



# Chemicals “Policy”: Shifting Demand for Transparency & Safer Alternatives

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*a project of*

**CLEAN  
PRODUCTION  
ACTION**

# Overview

- Who is BizNGO
- Guiding Principles for Chemicals Policy
- Best Business Practices
- Policy Integration



## BizNGO mission

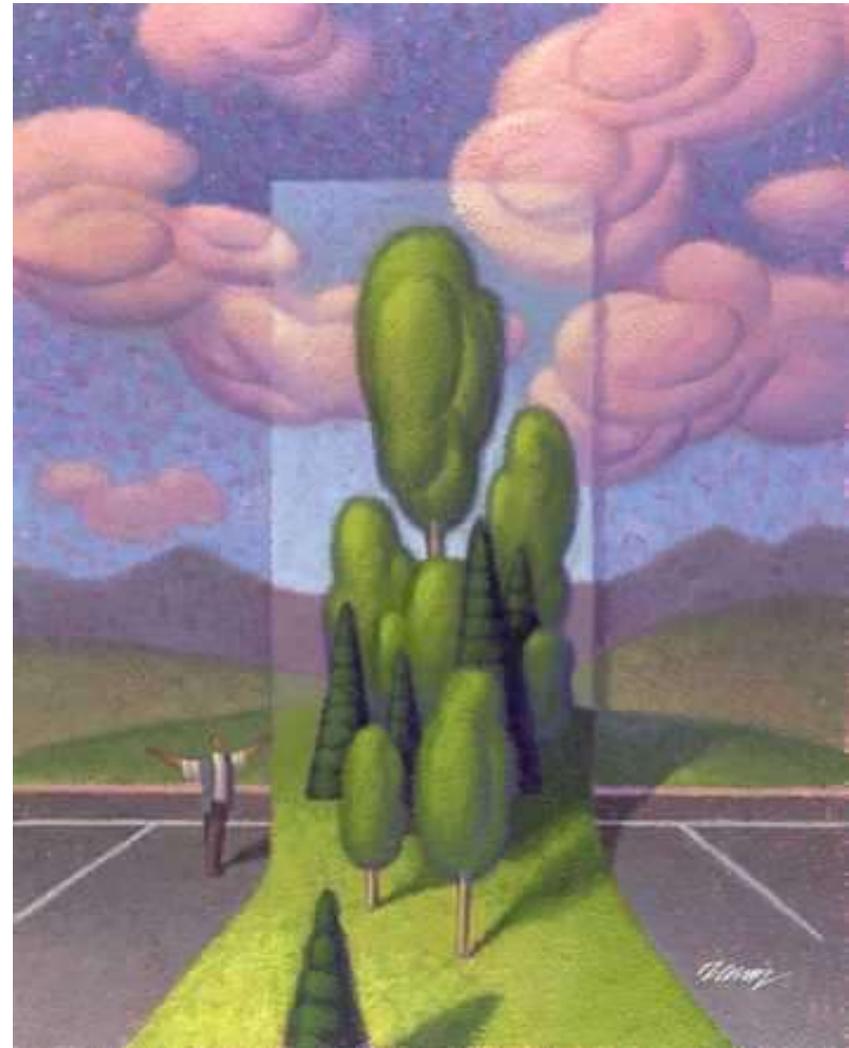
To promote the creation and adoption of safer chemicals and sustainable materials in a way that supports **market transitions to a healthy economy, healthy environment, and healthy people.**

## BizNGO issues

safer chemicals, sustainable materials, policy initiatives

## Our objectives include ...

- Model new type and degree of collaboration
- Develop tools and continuous improvement criteria
- Advance policy initiatives



# We are downstream users of chemicals ...

- **Health care:** Catholic Healthcare West, Consorta, Healthcare Without Harm, Hospira, Kaiser Permanente, Practice Greenhealth, Premier
- **Electronics:** Dell, Electronic Take Back Coalition, HP, Seagate
- **Furnishings / Buildings:** Construction Specialties, Healthy Building Network, Perkins+Will, Q Collection, True Textiles
- **Retail:** Staples, Whole Foods
- **Cleaning Products:** Method, Seventh Generation
- **NGOs** (not listed above) include: Breast Cancer Fund, ChemSec, Ecology Center, Environmental Defense Fund, Institute for Agriculture and Trade Policy, Institute for Local Self-Reliance, Investors Environmental Health Network, Natural Resources Defense Council
- **Supporting Organization:** Clean Production Action

*Contemporary corporate leaders are taking responsibility for their externalities*

