

2024



Retailer Report Card

Ranking retailers on toxic chemicals

Key Supporting Materials



Mind the Store 

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ABOUT THE RETAILER REPORT CARD

The Retailer Report Card is the first of its kind publication to benchmark and score the biggest retailers in the U.S. and Canada on their movement to safer chemicals. Developed in 2016 by Toxic-Free Future’s Mind the Store program, this comprehensive report is a result of in-depth research and original analysis by Toxic-Free Future and key partners and is routinely updated. By highlighting retail leaders and identifying laggards, the report drives a competitive race to the top to eliminate toxic chemicals and plastics and replace them with safer alternatives.

Launched in 2013, Toxic-Free Future’s Mind the Store program challenges the nation’s largest retailers to adopt policies that stop the use of the most hazardous chemicals and ensure products they sell are safe. The Retailer Report Card plays a key role in catalyzing retailers to reduce and eliminate toxic chemicals and plastics in products and packaging and develop comprehensive safer chemicals policies.

Toxic-Free Future is a national leader in environmental health research and advocacy. Through the power of science, education, and activism, Toxic-Free Future drives strong laws and corporate responsibility that protects the health of all people and the planet.



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Summary of Changes to the Scoring Rubric for Retailer Report Card 2024

Introduction

This year, the Mind the Store campaign celebrates 10 years since its launch and will release its sixth Retailer Report Card. To mark this important milestone, we have revamped the scoring rubric for the **Retailer Report Card 2024** to continue to drive market transformation towards safer chemicals, products, and packaging. These changes were developed by Toxic-Free Future in consultation with key campaign partners, leading retailers, and experts in the field. This document summarizes the most notable changes to the scoring rubric since the previous report card was published.

New framework: Four Essential Elements for a Safer Marketplace

The original 13 criteria items as part of previous report cards' scoring rubric have been distilled into "Four Essential Elements for a Safer Marketplace." This was done for two primary reasons:

1. To simplify and clearly communicate how the original criteria relate to one another; and
2. To highlight the four key areas of focus that are essential for retailers to reduce and eliminate hazardous chemicals and plastics, and to move towards truly safer products, packaging, operations, and global supply chains.

The Four Essential Elements are:

- **Corporate Commitment:** Evaluates the retailer's commitment to move to safer chemicals and materials through its corporate chemicals policy, participation in the Chemical Footprint Project, external collaboration, and support of public policies. 
- **Transparency:** Evaluates a retailer's knowledge of hazardous chemicals and plastics in the products and packaging it sells and public disclosure of chemicals and plastics to consumers. 
- **Ban the Bad:** Evaluates the scope of hazardous chemicals and plastics a retailer both currently prohibits and its progress in reducing and eliminating high-priority chemicals, chemical classes, and plastics of high concern. 
- **Safer Solutions:** Evaluates a retailer's implementation of safer solutions, through financial investments in safer solutions and the steps it is taking to ensure suppliers are transitioning to safer chemicals and products. 

Most of the original 13 criteria are nested within the Four Essential Elements. The Four Essential Elements are strongly aligned with the previous criteria, though various changes were made throughout to improve them.

Weighting the Four Essential Elements: Emphasis on hazard reduction and safer solutions

The Four Essential Elements are weighted to emphasize the need to reduce and eliminate harmful chemicals and plastics and to ensure substitutes are truly safer. Of 155 possible points, 45 are allocated to Ban the Bad, which includes actions to reduce and eliminate hazardous chemicals and plastics. Previously, only 23 points were allocated to these actions. Fifty points are now allocated to Safer Solutions, which includes actions to support the development, implementation, and tracking of safer products. Previously, only 24.5 points were allocated to these types of actions. While some of the criteria in these two categories existed before, they have been adjusted; others are new. We also adjusted the points awarded for other criteria throughout the Report Card to achieve this new weighting.

