



# Beauty and Personal Care Product Sustainability Rating System

Version 1.1



April 2019

# Introduction

This document presents the technical content for the Beauty and Personal Care (BPC) Product Sustainability Rating System. This system is the result of a thorough collaboration among various stakeholders including retailers, suppliers, and NGOs associated with the beauty and personal care product industry. It aims to increase BPC product sustainability by:

- **Creating a shared vision for sustainable products**
- **Driving a clear market signal**

## BPC System Design

The Rating System was developed by the Beauty and Personal Care Leadership Group, a multi-stakeholder group comprised of leading brands, manufacturers, retailers, and non-profit organizations that represent broad perspectives on sustainability. To build a rating system that can be deployed across the beauty and personal care industry, each member of the group acknowledges that members have diverse points of view. As such, the attributes, activities, KPIs, and scoring used in the BPC Rating System represent a composite perspective of the current market and are not necessarily the views, policies, or program of any single participant of the Leadership Group themselves. Retailers will independently determine how to act upon any product ratings or scores resulting from the use of the system.

This rating system consists of 32 Key Performance Indicators (KPIs) that have been grouped into 4 thematic clusters (Packaging, Disclosure, Human Health, and Supply Chain and the Environment). The response options for each of the KPIs have been crafted to include

product attributes or company activities at both the introductory as well as leadership or aspirational levels. As such, this system can be used by retailers to differentiate a wide range of products in the beauty and personal care space and can be used as a resource for manufacturers regardless of where they currently are in their sustainability journey.

In this system, the most “sustainable” products are those that embody ambitious (high-scoring) attributes from companies pursuing leadership activities. The broad nature of the cluster topics along with the ability of the system to track manufacturer practices throughout a product’s life cycle ensure that a thorough and holistic sustainability assessment is made. Additionally, the use of this rating system by multiple retailers provides a clear and aspirational market signal for manufacturers to work towards for more sustainable products. This level of retailer alignment alleviates the complexities of manufacturer data collection and reporting burden that currently exist in the marketplace. Although retailers will be independently and voluntarily applying this system and providing brands with incentives to achieve their sustainability goals, it can be used proactively by brands to highlight individual products in their portfolio that represent the best of the best in product sustainability.

## Background, Development, and Continuous Improvement

The group of leading organizations that developed this work has made significant progress, culminating in the piloting of a draft assessment tool in late 2017. The approach developed through this work aims to provide greater alignment across existing product sustainability

measurement approaches and policies. It builds on current practices, beginning with existing science-based sustainability metrics.

TSC has led the technical work and will now take on coordination, development, and implementation of the assessment tool. This will allow TSC to ensure alignment with their existing product sustainability assessment, measurement, and reporting tools that currently cover over \$200 billion in retail sales. This continued push toward more aligned assessment tools is an important step toward putting more sustainable products on retailers' shelves.

The assessment tool includes a set of key performance indicators (KPIs), along with a proposed method of scoring products against these indicators. A range of sustainability attributes and activities, from basic practice to aspirational leadership, are reflected within the KPIs. Retailers and other companies may voluntarily use this tool to independently and individually evaluate product sustainability, with scores intended to remain confidential between retailer and supplier. Resulting product assessment may be used to facilitate supplier-retailer conversations, drive improvements in supply chains, and independently evaluate and incentivize better, more sustainable products.

As this evaluation tool continues to be tested and as the sustainability landscape evolves, the KPIs and product scores will be updated and improved over time through industry and stakeholder input. Forum for the Future has played a key leadership role in driving the work to this point and will remain engaged in the process going forward.



## KPI Design

The majority of the KPIs in this system are qualitative; however, some metrics are quantitative and require calculation at the product or product category level. Each KPI is accompanied by guidance that should be used when considering the response options. Descriptions or qualifiers, where applicable, for qualitative response options along with specific calculation instructions for quantitative metrics are provided therein. Additionally, resources and definitions valuable for interpreting the response options have also been provided. These resources frequently reference certifications, tools, or standards that can be helpful, or required, when answering the KPIs.

The figure below shows the key elements of KPI design. The title bar contains the KPI title along with its scope. Response options are listed in order with labels on the left-hand side. Point allocations are listed next to each response option along with corresponding rules for selection. The total point allocation is listed for each KPI.

By default, multiple response options can be selected at the same time (noted as "Multi"). Mutually exclusive response options are labeled with "OR" (sometimes with alternatives noted). Response options that require a qualifying selection are labeled with "IF" and the prerequisite response option.

The diagram illustrates the structure of a KPI design. It features a title bar with the KPI title and scope, followed by a table of response options with their respective points and rules. A total point allocation is indicated at the bottom.

KPI Title		Scope	
3. Packaging attribute communication		Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
A.	This product's sales packaging does NOT have a consumer communication for recyclability, recycled content, and sustainably sourced renewable content.	0	OR B - D
B.	We communicate the recycled content of this product's sales packaging.	3	Multi
C.	We communicate the sustainably sourced renewable content of this product's sales packaging.	3	Multi
D.	This product's sales packaging has a consumer communication for recyclability (for example, but not limited to, How2Recycle).	9	Multi
TOTAL POINTS AVAILABLE		15	

**Total Point Allocation** ↑

# KPI Table of Contents

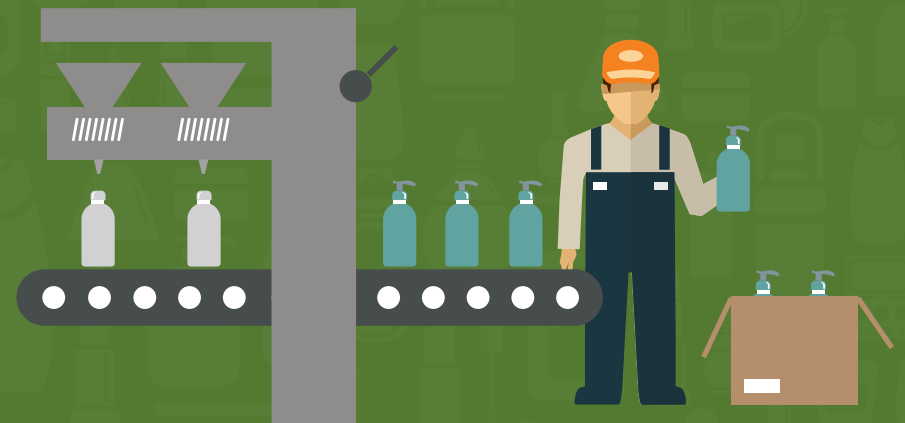
PACKAGING		60 points	
#	KPI TITLE	POINTS	PAGE #
1.	Design, policy, and goals	5	2
2a/b.	Sustainable sourcing	15/10	4/8
3.	Attribute communication	15	12
4.	Recyclability – Improving collection and recovery	5	14
5.	Recyclability – Sales packaging	15	15
6.	Stewardship list chemical management	5	16

DISCLOSURE		105 points	
#	KPI TITLE	POINTS	PAGE #
1.	Intentionally added ingredients	25	19
2.	Fragrance allergens	25	22
3.	Stewardship listed chemicals – Unintentionally added	20	24
4.	Ingredient function	12	26
5.	Nanoparticles	11	27
6.	Animal testing	12	28

HUMAN HEALTH		130 points	
#	KPI TITLE	POINTS	PAGE #
1.	Worker health and safety – Manufacturing	20	31
2.	Fragrance management	15	33
3.	Formulation – Stewardship list chemical management	15	35
4.	Formulation – Chemical selection	15	38
5.	Formulation – Stewardship list chemical usage	20	41
6.	Chemical footprint	15	44
7.	Risk assessment and product safety	15	46
8.	Ingredient disclosure to manufacturers	15	48

SUPPLY CHAIN AND THE ENVIRONMENT		105 points	
#	KPI TITLE	POINTS	PAGE #
1.	Responsible sourcing	8	51
2.	Human rights – Supply chain	10	52
3.	Palm oil sourcing	10	54
4.	Greenhouse gas – Supply chain	9	57
5.	Greenhouse gas emissions – Manufacturing	9	59
6.	Greenhouse gas – Reduction goal	10	62
7.	Water use – Formulation raw material suppliers	7	64
8.	Water use – Manufacturing	8	66
9.	Water use – Reduction goal	7	68
10.	Water use – Scarcity mapping	7	70
11.	Use phase – Messaging and design	10	72
12a/b.	Biodegradability and environmental risk	10/5	73/75

#	KPI TITLE	POINTS	PAGE #
1.	Design, policy, and goals	5	2
2a/b.	Sustainable sourcing	15/10	4/8
3.	Attribute communication	15	12
4.	Recyclability – Improving collection and recovery	5	14
5.	Recyclability – Sales packaging	15	15
6.	Stewardship list chemical management	5	16
<b>TOTAL POINTS</b>		<b>60</b>	



# PACKAGING

1. Packaging – Design, policy, goals			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We have NOT made efforts beyond legal and regulatory compliance for our sales packaging.	0	OR B - E	
B.	We, or our packaging supplier, assess material efficiency and weight or volume optimization on all new sales packaging designs.	1	Multi	
C.	We have established goals to address contamination of recycling streams in our products' sales packaging.	1	Multi	
D.	We have established goals to address material and process efficiency and weight or volume optimization in our products' sales packaging.	1	Multi	
E.	We have established goals to address the environmental impact of our products' sales packaging.	1	Multi	
F.	We publicly report our progress towards these goals.	1	IF C, D, OR E	
<b>TOTAL POINTS AVAILABLE</b>		<b>5</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

For this KPI, resources that can be used to establish goals and track progress on weight or volume optimization of packaging include, but are not limited to, assessment of packaging against ISO Standard 18602:2013 (Packaging and the environment -- Optimization of the packaging system) or EN 13428:2004 (Packaging: Requirements specific to manufacturing and composition - Prevention by source reduction). Life cycle impact assessment can be used to establish goals and track progress on environmental impact reduction.

- For E, methods for demonstrating quantified environmental impact reduction include, but are not limited to, life cycle impact assessment or assessment against ISO Standard 14040.
- For B, an assessment of material efficiency and weight or volume optimization must have been made.
- For D, goals must have been established based on these assessments.

## Resources

### EN 13428: Prevention by packaging source reduction:

European standard 13428:2004 outlines a method for evaluating if packaging material weight and/or volume have been sufficiently minimized while also taking into consideration other packaging performance parameters. The standard also includes recommended methodology for identifying heavy metals and dangerous substances in packaging formats.

<http://ec.europa.eu/growth/single-market/european-standards/harmonised-standards/packaging/>

**ISO 18602:2013:** ISO 18602 provides criteria for optimization of packaging systems. It outlines a procedure for reduction of packaging material weight or volume while taking into consideration packaging function. It also provides assessment methodology for substances hazardous to the environment and heavy metals.

<https://www.iso.org/standard/55870.html>

**ISO 14040:2006:** The International Organization for Standardization's "Principles and Framework" document for conducting life cycle assessments provides an overview of the framework for life cycle assessment (LCA) and life cycle inventory analysis (LCI) along with the limitations of use and conditions for optimal use.

[http://www.iso.org/iso/catalogue\\_detail?csnumber=37456](http://www.iso.org/iso/catalogue_detail?csnumber=37456)

## Definitions

**Environmental Impact:** Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services (ISO definition).

**Goals:** Goals should be specific, measurable, achievable, relevant, and time-bound.

**Material and process efficiency:** The practice of minimizing material use and waste in production processes.

**Public disclosure:** The act of making information available and readily accessible to consumers.

**Sales packaging:** "Packaging that leaves a store with the consumer" (Global Protocol on Packaging Sustainability 2.0:2011).



2a. Sustainable Sourcing			Product
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
<b>A.</b>	Not applicable. This KPI is being answered at the category level.	NA	OR KPI 2b
<b>B.</b>	We do NOT incorporate PIR, PCR, or sustainably sourced renewable content into this product's sales packaging.	0	OR C - H
<b>C.</b>	We incorporate PIR, PCR, or sustainably sourced renewable content in this product's sales packaging.	3	OR B

*We are able to report the following percentages for this product:*

<b>D.</b>	<b>Wood/paper content</b>		Multi
D1.	_____ % of this product's sales packaging is composed of wood or paper.		
D2.	_____ % of this product's wood or paper sales packaging is composed of PCR or PIR content.		
D3.	_____ % of this product's wood or paper sales packaging is composed of sustainably sourced renewable content.		
<b>E.</b>	<b>Plastic</b>		Multi
E1.	_____ % of this product's sales packaging is composed of plastic.		
E2.	_____ % of this product's plastic sales packaging is composed of PCR content.		
E3.	_____ % of this product's plastic sales packaging is composed of PIR content.		
E4.	_____ % of this product's plastic sales packaging is composed of sustainably sourced renewable content.		
<b>F.</b>	<b>Glass</b>		Multi
F1.	_____ % of this product's sales packaging is composed of glass.		
F2.	_____ % of this product's glass sales packaging is composed of PCR content.		
F3.	_____ % of this product's glass sales packaging is composed of PIR content.		

