

Principles for Chemical Ingredient Disclosure

We aspire to a marketplace of products made from safe and healthy chemical ingredients. To this end, all stakeholders have a fundamental right to know the chemicals in products and the functions of those chemicals. Of particular concern is the presence of chemicals that may harm human health or the environment.

Disclosure is the sharing of chemical ingredient information with the public and across supply chains. It is critical to promoting the use of safer chemicals and products. Signatories to these Principles recognize the need to protect confidential business information (CBI) in limited situations when protection of the information is justified and substantiated.

To advance an economy where the production and use of chemicals are healthy for people and the planet, responsible organizations should expeditiously adopt and implement the following guiding Principles for Chemical Ingredient Disclosure:

1. **Disclose all intentionally added chemical ingredients.** Disclosure comprises identity of the chemical ingredient, including name(s), CAS registry number, function, presence on specified lists of chemicals of concern, and other chemical hazard characteristics of the ingredient. Chemicals of concern, i.e., substances that are known or suspected hazards to human health or the environment, including carcinogens, mutagens, reproductive/developmental toxicants, endocrine disruptors, asthmagens, and allergens, are not confidential business information.
2. **Disclose nonfunctional constituents that are identified on specified lists of chemicals of concern.** This is a general principle to which Signatories agree, though they may hold differing positions on the thresholds for disclosure.
3. **Proactively engage supply chains and interested stakeholders**—including governments, investors, and non-governmental organizations (NGOs)—to increase full chemical ingredient information disclosure. Manufacturers and retailers need reliable documentation to trace chemical information along supply chains.
4. **Advocate for filling data gaps to characterize the hazards of chemicals.**
5. **Make accurate chemical ingredient information easily accessible to consumers, government agencies, manufacturers, brands, retailers, and others in the supply chain.**
6. **Support public policies and industry standards that advance the above Principles.**

These Principles for Chemical Ingredient Disclosure will help to promote development and use of safer chemicals in products. We support efforts by governments, businesses, universities, and NGOs to fill chemical hazard data gaps with information on the hazards of chemicals that is consistent with scientific best practices and to publicly share the findings.

We recommend that a diverse community of stakeholders, including consumers, NGOs, academia, investors, governments, and businesses use these Principles to: drive avoidance of

chemicals of concern; build trust among users and producers; use chemicals with the most comprehensive chemical hazard profiles; and work to reduce hazardous chemicals and their uses in products, across supply chains, and throughout product lifecycles. For clarifications and definitions of terms used herein see Principles for Chemical Ingredient Disclosure—Terms and References Document.

We, the following organizations, support the broad and effective implementation of these Principles for Chemical Ingredient Disclosure, starting in the United States:

ENDORISING ORGANIZATIONS

Businesses

100% PURE
Alaska Glacial Essentials Skincare
Andersen Corporation
Beautycounter
Bedrock Sandals
Brand Geek
Clear Consumption LLC
Clearya
Credo
Dirty Labs Inc.
Earth Mama Organics
Eighty2degrees LLC
HAN Cosmetics
HNI Corp
Humanscale
Innersense Organic Beauty
Intelligent I-N
Juice Beauty, Inc.
Just the Goods
Meliora Cleaning Products
Milliken & Company
NakedPoppy
Natracare LLC
Naturepedic Organic Mattresses & Bedding
OSEA
Pure Strategies
Reckitt Benckiser LLC – US Hygiene

Repurpose
Seventh Generation
Sprout San Francisco
The Holistic Health Co.

Governments, Health Care Organizations, & Universities

California Department of Toxic Substances Control
City of San Francisco Department of Environment
Hackensack Meridian Health
King County Hazardous Waste Management Program
Lowell Center for Sustainable Production
Massachusetts Toxics Use Reduction Institute
Minnesota Department of Health
Minnesota Pollution Control Agency
Oregon Department of Environmental Quality
Oregon Health Authority
Vermont Department of Environmental Conservation
Vizient
Washington State Department of Ecology
Washington State Department of Health

Investors

Adrian Dominican Sisters, Portfolio Advisory Board
Arjuna Capital
Aviva Investors
Boston Trust Walden
Clean Yield Asset Management
Congregation of St. Joseph
Daughters of Charity, Province of St. Louise
Domini Impact Investments LLC
Everence and the Praxis Mutual Funds
Figure 8 Investment Strategies
First Affirmative Financial Network
Harrington Investments, Inc.
Impax Asset Management LLC
Interfaith Center for Corporate Responsibility
Mercy Investment Services, Inc.
Natural Investments
NorthStar Asset Management, Inc.
Parnassus Investments
Safer Made Ventures
Sisters of St. Francis of Philadelphia
Sonen Capital
The Sustainability Group of Loring, Wolcott & Coolidge
Trillium Asset Management
Trinity Health
Vancity Investment Management

NGOs

Alaska Community Action on Toxics
American Sustainable Business Council
Arnika - Toxics and Waste Programme
As You Sow
Breast Cancer Prevention Partners
Center for Environmental Health
ChemFORWARD
Citizen Environmental Coalition

Clean and Healthy New York
Clean Production Action
Clean Water Action / Clean Water Fund
ClientEarth
Coming Clean
Defend Our Health
Earthjustice
Ecology Center
Environmental Defense Fund
Friends of the Earth
Healthy Babies Bright Futures
Healthy Schools Network
Impax Asset Management LLC
International Campaign for Responsible Technology (ICRT)
International Pollutants Elimination Network (IPEN)
Interstate Chemicals Clearinghouse
Mind the Store campaign
National Pollution Prevention Roundtable
National Stewardship Action Council
Natural Resources Council of Maine
Natural Resources Defense Council
North American Hazardous Materials Management Association (NAHMMA)
North Carolina Conservation Network
Northeast States for Coordinated Air Use Management
Northeast Waste Management Officials Association (NEWMOA)
Northwest Green Chemistry
Pacific Northwest Pollution Prevention Resource Center
Product Stewardship Institute
Protect Our Breasts
Safer States
Toxic Free NC
Toxic-Free Future
Union of Concerned Scientists

UPSTREAM

Women's Voices for the Earth

Zero Waste Washington

Principles for Chemical Ingredient Disclosure— Terms & References Guidance Document

This guidance document clarifies terms and references used in the Principles for Chemical Ingredient Disclosure.