**CORE  
BUSINESS**

**Take Ownership** – directly traceable to your organization (for example, tier 1 suppliers)

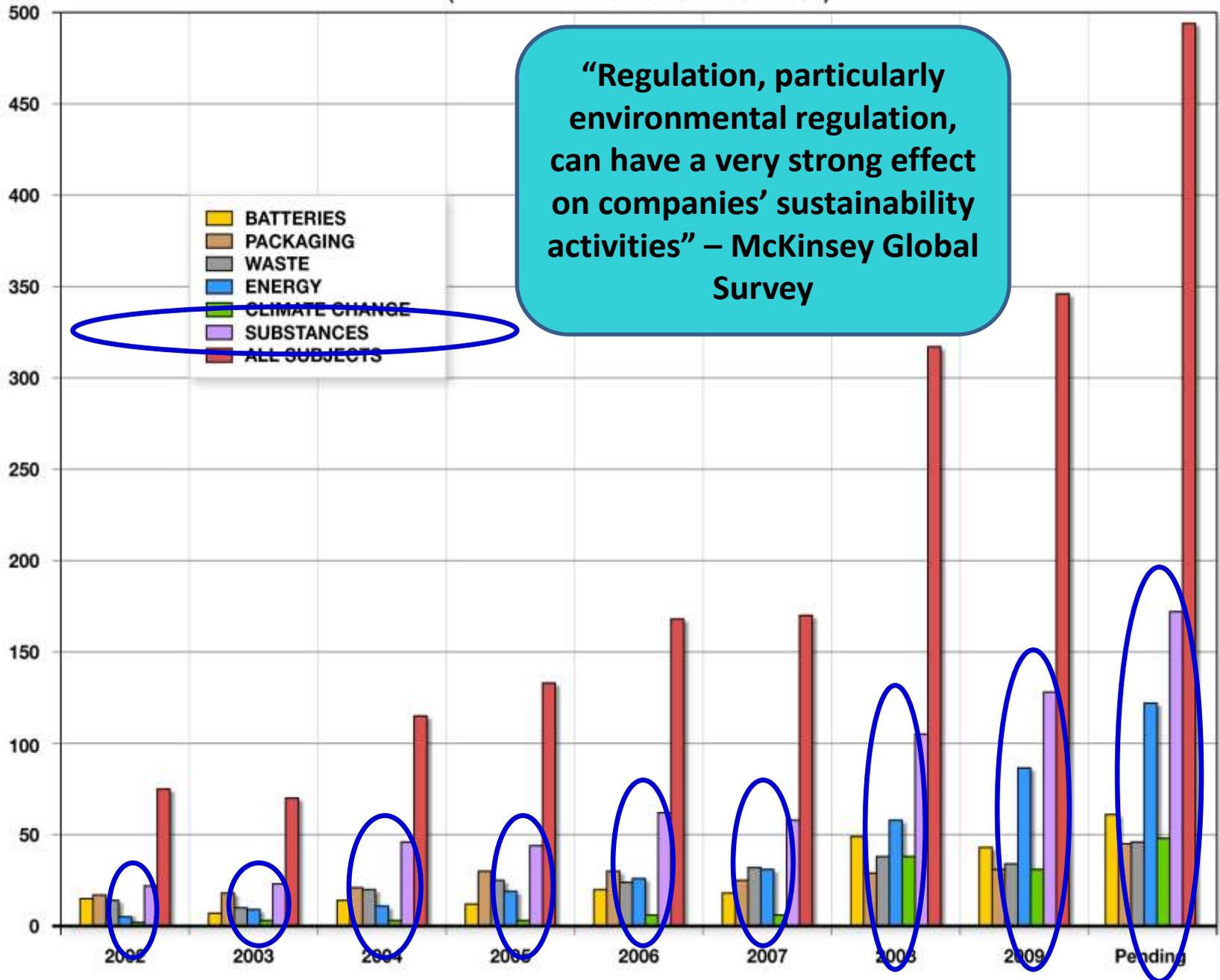
**Take Action** – impacts you contribute to + have problem solving competence

**Take Interest** – ripple effects, have no special competence to address them



Where do the following fall?  
-- Tier 2 and higher suppliers  
-- End of life impacts  
-- Public policies

## C2P GLOBAL REGULATIONS BY SUBJECT AREA (ENTERED INTO FORCE 2002-2009)



# BizNGO Guiding Principles for Chemicals Policy

## Endorsers include ...

- Breast Cancer Fund
- Catholic Healthcare West
- Construction Specialties, Inc.
- Health Care Without Harm
- Hewlett-Packard Company
- Hospira, Inc.
- Kaiser Permanente
- Method
- Natural Resources Defense Council
- Practice Greenhealth
- Premier, Inc.
- Seventh Generation
- Staples, Inc.
- Whole Foods Market, Inc.

1. Know and disclose product chemistry

2. Assess and avoid hazards

3. Commit to continuous improvement

4. Support public policies and industry standards

# Guiding Principle #1

## Know and Disclose Product Chemistry



Manufacturers will:

- **identify the substances associated with and used in a product across its lifecycle** and
- will increase as appropriate the **transparency of the chemical constituents in their products, including the public disclosure of chemicals of high concern.**

Buyers will request product chemistry data from their suppliers.