KPI continued on the next page

<b>G.</b>	<b>Metal</b>		Multi
G1.	_____ % of this product's sales packaging is composed of metal.		
G2.	_____ % of this product's metal sales packaging is composed of PCR content.		
G3.	_____ % of this product's metal sales packaging is composed of PIR content.		
<b>H.</b>	<b>Other materials</b>		Multi
H1.	_____ % of this product's sales packaging is composed of other materials.		
H2.	_____ % of this product's other material sales packaging is composed of PCR content.		
H3.	_____ % of this product's other material sales packaging is composed of PIR content.		
H4.	_____ % of this product's other material sales packaging is composed of sustainably sourced renewable content.		
<b>Points for D - H:</b> (Total PCR % + Total PIR % + Total sustainably sourced renewable %) ×		12	
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>	

## Guidance

This KPI is to be answered only once per responder, either at the product level (KPI #2a) or at the product category level (KPI #2b).

The total point value earned for D - H equals the total percentage of PCR, PIR, and sustainably sourced renewable content across all materials multiplied by 12. This value is calculated by:

**% wood/paper composition** × (% PCR or PIR content + % sustainably sourced renewable content)

**+ % plastic composition** × (% PCR content + % PIR content + % sustainably sourced renewable content)

**+ % glass composition** × (% PCR content + % PIR content)

**+ % metal composition** × (% PCR content + % PIR content)

**+ % other materials composition** × (% PCR content + % PIR content + % sustainably sourced renewable content)

For example, if the total percentage of PCR, PIR, or sustainably sourced renewable content across all materials is 25%, then the points earned for D - H would be 25% × 12 points available = 3 points earned.

Product sales packaging, which is defined as packaging that leaves a store with the consumer, is to be considered. For products that are shipped directly to an end consumer, include the transportation-related packaging.

**Perform the calculations for this KPI in two steps:**

**Step 1.** Enter the percentage composition for each component type in this product's sales packaging:

- D1: Wood or paper
- E1: Plastic
- F1: Glass
- G1: Metal
- H1: Other materials

**Step 2.** Enter the percentage by mass of each material type in this product's sales packaging that is PCR, PIR, or sustainably sourced renewable content. For this step, be sure to enter the percentage of content based on each respective component type. Do not enter percentages based on the total mass of this product's sales packaging.

- D2: Post-consumer or post-industrial recycled content
- E2, F2, G2, H2: Post-consumer recycled content
- E3, F3, G3, H3: Post-industrial recycled content
- D3, E4, H4: Sustainably sourced renewable content

For this KPI, post-consumer recycled content is defined by ISO 14021:2016 or the Global Protocol on Packaging Sustainability 2.0 and post-industrial (pre-consumer) recycled content is defined by ISO 14021:2016. Sustainably sourced renewable content is defined by the Global Protocol on Packaging Sustainability 2.0. Sustainable sourcing may be demonstrated by second or third party verification that the raw material has been harvested or produced legally and in a way that minimizes damage to the environment, workers, and communities.

- Calculate D1, E1, F1, G1, and H1, as the mass of packaging composition for each component type in the sales packaging for this product, divided by the total mass of the sales packaging for this product, then multiply by 100.
- For H1, "other materials" include, but are not limited to, textile packaging.
- Calculate E2, F2, G2, and H2 as the mass of post-consumer recycled content for each component type in this product's sales packaging, divided by the total mass of each respective component type in this product's sales packaging, then multiply by 100.
- For D2, sum the mass of post-consumer recycled and post-industrial recycled wood or paper content in this product's sales packaging and divide this value by the total mass of wood or paper in this product's sales packaging.
- Calculate E3, F3, H3, and G3 as the mass of post-industrial recycled content for each component type in this product's sales packaging, divided by the total mass of each respective component type in this product's sales packaging, then multiply by 100.
- Calculate D3, E4, and H4 as the mass of sustainably sourced renewable content for each component type in this product's sales packaging, divided by the total mass of each respective component type in this product's sales packaging, then multiply by 100.

## Resources

**ISO 14021:2016:** ISO 14021 provides criteria for self-declared environmental claims, including recyclable claims, recycled content claims, and recovered energy claims.

<https://www.iso.org/standard/66652.html>

**Global Protocol on Packaging Sustainability:** The Global Protocol on Packaging Sustainability provides metrics and a framework for businesses on the relative sustainability of packaging.

<https://www.theconsumergoodsforum.com/wp-content/uploads/2017/11/CGF-Global-Protocol-on-Packaging.pdf>

**ISO 18602:2013:** ISO 18602 provides criteria for optimization of packaging systems. It outlines a procedure for reduction of packaging material weight or volume while taking into consideration packaging function. It also provides assessment methodology for substances hazardous to the environment and heavy metals.

<https://www.iso.org/standard/55870.html>

## Definitions

**Post-consumer recycled (PCR) content:** Materials obtained from a product that has been disposed of after its intended consumer use.

**Post-industrial recycled (PIR) content:** Materials obtained from a manufacturing process that has been disposed of after its intended use.

**Sales packaging:** “Packaging that leaves a store with the consumer” (Global Protocol on Packaging Sustainability 2.0:2011).

**Sustainably sourced renewable content:** Materials obtained from living biomass that is continually replenished at a rate equal to, or greater than, the rate of depletion.

2b. Sustainable Sourcing			Category
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
<b>A.</b>	Not applicable. This KPI is being answered at the product level.	NA	OR KPI 2a
<b>B.</b>	We do NOT incorporate PIR, PCR, or sustainably sourced renewable content into this category's sales packaging.	0	OR C - H
<b>C.</b>	We incorporate PIR, PCR, or sustainably sourced renewable content in this category's sales packaging.	2	OR B

We are able to report the following percentages for this category:

<b>D.</b>	<b>Wood/paper content</b>		Multi
D1.	_____% of this category's sales packaging is composed of wood or paper.		
D2.	_____% of this category's wood or paper sales packaging is composed of PCR or PIR content.		
D3.	_____% of this category's wood or paper sales packaging is composed of sustainably sourced renewable content.		
<b>E.</b>	<b>Plastic</b>		Multi
E1.	_____% of this category's sales packaging is composed of plastic.		
E2.	_____% of this category's plastic sales packaging is composed of PCR content.		
E3.	_____% of this category's plastic sales packaging is composed of PIR content.		
E4.	_____% of this category's plastic sales packaging is composed of sustainably sourced renewable content.		
<b>F.</b>	<b>Glass</b>		Multi
F1.	_____% of this category's sales packaging is composed of glass.		
F2.	_____% of this category's glass sales packaging is composed of PCR content.		
F3.	_____% of this category's glass sales packaging is composed of PIR content.		

KPI continued on the next page

<b>G.</b>	<b>Metal</b>		Multi
G1.	_____ % of this category's sales packaging is composed of metal.		
G2.	_____ % of this category's metal sales packaging is composed of PCR content.		
G3.	_____ % of this category's metal sales packaging is composed of PIR content.		
<b>H.</b>	<b>Other materials</b>		Multi
H1.	_____ % of this category's sales packaging is composed of other materials.		
H2.	_____ % of this category's other material sales packaging is composed of PCR content.		
H3.	_____ % of this category's other material sales packaging is composed of PIR content.		
H4.	_____ % of this category's other material sales packaging is composed of sustainably sourced renewable content.		
<b>Points for D - H: (Total PCR % + Total PIR % + Total sustainably sourced renewable %) ×</b>		<b>8</b>	
<b>TOTAL POINTS AVAILABLE</b>		<b>10</b>	

## Guidance

This KPI is to be answered only once per responder, either at the product level (KPI #2a) or at the product category level (KPI #2b).

The total point value earned for D - H equals the total percentage of PCR, PIR, and sustainably sourced renewable content across all materials multiplied by 8. This value is calculated by:

**% wood/paper composition** × (% PCR or PIR content + % sustainably sourced renewable content)

**+ % plastic composition** × (% PCR content + % PIR content + % sustainably sourced renewable content)

**+ % glass composition** × (% PCR content + % PIR content)

**+ % metal composition** × (% PCR content + % PIR content)

**+ % other materials composition** × (% PCR content + % PIR content + % sustainably sourced renewable content)

For example, if the total percentage of PCR, PIR, or sustainably sourced renewable content across all materials is 25%, then the points earned for D - H would be 25% × 8 points available = 3 points earned.

Product sales packaging, which is defined as packaging that leaves a store with the consumer, is to be considered. For products that are shipped directly to an end consumer, include the transportation-related packaging.

**Perform the calculations for this KPI in two steps:**

**Step 1.** Enter the percentage composition for each component type in this product category's sales packaging:

- D1: Wood or paper
- E1: Plastic
- F1: Glass
- G1: Metal
- H1: Other materials

**Step 2.** Enter the percentage by mass of each material type in this product category's sales packaging that is PCR, PIR, or sustainably sourced renewable content. For this step, be sure to enter the percentage of content based on each respective component type. Do not enter percentages based on the total mass of this product category's sales packaging.

- D2: Post-consumer or post-industrial recycled content
- E2, F2, G2, H2: Post-consumer recycled content
- E3, F3, G3, H3: Post-industrial recycled content
- D3, E4, H4: Sustainably sourced renewable content

For this KPI, post-consumer recycled content is defined by ISO 14021:2016 or the Global Protocol on Packaging Sustainability 2.0 and post-industrial (pre-consumer) recycled content is defined by ISO 14021:2016. Sustainably sourced renewable content is defined by the Global Protocol on Packaging Sustainability 2.0. Sustainable sourcing may be demonstrated by second or third party verification that the raw material has been harvested or produced legally and in a way that minimizes damage to the environment, workers, and communities.

- Calculate D1, E1, F1, G1, and H1, as the mass of packaging composition for each component type in this product category's sales packaging, divided by the total mass of this product category's sales packaging, then multiply by 100.
- For H1, "other materials" include, but are not limited to, textile packaging.
- Calculate E2, F2, G2, and H2 as the mass of post-consumer recycled content for each component type in this product category's sales packaging, divided by the total mass of each respective component type in this product category's sales packaging, then multiply by 100.
- For D2, sum the mass of post-consumer recycled and post-industrial recycled wood or paper content in this product category's sales packaging and divide this value by the total mass of wood or paper in this product category's sales packaging.
- Calculate E3, F3, H3, and G3 as the mass of post-industrial recycled content for each component type in this product category's sales packaging, divided by the total mass of each respective component type in this product category's sales packaging, then multiply by 100.
- Calculate D3, E4, and H4 as the mass of sustainably sourced renewable content for each component type in this product category's sales packaging, divided by the total mass of each respective component type in this product category's sales packaging, then multiply by 100.

## Resources

**ISO 14021:2016:** ISO 14021 provides criteria for self-declared environmental claims, including recyclable claims, recycled content claims, and recovered energy claims.

<https://www.iso.org/standard/66652.html>

**Global Protocol on Packaging Sustainability:** The Global Protocol on Packaging Sustainability provides metrics and a framework for businesses on the relative sustainability of packaging.

<https://www.theconsumergoodsforum.com/wp-content/uploads/2017/11/CGF-Global-Protocol-on-Packaging.pdf>

**ISO 18602:2013:** ISO 18602 provides criteria for optimization of packaging systems. It outlines a procedure for reduction of packaging material weight or volume while taking into consideration packaging function. It also provides assessment methodology for substances hazardous to the environment and heavy metals.

<https://www.iso.org/standard/55870.html>

## Definitions

**Post-consumer recycled (PCR) content:** Materials obtained from a product that has been disposed of after its intended consumer use.

**Post-industrial recycled (PIR) content:** Materials obtained from a manufacturing process that has been disposed of after its intended use.

**Sales packaging:** “Packaging that leaves a store with the consumer” (Global Protocol on Packaging Sustainability 2.0:2011).

**Sustainably sourced renewable content:** Materials obtained from living biomass that is continually replenished at a rate equal to, or greater than, the rate of depletion.



3. Packaging attribute communication			Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	This product's sales packaging does NOT have a consumer communication for recyclability, recycled content, and sustainably sourced renewable content.	0	OR B - D	
B.	We communicate the recycled content of this product's sales packaging.	3	Multi	
C.	We communicate the sustainably sourced renewable content of this product's sales packaging.	3	Multi	
D.	This product's sales packaging has a consumer communication for recyclability (for example, but not limited to, How2Recycle).	9	Multi	
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>		

## Guidance

For this KPI, consumer communication does not include resin labeling per the ASTM International Resin Identification Coding System. Additionally, due to issues with contamination of plastic recycling streams, communication of recyclability of PVC are not to be considered for this KPI.

- For A, reasons which may preclude inclusion of consumer communication for recyclability include, but are not limited to, small product and packaging size or lack of acceptance into recycling streams.
- For B, recycled content includes post-consumer recycled content or post-industrial recycled content. Post-consumer recycled content is defined by ISO 14021:2016 or the Global Protocol on Packaging Sustainability 2.0. Pre-consumer (post-industrial) recycled content is defined by ISO 14021:2016.