Accessibility includes the following:

- Making chemical ingredient information available, to the greatest extent possible, at point of purchase;
- Posting all chemical ingredient information online in a searchable and easily accessible format;
- Providing consistent chemical ingredient information in accordance with these Principles; and
- Providing this information in multiple languages and through assistive technology to the greatest extent possible. “Assistive technology” is “products, equipment, and systems that enhance learning, working, and daily living for persons with disabilities” (<https://www.atia.org/home/at-resources/what-is-at/> accessed 6/4/2020).

Chemicals of concern: substances that are known or suspected hazards to human health or the environment, for example, carcinogens, mutagens, reproductive/developmental toxicants, endocrine disruptors, asthmagens, and allergens.

Chemicals in products: includes both *intentionally-added chemical ingredients* and *nonfunctional constituents*.

Intentionally added chemical ingredient: “a chemical that a manufacturer has intentionally added to a designated product and that has a functional or technical effect in the designated product, including, but not limited to, the components of intentionally added fragrance ingredients and colorants and intentional breakdown products of an added chemical that also have a functional or technical effect in the designated product” (Source: State of California, Senate Bill No. 258, Cleaning Product Right to Know Act, October 15, 2017).

Chemical hazard characteristics as defined by:

- Globally Harmonized System (GHS) of Classification and Labeling hazard phrases (H-phrases) or

- GreenScreen® for Safer Chemical and GreenScreen scores.

For example, H-phrases are contained within a GHS compliant Product Safety Sheet and/or can be separately shared; and GreenScreen scores are listed in Health Product Declarations (HPDs).

Incidental component:

(1) **a chemical which was added during the manufacturing process** at any point in a product, a raw material, or an ingredient's supply chain, but which has no functional or technical effect in the finished product, including an unreacted chemical; or

(2) **a chemical present in the environment as a contaminant** which was introduced into a product, a raw material, or a product ingredient at any point in the supply chain for the product, raw material, or ingredient, as a result of the use of an environmental medium, such as a naturally occurring mineral, air, soil, or water, in the manufacturing process.

Nonfunctional constituent: a chemical that has no functional or technical effect on the designated product and is present as an *incidental component* of an intentionally added ingredient, a breakdown product of an intentionally added ingredient, or a byproduct of the manufacturing process.

Specified list of chemicals of concern: companies disclose ingredients as chemicals of concern using one or more of the following lists:

- California Cleaning Product Right to Know Act of 2017 (SB 258) Designated List (https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB258) or California Cosmetic Fragrance and Flavor Right to Know Act (SB 312) (both laws reference the same designated lists) ([https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB312#:~:text=Cosmetic%20Fragrance%20and%20Flavor%20Ingredient%20Right%20to%20Know%20Act%20of%202020,-Existing%20law%2C%20the&text=The%20bill%20would%2C%20commencing%20January,and%20its%20associated%20health%20hazards\);](https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB312#:~:text=Cosmetic%20Fragrance%20and%20Flavor%20Ingredient%20Right%20to%20Know%20Act%20of%202020,-Existing%20law%2C%20the&text=The%20bill%20would%2C%20commencing%20January,and%20its%20associated%20health%20hazards);)
- ChemSec SIN List (<https://sinlist.chemsec.org/>);
- GreenScreen List Translator LT-1 and Benchmark 1 chemicals (<https://www.greenscreenchemicals.org/learn/greenscreen-list-translator>); or
- New York State Lists of Chemicals of Concern (https://www.dec.ny.gov/docs/materials_minerals_pdf/cpidbmps.pdf).

Supply chain: “a system of organizations, people, activities, information, and resources involved in moving a product or service from supplier to customer. Supply chain activities involve the transformation of natural resources, raw materials, and components into a finished product that is delivered to the end customer. In sophisticated supply chain systems, used products may re-enter the supply chain at any point where residual value is recyclable” (https://en.wikipedia.org/wiki/Supply_chain accessed 3/19/2020).

[Clean Production Action](#) is a nonprofit organization whose mission is to design and deliver strategic solutions for green chemicals, sustainable materials, and environmentally preferable products. We are a solutions organization. Our tools, GreenScreen® for Safer Chemicals and Chemical Footprint Project, simplify the complexity of substituting chemicals of concern to human health and the environment with green chemistry solutions. Our collaborations, BizNGO and Investor Environmental Health Network, provide effective platforms for practitioners and thought leaders to work together in advancing chemicals, materials, products, and systems that are healthy for people and the planet.

The [Interstate Chemicals Clearinghouse \(IC2\)](#) is an association of state, local, and tribal governments that promotes a clean environment, healthy communities, and a vital economy through the development and use of safer chemicals and products. IC2 is a program of the Northeast Waste Management Officials' Association (NEWMOA).