The new list of high-priority chemicals, chemical classes, and updated list of plastics

Ten years ago, we developed the *Hazardous 100+ List of Chemicals of High Concern*, a list of priority chemicals we encouraged retailers to reduce and eliminate. This year we have developed a new list of high-priority chemicals, chemical classes or groups, and plastics of high concern that we believe are critical for retailers to reduce, eliminate, and safely substitute. Those chemicals and plastics are embedded throughout the Report Card, most notably in Ban the Bad.

Greater emphasis on “classes” of chemicals and plastics of high concern

Throughout the Report Card, we made changes to emphasize the need for retailers to address not only individual chemicals of high concern but also key classes or groups of chemicals, as well as plastics of high concern.

Number of chemicals, plastics, and product categories

In certain areas, particularly in Ban the Bad, we expanded both 1.) the number of chemicals and/or plastics and 2.) the number of product categories required to be addressed for retailers to receive credit. This sets a higher bar for retailers to target a larger universe of chemicals and plastics in strategic product categories or for reduction and elimination.

Time-bound commitments

In several areas, we set timelines to benchmark company progress. For example, if a company initiated an action five years ago, they may no longer receive credit unless that practice is ongoing (e.g., testing or supplier training).

Private-label and brand-name products

In multiple places, we changed language to incentivize retailers to address not only chemicals and plastics in private-label products, but also in brand-name products. For example, in Transparency, this was done in (T.1) Supplier Disclosure and (T.3) Consumer Disclosure. In Safer Solutions, this was done in (S.3) Implementation of Known Safer Solutions.

Formulated products vs. articles

In a few categories, we have developed new distinctions between formulated products and articles. For example, in Transparency, this was done in (T.1) Supplier Disclosure and (T.3) Consumer Disclosure.

Weighting the Transparency criteria

Recognizing that some retailers sell more formulated products and others sell more articles, as well as differences in private label products compared to third-party, we developed a new system to weight the Transparency criteria so that any one type of retailer is not at a disadvantage in our Transparency scoring. For example, if a retailer sells 80% or more of formulated products, we will primarily grade their transparency actions on formulated products. The same is true for articles. See the scoring rubric for the weighting formula.

Extra credit eliminated

As the criteria evolved between 2016 and 2021, we added various extra credit options to encourage retailers to go further across multiple categories. As we added more extra credit, the line between “base” criteria and “extra credit” began to blur, with several extra credit being categories that we believed were critically important for retailers to address, not just “extra.” So, we have removed the concept of extra credit and included most of the previous extra credit in the base criteria throughout. We also deleted some extra credit that did not seem essential (see below).

Clarifying language in the criteria and glossary

Throughout the scorecard, we have made various copyedit changes to clarify, strengthen, or improve the readability of the criteria.

New or other notable changes to the criteria

Throughout the report card, we added new criteria and edited existing criteria, summarized here:

New: Corporate Commitment – (C.3) Chemical Footprint Project (1.5 points)

The retailer asked at least three of its suppliers to participate in the CFP survey in the past year (since March 2022).

New: Corporate Commitment – (C.5) Public Policy Support (3.5 points)

The retailer supports governmental policies to reduce chemicals and plastics of high concern.

Edited: Transparency – (T.1) Supply Chain Disclosure

This criterion was revamped throughout to distinguish between formulated products and articles, private-label and brand name products, levels of disclosure, as well as the number of applicable product categories. It was also improved to address plastics.

Edited: Transparency – (T.3) Consumer Ingredient Disclosure

This criterion was revamped throughout to distinguish between formulated products and articles, private-label and brand name products, levels of disclosure, as well as the number of applicable product categories. It was also improved to address plastics and products that do not contain chemicals of concern.

New and edited: Ban the Bad

The criteria grouped in Ban the Bad were revamped throughout to distinguish between the numbers of chemicals or chemical classes, plastics, and/or product categories a retailer is addressing for existing restrictions, future restrictions, and progress towards reducing and

eliminating chemicals and plastics of high concern. New criteria for brand-name products and circular economy were also added.

