

## HIGH PRIORITY CHEMICALS DATA SYSTEM (HPCDS) FACT SHEET

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### Active Reporting Programs:

- Oregon Toxics-Free Kids Act (TFKA)
- Vermont Chemicals Disclosure Program (VT CDP)
- Washington Children's Safe Products Act (WA-CSPA)
- Safer Products for Washington (WA-SPWA)

### About

The HPCDS is a project of the Interstate Chemicals Clearinghouse (IC2), a program of the [Northeast Waste Management Officials' Association \(NEWMOA\)](#). Project funding was provided through an [EPA Exchange Network grant](#) to the Oregon Health Authority, in partnership with the Washington State Department of Ecology and NEWMOA. The IC2 [High Priority Chemicals Data System \(HPCDS\)](#) is an online platform that supports reporting on the presence of chemicals of concern in children's products required by the [Oregon Toxic-Free Kids Act \(TFKA\)](#), the [Washington Children's Safe Products Act \(CSPA\)](#), and the [Vermont Chemical Disclosure Program \(VT CDP\)](#). HPCDS has expanded to support reporting on priority products in general consumer and commercial products required by [Safer Products for Washington \(SPWA\)](#). IC2 member users of the HPCDS share annual contracted operations and maintenance (O&M) costs, which are distributed across participating programs.

### Advantage of a Multi-State Reporting Platform

Multi-state platforms allow for cost savings, reduce burden on industry and support data comparison between programs:

- Reporting programs share software and security expenses and reduce duplication of effort and staffing.
- Manufacturers can utilize a single reporting workflow, improve training efficiency and support timely compliance across programs.
- Standardized picklists and validation rules reduce errors and support data analysis.

### Ease of Entry and Timeline

The HPCDS can be joined at any time by IC2 members. Once a reporting requirement is defined by law, the IC2 will facilitate scoping meetings with our database development team to identify required reporting elements and any needed system enhancements. No advanced preparations are required. It takes approximately 8-10 months to add a new reporting program to the HPCDS. This timeframe includes discussions on the reporting needs, formation of the contract and system development work.



## Customizability

The HPCDS is semi-customizable to fit the needs of each reporting program. The system requires that reporting companies list a public contact and that all reports begin with the same standardized function set format. A function set is defined as the following elements:

1. Product brick
2. Component that contains the chemical
3. Chemical name/class and CASRN
4. Chemical function in the product
5. Concentration category or value (ppm)
6. Optional: additional notes

Each function set element is chosen from a preset list determined by the program laws. If required, minimal adjustments may be incorporated without disruption, such as the SPWA requirement to report chemical class in addition to chemical name/CASRN. Once the function set information is entered, reporters then select the function sets, state program and year they wish to report. States have the option to include additional required reporting elements. For example, the Oregon Toxic Free Kids Act (TFKA) requires reporting of brand name, product model, target age, and the number of bricks sold or offered for sale in the state. HPCDS supports integrated payment systems but does not process payments directly.

## Cost of Entry

The cost of entry is dependent on the required reporting elements as outlined by the state law. Costs may range from \$50,000 to \$500,000. The more similar a program's reporting and security requirements are to existing system capabilities, the lower the cost of entry.

## Post Deployment: Operations & Maintenance (O&M) Costs

Once a platform is established, programs assume an annual Operations and Maintenance (O&M) cost. These costs are shared among active programs and support the Database Program Manager, IT Services Contractor, and software used to host the reporting system (Amazon Web Services).

The O&M services provided by NEWMOA's IC2 include:

- Maintain and update the online reporting system (e.g., coordination with information technology (IT) contractor(s), participating states).
- Oversee and manage the IT services contractor.
- Ensure availability of reported data through the public search interface, state administrative interface, and application program interface (API).
- Respond to phone and email questions regarding account creation and maintenance.
- Respond to phone and email questions regarding general reporting (i.e., not state-specific).
- Respond to phone and email questions regarding state reporting requirements (this task involves redirecting such questions to the appropriate state contact).
- Maintain and update reporting guidance on the IC2 website.
- Coordinate state reviews of reported data.
- Plan and facilitate monthly IC2 Database User Group meetings.
- Conduct occasional outreach to manufacturers (for example, to notify them of planned service interruptions or significant enhancements).
- Review and update HPCDS documentation, including standard operating procedures (SOPs).
- Prepare and execute annual O&M service contracts, including budget forecasting for upcoming service years.

Product Brick	Component	Chemical/Class	CASRN	Concentration Category	Chemical Function
Toy Building Blocks (Non Powered) [10005166]	Synthetic Polymers (synthetic rubber, plastics, foams etc.)	Styrene [100-42-5]	100-42-5	Equal to or greater than 1,000 but less than 5,000 ppm	No function - Contaminant
Toy Building Blocks (Non Powered) [10005166]	Synthetic Polymers (synthetic rubber, plastics, foams etc.)	Styrene [100-42-5]	100-42-5	Equal to or greater than 1,000 but less than 5,000 ppm	No function - Contaminant
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Dolls/Puppets/Soft Toys Other [10005144]	Bio-based Materials (Animal or Plant based) ex. leather, horn, silk, wool	Cobalt & cobalt compounds [7440-48-4]	7440-48-4	PQL to less than 100 ppm	Coloration/Pigmen...