Recycled content claims must follow the guidelines set by the United States Federal Trade Commission Green Guides.

- For C, sustainably sourced renewable content is defined by the Global Protocol on Packaging Sustainability 2.0. Sustainable sourcing may be demonstrated by second or third party verification that the raw material has been harvested or produced legally and in a way that minimizes damage to the environment, workers, and communities.
- For B and C, communication can occur online or on label. Online communication includes making information electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile apps). Electronic communication via these means must occur through manufacturer-based efforts and not via third party websites or services.

## Resources

**ISO 18602:2013:** ISO 18602 provides criteria for optimization of packaging systems. It outlines a procedure for reduction of packaging material weight or volume while taking into consideration packaging function. It also provides assessment methodology for substances hazardous to the environment and heavy metals.

<https://www.iso.org/standard/55870.html>

**How2Recycle Label:** The How2Recycle Label provides guidance to consumers on how to recycle packaging for consumable goods. The label is intended to be used on all types of packaging and to provide instruction regarding how and where various raw materials can be recycled.

[www.how2recycle.info](http://www.how2recycle.info)

**United States Federal Trade Commission Green Guides:** The US Federal Code of Regulations contains guidance on environmental marketing claims in its Federal Trade Commission Green Guides. These guides are available to marketers to ensure that claims are not deceptive or unfair.

<https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=5de11e010afaa51af478dbd337f0cad6&rgn=div5&view=text&node=16:1.0.1.2.24&idno=16>

## Definitions

**Post-consumer recycled (PCR) content:** Materials obtained from a product that has been disposed of after its intended consumer use.

**Post-industrial recycled (PIR) content:** Materials obtained from a manufacturing process that has been disposed of after its intended use.

**Recyclable content:** Recyclable content is defined by Federal Trade Commission Green Guides: “materials collected, separated, or otherwise recovered from the waste stream.” Recyclable materials can include wood fiber-based materials, metals, single-color glass, rigid plastics with resin codes 1, 2, 4, and 5, and organic material.

**Sustainably sourced renewable content:** Materials obtained from living biomass that is continually replenished at a rate equal to, or greater than, the rate of depletion.

4. Recyclability – Improving collection and recovery			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT participate in an effort to improve collection and recovery rates.	0	OR B	
B.	We participate in an effort to improve collection and recovery rates (e.g., in-store collection, HPRC, Recycling Council, or Closed Loop Fund).	5	OR A	
<b>TOTAL POINTS AVAILABLE</b>		<b>5</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

- For B, efforts that improve collection and recovery include, but are not limited to, those that establish a means for in store collection for sales packaging, bring public attention to the development of recycling infrastructure, technologies, and actionable tools, or otherwise increase participation in recycling.
- Examples of initiatives that improve collection and recovery rates include, but are not limited to, those in the Resources section.

## Resources

**Closed Loop Fund:** The Closed Loop Fund aims to increase the recycling rate of packaging and products with timed commitments to eliminate GHG production, divert waste, and provide a replicable model for additional investment.

[www.closedloopfund.com](http://www.closedloopfund.com)

**Healthcare Plastics Recycling Council (HPRC):** HPRC is a consortium of organizations throughout the value chain of the health care industry that are committed to enhancing the economics, efficiency, and quality of healthcare plastics. HPRC is actively engaged with the Circular Economy to achieve these goals.

<https://www.hprc.org/>

5. Recyclability – Sales packaging			Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We are unable to determine this product's sales packaging recyclability.	0	OR	
B.	This product's sales packaging is not recyclable in the form sold to consumers.	0	OR	
C.	This product's sales packaging is only recyclable via drop-off, mail-in, and/or takeback.	3	OR	
D.	This product's sales packaging is recyclable with separation.	9	OR	
E.	This product's sales packaging is made of materials that are recyclable without separation but is too small to be accepted into the recycling stream where the product is sold.	9	OR	
F.	This product's sales packaging is recyclable at curbside without separation.	15	OR	
		<b>TOTAL POINTS AVAILABLE</b>	<b>15</b>	

## Guidance

- For B, the product sales packaging may be composed of a material that is not recyclable or may contain non-recyclable components which can prevent it from being recycled.
- For C, an example of a program that provides infrastructure for product takeback includes, but is not limited to, TerraCycle.
- For D, the product's sales packaging may contain non-recyclable components that do not prevent the recyclable components from being recycled.

- For E, the product's sales packaging would be recyclable but is small in form, so may have limited recyclability depending on the infrastructure available where sold.
- For F, the product's sales packaging must be recyclable at curbside in the jurisdictions where it is sold.

## Resources

**TerraCycle:** TerraCycle is a recycling company that deals with hard-to-recycle waste and offers free recycling programs and recycling solutions for purchase for almost all forms of waste.

<https://www.terracycle.com/en-US/>

6. Packaging – Stewardship list chemical management			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT go beyond legal and regulatory compliance regarding the incorporation of chemicals on the stewardship list in our sales packaging.	0	OR B	
B.	We have assessed our sales packaging raw materials for the presence of chemicals on the stewardship list.	2	OR A	
C.	We perform alternatives assessments that provide informed substitutions of the chemicals on the stewardship list in our sales packaging.	1	IF B	
D.	We use, and can demonstrate that, the outputs of our alternatives assessments provide informed substitutions of the chemicals on the stewardship list in our sales packaging.	1	IF B	
E.	We publicly disclose annually our progress resulting from alternatives assessment and informed substitution for the chemicals on the stewardship list in our sales packaging.	1	IF B	
<b>TOTAL POINTS AVAILABLE</b>		<b>5</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

Sales packaging materials for beauty and personal care products are included in the scope of this KPI.

The stewardship list is comprised of the following lists which describe the conditions under which the identified chemicals can or cannot be used. If a chemical on a stewardship list is listed with a qualifying statement on production, exposure, or threshold, the statement should be considered for this KPI.

- CA EPA Prop 65 – Reproductive and Developmental Toxicants, Carcinogens
- EPA Toxics Release Inventory PBTs
- EU – Cosmetics Regulation Annex II
- EU – Priority Endocrine Disruptors (Categories 1, 2)
- EU REACH – Annex XVII CMRs (Appendices 1 - 6)
- IARC – Groups 1, 2A, 2B

These published lists have been referenced in public retailer chemical policies. Where a chemical is accompanied by a specific route of exposure on these published lists and the exposure route is relevant to the product during consumer use or foreseeable misuse, then the chemical is relevant to this KPI.

Resources that can be used to identify and perform alternatives assessments on chemicals on the stewardship list include, but are not limited to, those listed in the Resources section.

## Resources

**BizNGO Chemical Alternatives Assessment Protocol:** This protocol provides a decision framework that can be used to identify chemicals of concern and effectively choose economically viable alternatives that have reduced impact on human health and the environment.

<http://www.bizngo.org/alternatives-assessment/chemical-alternatives-assessment-protocol>

**GreenScreen for Safer Chemicals:** GreenScreen is a “Chemical Hazard Assessment” method that can be used to identify chemicals of high concern and determine safer alternatives. The tool was developed and is administered by Clean Production Action.

<http://www.greenscreenchemicals.org/>

**Global Protocol on Packaging Sustainability:** The Global Protocol on Packaging Sustainability provides metrics and a framework for businesses on the relative sustainability of packaging.

<https://www.theconsumergoodsforum.com/wp-content/uploads/2017/11/CGF-Global-Protocol-on-Packaging.pdf>

**EPA - Safer Choice, Alternatives Assessments:** EPA developed the Safer Choice program in which companies can voluntarily participate

by researching and reformulating their product to meet Safer Choice standards in order to earn the Safer Choice Label on their products. Safer Choice uses alternatives testing to encourage industry to move to safer alternatives, complement regulatory action by showing that safer and higher functioning alternatives are available, or point out the limitations to chemical substitution for a particular use.

<https://www.epa.gov/saferchoice/design-environment-alternatives-assessments>

## Definitions

**Goals:** Goals should be specific, measurable, achievable, relevant, and time-bound.

**Informed substitution:** Informed substitution implies that factors such as cost and performance, technical feasibility, life cycle impacts, economic and social accountability, and potential to result in lasting change have been taken into consideration to ensure that substitutes and the final product are safer based on their health and environmental profiles (adapted from United States Environmental Protection Agency Design for Environment Program Alternative Assessment information).

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

**Sales packaging:** “Packaging with which the consumer leaves a store,” as defined by GPPS 2.0.

#	KPI TITLE	POINTS	PAGE #
1.	Intentionally added ingredients	25	19
2.	Fragrance allergens	25	22
3.	Stewardship listed chemicals – Unintentionally added	20	24
4.	Ingredient function	12	26
5.	Nanoparticles	11	27
6.	Animal testing	12	28
TOTAL POINTS		105	



# DISCLOSURE

1. Intentionally added ingredients			Product
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
<b>A.</b>	For this product's non flavor/fragrance materials, we disclose intentionally added ingredients on pack in the following manner:		AND B, C, D
A1.	Generic names are used for SOME ingredients (e.g., colorant).	0	OR
A2.	Specific names are used for ALL ingredients.	6	OR
<b>B.</b>	For this product's non flavor/fragrance materials, we disclose intentionally added ingredients online in the following manner:		AND A, C, D
B1.	Generic names are used for SOME ingredients (e.g., colorant).	0	OR
B2.	Specific names are used for ALL ingredients.	6	OR
<b>C.</b>	For this product's flavor/fragrance materials, we disclose ingredients to consumers in the following manner:		AND A, B, D
C1.	The generic terms "flavor" or "fragrance" are used. Disclosure occurs on pack or online.	0	OR
C2.	This product does not contain a flavor/fragrance and we do NOT disclose this fact on pack or online.	0	OR
C3.	Specific names are used for ingredients on a "palette list". Disclosure occurs on pack or online.	4	OR
C4.	We disclose ALL product specific fragrance ingredients above 100 ppm on pack or online.	8	OR
C5.	We disclose ALL product specific fragrance ingredients above 10 ppm on pack or online.	10	OR
C6.	The product being assessed does not contain a flavor/fragrance and we disclose this fact on pack or online.	10	OR
<b>D.</b>	For ALL of this product's materials, we disclose ingredients to third parties in the following manner:		AND A, B, C
D.	We disclose all formulation ingredients, including fragrance ingredients, to a third party (e.g., Cradle to Cradle Certified™ Products Program, EPA Safer Choice) for safety and/or regulatory compliance assessment.	3	
<b>TOTAL POINTS AVAILABLE</b>		<b>25</b>	



## Guidance

Intentionally added ingredients in final formulations are covered by this KPI, unintentionally added (incidental) ingredients are excluded.

- For B, online disclosure includes publicly accessible websites (desktop or mobile) as well as making ingredient information electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile apps). Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.
- For A1 and B1, proprietary materials can be disclosed using a generic term or other chemical descriptive name.
- For A2 and B2, intentionally added ingredients must be listed by the International Nomenclature Cosmetic Ingredient (INCI) name. Specific names must be used for proprietary materials.
- For C, online disclosure includes publicly accessible websites (desktop or mobile) as well as making ingredient information electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile apps). Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.
- For C3, C4, and C5, ingredients must be listed by a scientific name such as the International Nomenclature Cosmetic Ingredient (INCI) name, the International Union of Pure and Applied Chemistry (IUPAC) name, Chemical Abstract Service (CAS) name, or the common chemical name.
- For C3, the palette list may reference a list or subset list of the ingredients authored by the International Fragrance Association

(IFRA) or another list that represents the fragrance materials used in the product. Fragrance ingredients present in the final formula above a level of 10 ppm must be disclosed.

- For C4, fragrance ingredients present in the final formula above a level of 100 ppm must be disclosed.
- For C5, fragrance ingredients present in the final formula above a level of 10 ppm must be disclosed.
- For D, examples of routes of disclosure to third parties for assessment include, but are not limited to, those listed in the Resources section of this KPI.

## Resources

**EPA Safer Choice Program:** EPA developed the Safer Choice program in which companies can voluntarily participate by researching and reformulating their product to meet Safer Choice standards in order to earn the Safer Choice Label on their products. Safer Choice reviews the formulation of ingredients in terms of environmental and human health risk, and characteristics of concern within a functional class against the Master and Functional-Class Criteria documents.

<https://www.epa.gov/saferchoice>

**Cradle to Cradle Certified™ Product Standard:** Cradle-to-Cradle product Certification provides a standard of performance for manufacturers regarding product sustainability and material safety. Individual product assessments are performed by independent and trained third parties and certifications are made by the Cradle-to-Cradle Products Innovation Institute.

[http://www.c2ccertified.org/product\\_certification](http://www.c2ccertified.org/product_certification)

**Grocery Manufacturer's Association - SmartLabel™:** SmartLabel™ provides a standardized approach for the ingredient disclosure of food, home, and personal care products to consumers. Ingredient information is accessible via manufacturer-based websites, QR codes on packages, or from the SmartLabel™ website.