## Know Chemical Ingredients – Business Practices

Steelcase

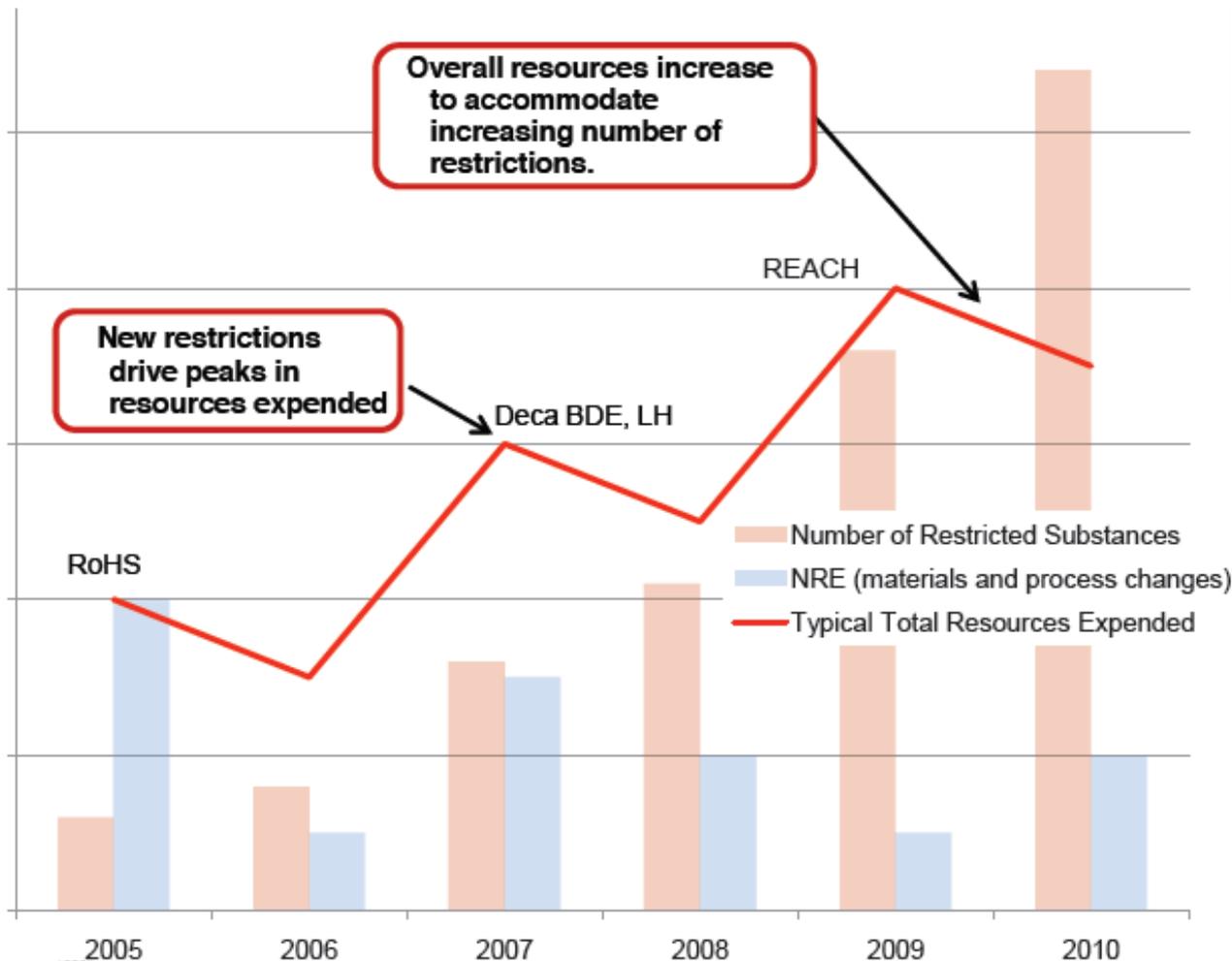
 Herman Miller

Seagate



Collecting all chemical constituent data in a product  
(down to 100 ppm – 0.01% by weight -- in some cases)

# Resources required to gather data to meet new substance restrictions typically follow a 'sawtooth' line, and increase over time