Edited: Safer Solutions – (S.1) Policy (5 points)

We adjusted the definition of a “safer alternative” to align with the definition adopted by Washington State and to note the definition must be made public.

Edited: Safer Solutions– (S.2) Filling the gaps: Investment in Safer Solutions (20 points)

We modified the previous criterion (Impact Investment) and added five tiers of financial investments, ranging from \$25,000 to \$1,000,000 to incentivize retailers to help drive the development and implementation of safer solutions. Previously this category was only worth 7.5 points.

New and edited: Safer Solutions – (S.3) Implementing Known Safer Solutions (20 points)

While a number of these criteria existed before, others are new, and overall they have been adjusted to encourage retailers to transition to safer solutions across both private label and brand name products and across a greater number of product categories. One of the new criteria is to encourage retailers to move towards safer reusables/refillables that do not contain plastics or chemical additives of high concern. The criteria were also redesigned to award additional points based on the number of safer solutions that are implemented.

Edited: Safer Solutions – (S.4) Quantified Safer Products (5 points)

This criterion was modified for retailers to not only measure but also disclose the number or percent of UPCs within a major product category that meet hazard-based third-party safer chemicals standards. We have also clarified that these standards must be hazard-based, and the third-party standards retailers can receive credit for have been updated (see the glossary).

Deleted criteria

We deleted the following criteria:

Transparency – Accountability

- Two and a half extra points awarded for retailer engaging in one of the four listed practices, where the practice is major in scope or impact.

Transparency – Supply Chain Disclosure (formerly known as Disclosure)

- The criterion previously stated: “The retailer’s safer chemicals policy and beyond restricted substance list (BRSL) (as well as the manufacturing restricted substance list (MRSL) and beyond restricted material list (BRML)**, if applicable) are all publicly available.” In the 2024 Retailer Report Card, points will only be awarded for information, including RSLs and MRSLs, that is publicly available.
- Extra point awarded for retailer reporting the percentage of a major product category, of the products within the scope of the disclosure policy, or of suppliers that have achieved one of the levels of disclosure specified in any of the criterion above.
- Extra point awarded for retailer requiring suppliers to report to the retailer process chemicals used to manufacture at least one major product category.
- Extra point awarded for retailer who (a) pledges to ask suppliers to verify purity of ingredients where contaminants of concern may exist, and (b) annually measures the weight or volume of ingredients, known to often harbor contaminants of concern, that are verified to meet purity standards.
- Extra point awarded for retailer setting a public deadline that is in the last three years (since November 2017) or in the next three years (until April 2024) for suppliers to report chemicals to retailer.

Transparency – Consumer Ingredient Disclosure (formerly known as Transparency around consumer ingredient disclosure)

- Extra point awarded for retailer applying the most stringent ingredient transparency standard adopted by a U.S. state to all its relevant private-label cleaning products sold in North America, both online and on product packaging.
- Extra point awarded for retailer explicitly encouraging suppliers to publicly disclose non-food ingredients that are considered to be allergens, labeled as such, on-pack or online.
- Extra point awarded for the retailer setting a public deadline that is in the last three years (since November 2017) or in the next three years (until April 2024) for the disclosure of ingredients to consumers online and/or on product packaging.

Ban the Bad (formerly known as Action)

- Extra point awarded for retailer publicly reporting on its replacement for at least one CHC or class of CHCs, or for at least one PHC, after eliminating the substance from a major product category, packaging category, or manufacturing process, or a major aspect of operations in the last three years (since November 2017).

Safer Solutions (formerly Safer Alternatives)

- Extra point awarded if retailer is a supporter of the ChemSec safer alternatives marketplace.

Joint Announcement

- This extra credit was removed.

Continuous Improvement

- This extra credit was removed.