<http://www.smartlabel.org/>

**International Union of Pure and Applied Chemistry (IUPAC):** IUPAC is a neutral scientific organization that is the authority on chemical nomenclature. IUPAC's goal is to unite the global chemical community through collaboration in order to advance the chemical sciences.

<https://iupac.org/>

**International Nomenclature of Cosmetic Ingredients (INCI):** The INCI system was established by the Personal Care Products Council, the American trade association for cosmetics products, and maintains the 160,000 INCI name list of ingredients that are used in cosmetics and personal care products.

<https://www.personalcarecouncil.org/public/what-inci>

**Chemical Abstract Service (CAS®):** The Chemical Abstract Service is a global organization that registers chemicals under unique numbers that are used for management and organization across organizations and industries.

<https://www.cas.org/>

## Definitions

**Fragrance and flavor:** Defined by SCCS: "Fragrance and flavour substances are organic compounds with characteristic, usually pleasant, odours. They are ubiquitously used in perfumes and other perfumed cosmetic products, but also in detergents, fabric softeners, and other household products where fragrance may be used to mask unpleasant odours from raw materials." Fragrances can be composed of natural or synthetic ingredients.

**Intentionally added ingredient:** An ingredient that provides a function in the final formulation or is present as a result of producing a final formulation for safe use by consumers.

**Unintentionally added ingredient:** An ingredient that provides no function in a final formulation and is not present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases). Unintentionally added ingredients include incidental ingredients and contaminants.

2. Fragrance allergens			Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT disclose ingredients identified as fragrance allergens.	0	OR B, C	
B.	We disclose the presence of fragrance ingredients identified as allergens by the SCCS which require disclosure per EU cosmetic regulation in the following manner(s):		OR A, C	
B1.	Disclosure occurs on a publicly accessible website.	5	Multi	
B2.	Disclosure is electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile app).	8	Multi	
B3.	Disclosure occurs on pack.	12	Multi	
C.	This product does not contain any fragrance OR it contains a fragrance without any of the fragrance ingredients identified as allergens by the SCCS at levels which require disclosure per EU cosmetic regulation. This is disclosed online or on pack.	25	OR A, B	
<b>TOTAL POINTS AVAILABLE</b>		<b>25</b>		

## Guidance

Fragrance ingredients present in final formulations are covered by this KPI, other formulation ingredients and sales packaging are to be excluded from consideration.

For this KPI, the list of allergens is defined as those identified by the Scientific Committee for Consumer Safety (SCCS/1459/11) which are currently listed in Annex III, entries 67-92, in the EU Cosmetic Products Regulation (EC) No 1223/2009. Disclosure must occur for these ingredients when used above the threshold levels listed in the EU regulation (0.001% in leave-on products, 0.01% in rinse off products).

- For B1, disclosure via a publicly accessible website (desktop or mobile) must occur through manufacturer-based efforts and not via third party websites or services.
- For B2, disclosure that is electronically available at shelf includes mobile apps, SmartLabel™, and disclosure through QR codes. Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.

- For C, the concentration of allergens in the final product must be below the threshold set by the EU Cosmetic Products Regulation (EC) No. 1223/2009 (0.001% in leave-on products, 0.01% in rinse off products).
- For C, online disclosure includes publicly accessible websites (desktop or mobile) as well as making ingredient information electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile apps). Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.

## Resources

**Grocery Manufacturer's Association - SmartLabel™:** SmartLabel™ provides a standardized approach for the ingredient disclosure of food, home, and personal care products to consumers. Ingredient information is accessible via manufacturer-based websites, QR codes on packages, or from the SmartLabel™ website.

<http://www.Smartlabel.org/>

**SCCS/1459/11:** The Scientific Committee on Consumers Safety (SCCS) Opinion on Fragrance Allergens in Cosmetic Products was adopted by the SCCS at its 13th plenary meeting in 2011. This opinion provides the background and scientific information that was used to assess the 26 allergens that require disclosure on pack when used in cosmetic products above specific concentrations.

[https://ec.europa.eu/health/scientific\\_committees/consumer\\_safety/docs/sccs\\_o\\_073.pdf](https://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_073.pdf)

**EU Cosmetic Products Regulation (EC) No 1223/2009:** REGULATION (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on Cosmetic Products (Recast) provides the regulatory requirements for cosmetic products for sale in the EU. Aspects of regulation include safety justification, maintenance of a product information file, and restriction of hazardous ingredients.

<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1522858552923&uri=CELEX:32009R1223>

## Definitions

**Allergen:** A chemical that induces an allergic immune system response in sensitized individuals, typically by dermal or inhalation exposure.

**Fragrance and flavor:** Defined by SCCS: "Fragrance and flavour substances are organic compounds with characteristic, usually pleasant, odours. They are ubiquitously used in perfumes and other perfumed cosmetic products, but also in detergents, fabric softeners, and other household products where fragrance may be used to mask unpleasant odours from raw materials." Fragrances can be composed of natural and/or synthetic ingredients.

**Public disclosure:** The act of making information available and readily accessible to consumers.

3. Stewardship list chemicals - Unintentionally added			Product
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
<b>A.</b>	We do NOT disclose chemicals on the stewardship list that have been unintentionally added to our formulation.	0	OR B/C, D
<b>B.</b>	We disclose unintentionally added chemicals on the stewardship list (incidental chemicals and reasonably expected contaminants) present in our formulation above a threshold of 100 ppm in the following manner(s):		OR A, D
B1.	Disclosure occurs on a publicly accessible website.	1	Multi
B2.	Disclosure is electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile app).	2	Multi
B3.	Disclosure occurs on pack.	4	Multi
<b>C.</b>	We disclose unintentionally added chemicals on the stewardship list (incidental chemicals and reasonably expected contaminants) present in our formulation above a threshold of 10 ppm in the following manner(s):		OR A, D
C1.	Disclosure occurs on a publicly accessible website.	2	Multi
C2.	Disclosure is electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile app).	4	Multi
C3.	Disclosure occurs on pack.	6	Multi
<b>D.</b>	This product does not include any reasonably expected unintentionally added chemicals on the stewardship list and we disclose this fact online OR on pack.	20	OR A, B/C
<b>TOTAL POINTS AVAILABLE</b>		<b>20</b>	

## Guidance

For this KPI, disclosure of incidental chemicals on the stewardship list is not required when those chemicals are present in the water supply used for formulations (e.g., municipal and private water providers, surface water, groundwater, or wells) at concentrations greater than, or equal to, the concentration found in final formulations.

- For B and C, different unintentionally added ingredients may be disclosed at the levels noted (100 ppm, 10 ppm).

- For B1 and C1, disclosure via publicly accessible websites (desktop or mobile) must occur through manufacturer-based efforts and not via third party websites or services.
- For B2 and C2, disclosure that is electronically available at shelf includes mobile apps, SmartLabel™, and disclosure through QR codes. Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.

- For D, the manufacturer must publicly disclose a policy statement that contains a commitment to not include unintentionally added chemicals on the stewardship list in their product. The policy must have been started or in effect within the last 12 months of the date of answering this question with public disclosure occurring within that timeframe. Online disclosure includes publicly accessible websites (desktop or mobile) as well as making ingredient information electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile apps). Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.

The stewardship list is comprised of the following lists which describe the conditions under which the identified chemicals can or cannot be used. If a chemical on a stewardship list is listed with a qualifying statement on production, exposure, or threshold, the statement should be considered for this KPI.

- CA EPA Prop 65 – Reproductive and Developmental Toxicants, Carcinogens
- EPA Toxics Release Inventory PBTs
- EU – Cosmetics Regulation Annex II
- EU – Priority Endocrine Disruptors (Categories 1, 2)
- EU REACH – Annex XVII CMRs (Appendices 1 - 6)
- IARC – Groups 1, 2A, 2B

These published lists have been referenced in public retailer chemical policies. Where a chemical is accompanied by a specific route of exposure on these published lists and the exposure route is relevant to the product during consumer use or foreseeable misuse, then the chemical is relevant to this KPI.

## Resources

**Grocery Manufacturer's Association - SmartLabel™:** SmartLabel™ provides a standardized approach for the ingredient disclosure of food, home, and personal care products to consumers. Ingredient information is accessible via manufacturer-based websites, QR codes on packages, or from the SmartLabel™ website.

<http://www.smartlabel.org/>

## Definitions

**Intentionally added ingredient:** An ingredient that provides a function in the final formulation or is present as a result of producing a final formulation for safe use by consumers.

**Public disclosure:** The act of making information available and readily accessible to consumers.

**Unintentionally added ingredient:** An ingredient that provides no function in a final formulation and is not present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases). Unintentionally added ingredients include incidental ingredients and contaminants.

4. Ingredient function			Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT disclose ingredient function for this product.	0	OR	
B.	We disclose the function of each of this product's ingredients on a publicly accessible website, on pack, or electronically at shelf.	12	OR	
<b>TOTAL POINTS AVAILABLE</b>		<b>12</b>		

## Guidance

For this KPI, ingredient function is to be determined by the manufacturer making the formulation and must comply with United States regulations where applicable (e.g., OTC active ingredient purpose).

- For B, disclosure of function cannot occur via palette list.
- For B, online disclosure includes publicly accessible websites (desktop or mobile) as well as making ingredient information electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile apps). Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.

## Resources

**Grocery Manufacturer's Association - SmartLabel™:** SmartLabel™ provides a standardized approach for the ingredient disclosure of food, home, and personal care products to consumers. Ingredient information is accessible via manufacturer-based websites, QR codes on packages, or from the SmartLabel™ website.

<http://www.smartlabel.org/>

## Definitions

**Intentionally added ingredient:** An ingredient that provides a function in the final formulation or is present as a result of producing a final formulation for safe use by consumers.

**Public disclosure:** The act of making information available and readily accessible to consumers.

**Unintentionally added ingredient:** An ingredient that provides no function in a final formulation and is not present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases). Unintentionally added ingredients include incidental ingredients and contaminants.

5. Nanoparticles		Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
A.	We have NOT assessed the raw materials in this product for the presence of nanomaterials.	0	OR B
B.	We have performed a nanomaterial assessment on the raw materials in this product.	6	OR A
C.	Our assessment determined that the product contains nanomaterials and we disclose the presence on pack or online.	5	OR D, IF B
D.	Our assessment determined that the product does NOT contain nanomaterials.	-	OR C, IF B
<b>TOTAL POINTS AVAILABLE</b>		<b>11</b>	

## Guidance

- For C, online disclosure includes publicly accessible websites (desktop or mobile) as well as making ingredient information electronically available at shelf (e.g., via SmartLabel™, QR code, or mobile apps). Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.

## Definitions

**Nanomaterial:** Nanomaterials are defined according to the Commission Recommendation of 18 October 2011 on the definition of nanomaterial (2011/696/EU) as "A natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50% or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm - 100 nm."

## Resources

**Grocery Manufacturer's Association - SmartLabel™:** SmartLabel™ provides a standardized approach for the ingredient disclosure of food, home, and personal care products to consumers. Ingredient information is accessible via manufacturer-based websites, QR codes on packages, or from the SmartLabel™ website.

<http://www.smartlabel.org/>

In specific cases and where warranted by concerns for the environment, health, safety or competitiveness the number size distribution threshold of 50% may be replaced by a threshold between 1 and 50%. By derogation from the above, fullerenes, graphene flakes and single wall carbon nanotubes with one or more external dimensions below 1 nm should be considered as nanomaterials."

**Public disclosure:** The act of making information available and readily accessible to consumers.



6. Animal testing			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We perform animal testing on ingredients or products to justify safety.	0	OR B - E	
B.	We use validated alternative methods that reduce, refine, or replace the use of animals when available and required to fulfill US regulatory requirements.	2	OR C	
C.	Under NO conditions do we conduct, or require others to conduct on our behalf, animal testing in any region to obtain safety data for ingredients or final formulations for products sold in the United States.	4	OR B	
D.	We participate in or contribute to a major research initiative dedicated to the continuous advancement and promotion of animal alternatives validation.	4	Multi	
E.	We actively work to reduce regulatory requirements for animal testing in regions where they are required.	4	Multi	
<b>TOTAL POINTS AVAILABLE</b>		<b>12</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Except where noted, company-level activities in other regions are not to be considered.

Manufacturers that are performing animal testing but not performing any of the activities associated with B - E should select response option A.

- For A, a manufacturer, or their raw material suppliers, may perform animal testing or a manufacturer may be unable to verify that their suppliers do not perform animal testing on the raw materials they produce.

- For B, animal testing can be performed using validated alternative methods which refine or replace the use of animals. In the US, alternative methods are validated by ICVAAM and accepted by regulatory agencies. The complete list of acceptable alternative methods for the US can be found using the National Toxicology Program (NTP) link in the Resources section.
- For C, animal testing cannot be performed to obtain safety data for safety justification of products sold in the United States. Any data obtained from mandatory animal testing per regulatory requirements in regions outside of the United States cannot be used to substantiate ingredient or formulation safety for products sold in the United States.