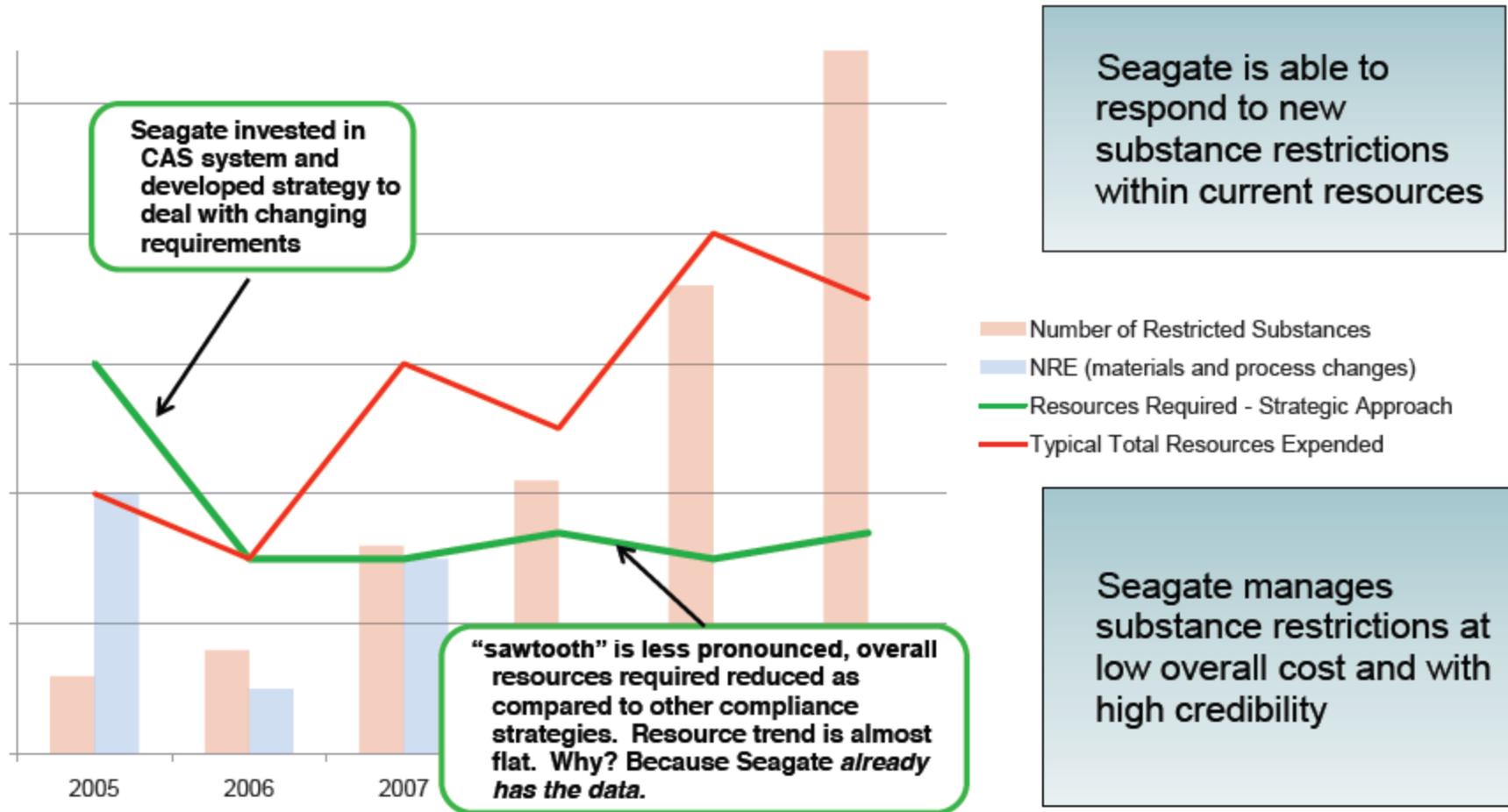
Emerging new restrictions result in spikes of NRE, business process change, and resource requirements

Non-regulatory restrictions, like low halogen, add even more requirements

**Challenge:** Produce environmentally friendly products that meet all regulatory and customer requirements while controlling overall cost of compliance.

This slide is courtesy of Brian Martin at Seagate

# By investing 'early' in full data disclosure, Seagate has been able to flatten the 'sawtooth' in resource requirements for gathering substance data



This slide is courtesy of Brian Martin at Seagate

# Disclose Chemical Ingredients – Business Practices

## *Increasing Transparency ...*

- Seventh Generation – “we disclose all ingredients”\*
- Method – “the naked truth” – chemical ingredients listed for each product\*\*
- Consumer Specialty Products Association – voluntary ingredient disclosure program
- Cosmetics disclosure – wave of the future

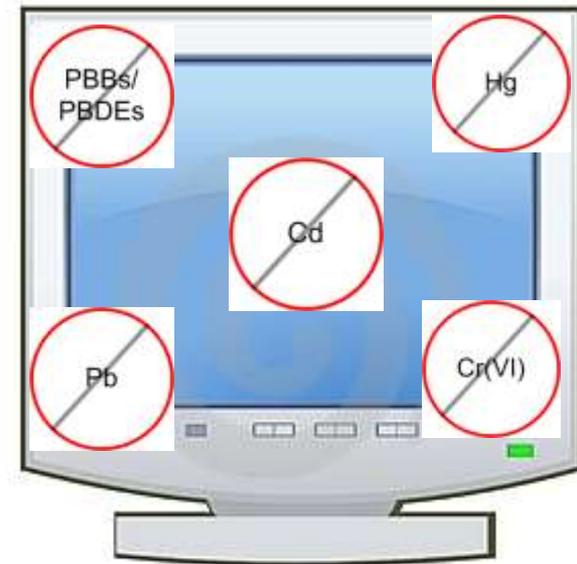


\*Color pigments: chemical ingredients are not listed for certain products.

\*\*Fragrances and color pigments: chemical ingredients are not listed.