Priority Chemical Classes and Groups, Additional Priority Chemicals, and Plastics

Ten years ago, we developed the *Hazardous 100+ List of Chemicals of High Concern*, a list of priority chemicals we encouraged retailers to reduce and eliminate. In 2023, we developed a new list of high-priority chemicals, chemical classes or groups, and plastics of high concern that we believe are critical for retailers to reduce, eliminate, and safely substitute. Those chemicals and plastics are embedded throughout the Report Card, most notably in Ban the Bad.

Mind the Store Priority Chemical Classes & Groups

Mind the Store Priority Chemical Classes & Groups	Priority chemicals for beauty products of environmental justice concern
6PPD & related compounds ¹ : Includes 6PPD and alternative chemicals used as anti-degradants in tire manufacturing with chemical hazard of GreenScreen Benchmark-1 or equivalent. Includes but is not limited to list below.	
6PPD [N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine]	
6QDI [N-(4-Methylpentan-2-yl)-N'-phenylcyclohexa-2,5-diene-1,4-diimine]	
7PPD [N-(5-Methyl-2-hexyl)-N'-phenyl-p-phenylenediamine]	
CCPD [N,N'-Dicyclohexyl-4-phenylenediamine]	
IPPD [N-Isopropyl-N'-phenyl-p-phenylenediamine]	
NBC [Nickel dibutyldithiocarbamate]	
Alkylphenols and alkylphenol ethoxylates ² : Alkylphenol ethoxylates (APEs) as a class can be defined by the chemical structure in which a branched or linear alkyl chain is attached to a polyethoxylated phenolic ring. The general chemical formula of APEs is $C_nH_{2n+1}-C_6H_5O(CH_2CH_2O)_m$, where 'n' represents the length of the alkyl chain and 'm' represents the number of repeating ethoxylate (EO) units.	●
Benzophenones : Fixed list below.	●
2,4-Dihydroxybenzophenon; Resbenzophenone; Benzophenone-1	●
Benzophenone	●
Benzophenone2	●
Oxybenzone, BP-3, Benzophenone-3	●

- 1 Manahan, C., Washington State Department of Ecology, "Hazardous Waste and Toxics Reduction Program Technical Memo: Assessment of potential hazards of 6PPD and alternatives," November 2021, p. 5, https://www.ezview.wa.gov/Portals/_1962/Documents/6ppd/6PPD%20Alternatives%20Technical%20Memo.pdf.
- 2 Washington State Department of Ecology, "Regulatory Determinations Report to the Legislature: Safer Products for Washington Cycle 1 Implementation Phase 3" June 2022, <https://apps.ecology.wa.gov/publications/documents/2204018.pdf>, p. 159.

Mind the Store Priority Chemical Classes & Groups	Priority chemicals for beauty products of environmental justice concern
<p>Bisphenols³: Bisphenols can be defined as a chemical class based on their chemical structure as two phenol rings connected by a 'linker' region. Further, bisphenols:</p> <ol style="list-style-type: none"> 1. Must have two six-membered aromatic rings connected by a linker atom. 2. The linker atom can also be substituted, but the linker length must be a single atom. 3. Both rings must have at least one hydroxyl substituent (i.e., phenol rings). 	●
<p>Formaldehyde and formaldehyde releasers: Includes formaldehyde (CAS 50-00-0) and chemicals that release formaldehyde.</p>	●
<p>Heavy metals (fixed list below) and their compounds.</p>	●
Antimony	
Arsenic	●
Cadmium	●
Chromium VI	
Cobalt	
Lead	●
Mercury	●
<p>Organohalogen flame retardants⁴: Organohalogen flame retardants are defined as a class on the basis of their chemical structure, physiochemical properties, and functional use. HFRs contain at least one atom of chlorine, bromine, fluorine, or iodine bonded directly to a carbon atom. Functionally, flame retardants are chemicals intentionally added to other materials and intended to slow ignition and progression of fires. Flame retardants are added to products to meet flammability standards and are sometimes used as part of an approach to address fire safety.</p>	
<p>Organohalogen plasticizers: Organohalogen plasticizers are defined as a class on the basis of their chemical structure, physiochemical properties, and functional use. Organohalogen plasticizers contain at least one atom of chlorine, bromine, fluorine, or iodine bonded directly to a carbon atom. Functionally, plasticizers are added to a material to make it softer and more flexible, to increase its plasticity, to decrease its viscosity, and/or to decrease friction during its handling in manufacture.</p>	
<p>Organohalogen solvents: Organohalogen solvents are defined as a class on the basis of their chemical structure, physiochemical properties, and functional use. Organohalogen solvents contain at least one atom of chlorine, bromine, fluorine, or iodine bonded directly to a carbon atom. Functionally, a solvent is a substance that dissolves a solute, resulting in a solution.</p>	