- For D and E, contributions to research initiatives and efforts to reduce regulatory requirements for animal testing include those outside of the United States.
- For D, major research initiatives are government, university, or privately based programs that are dedicated to the replacement or refinement of animal testing by advancing non-animal alternative testing methods through effective development, validation, use, or communication. Examples of major research initiatives include, but are not limited to, those listed in the Resources section.

## Resources

### **National Toxicology Program (NTP) Alternative Methods Accepted by US Agencies:**

This website lists the testing methodologies that have been accepted or endorsed by US and EU regulation.

<https://ntp.niehs.nih.gov/pubhealth/evalatm/accept-methods/>

### **Japanese Center for the Validation of Alternative Methods (JaCVAM):**

JaCVAM is an institute that is dedicated to the promotion of the reduction, refinement, and replacement of animal testing used to justify chemical safety in Japan. This mission is achieved in part through international collaboration.

<http://www.jacvam.jp/en/>

### **The European Union Reference Laboratory for Alternatives to Animal Testing (EURL ECVAM):**

EURL ECVAM is dedicated to the advancement of animal testing alternatives by promoting non-animal alternatives through scientific research, validation, and independent evaluation. ECVAM's ultimate goal is enhanced safety at multiple life cycle stages with decreased reliance on animal testing.

<https://eurl-ecvam.jrc.ec.europa.eu/about-ecvam>

**Center for Alternatives to Animal Testing (CAAT):** The Johns Hopkins Center for Alternatives to Animal Testing provides a valuable resource for organizations seeking information about alternatives to animal testing. CAAT promotes the science and support of animal alternatives, their creation, development, and validation.

<http://caat.jhsph.edu/>

### **Centre for Documentation and Evaluation of Alternatives to Animal Experiments (AnimAlt-ZEBET):**

The ZEBET database is part of the German Centre for the Protection of Laboratory Animals and is a valuable resource for industry, universities, and the public to access and understand information regarding animal testing alternatives.

[http://www.bfr.bund.de/en/zebet\\_database\\_on\\_alternatives\\_to\\_animal\\_experiments\\_on\\_the\\_internet\\_animalt\\_zebet\\_-1508.html](http://www.bfr.bund.de/en/zebet_database_on_alternatives_to_animal_experiments_on_the_internet_animalt_zebet_-1508.html)

### **The Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM):**

ICCVAM is an interagency committee composed of representatives from various U.S. federal regulatory and research agencies with the goal of facilitating the development and ultimate regulatory acceptance of test methods that reduce, refine, or replace animal testing.

<https://ntp.niehs.nih.gov/pubhealth/evalatm/iccvam/index.html>

## Definitions

**Validated alternative methods:** Testing methodologies that reduce, refine, or replace the use of animals and have been validated by ICVAAAM in the United States and accepted by regulatory agencies for data collection.

#	KPI TITLE	POINTS	PAGE #
1.	Worker health and safety – Manufacturing	20	31
2.	Fragrance management	15	32
3.	Formulation – Stewardship list chemical management	15	35
4.	Formulation – Chemical selection	15	38
5.	Formulation – Stewardship list chemical usage	20	41
6.	Chemical footprint	15	44
7.	Risk assessment and product safety	15	46
8.	Ingredient disclosure to manufacturers	15	48
TOTAL POINTS		130	



# HUMAN HEALTH

1. Worker health and safety – Manufacturing		Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
A.	We have NOT audited our company-owned or contract manufacturing facilities to assess worker health and safety.	0	OR B
B.	We have an audit program for worker health and safety for our company-owned or contract manufacturing facilities.	2	OR A
C.	The audit program includes formal systems for ensuring that any adverse findings are mitigated.	3	IF B
D.	This product was produced in a site that has had an audit in the last 36 months.	7	IF B, OR E
E.	This product was produced in a site that has had an audit in the last 24 months.	15	IF B, OR D
<b>TOTAL POINTS AVAILABLE</b>		<b>20</b>	

## Guidance

The scope of this KPI includes your company-level activities for beauty and personal care products sold in the United States. Activities for products sold in other regions are not to be considered.

On-site audits can be conducted by second or third parties and must have been conducted at least once every 24 or 36 months using a standard based on internationally recognized principles. The audits and standard must be verifiable and must address worker injury and worker exposure to harmful material elements, and must align with applicable International Labour Organization Occupational Safety and Health Conventions (e.g., No. 155).

- For B, the scope of the response option is company level but the subsequent response options are product level.

- For D, the product must have been produced in company-owned or contract facilities that have had a verifiable audit for compliance with a widely-recognized code of conduct in the last thirty-six months.
- For E, the product must have been produced in company-owned or contract facilities that have had a verifiable audit for compliance with a widely-recognized code of conduct in the last twenty-four months.

Standards based on internationally recognized principles include, but are not limited to, those in the Resources section.

## Resources

**International Labor Organization - C155 - Occupational Safety and Health Convention, 1981 (No. 155):** The International Labour Organization provides a comprehensive outline on mechanical health and safety risks and guidance on the safe use of and exposure to machinery.

[http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C155](http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C155)

**Social Accountability International SA8000 Standard:** SA8000 is a human rights standard that can be used for audits of workplaces across industries. It is based on principles developed by the United Nations Declaration on Human Rights and the Conventions of the International Labour Organization.

<http://www.sa-intl.org/index.cfm?fuseaction=page.viewpage&pageid=1689>

## Definitions

**Adverse Finding:** Any unexpected, inappropriate, or undesired occurrence such as worker injury or worker exposure to harmful material elements that result in a negative effect in human health and safety associated with the manufacturing and production of a product.

**Company-owned or contract manufacturing facilities:**

Facilities responsible for manufacturing and assembly of final products, whether these facilities are internal or external to the respondent's organization.

**Verifiable:** Having the ability to demonstrate, through a reputable assessor, the truth or accuracy of a claim.

**Second-party audit:** An audit conducted by a party having an interest in the organization, such as customers, or by another entity on their behalf.

**Third-party audit:** An audit conducted by external, independent auditing organizations, such as those providing certification of conformity to a standard.

**Material elements:** Defined by ILO as "workplaces, working environment, tools, machinery and equipment, chemical, physical and biological substances and agents, work processes.

2. Fragrance management			Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT address fragrance safety beyond legal and regulatory compliance.	0	OR B, D	
B.	We have promoted fragrance safety for this product by complying with the latest IFRA standards.	2	Multi	
C.	We have promoted fragrance safety for this product by using restrictions beyond IFRA compliance.	5	IF B	
D.	This product does not contain any fragrance OR it contains a fragrance without any of the fragrance ingredients identified as allergens by the SCCS at levels which require disclosure per EU cosmetic regulation.	8	Multi	
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>		

## Guidance

This KPI covers International Fragrance Association (IFRA) compliance, and beyond, for fragrances in final formulations.

For this KPI, fragrances are defined as mixtures of aroma compounds that enhance or alter the consumer experience of products. These mixtures may be of natural or synthetic origin.

- For B and C, fragrances used in products must comply at the time of production with the prohibitions, restrictions, and specifications set forth by the most recent IFRA Standards.
- For C, restrictions that go beyond IFRA compliance further limit the use or concentration of potential sensitizers and allergens in final formulations.
- For D, the list of 26 allergens is defined as those identified by the Scientific Committee for Consumer Safety (SCCS/1459/11) which are currently listed in Annex III, entries 67-92, in the EU Cosmetic Products Regulation (EC) No 1223/2009. For this response option, these ingredients must NOT be present above the threshold levels listed in the EU regulation (0.001% in leave-on products, 0.01% in rinse off products).

## Resources

**International Fragrance Association (IFRA) Standards:** IFRA, the international trade association for the fragrance industry, establishes standards for fragrance ingredient use in various consumer products which result in different types of exposures. These standards are used by industry to manage risk regarding fragrance ingredient use.

<http://www.ifraorg.org/en-us/standards>

**SCCS/1459/11:** The Scientific Committee on Consumers Safety (SCCS) Opinion on Fragrance Allergens in Cosmetic Products was adopted by the SCCS on June 26-27 at its 15th plenary meeting. This opinion provides the background and scientific information that was used to assess the 26 allergens that require disclosure on pack when used in cosmetic products above specific concentrations.

[https://ec.europa.eu/health/scientific\\_committees/consumer\\_safety/docs/sccs\\_o\\_073.pdf](https://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_073.pdf)

**EU Cosmetic Products Regulation (EC) No 1223/2009:** REGULATION (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on Cosmetic Products (Recast) provides the regulatory requirements for cosmetic products for sale in the EU. Aspects of regulation include safety justification, maintenance of a product information file, and restriction of hazardous ingredients.

<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1522858552923&uri=CELEX:32009R1223>

## Definitions

**Fragrance and flavor:** Defined by SCCS: "Fragrance and flavour substances are organic compounds with characteristic, usually pleasant, odours. They are ubiquitously used in perfumes and other perfumed cosmetic products, but also in detergents, fabric softeners, and other household products where fragrance may be used to mask unpleasant odours from raw materials." Fragrances can be composed of natural and/or synthetic ingredients.

**Allergen:** A substance that causes an altered specific reactivity in the immune system resulting from recognition of an allergen by immune cells.

3. Formulation – Chemical management			Brand
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
A.	We do NOT go beyond ensuring the legal and regulatory compliance regarding the management of chemicals on the stewardship list in our formulations.	0	OR B - H
B.	We follow the guidance of food, drug, and cosmetic health safety authorities (e.g., SCCS, CIR) for ingredients on the stewardship lists.	2	Multi
C.	We have processes in place to review ingredients on the stewardship lists for potential restriction, reduction, and removal.	2	Multi
D.	We publicly disclose our processes, goals, and progress.	1	IF C
E.	We conduct alternative assessments and implement the conclusions for ingredients on the stewardship lists.	1	IF C
F.	We conduct alternative assessments and implement the conclusions for ingredients beyond those on the stewardship lists.	2	Multi
G.	We routinely publish our safety assessments in peer-reviewed journals or through government regulatory bodies.	2	IF E OR F
H.	We have a publicly stated policy not to use ingredients on the stewardship lists and verify compliance with this policy.	15	OR B - G
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>	

## Guidance

The scope of this KPI includes brand-level activities for manufacturers that sell beauty and personal care products in the United States. Brand-level activities for products sold in other regions are not to be considered.

Intentionally and unintentionally added ingredients in final formulations are in scope for this KPI.

- For D, public disclosure of goals and progress must have occurred within 12 months of the date you respond to this question.
- For H, the policy must exclude chemicals on the stewardship list from formulations or must exclude them from exceeding a threshold level of 100 ppm in final formulations.



The stewardship list is comprised of the following lists which describe the conditions under which the identified chemicals can or cannot be used. If a chemical on a stewardship list is listed with a qualifying statement on production, exposure, or threshold, the statement should be considered for this KPI.

- CA EPA Prop 65 – Reproductive and Developmental Toxicants, Carcinogens
- EPA Toxics Release Inventory PBTs
- EU – Cosmetics Regulation Annex II
- EU – Priority Endocrine Disruptors (Categories 1, 2)
- EU REACH – Annex XVII CMRs (Appendices 1 - 6)
- IARC – Group 1, 2A, 2B

These published lists have been referenced in public retailer chemical policies.

Product exposure under conditions of intended use or foreseeable misuse by consumers should be considered for this KPI.

Resources that can be used to identify, prioritize, and perform alternatives assessments on chemicals on the stewardship list include, but are not limited to, those listed in the Resources section.

## Resources

**BizNGO Chemical Alternatives Assessment Protocol:** This protocol provides a decision framework that can be used to identify chemicals of concern and effectively choose economically viable alternatives that have reduced impact on human health and the environment.

<http://www.bizngo.org/alternatives-assessment/chemical-alternatives-assessment-protocol>

**The Globally Harmonized System of Classification and Labelling of Chemicals (GHS):** GHS provides specific human and environmental health criteria along with physical hazard criteria for chemicals in industry. These criteria are used for hazard communication and labeling of chemicals.

<https://www.osha.gov/dsg/hazcom/global.html>

**EPA - Safer Choice:** The EPA Safer Choice program (previously Design for the Environment) provides a voluntary standard for product designers who wish to choose ingredients based on established criteria. In this program, all ingredients are reviewed and must meet strict criteria for various impacts (e.g., human health and the environment, carcinogenicity, reproductive/developmental toxicity). Products meeting the standard are able to carry the Safer Choice label.

<https://www.epa.gov/saferchoice>

**GreenScreen® for Safer Chemicals:** GreenScreen is a “Chemical Hazard Assessment” method that can be used to identify chemicals of high concern and determine safer alternatives. The tool was developed and is administered by Clean Production Action.