# Know and Disclose – Policy

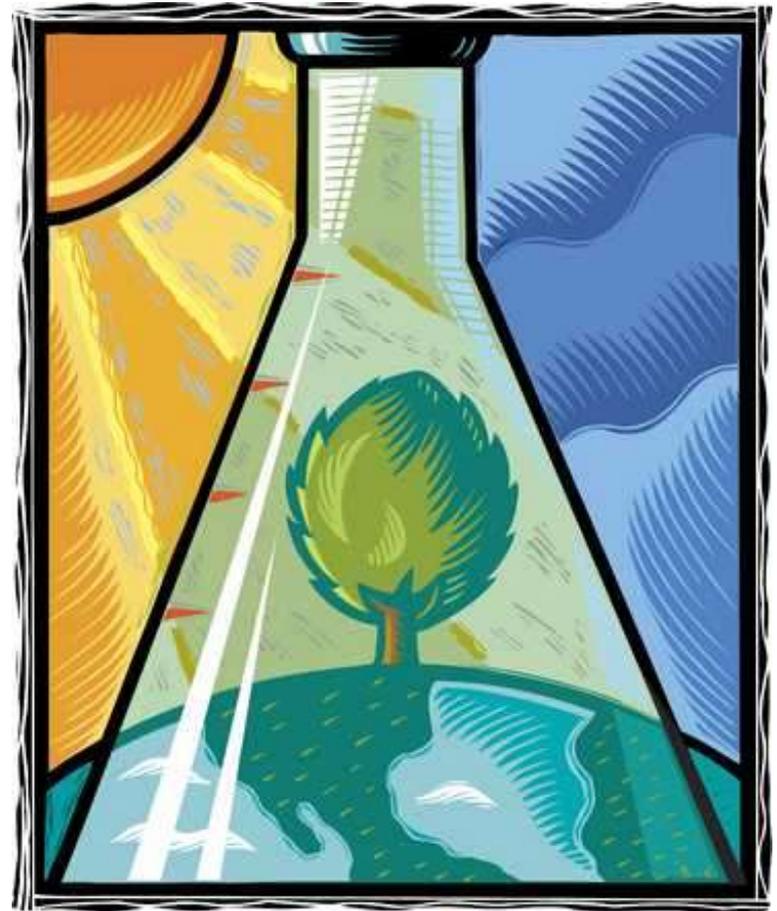
- CA Proposed Regulations for Safer Consumer Products – will target chemicals of concern in consumer products
- REACH – need to know if substance of very high concern is in product
- RoHS – need to verify Pb, Cd, Hg, hex. chromium, PBBs + PBDEs are not in product
- ME & WA -- targeting chemicals in children's products



# TSCA Reform HR 5820 – Sharing Chemical Data across the Supply Chain

Sec.8(f) DISCLOSURES TO COMMERCIAL PURCHASERS.— ... all **manufacturers and processors of chemical substances and mixtures** subject to this section **shall provide** ... to all known commercial purchasers ... a disclosure of:

- 1) the chemical identity of the chemical substance
- 2) all information regarding toxicological properties of the chemical
- 3) the list of health and safety studies submitted to the EPA



## Guiding Principle #2

### Assess and Avoid Hazards

Manufacturers will

-- determine the hazards of chemical ingredients

in their 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/or generation of hazardous chemicals.

Buyers will work with their suppliers to achieve this principle.



# Assess Hazards – Business Practices



Benchmark 4

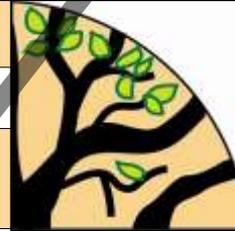
Prefer – Safer Chemical



*“HP is the world’s leading practitioner of the Green Screen tool. ... It enables informed decisions to substitute materials eliminated from our products. substitution for substances eliminated from our products.*

Benchmark 3

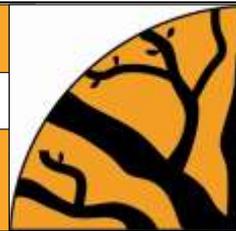
Use but Still Opportunity for Improvement



*HP is championing wider acceptance of the Green Screen within industry, the environmental NGO community and regulatory bodies.”*  
Global Corporate Citizenship Report

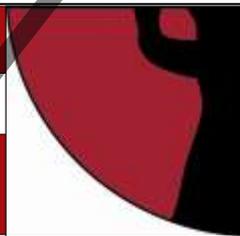
Benchmark 2

Use but Search for Safer Substitutes



Benchmark 1

Avoid – Chemical of High Concern



## Avoid Hazards – Business Practices

The H&M logo is displayed in a stylized, red, italicized font.

### Chemical Restriction List

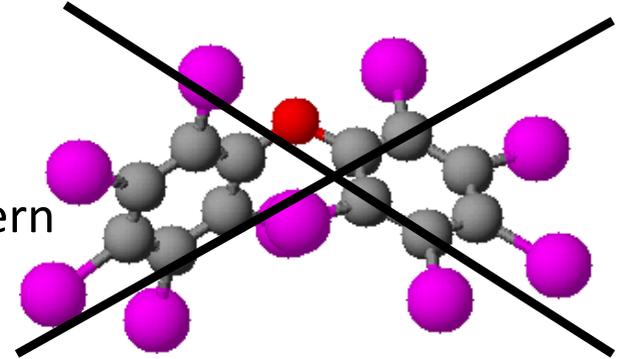
All suppliers must comply



- Flame retardants
- Phthalates
- PVC
- Bisphenol A
- Formaldehyde
- Cd, Cr, Hg, Ni, & Pb
- Perfluorinated substances
- Triclosan
- Organotins
- Phenols
- Chlorinated bleaches
- Azo dyes