3 Washington State Department of Ecology, "Regulatory Determinations Report to the Legislature: Safer Products for Washington Cycle 1 Implementation Phase 3" June 2022, <https://apps.ecology.wa.gov/publications/documents/2204018.pdf>, pp. 138 - 9.

4 Washington State Department of Ecology, "Regulatory Determinations Report to the Legislature: Safer Products for Washington Cycle 1 Implementation Phase 3" June 2022, <https://apps.ecology.wa.gov/publications/documents/2204018.pdf>, p. 38

Mind the Store Priority Chemical Classes & Groups	Priority chemicals for beauty products of environmental justice concern
Organophosphate flame retardants/plasticizers: Fixed list below.	●
Ethylhexyl diphenyl phosphate (EHDPP)	
Isopropylated triphenyl phosphate (IPTPP)	
Tricresyl phosphate (TCP)	
Tri-n-butyl phosphate (TNBP)	
Triphenyl phosphate (TPP)	
Organotins ⁵ : Organometallic compounds combining tin and organics such as butyl and phenyl groups.	
Ortho-phthalates ⁶ : Synthetic esters of benzenedicarboxylic acid consisting of two carboxy groups at ortho positions.	●
Parabens ⁷ : Short alkyl chain esters of para-hydroxybenzoic acid (PHBA).	●
PFAS ⁸ : Fluorinated organic chemicals containing at least one fully fluorinated carbon atom.	●
Polychlorinated biphenyls (PCBs) ⁹ : Chemical forms that consist of two benzene rings joined together and containing one to ten chlorine atoms attached to the benzene rings.	
Siloxanes ¹⁰ : Cyclic volatile methyl siloxanes (D4, D5, D6): Chemical forms that are cyclic, volatile, have at least one methyl group, and are siloxanes (alternating Si and O compounds).	●

5 ZDHC MRSL, <https://mrsl-30.roadmaptozero.com>

6 Washington State Department of Ecology, “Regulatory Determinations Report to the Legislature: Safer Products for Washington Cycle 1 Implementation Phase 3” June 2022, <https://apps.ecology.wa.gov/publications/documents/2204018.pdf>, p. 173.

7 Centers for Disease Control and Prevention, “National Biomonitoring Program: Biomonitoring Summary: Parabens,” https://www.cdc.gov/biomonitoring/Parabens_BiomonitoringSummary.html

8 Wash. Rev. Code 2020 c 20 § 1451. Prior: 2019 c 292 § 1. Formerly RCW 70.365.010. <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.350.010>

9 Washington State Department of Ecology, “Regulatory Determinations Report to the Legislature: Safer Products for Washington Cycle 1 Implementation Phase 3” June 2022, <https://apps.ecology.wa.gov/publications/documents/2204018.pdf>, p. 78.

10 European Chemicals Agency, “Annex XV Restriction Report: Proposal for a Restriction, Substance Name(s): Octamethylcyclotetrasiloxane (D4), Decamethylcyclopentasiloxane (D5), Dodecamethylcyclohexasiloxane (D6),” 2019, https://echa.europa.eu/documents/10162/13641/rest_d4d5d6_axvreport_en.pdf/c4463b07-79a3-7abe-b7a7-5e816e45bb98.