<http://www.greenscreenchemicals.org/>

**EPA - Safer Choice, Alternatives Assessments:** EPA developed the Safer Choice program in which companies can voluntarily participate by researching and reformulating their product to meet Safer Choice standards in order to earn the Safer Choice Label on their products. Safer Choice uses alternatives testing to encourage industry to move

to safer alternatives, complement regulatory action by showing that safer and higher functioning alternatives are available, or point out the limitations to chemical substitution for a particular use.

<https://www.epa.gov/saferchoice/design-environment-alternatives-assessments>

### **BizNGO - The Commons Principles for Alternatives Assessment:**

[The Common Principles for Alternatives Assessment is a document developed by BizNGO that provides a common definition for chemical alternative assessment and acts as a guide for enhanced decision making for safer chemical substitution.

<https://www.bizngo.org/alternatives-assessment/commons-principles-alt-assessment>

## Definitions

**Goals:** Goals should be specific, measurable, achievable, relevant, and time-bound.

**Informed substitution:** Informed substitution implies that factors such as cost and performance, technical feasibility, life cycle impacts, economic and social accountability, and potential to result in lasting change have been taken into consideration to ensure that substitutes and the final product are safer based on their health and environmental profiles (Adapted from United States Environmental Protection Agency Design for Environment Program Alternative Assessment information).

**Intentionally added ingredient:** A chemical that provides a function to the final formulation during consumer use or is present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases).

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

**Unintentionally added ingredient:** An ingredient that provides no function in a final formulation and is not present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases).

**Contaminants:** Naturally occurring impurities present in procured raw materials that are unintentionally incorporated into final formulations where they provide no function.

**Incidental chemicals:** Chemicals in raw materials present as a result of processing or for stabilization such as catalysts, solvents, residual monomers, reactive by-products, and raw material preservatives.

4. Formulation – Chemical selection			Category	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We have NOT assessed our formulations for the presence of chemicals on the stewardship list.	0	OR B	
B.	We have assessed our formulations for the presence of chemicals on the stewardship list.	3	OR A	
C.	<p>_____ % of our products in this category, by number, have intentionally added formulation ingredients that are on the stewardship list.</p> <p><i>If a chemical is listed with a specific exposure, for the purpose of this response option, the chemical should be included even if the specified exposure is NOT relevant to the consumer during product use.</i></p>	$6 \times (1 - \%)$	IF B	
D.	<p>_____ % of our products in this category, by number, have intentionally added formulation ingredients that are on the stewardship list.</p> <p><i>If a chemical is listed with a specific exposure that is NOT relevant to the consumer during product use, for the purpose of this response option, the chemical should NOT be included.</i></p>	$6 \times (1 - \%)$	IF B	
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>		

## Guidance

Intentionally added ingredients in final formulations are in scope for this KPI.

For this KPI, the threshold for intentionally added chemicals on the stewardship list is 100 ppm. Intentionally added chemicals on the stewardship list below this threshold are not to be considered.

- For C, chemicals on the stewardship list are those chemicals on any of the six authoritative and scientific lists referenced below. Even when a list specifies a particular route of exposure, C measures the presence of chemicals on the stewardship list regardless of the route of exposure.

- Calculate C as the number of beauty and personal care products that you sell in the United States in this product category that contain any intentionally added formulation ingredients that are on the stewardship list, divided by the total number of beauty and personal care products that your organization sells in the United States in this product category, then multiply by 100.
- For D, chemicals on the stewardship list are those chemicals on any of the six authoritative and scientific lists referenced below. When a list specifies a particular route of exposure, D measures the presence of chemicals on the stewardship list when that route of exposure is relevant to consumers under

conditions of instructed use or foreseeable misuse. Foreseeable misuse is limited to consumer misuse during a product's intended application and does not include exposure from intentional misuse (e.g., ingestion of rinse-off skin products).

- Calculate D as the number of beauty and personal care products that you sell in the United States in this product category that contain any intentionally added formulation ingredients that are on the stewardship list where exposure is relevant, divided by the total number of beauty and personal care products that your organization sells in the United States in this product category, then multiply by 100.
- For D, examples of authoritative or scientific hazard classifications where a route of exposure has been specified include:
  1. **Ethyl alcohol** in alcoholic beverages
  2. **Titanium dioxide** (airborne, unbound particles of respirable size)
  3. **Silica, crystalline** (airborne particles of respirable size)
  4. **Carbon black** (airborne, unbound particles of respirable size)

#### Example-1: Titanium dioxide

For C, ALL products containing titanium dioxide are to be included in the numerator of the calculation. For D, for products containing titanium dioxide (unbound particles of respirable size), ONLY those products that can become airborne during instructed consumer use or foreseeable misuse are to be included in the numerator of the calculation.

#### Example-2: Ethyl alcohol

- For C, ALL products containing ethyl alcohol are to be included in the numerator of the calculation. For D, for products containing ethyl alcohol, ONLY those products that are ingested under conditions of instructed use or foreseeable misuse are to be included in the numerator of the calculation.
- For product categories without intentionally added formulation ingredients that are on the stewardship list with or without a specified route of exposure, enter zero for C.
- For product categories without intentionally added formulation ingredients that are on the stewardship list, enter zero for C and D.

The stewardship list is comprised of the following lists which describe the conditions under which the identified chemicals can or cannot be used. If a chemical on a stewardship list is listed with a qualifying statement on production, exposure, or threshold, the statement should be considered for this KPI.

- CA EPA Prop 65 – Reproductive and Developmental Toxicants, Carcinogens
- EPA Toxics Release Inventory PBTs
- EU – Cosmetics Regulation Annex II
- EU – Priority Endocrine Disruptors (Categories 1, 2)
- EU REACH – Annex XVII CMRs (Appendices 1 - 6)
- IARC – Groups 1, 2A, 2B

These published lists have been referenced in public retailer chemical policies.

## Resources

**The Globally Harmonized System of Classification and Labelling of Chemicals (GHS):** GHS provides specific human and environmental health criteria along with physical hazard criteria for chemicals in industry. These criteria are used for hazard communication and labeling of chemicals.

<https://www.osha.gov/dsg/hazcom/global.html>

**EPA - Safer Choice:** The EPA Safer Choice program (previously Design for the Environment) provides a voluntary standard for product designers who wish to choose ingredients based on established criteria. In this program, all ingredients are reviewed and must meet strict criteria for various impacts (e.g., human health and the environment, carcinogenicity, reproductive/developmental toxicity).

Products meeting the standard are able to carry the Safer Choice label.

<https://www.epa.gov/saferchoice>

## Definitions

**Intentionally added chemical:** A chemical that provides a function to the final formulation during consumer use or is present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases).

**Unintentionally added ingredient:** An ingredient that provides no function in a final formulation and is not present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases).

**Contaminants:** Naturally occurring impurities present in procured raw materials that are unintentionally incorporated into final formulations where they provide no function.

**Incidental chemicals:** Chemicals in raw materials present as a result of processing or for stabilization such as catalysts, solvents, residual monomers, reactive by-products, and raw material preservatives.

5. Formulation - Stewardship list chemical usage			Product
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
<b>A.</b>	We have NOT assessed this product's formulation for the presence of chemicals on the stewardship list.	0	OR B, C OR D
<b>B.</b>	We have assessed this product's formulation for the presence of chemicals on the stewardship list and are able to report the following:		OR A
B1.	This formulation contains intentionally added ingredients on the stewardship list.	0	OR B4
B2.	The chemicals on the stewardship list in this formulation are used according to the thresholds established by SCCS and CIR.	9	IF B1
B3.	We publicly disclose the reason for the inclusion of chemicals on the stewardship list in this formulation.	1	IF B1
B4.	This product's formulation does NOT contain intentionally added chemicals on the stewardship list.	15	OR B1
B5.	This product's formulation does NOT contain incidental chemicals on the stewardship list.	3	Multi
B6.	This product's formulation does NOT contain reasonably expected contaminants on the stewardship list.	1	Multi
<b>C.</b>	This product has been certified for safety by a third party (e.g., Safer Choice, Cradle to Cradle Certified™ Product Standard).	1	Multi
<b>TOTAL POINTS AVAILABLE</b>		<b>20</b>	

## Guidance

Intentionally and unintentionally added ingredients in final formulations are in scope for this KPI.

- For B1, intentionally added chemicals on the stewardship list below 100 ppm are not to be considered.
- For B2, when SCCS and CIR have both established safe use thresholds, use the more conservative threshold.
- For B3, communication can occur electronically or on label. Electronic disclosure includes, but is not limited to, websites, mobile apps, SmartLabel™, and QR codes. Electronic disclosure via these means must occur through manufacturer-based efforts and not via third party websites or services.
- For B4, B5, and B6, chemicals on the stewardship list must not be present above a threshold level of 100 ppm in final formulations.
- For C, the criteria for certification must be publicly available from a third party and must limit the use of chemicals on the stewardship list. Valid certifications include, but are not limited to, EPA Safer Choice and Cradle to Cradle Certified™ Product Standard.

The stewardship list is comprised of the following lists which describe the conditions under which the identified chemicals can or cannot be used. If a chemical on a stewardship list is listed with a qualifying statement on production, exposure, or threshold, the statement should be considered for this KPI.

- CA EPA Prop 65 – Reproductive and Developmental Toxicants, Carcinogens
- EPA Toxics Release Inventory PBTs
- EU – Cosmetics Regulation Annex II
- EU – Priority Endocrine Disruptors (Categories 1, 2)
- EU REACH – Annex XVII CMRs (Appendices 1 - 6)
- IARC – Groups 1, 2A, 2B

Product exposure under conditions of intended use or foreseeable misuse by consumers should be considered for this KPI.

## Resources

### **The Globally Harmonized System of Classification and Labelling of Chemicals (GHS):**

GHS provides specific human and environmental health criteria along with physical hazard criteria for chemicals in industry. These criteria are used for hazard communication and labeling of chemicals.

<https://www.osha.gov/dsg/hazcom/global.html>

### **Cradle to Cradle Certified™ Product Standard:**

Cradle-to-Cradle product Certification provides a standard of performance for manufacturers regarding product sustainability and material safety. Individual product assessments are performed by independent and trained third parties and certifications are made by the Cradle-to-Cradle Products Innovation Institute.

[http://www.c2ccertified.org/product\\_certification](http://www.c2ccertified.org/product_certification)

**EPA - Safer Choice:** The EPA Safer Choice program (previously Design for the Environment) provides a voluntary standard for

product designers who wish to choose ingredients based on established criteria. In this program, all ingredients are reviewed and must meet strict criteria for various impacts (e.g., human health and the environment, carcinogenicity, reproductive/developmental toxicity). Products meeting the standard are able to carry the Safer Choice label.

<https://www.epa.gov/saferchoice>

## Definitions

**Intentionally added ingredient:** A chemical that provides a function to the final formulation during consumer use or is present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases).

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

**Unintentionally added ingredient:** An ingredient that provides no function in a final formulation and is not present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases).

**Contaminants:** Naturally occurring impurities present in procured raw materials that are unintentionally incorporated into final formulations where they provide no function.

**Incidental chemicals:** Chemicals in raw materials present as a result of processing or for stabilization such as catalysts, solvents, residual monomers, reactive by-products, and raw material preservatives.



6. Chemical footprint			Company
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES
A.	We do NOT measure our own chemical footprint and we are NOT engaged in a program to reduce the use of chemicals on the stewardship list.	0	OR B, C
B.	We measure our chemical footprint.	6	Multi
C.	We participate in the Chemical Footprint Project™ or another external program.	5	Multi
D.	We publicly disclose our chemical footprint.	4	IF B, C
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>	

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

The stewardship list is comprised of the following lists which describe the conditions under which the identified chemicals can or cannot be used. If a chemical on a stewardship list is listed with a qualifying statement on production, exposure, or threshold, the statement should be considered for this KPI.

- CA EPA Prop 65 – Reproductive and Developmental Toxicants, Carcinogens
- EPA Toxics Release Inventory PBTs

- EU – Cosmetics Regulation Annex II
- EU – Priority Endocrine Disruptors (Categories 1, 2)
- EU REACH – Annex XVII CMRs (Appendices 1 - 6)
- IARC – Groups 1, 2A, 2B

These published lists have been referenced in public retailer chemical policies. Where a chemical is accompanied by a specific route of exposure on these published lists and the exposure route is relevant to the product during consumer use or foreseeable misuse, then the chemical is relevant to this KPI.

- For B, the program may be internal to an organization but must measure the chemical footprint as defined by the Chemical Footprint Project (CFP).

- For C, the external program must measure the chemical footprint of the organization and must be multi-stakholder (include representatives from government or NGO as well as industry) with transparent methodology and include actors from across the supply chain (raw material suppliers, manufacturers, and retailers).

## Resources

**Clean Production Action - Chemical Footprint Project™:** The Chemical Footprint Project™ (CFP), an initiative of Clean Production Action (CPA), has developed a tool to track and benchmark corporate activities to include safer chemicals in consumer products. The CFP survey also covers chemical selection at the manufacturing and supply chain phases and tracks progress according to four major elements: Management Strategy, Chemical Inventory, Footprint Measurement, and Public disclosure and Verification.