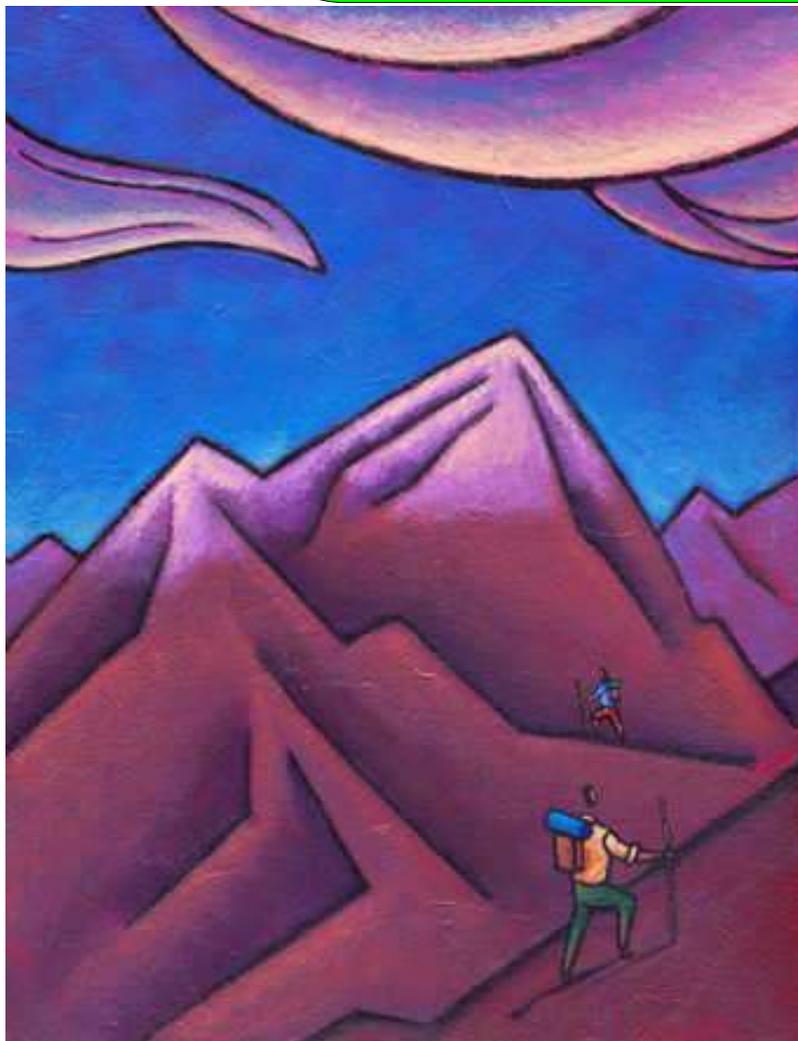
# Assess & Avoid Hazards – Policy

- REACH
  - Registration and evaluation of chemicals
  - Identification of substances of very high concern
- TSCA Reform – HR 5820 (proposed law)
  - Expedited exposure reduction for PBTs
  - Comprehensive hazard/exposure data on all chemicals
  - Identification & promotion of safer alternatives
- States –
  - PBTs, BPA, carcinogens, reproductive toxicants
  - Green Screen assessments – CA, ME
- US EPA – Priority Chemical Action Plans: phthalates, BPA, perfluorinated chemicals, PBDEs, short chain chlorinated paraffins



# Guiding Principle #3

## Commit to Continuous Improvement



**Establish corporate governance structures, policies and practices that:**

- create a framework for the regular review of product and process chemistry and
- promote the use of chemicals, processes, and products with inherently lower hazard potential.

## 3. Commit to Continuous Improvement

# Kaiser Permanente's Organizational Guideline - Chemicals

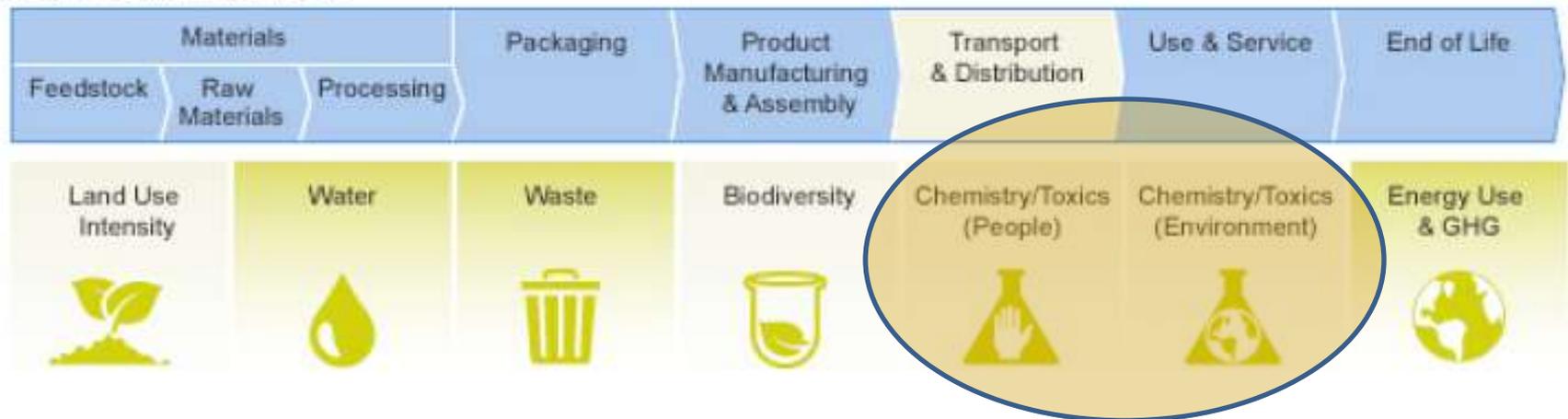
To advance an economy where the production and use of chemicals are not harmful for humans as well as for our global environment and its non-human inhabitants, Kaiser Permanente adopts the following five guiding principles for chemicals:

1. **Understand product chemistry.** To increase the transparency of the chemical constituents in products we buy, we will request product chemistry data from their suppliers.
2. **Assess and avoid hazards.** We will encourage suppliers to use chemicals with inherently low hazard potential, eliminate chemicals of high concern, minimize exposure when hazards cannot be prevented, and redesign products and processes to avoid the use and/or generation of hazardous chemicals.
3. **Commit to continuous improvement.** Create a framework for the review of product and process chemistry, and promote the use of chemicals, processes, and products with inherently lower hazard potential.
4. **Support industry standards** that, in KP's opinion, eliminate or reduce known hazards and promote a greener economy, including support for green chemistry research and education.
5. **Inform public policies** and be part of the public dialogue that advances the implementation of the above principles.

### 3. Commit to Continuous Improvement

# Outdoor Industry Association Eco-Index Beta (2010)

## ECO FRAMEWORK 3.0



### 3. Commit to Continuous Improvement

## CH04 ENVIRONMENT

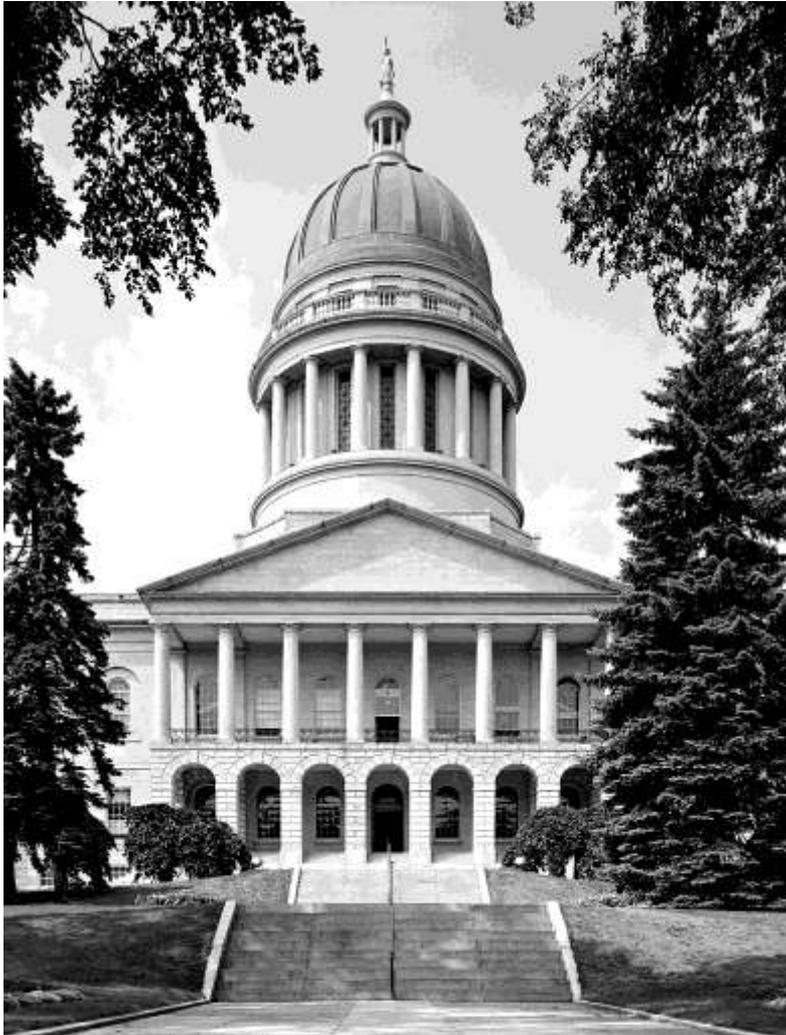
Nike's North Star

Healthy Chemistry	Climate Stability	Water Stewardship	Closing the Loop	Thriving Communities	Game Changers
Minimize the impact of product ingredients throughout the life cycle					