US EPA, “Technical Overview of Volatile Organic Compounds,” <https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds>.

Mind the Store Additional Priority Chemicals

Mind the Store Additional Priority Chemicals	Chemicals of high concern for beauty products of environmental justice concern
Acetaldehyde	●
Benzene	●
Butylated hydroxyanisole (BHA)	●
Cocamide Dea	●
D&C Black 2; Carbon Black	●
Ethylene Oxide	●
Hydroquinone	●
Naphtha (petroleum), hydrotreated heavy; C10-12 Alkane/Cycloalkane	●
Nickel (Metallic)	●
Perchlorate	
Polyacrylamide	●
Silica, crystalline (airborne particles of respirable size)	●
Sodium borate	●
Styrene (Cinnamene)	●
Talc (only in personal hygiene products)	●
Toluene	●
Triclocarban	
Triclosan	●
Vinyl chloride	

Mind the Store Plastics of High Concern (PHC)

Mind the Store Plastics of High Concern
Acrylonitrile butadiene styrene (ABS)
Chlorinated Polyvinyl Chloride (CPVC)
Melamine
Polycarbonate (PC)
Polyethylene terephthalate (PET)
Polystyrene (PS) (expanded)
Polystyrene (PS) (non-expanded)
Polysulfones (including polysulfone (PSU) and polyether sulfone (PES))
Polytetrafluoroethylene (PTFE)
Polyvinyl chloride (PVC)
Polyvinylidene chloride (PVDC)
Styrene butadiene rubber (SBR)
Any other halogenated plastic, including brominated, chlorinated, and fluorinated polymers.
Any other plastic scoring a 'o' in the Clean Production Action Plastics Scorecard
Microplastics

Glossary of Terms¹¹

Allergen: any substance that the immune system recognizes as a threat and attacks.

Article: an object that, during production, is given a special shape, surface, or design, which determines its function to a greater degree than its chemical composition.¹²

Beauty products of environmental justice concern

(BPEJC): beauty and personal care products marketed primarily to people of color that may contain chemicals of high concern (CHCs), including but not limited to hair straightening treatments such as relaxers; and skin lightening, brightening, bleaching, and whitening creams, lotions, and soaps.

Chemical Footprint Project (CFP): an initiative for measuring corporate progress to safer chemicals. It provides a metric for benchmarking companies as they select safer alternatives and reduce their use of chemicals of high concern. The Chemical Footprint Project measures overall corporate chemicals management performance through the CFP Survey that evaluates:

- Management Strategy
- Chemical Inventory
- Footprint Measurement
- Public Disclosure and Verification¹³

Chemical Footprint Project (CFP) signatories: signatories of the CFP agree to:

- Encourage companies in their sphere of influence to participate in the CFP,
- Be listed on the CFP website, and

- Provide feedback on how to improve implementation of the CFP.¹⁴

Chemicals in products: chemicals that are intended or anticipated to be part of the finished product. Examples include dyes, silicone finishes, screen printing, inks, labels, flame retardants, a durable water repellent chemical formulation, or a chemical plasticizer added to a plastic product or component.

Chemicals of high concern (CHCs): substances that have any of the following properties: 1) persistent, bioaccumulative and toxic (PBT); 2) very persistent and very bioaccumulative (vPvB); 3) very persistent and toxic (vPT); 4) very bioaccumulative and toxic (vBT); 5) carcinogenic; 6) mutagenic; 7) reproductive or developmental toxicant; 8) endocrine disruptor; 9) neurotoxicant or 10) a chemical whose breakdown products result in a CHC that meets any of the above criteria. “Toxic” (T) includes both human toxicity and ecotoxicity.