<http://www.chemicalfootprint.org/>

## Definitions

**Chemical footprint:** Defined by the Chemical Footprint Project™ as the total mass of chemicals sold by a company, used in its manufacturing operations and by its suppliers, and contained in packaging that meet any of the following criteria:

- Carcinogenic, mutagenic, or toxic to reproduction (CMR);
- Persistent, bioaccumulative and toxic substance (PBT);
- Any other chemical for which there is scientific evidence of probable serious effects to human health or the environment that give rise to an equivalent level of concern (for example, an endocrine disruptor or neurotoxicant); or
- A chemical whose breakdown products result in a [chemical] that meets any of the above criteria.

The Chemical Footprint Project™ provides other specific guidance that can be used to identify chemicals that meet these criteria.

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

7. Risk assessment and product safety			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT address product safety beyond legal and regulatory compliance.	0	OR B - E	
B.	We use best in class approaches according to SCCS guidance for human health risk assessment to screen all of our beauty and personal care ingredients and our final products, to ensure an acceptable margin of safety.	3	Multi	
C.	We participate in on-going research to advance the science of product safety and risk assessment.	2	Multi	
D.	We ensure adequate microbiological protection of our products.	3	Multi	
E.	We have systems in place for post market safety surveillance.	3	Multi	
F.	We disclose the following information on our website:		AND	
F1.	Details of our risk assessment methodologies.	1	IF B	
F2.	Full risk assessments of our ingredients and final products.	1	IF B	
F3.	Details of our postmarket safety surveillance strategy.	1	IF E	
F4.	Results of our postmarket safety surveillance.	1	IF E	
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

Final formulations, not packaging materials, are in scope for this KPI.

- For B, ingredient risk assessments must consider the aggregate exposure to individual ingredients from all products that are sold

by a manufacturer and arrive at an acceptable margin of safety. These risk assessments should take into account exposure to vulnerable populations such as children under the age of three, the elderly, pregnant and breast-feeding women, and people with compromised immune systems (as described in the EU Cosmetic Products Regulation (EC) No 1223/2009).

Product level risk assessments must be performed for all products that are sold by a manufacturer and must account for interactions between individual ingredients in final formulations to justify safe use by consumers.

Resources for performing risk assessment, formulating products for adequate microbiological protection, and post market safety surveillance include, but are not limited to, those listed in the Resources section.

## Resources

### **The SCCS Notes of Guidance for the Testing of Cosmetic Ingredients and Their Safety Evaluation - 9th Revision:**

The SCCS Notes of Guidance for the Testing of Cosmetic Ingredients and Their Safety Evaluation is a document compiled by the members of the Scientific Committee on Consumer Safety (SCCS). The document contains information on the different aspects of testing and safety evaluation of cosmetic substances in Europe, with an emphasis on cosmetic ingredients and finished products. It is designed to provide guidance to public authorities and to the cosmetic industry in order to improve harmonized compliance with the current cosmetic EU legislation.

[http://ec.europa.eu/health/scientific\\_committees/consumer\\_safety/docs/sccs\\_o\\_190.pdf](http://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_190.pdf)

### **European Chemicals Agency Guidance on Information Requirements and Chemical Safety Assessment (ECHA):**

This guidance document describes the information requirements under REACH with regard to substance properties, exposure, use and risk management measures, in the context of the chemical safety assessment.

<http://echa.europa.eu/guidance-documents/guidance-on-information-requirements-and-chemical-safety-assessment>

**Microbiological Safety and Cosmetics:** The FDA provides guidance and resources on Microbiological Safety for Cosmetics such as Good Manufacturing Practice for Cosmetics, Microbiological Methods for Cosmetics, and Product Testing.

<https://www.fda.gov/cosmetics/productsingredients/potentialcontaminants/ucm433748.htm>

**Cosmetics Europe The Personal Care Association:** Cosmetics Europe is the European trade association for the cosmetics and personal care industry and provides information on ingredient safety assessment, manufacturing according to good manufacturing practices, marketing, labeling, and market surveillance.

<https://www.cosmeticseurope.eu/cosmetics-industry/understanding-cosmetics-regulation/>

## Definitions

**Risk assessment:** A systematic process to evaluate the potential risks associated with consumer exposure to individual ingredient hazards or final formulations when used in products under conditions of instructed use or foreseeable misuse.

**Postmarket surveillance:** The practice of monitoring the safety of beauty and personal care products after they have been released on the market.

8. Ingredient disclosure to manufacturers			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We require that ONLY a safety data sheet accompany all purchased raw materials and ingredients.	0	OR B - E	
B.	We require a list from our suppliers of all substances intentionally added to ingredients or raw materials.	2	Multi	
C.	We ensure that our suppliers identify in the composition of all raw materials and ingredients any intentionally added chemicals on the stewardship list and incidental chemicals and known contaminants.	3	Multi	
D.	We require from our suppliers that a list accompany all procured raw materials identifying all chemicals on the stewardship list that are reasonably expected to be present at 100 ppm, whether intentionally added or not, and we verify this information by internal testing methodologies or additional research.	5	OR E	
E.	We require from our suppliers that a list accompany all procured raw materials identifying all chemicals on the stewardship list that are reasonably expected to be present at detectable levels, whether intentionally added or not, and we verify this information by internal testing methodologies or additional research.	10	OR D	
<b>TOTAL POINTS AVAILABLE</b>		<b>15</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

Both intentionally and unintentionally added ingredients in final formulations are in scope for this KPI.

- For D and E, chemicals that are reasonably expected to be present include intentionally and unintentionally added ingredients present above trace quantities where the

manufacturer knows or should reasonably know of such ingredients, impurities, or contaminants, unless they are withheld as confidential business information (adapted from the New York State Department of Environmental Conservation).

- For D, the limit of detection is 100 ppm. Chemicals that are reasonably expected to be present at levels lower than 100 ppm are not included.
- For E, chemicals that are reasonably expected to be present at detectable levels are included.

The stewardship list is comprised of the following lists which describe the conditions under which the identified chemicals can or cannot be used. If a chemical on a stewardship list is listed with a qualifying statement on production, exposure, or threshold, the statement should be considered for this KPI.

- CA EPA Prop 65 – Reproductive and Developmental Toxicants, Carcinogens
- EPA Toxics Release Inventory PBTs
- EU – Cosmetics Regulation Annex II
- EU – Priority Endocrine Disruptors (Categories 1, 2)
- EU REACH – Annex XVII CMRs (Appendices 1 - 6)
- IARC – Groups 1, 2A, 2B

These published lists have been referenced in public retailer chemical policies. Where a chemical is accompanied by a specific route of exposure on these published lists and the exposure route is relevant to the product during consumer use or foreseeable misuse, then the chemical is relevant to this KPI.

## Resources

**The Globally Harmonized System of Classification and Labelling of Chemicals (GHS):** GHS provides specific human and environmental health criteria along with physical hazard criteria for chemicals in industry. These criteria are used for hazard communication and labeling of chemicals.

<https://www.osha.gov/dsg/hazcom/global.html>

## Definitions

**Intentionally added ingredient:** A chemical that provides a function to the final formulation during consumer use or is present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases).

**Limit of detection:** Defined by the IUPAC Compendium of Chemical Terminology, 2nd ed. (the “Gold Book”) as: “The limit of detection, expressed as the concentration, or the quantity, is derived from the smallest measure, that can be detected with reasonable certainty for a given analytical procedure.”

**Unintentionally added ingredient:** An ingredient that provides no function in a final formulation and is not present as a result of formulating a product for safe use by consumers (e.g., pH balancing by acids or bases). Unintentionally added ingredients include chemical contaminants (naturally occurring impurities present in procured raw materials that are unintentionally incorporated into final formulations where they provide no function) and incidental chemicals (chemicals in raw materials present as a result of processing or for stabilization such as catalysts, solvents, residual monomers, reactive by-products, and raw material preservatives).

#	KPI TITLE	POINTS	PAGE #
1.	Responsible sourcing	8	51
2.	Human rights – Supply chain	10	52
3.	Palm oil sourcing	10	54
4.	Greenhouse gas – Supply chain	9	57
5.	Greenhouse gas emissions – Manufacturing	9	59
6.	Greenhouse gas – Reduction goal	10	62
7.	Water use – Formulation raw material suppliers	7	64
8.	Water use – Manufacturing	8	66
9.	Water use – Reduction goal	7	68
10.	Water use – Scarcity mapping	7	70
11.	Use phase – Messaging and design	10	72
12a/b.	Biodegradability and environmental risk	10/5	73/75
<b>TOTAL POINTS</b>		<b>105</b>	



# SUPPLY CHAIN & THE ENVIRONMENT

1. Responsible sourcing			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT have policies in place at this time to address responsible sourcing.	0	OR B - E	
B.	We have stated environmental principles and we require all of our suppliers to commit and adhere to them.	1	Multi	
C.	We use supply-chain environmental risk mapping to identify risks associated with our raw material or other component sourcing.	1	Multi	
D.	We conduct audits of suppliers identified as high risk through supply-chain environmental risk mapping and we take corrective action where needed.	2	Multi, OR E	
E.	We do NOT source from suppliers identified as high risk.	5	Multi, OR D	
F.	We publicly disclose our policies.	1	IF B - E	
<b>TOTAL POINTS AVAILABLE</b>		<b>8</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

- Responsible sourcing may be demonstrated by second or third party verification that the raw material has been harvested or produced legally and in a way that minimizes damage to the environment, workers, and communities.
- For D, a risk assessment can include an on-site audit by a second or third party, or a first party systematic risk assessment of suppliers identified as high risk through supply-chain environmental risk mapping.

## Definitions

**Risk assessment:** A systematic process to evaluate potential risks within an operation, system, or supply chain. It can include an on-site audit by a second party or third party or a country risk classification analysis that judges the site risk due to prevailing conditions, controls, or other mitigating factors.

**Public Disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.



2. Human rights – Supply chain			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT have a human rights policy to assure the protection of human rights throughout our products' value chain.	0	OR B - E	
B.	We have a human rights policy to assure the protection of human rights throughout our products' value chain.	1	Multi	
C.	We have publicly communicated our human rights policy.	1	IF B	
D.	We perform internal risk assessments and social compliance audits.	2	Multi	
E.	We conduct third party audits of our suppliers at least once every 36 months.	4	Multi	
F.	Selection of our third party audit locations includes previous human rights incidents.	1	IF E	
G.	We have formal systems in place to ensure that any adverse findings are mitigated.	1	IF B - F	
<b>TOTAL POINTS AVAILABLE</b>		<b>10</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

- For B, the human rights policy must address the following issues: child labor, compensation, discipline, discrimination, forced labor, freedom of association and right to collective bargaining, management systems for human resources, and working hours.
- For D, risk assessments should use tools to determine if a country is low risk or high risk for rights violations. The tool should measure the strength of a country's ability to govern and

enforce laws, regulations, and internationally recognized principles. This assessment may be a first party systematic review assessment, or external risk analyses tools may be utilized. It must be conducted at least once per year.

- The assessments and audits must be verifiable and must address freedom of association & collective bargaining, forced & child labor, fair income, and equality of opportunity & treatment, as outlined by the United Nations Global Compact or the International Labour Organization Declaration on Fundamental Principles and Rights at Work. Other standards, certifications, and tools may also be applicable. Where freedom of association & collective bargaining are restricted by law,

employers can use other forms of non-union employee representation and relations to respect this aspect of workers' rights. Audits must have been completed within 12 months of the completion date of this question.

- For C and E, public reporting and third-party audits are valid for vertically integrated organizations.

## Resources

### **Business Social Compliance Initiative Countries' Risk Classification:**

This list classifies countries' risk of social injustice in an effort to assist companies in determining high and low risk for their sourcing and operations.

<http://www.amfori.org/resource/countries-risk-classification>

### **United Nations Global Compact Human Rights and Business**

**Dilemmas Forum:** United Nations Global Compact Human Rights and Business Dilemmas Forum present an introduction to, analysis of, and business recommendations for minimizing social sustainability risks in the supply chain.

<https://hrbdf.org/>

**Social Accountability International SA8000 Standard:** SA8000 is a human rights standard that can be used for audits of workplaces across industries. It is based on principles developed by the United Nations Declaration on Human Rights and the Conventions of the International Labour Organization.

<http://www.sa-intl.org/index.cfm?fuseaction=page.viewpage&pageid=1689>

### **International Labour Organization Declaration on Fundamental**

**Principles and Rights at Work:** This declaration outlines the universal rights of all workers regardless of citizenship status, gender, or the local level of economic development.

<http://www.ilo.org/declaration/lang-en/index.htm>

## Definitions

**Human rights incident:** An incident which violates the human rights of workers within the value chain.

**Human rights:** Universal rights of all human beings as born free and equal in dignity and rights as described in the United Nations Universal Declaration of Human Rights.