**Nike Restricted Substances List (RSL)  
and  
Sustainable Chemistry Guidance**

Corporate Version Date: March 2010

## Guiding Principle #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.

# Support Public Policies

- Effective California Green Chemistry Initiative
- Comprehensive Toxic Substances Control Act (TSCA) reform:
  - Core Issues for BizNGO:
    - chemical ingredient disclosure across the supply chain
    - comprehensive data on chemical hazards
    - safer alternatives
    - harmonization across policy initiatives
    - expedited action on chemicals of high concern



- Hosting informational sessions: webinars, forums (D.C. – June 2010)
- Factsheets on the business case for TSCA reform

# Support Public Policies



## Using Safer Chemicals in Products Supports Preventive Health Care



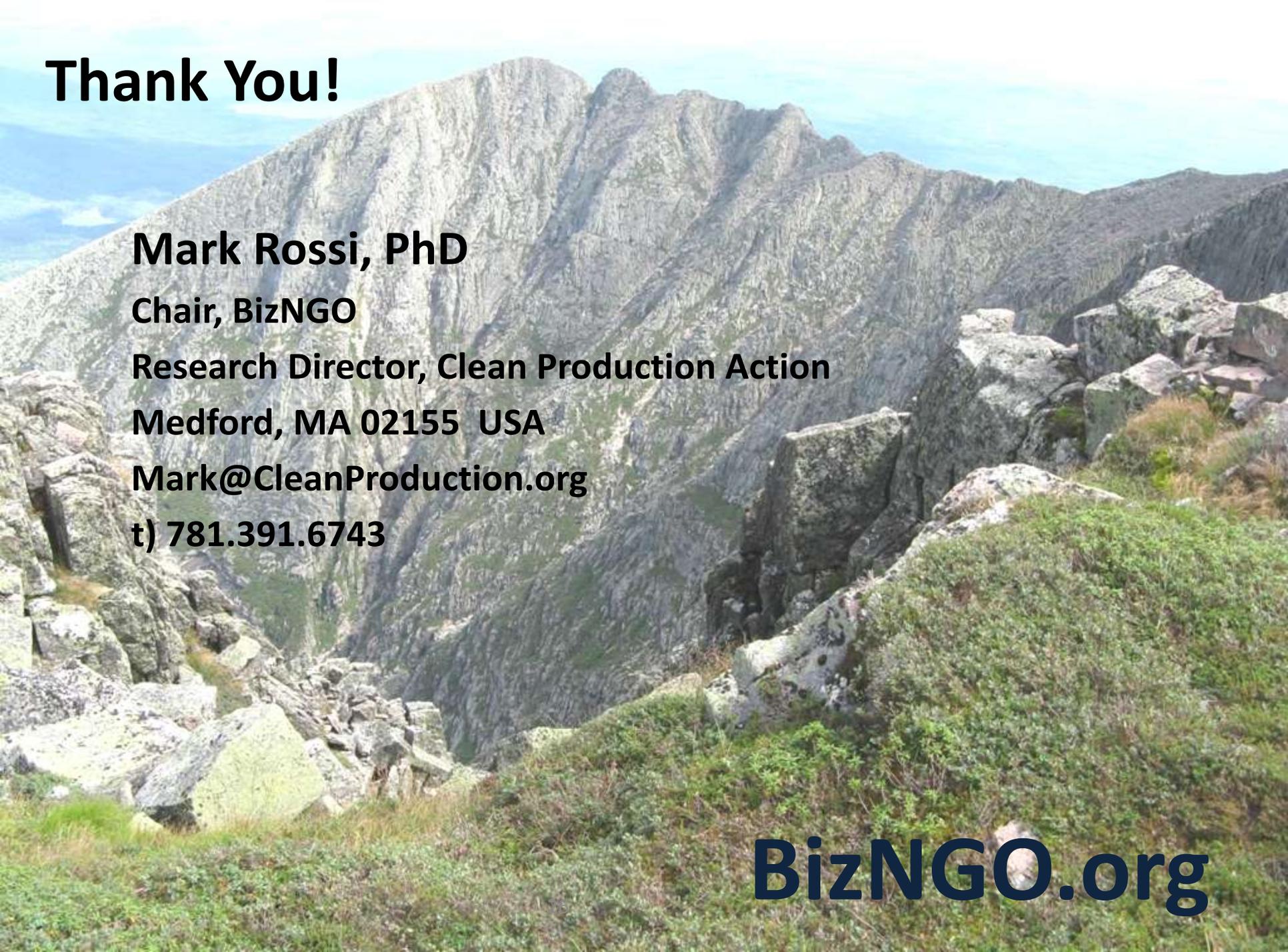
*Organizational profiles available at:*  
[www.bizngo.org](http://www.bizngo.org)



## Healthy Chemicals, Healthy Patients— Why Health Care Needs Federal Chemicals Reform



bioaccumulative toxics) for elimination. We create contractual obligations with manufacturers, suppliers and distributors to avoid identified chemicals of concern, disclose processes that use chemicals of concern even if the chemicals used in the processes are not a part of the end product and substitute safer alternatives identified through hazard analysis. We develop goals and metrics to measure our progress and evaluate our results, and share our successes and lessons learned with others.



# Thank You!

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