These criteria align with the Chemical Footprint Project’s definition for a chemical of high concern and criteria for GreenScreen Benchmark 1.¹⁵

Collaborative processes to promote safer

chemicals: examples of such initiatives include the Apparel and Footwear International RSL Management Group (AFIRM); the BizNGO Workgroup for Safer Chemicals and Sustainable Materials (BizNGO); ChemFORWARD; Change Chemistry & Commerce Council’s (GC3) Retailer Leadership Council (RLC); and the Zero Discharge of Hazardous Chemicals (ZDHC) Program.

¹¹ Adapted from the Chemical Footprint Project Glossary: https://chemicalfootprint.org/assets/downloads/CFP_Glossary.pdf

¹² See <http://www.REACH-compliance.eu/english/REACH-ME/engine/sources/definitions.html>.

¹³ See <https://chemicalfootprint.org>.

¹⁴ See <https://chemicalfootprint.org/value>.

¹⁵ See <https://www.greenscreenchemicals.org/learn/full-greenscreen-method>.

Food contact articles: items in direct contact with food or beverage, including food packaging and other items used during food processing and food preparation, such as disposable gloves, conveyor belts, plastic tubing, processing equipment, storage containers, and kitchenware.

Food contact chemicals: substances present in food contact materials and food contact articles that may reasonably be anticipated to migrate into a food product intended for human consumption. Also known as “indirect food additives.”

Food contact materials: the components of a food contact article in direct contact with food or beverage, including plastics, rubber, paper and paperboard, inks, adhesives, metals, etc.

Formulated product: a preparation or mixture of chemical substances that can be gaseous, liquid, or solid (e.g., paints, liquid cleaning products, adhesives, coatings, cosmetics, detergents, dyes, inks, or lubricants). This can be an intermediate product sold to another formulator, fabricator, or distributor, or a final product sold to a consumer or retailer.

Full chemical ingredient information:

For articles, including food contact articles, a company knows or discloses:

- 95% of the intentionally added substances by mass; and
- any known impurities that are both CHCs and present at 1,000 ppm (0.1%) or higher in a homogeneous material.

For formulated products, a company knows or discloses:

- 100% of the intentionally added substances by mass.
- Note – generic terms, such as those to describe fragrance ingredients, are not acceptable, and industry naming standards, as defined below, must be used; and

- any known impurities that are both CHCs and present at 100 parts per million (ppm) or higher in the formulation.

Generic material content: the general name of a material, such as steel, nylon fabric, adhesive, or type of plastic (e.g., polyethylene terephthalate (PET)). CAS# is not required.

Generic material content (for purposes of Transparency element questions 1 and 3): examples include fragrance, preservative, perfume, parfum, ink, and adhesive. These are not acceptable as part of “full chemical ingredient information.”

GreenScreen® for Safer Chemicals: a method for comparative chemical hazard assessment (CHA) that can be used for identifying chemicals of high concern and safer alternatives. GreenScreen® considers 18 human and environmental health endpoints and can be used to evaluate the hazard of a single chemical or mixtures and polymeric materials. GreenScreen® uses a set of four benchmarks to screen out chemicals that are associated with adverse health and environmental impacts. Chemicals that do not pass through Benchmark-1 (BM-1) are deemed “chemicals of high concern” and should be avoided; chemicals at Benchmark-2 are categorized as usable, but efforts should be taken to find safer alternatives; Benchmark-3 chemicals are those with an improved environmental health and safety profile that could still be improved further; and chemicals that pass through all four benchmarks are considered safer chemicals and are therefore preferred.

GreenScreen® List Translator: an abbreviated version of the full GreenScreen® method that can be automated. It is based on the hazard lists that inform the GreenScreen® method. The GreenScreen® List Translator maps authoritative and screening hazard lists, including GHS country classifications, to GreenScreen® hazard classifications. The GreenScreen® List Translator can be accessed through tools such as Healthy Building Network’s [Pharos Chemical and Material Library](#), a fee-for-service database. A score of GreenScreen List

Translator-1 means the chemical meets one or more criteria for BM-1 and is most likely to receive that score after a full GreenScreen assessment.

