GHG emissions, recycled content, sustainable and safe materials, ease of disassembly, and social compliance. Our aspiration is for all of our products to meet target thresholds in each of these areas. In 2017, we set a goal for 10% of our products to meet the sustainability criteria, and all departments will work together to pursue positive changes towards this goal.

Product Sustainability Criteria				
GHG Emissions	Sustainable Materials	Safe Chemicals	End of Life Guidance	Social Responsibility
Emissions are less than 3.7 kg CO ₂ e/kg	Packaging contains 60% recycled content or is 100% FSC or SFI certified	Chemical Footprinting completed for 70% of Tier 1 and Tier 2 materials & processes	Recycling guidance is provided on Radioflyer.com	Suppliers must have ICTI seal of compliance or domestic equivalent.

SUSTAINABLE PACKAGING

We aim to package all of our products sustainably. This means using the smallest amount of material possible to safely contain our products; designing boxes that fit efficiently on a truck or train; and ensuring that we use responsible materials. Our goal is for all of our corrugate packaging boxes to contain on average at least 70% recycled content, or for the virgin fiber to be certified by the Forest Stewardship Council (FSC) or Sustainable Forestry Initiative (SFI). FSC and SFI certifications ensures that the forests from which the wood pulp is obtained are managed responsibly. An additional FSC certification verifies the recycled content. In 2017, we transitioned six products to a new partner with

FSC certification for the 100% recycled content in these packages. This transition allowed us to have a significant positive impact on the environment.

Safe Materials

The well-being of the children who enjoy our products and the workers who create them is of fundamental importance to Radio Flyer. We take a strong precautionary approach to material and product safety and place these at the heart of our product development and supplier assessment programs.

RADIO FLYER'S RESTRICTED SUBSTANCES LIST (RSL)

We use a Restricted Substances List (RSL) to communicate our priorities and standards related to safer chemicals both internally and to our suppliers. We update this list annually by monitoring chemical requirements across the globe and adopting the most stringent published standards. As a further layer of assurance that there are no harmful chemicals in our products, we conduct RSL testing and supplier auditing, with risk assessments informing the frequency and type of tests. In 2017, we upgraded our Chemical Management Policy to clarify our approach to assessing alternative substances to ensure that replacement chemicals improve material safety.

ERIC SELNER, SENIOR OPERATIONS AND SUSTAINABILITY MANAGER:

“As a company that creates playthings for children, safe chemistry is critical for Radio Flyer. To assure our consumers that their children are playing with safe, responsibly made toys, we need superior visibility into the chemical makeup of our products. Beginning in 2016, we engaged our suppliers through an intensive [chemical footprinting effort](#) with the goal of achieving transparency for all intentionally added chemicals in our products. This initiative built strong accountability and a basis for improved chemicals management across our supply chain. To benchmark our program against industry best practices, Radio Flyer reports annually to the Chemical Footprint Project, a leading chemicals management self-assessment tool. This helps us pinpoint needed improvements and strengthen our commitment to safer materials.”

PHthalATES AND HEAVY METALS

We do not add regulated phthalates or heavy metals such as lead, mercury or chromium to our products.

PVC

Our aspiration is to eliminate polyvinyl chloride (PVC) from all of our products. In 2016 our products were 97.8% PVC free. We try to avoid using PVC but have not yet succeeded in removing this component from some of our products. In 2011, we removed PVC from our folding tricycles and replaced it with ethylene-vinyl acetate (EVA foam). This removed over 100,000 pounds of PVC from our products. In 2018 we removed PVC from our scooters and replaced it with a thermoplastic rubber (TPR). This removed over 110,000 pounds of PVC from our products. Any PVC we use is free of organophosphates, and meets all regulations put forth by the CPSC (Consumer Products Safety Commission).

F5. How does your company encourage the use of safer alternatives to CoHCs?

Response options	Response options selected
a. has developed a definition for a safer alternative that is consistent with the CFP definition, and we include such criteria in our business processes	
b. communicates about and asks suppliers to use our company's criteria for a safer alternative	X
c. rewards suppliers that use safer alternatives	
d. has integrated our company's criteria for a safer alternative into our product development process (e.g., through our design and safety processes)	
e. has established a goal and is tracking progress to improve the profile of chemicals across our products, consistent with our company's criteria for a safer alternative	X
f. publicly discloses our company's definition for a safer alternative and our approach to integrating it into our business practices. Provide web link:	
g. If your company's products do not contain CoHCs, please describe in documentation how it ensures that the safest chemicals available are used.	
h. none of the above	

**D1. What information does your company disclose about the chemical ingredients in its products?
Enter the percentages for all that apply.**

D1a. For formulated products, our company publicly discloses:

Response options	Response options selected
Chemical identity beyond legal requirements for ____ percentage of sales at the SKU level	
All intentionally added chemicals including fragrances, flavors, and preservatives in products for ____ percentage of sales at the SKU level	
We do not publicly disclose information about chemical ingredients in our formulated products beyond legal requirements.	X

D1b. For articles, our company publicly discloses:

Response options	Response options selected
i. Generic material content for 95% by mass of chemicals in products for ____ percentage of sales or spend at the SKU level	
ii. Chemical identity for 95% by mass of chemicals in products for ____ percentage of sales or spend (e.g., Health Product Declaration)	
iii. We do not publicly disclose information about chemicals in our articles beyond legal requirements.	X
Provide web link(s) to online ingredient disclosure:	

D2. Does your company agree to publicly disclose its responses to the CFP Survey? Yes

D3. Does your company agree to publicly disclose its score on the CFP website? Yes

Total Score: 67