

VCCM

Industry Wide or Individual Company

Value Chain Chemical Management

Chemical compliance requirements are on the rise.

- 350K chemicals and mixtures in commerce
- Regulators have limited ability to address the speed of chemicals entering market
- Brands and retailers strive to differentiate and manage risk
- Shift towards regulating entire classes of chemicals
- Shift towards “right-to-know” and transparency building regulations



Bisphenol-A (BPA)

BPS

BPF

Multiple States have emerging PFAS requirements

California – AB 1200 Cookware: Hazardous Chemicals

- New Chapter in CA's Health & Safety Code
- California's 1st broad legislation for PFAS in consumer products
- Includes requirements for cookware
- Requirements begin January 1, 2023

Colorado - Perfluoroalkyl and Polyfluoroalkyl Chemicals Consumer Protection Act

- Applies to cookware, among other products
- Similar requirements to AB 1200, but focused solely on PFAS
- Requirements begin January 1, 2024

Maine - Act To Stop Perfluoroalkyl and Polyfluoroalkyl Substances Pollution

- Effective January 1, 2030, any product containing intentionally added PFAS may not be sold in Maine

Washington – Safer Products Action Plan

- 5-year project to identify problem products, safer alternatives, & regulatory solutions
- PFAS requirements already established for drinking water, food packaging, and firefighting foam
- New requirements expected in 2023 for carpet, indoor furnishings, & others

VCCM = Value Chain Chemical Management

Purpose: Create a database of supplier chemical data to increase transparency into what is in your products

Inventory

- Collect Bill of Materials (BOMs) & other technical documents (SDS, TDS, MDS)
- Collect supplier names + contacts
- Build an initial inventory on existing data
- Engage suppliers to fill gaps & expand inventory to desired threshold (Ex: 100 ppm = 0.01%)

The image displays a comprehensive survey form titled 'Inventory' with multiple sections for data collection:

- Company Information:** Fields for Company Name, Product Name, Product Description, Address of Manufacturing Site, and ISO certification status.
- Chemical Inventory Table:** A table with columns for Chemical Name, CAS#, Min %, Max %, Typical %, Ingredient or Residual?, Nano-Particle?, and Location of extraction.
- Sustainability Certifications:** Checkboxes for EPP, HPD, EPD, C2C, C2C Material Health Certificate, UL Product Lens, Life Cycle Assessment (LCA), and FSC Certified.
- Recycled Content Table:** A table for Post-industrial, Post-consumer, and Bio-Based Recycled Content, including Percent (%) and Source of content.
- Restricted Substances List (RSL):** A table listing various RSLs (e.g., Cradle to Cradle, REACH, Perkins+Will) and asking for product concentration and chemical details.
- Manufacturing Metrics Table:** A table for tracking electricity, natural gas, propane, other energy, water, and waste usage, with columns for Amount, Unit, and Comments.
- Social Responsibility and Employee Benefits:** Sections for describing innovative social programs, employee benefits, and supplier policies.
- Suppliers:** A section for describing social and environmental policies used in evaluating suppliers.
- Miscellaneous:** A final section for additional information, including a checkbox for being a highlighted supplier.

EX: WAP's customizable VCCM Survey tool

Screen

Screen chemical inventory against regulatory, industry, and brand lists of chemicals of concern.

Raw Material	Products			Screening Results							
	Pan	Pot	Cup	GreenScreen	Prop 65	TSCA	EU - Annex VI CMRs	US EPA - Priority PBTs (NWMP)	Canada PBT	PFAS	Cradle to Cradle
Material ABC	X	X	X	LT - 1				Yes	Yes		
Magical Coating XYZ	X	X	X	BM - 1	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Chemicals Co. - TufCor C-845	X			LT - P2							
Chemicals Co. - NAFTA SAFE			X	LT - P1				Yes	Yes		
Chemicals Co. - TAOP 10	X			LT - P2							
WAPChem - Chemfrothy 1212	X	X	X	BM - 3							
Play Doh - Aquamarine		X		LT - 1				Yes	Yes		Yes
MyStar - NaOH-Caustic Soda 75%		X		LT - UNK							
Westeros - F260		X	X	LT - UNK							
Westeros - F262	X			LT-2							
Westeros - F260	X			BM-2							
ABFS Good Stuff	X			LT-UNK							
Dragon Carbonate (RO-40, CC-103)	X	X	X	LT - UNK			Yes	Yes	Yes	Yes	Yes

Ex: of VCCM screening report to 100 ppm (0.01% of product) reporting threshold

Disclose



COLORADO
Department of Public
Health & Environment



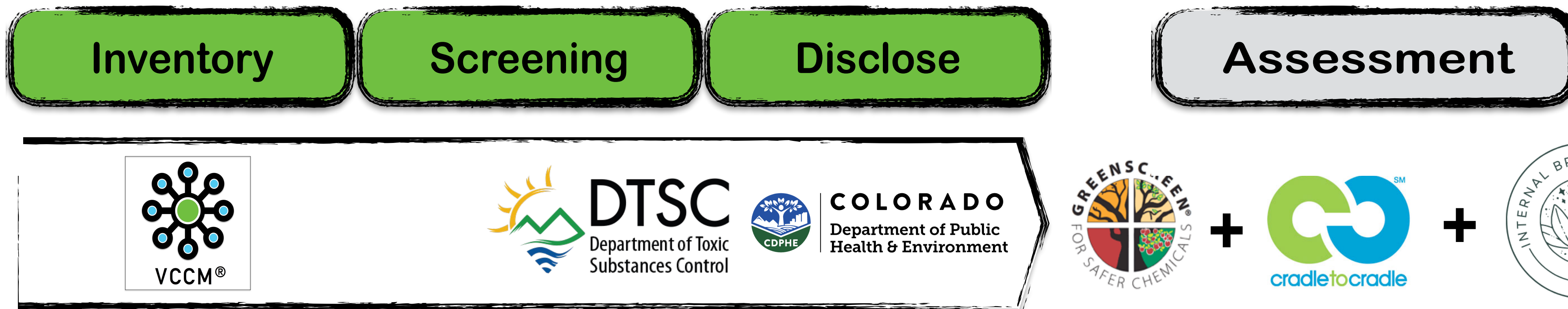
DTSC
Department of Toxic
Substances Control



Answer questions about products' current and forthcoming compliance status.

Assess

- Set company goals around health & chemistry
- Create a strategy to eliminate chemicals of concern
- Compare alternative materials and ingredients
- Differentiate your product in the market by going beyond baseline



Optimize



COLORADO
Department of Public
Health & Environment



DEPARTMENT OF
ECOLOGY
State of Washington



DTSC
Department of Toxic
Substances Control



Path Forward

1. Company by Company work

- Individual company can work with WAP at a 10% discount off typical rates due to being a CBA member
- Company decides on how many product families and suppliers
- Fee for setting up the initial database and annual fee for maintenance

Thank you!