Hazard (chemical): an inherent property of a substance having the potential to cause adverse effects when an organism, system, or population is exposed, based on its chemical or physical characteristics.

Hazard assessment: the process of determining under what exposure conditions (e.g., substance amount, frequency, and route of exposure) a substance can cause adverse effects in a living system. Toxicology studies are used to identify the potential hazards of a substance by a specific exposure route (e.g., oral, dermal, inhalation) and the dose (amount) of substance required to cause an adverse effect.

Impurity: an unintended constituent, not intentionally added, present in a substance as manufactured. It may, for example, originate from the starting materials or be the result of secondary or incomplete reactions during the production process. This term includes non-intentionally added substances (NIAS), which are chemicals present in a food contact article but not added for a technical reason during the production process, as well as other contaminants and byproducts.

Industry naming standards for fragrances (for purposes of Transparency element questions 1 and 3): International Nomenclature Cosmetic Ingredient (INCI), International Union of Pure and Applied Chemistry (IUPAC), Chemical Abstract Service (CAS), or Consumer Specialty Products Association (CSPA) Dictionary. Names according to one of these standards are distinct from generic terms, as defined above.

Major product category: a “product category” is made up of products that meet a similar consumer need, or products that are inter-related or substitutable.¹⁶ A “major product category” is determined by a retailer’s category

management system, as evidenced by website or physical store organization and/or labeling.

Manufacturing restricted substance list (MRSL): 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.¹⁷ An MRSL differs from an RSL because it restricts hazardous substances potentially used and discharged into the environment during manufacturing, not just substances that could be present in finished products. The MRSL takes into consideration both process and functional chemicals used to make products, as well as chemicals used to clean equipment and facilities. It addresses any chemical used within the four walls of a manufacturing facility.

Operations: examples of aspects of operations include food service gloves; thermal receipt paper; building materials in stores, corporate offices and/or warehouses; and cleaning products for stores, corporate offices, and/or warehouses.

Persistent, bioaccumulative and toxic substance (PBT): a chemical that is toxic, persists in the environment, and bioaccumulates in food chains and, thus, poses risks to human health and ecosystems.

Plastics of high concern (PHCs): virgin or recycled plastic materials that should especially be phased out due to the particular toxicity of the monomer, additives, and/or combustion byproducts. See list of PHCs on page 12, which may be modified over time.

Restricted material list (RML): hazardous materials that are plastics of high concern (PHCs), identified by a company for management, reduction, elimination, or avoidance beyond legal requirements; that is, beyond legally restricted and reportable materials.

¹⁶ See <http://www.acnielsen.com/news/european/ic/2001/20010201.htm>.

¹⁷ Adapted from ZDHC: <https://www.roadmaptozero.com/input#CG>

Restricted Substances List (RSL): 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. For companies to receive credit for an RSL in the Retailer Report Card under Ban the Bad (B1), the RSL must go above and beyond regulatory compliance.

Safer alternative: means an alternative that is less hazardous to humans or the environment, equivalent to GreenScreen Benchmark 2 or higher, than the existing chemical or chemical process. A safer alternative to a particular chemical may include a chemical substitute or a change in materials or design that eliminates the need for a chemical alternative.¹⁸

Safer chemicals policy: a statement of how a company manages chemicals in its materials, supply chains, products, packaging, and/or operations beyond what is required by regulation.

Third-party laboratory: an independent laboratory involved in a project, including chemical assessments, that is not biased to the results of the work and does not have any vested interest in the outcome of the work.

¹⁸ Adapted from RCW 70A.350 (<https://app.leg.wa.gov/RCW/default.aspx?cite=70A.350.010>) and Washington State Department of Ecology, "Regulatory Determinations Report to the Legislature: Safer Products for Washington Cycle 1 Implementation Phase 3," pp. 278 – 299 (<https://apps.ecology.wa.gov/publications/documents/2204018.pdf>)



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