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

**Risk assessment:** A systematic process to evaluate potential risks within an operation, system, or supply chain. It can include an on-site audit by a second party or third party or a country risk classification analysis that judges the site risk due to prevailing conditions, controls, or other mitigating factors.

**Third-party audit:** An audit conducted by external, independent auditing organizations, such as those providing certification of conformity to a standard.

3. Palm oil sourcing			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT go beyond legal and regulatory compliance regarding the procurement of palm oil and palm oil-derived ingredients.	0	OR B - H	
B.	_____ % of our palm oil and palm oil-derived ingredients is from Certified Sustainable Palm Oil (CSPO) purchased through book and claim.	1 x (%)	Multi	
C.	_____ % of our palm oil and palm oil-derived ingredients is physical Certified Sustainable Palm Oil (CSPO).	3 x (%)	Multi	
D.	We have implemented and have publicly disclosed sourcing policies that go beyond RSPO, or equivalent, Principles & Criteria by including policy provisions for the protection of high carbon stock forests.	1	Multi	
E.	We have implemented and have publicly disclosed sourcing policies that go beyond RSPO, or equivalent, Principles & Criteria by including policy provisions for no new development on peat regardless of depth.	1	Multi	
F.	We have implemented and have publicly disclosed sourcing policies that go beyond RSPO, or equivalent, Principles & Criteria by including policy provisions for no use of burning in new plantings or replanting.	1	Multi	
G.	We have implemented and have publicly disclosed efforts to trace our palm oil supply from plantation to mill.	1	Multi	
H.	_____ % of our palm oil and palm oil-derived ingredients can be traced to the palm oil mill.	2 x (%)	Multi	
<b>TOTAL POINTS AVAILABLE</b>		<b>10</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

Palm oil supply includes all palm oil, palm kernel oil, and their chemically-derived ingredients purchased or produced for inclusion in your final products.

- Calculate B as the mass of your certified palm oil and palm oil-derived ingredient supply for your beauty and personal care products sold in the United States that was purchased through book and claim (e.g., GreenPalm), divided by the total mass of your palm oil ingredient supply for your beauty and personal care products sold in the United States, then multiply by 100.

- Calculate C as the mass of your certified palm oil and palm oil-derived ingredient supply for your beauty and personal care products sold in the United States that is physical Certified Sustainable Palm Oil (CSPO), divided by the total mass of your palm oil ingredient supply for your beauty and personal care products sold in the United States, then multiply by 100.
- The sum of B and C must not exceed 100%.
- For D, the sourcing of palm oil ingredient supply that did not originate from new plantations established on high carbon stock land corresponds to criterion NDF 2.1 in the RSPO Next Guidance Document (2016) and requirement 1.1 of the Palm Oil Innovation Group Charter (2013) and Verification Indicators (2016). A new plantation is one that is in its first year of commercial production but may have been planted in previous years. New plantations include expansions of existing plantations.
- For E, the sourcing of palm oil ingredient supply that had no new developments on peatlands regardless of depth (CGF 2015) corresponds to criterion PT 1.1 in the RSPO Next Guidance Document (2016) and requirement 1.2 of the Palm Oil Innovation Group Charter (2013) and Verification Indicators (2016).
- For F, the sourcing policy must include policy provisions for no use of burning in new plantings, re-plantings, or any other developments, including the management of existing plantations (CGF 2015). This corresponds to criterion NFR 1.1 in the RSPO Next Guidance Document (2016).
- For D - G, public disclosure must have occurred within 12 months of the date you respond to this question.
- Calculate H as the mass of your palm oil ingredient supply for your beauty and personal care products that is traceable from plantation to mill, divided by the total mass of your palm oil ingredient supply for your beauty and personal care products sold in the United States, then multiply by 100. This corresponds to criterion TR 3.1 in the RSPO Next Guidance Document (2016) and requirement 3.2 of the Palm Oil Innovation Group Charter (2013) and Verification Indicators (2016).
- Perform these calculations using data from a 12-month period that ended within 12 months of the completion date of this questionnaire.

The assessments and audits must be verifiable and must address freedom of association & collective bargaining, forced & child labor, fair income, and equality of opportunity & treatment, as outlined by the United Nations Global Compact or the International Labour Organization Declaration on Fundamental Principles and Rights at Work. Other standards, certifications, and tools may also be applicable. Where freedom of association & collective bargaining are restricted by law, employers can use other forms of non-union employee representation and relations.

## Resources

### **Consumer Goods Forum Sustainable Palm Oil Sourcing Guidelines**

**(CGF 2015):** The Consumer Good Forum (CGF) Sustainable Palm Oil Sourcing Guidelines help companies design their own policies for sourcing palm oil more sustainably and achieving deforestation reduction goals.

[https://www.theconsumergoodsforum.com/press\\_releases/the-consumer-goods-forum-publishes-palm-oil-sourcing-guidelines/](https://www.theconsumergoodsforum.com/press_releases/the-consumer-goods-forum-publishes-palm-oil-sourcing-guidelines/)

**Palm Oil Innovation Group Charter (2013):** The Palm Oil Innovation Group (POIG) Charter supports the group's goals to support innovation and improvements in palm oil plantation management, create value for those using the practices outlined, and be a platform for communication for plantation managers and governments.

<http://poig.org/the-poig-charter/>

**Roundtable on Sustainable Palm Oil (RSPO) - Certification:** The RSPO certification is a seal of approval ensuring that the palm oil is traceable through the supply chain by certifying each facility that processes or uses it. RSPO was founded on and supports principles for palm oil production including transparency, regulatory compliance, financial viability, natural resource conservation, and continuous improvement.

<http://www.rspo.org/about>

**The Roundtable on Sustainable Palm Oil - RSPO NEXT:** The components of RSPO NEXT fall into the following categories: no deforestation, no fire, no planting on peat, reduction of GHGs, respect for human rights, and transparency and are applicable at an organization-wide level, including investments, joint ventures, and in the organization's wider supply base.

<http://www.rspo.org/certification/rspo-next>

**GreenPalm - Certified Sustainable Palm Oil:** The GreenPalm trading program allows companies to support RSPO growers and suppliers by allowing them to purchase book and claim certificates of RSPO to offset their use of palm and palm kernel oil.

<http://greenpalm.org/>

## Definitions

**Chemically-derived ingredients:** Any material that originated from a chemical reaction that included palm oil or palm kernel oil as a raw material. Examples of ingredients that may be derived from palm oil or palm kernel oil include, but are not limited to: surfactants such as sodium lauryl sulfate, sodium laureth sulfate, and sodium dodecyl sulphate; emulsifiers such as glyceryl stearate, steareth-20, and cetyl alcohol, as well as emollients such as palmitic acid.

**Physical certified sustainable palm oil:** Palm oil certified through identity preserved, segregated, or mass balance processes.

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

4. Greenhouse gas – Supply chain			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We are unable to determine what percentage of our ingredients, by total spend, was produced by suppliers that reported their annual scope 1 and 2 greenhouse gas emissions in the last twelve months.	0	OR B - C	
B.	_____ % of our ingredients, by total spend, was produced by suppliers that reported scope 1 and 2 greenhouse gas emissions in the last twelve months:	7 × (%)	Multi	
C.	We have set goals to reduce our scope 3 greenhouse gas emissions. We track, and publicly disclose, our scope 3 emissions.	2	Multi	
<b>TOTAL POINTS AVAILABLE</b>		<b>9</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

- Scope 1, 2, and 3 emissions are defined by the Greenhouse Gas Protocol Corporate Standard (2013).
- Calculate B as the spend on ingredient suppliers for beauty and personal care products sold in the United States that reported scope 1 and 2 greenhouse gas emissions, divided by total spend on all ingredient suppliers for beauty and personal care products sold in the United States, then multiply by 100.
- Perform these calculations using data from a 12-month period that ended within 12 months of the completion date of this questionnaire.
- Reporting can occur through public disclosure or private disclosure from the supplier to your organization directly or through another party.
- If suppliers responded to the most recent CDP Climate Change Information Request you may refer to each supplier's CDP Climate Change responses (in the 2016 information request, refer to questions CC8.2: Scope 1 Emissions Data and CC8.3: Scope 2 Emissions Data to determine if they report emissions).
- For C, public disclosure must have occurred within 12 months of the date you respond to this question. Resources that can be used to establish and track greenhouse gas reduction goals include, but are not limited to, the Greenhouse Gas (GHG) Protocol Corporate Standard and GRI Performance Indicators.

## Resources

**The Global Reporting Initiative:** The Global Reporting Initiative provides guidance globally on sustainable reporting standards.

<https://www.globalreporting.org/Pages/resource-library.aspx>

**Greenhouse Gas Protocol - Calculation Tools:** This site provides a list of sector toolsets developed by GHG Protocol, third-party databases, and other tools based on the GHG Protocol standards that can be used to calculate greenhouse gas inventories for use in emissions calculations.

<http://www.ghgprotocol.org/calculation-tools>

**Greenhouse Gas (GHG) Protocol Corporate Standard:** The Greenhouse Gas (GHG) Protocol provides guidance and is a useful resource published by the World Resources Institute with the World Business Council for Sustainable Development as a guide for monitoring and accounting for greenhouse gas emissions.

<http://www.ghgprotocol.org/corporate-standard>

**CDP Climate Change Information Request:** The CDP Climate Change Information Request provides questions that assess a company's carbon use, goals, and management. This CDP report provides the overview of the results from companies responding to the request. CDP can be contacted to respond to the Climate Information Request.

<https://www.cdp.net/en/research/global-reports/tracking-climate-progress-2016>

**GRI G4 Sustainability Reporting Guidelines:** The GRI G4 Sustainability Reporting Guidelines provide a standard set of metrics for companies to report on material environmental, social, and economic impacts, actions, and outcomes.

<https://www.globalreporting.org/information/g4/Pages/default.aspx>

## Definitions

**Goals:** Goals should be specific, measurable, achievable, relevant, and time-bound.

**Greenhouse gas:** Gases that contribute to the greenhouse effect by absorbing infrared radiation in the atmosphere, e.g., carbon dioxide, methane, nitrous oxide, ozone, and chlorofluorocarbons.

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

5. Greenhouse gas emissions – Manufacturing			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	RULES
A.	We do NOT report to CDP and we are NOT able to determine at this time the GHG emissions intensity in our company-owned or contract-manufacturing facilities.		0	OR B OR C
B.	Our CDP Letter Score for company-owned or contract-manufacturing facilities is:	A: 9 points × 1.00 B: 9 points × 0.75 C: 9 points × 0.50 D: 9 points × 0.25 E: 9 points × 0.00	9	OR C
C.	We have measured our GHG intensity and are able to report the following:			OR B
C1.	_____kg CO <sub>2</sub> e emissions per tonne of product from our company-owned and contract-manufacturing facilities.			
C2.	_____ % of our product is represented by the number reported above.		9 x (%)	IF C1
<b>TOTAL POINTS AVAILABLE</b>			<b>9</b>	

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

The scope of this KPI includes greenhouse gas emissions from company-owned or contract-manufacturing facilities that manufacture beauty and personal care products for sale in the United States.

- If your organization reports to CDP or is able to determine its GHG emissions intensity then answer either B OR C, not both.
- Included in the scope of this question are fuels combusted and electricity used in facilities that perform final manufacturing

activities for beauty and personal care products, as well as trace gases released during the manufacture of these products. This may include some or all corporate scope 1 and 2 emissions, as well as scope 1 and 2 emissions from any final manufacturing facilities not within an organization's financial or operational control (e.g., contract manufacturers). Excluded from the scope of this question are GHG allowances, offsets, and credits.

- For B, enter your most recent CDP letter score for company-owned or contract manufacturing facilities. This score must have been earned within 12 months of the completion date of this questionnaire.



- C1 may be calculated using product-specific data or the intensity may be estimated via facility data that is not product specific. If using product-specific data, calculate C1 as the average of each product's greenhouse gas emissions intensity, weighted by the mass of each product.
- If using facility data, calculate C1 as the average of each final manufacturing facility's greenhouse gas emissions intensity, weighted by the mass in tonnes, of beauty and personal care product for sale in the United States produced. If the manufacturing facilities produce more than one category of product, only weight using the total weight of production specific to beauty and personal care products for sale in the United States.
- Calculate C2 as the mass of beauty and personal care products for sale in the United States for which you are able to obtain data, divided by total mass of beauty and personal care products for sale in the United States produced, then multiply by 100. For each final manufacturing facility, follow the instructions in the Greenhouse Gas Protocol Corporate Standard (2013) to calculate scope 1 and 2 greenhouse gas emissions generated from electricity purchased or produced, fuels combusted, and trace gases released, and then add them together. Worksheets are available on the GHG Protocol website to facilitate these calculations.
- Perform these calculations using data from a 12-month period that ended within 12 months of the completion date of this questionnaire.
- The data required for the most recent CDP Climate Change Information Request combined with production data can be used to calculate the response (in the 2016 information request, refer to CC9.2b: Scope 1 Emissions Breakdown by Facility and CC10.2b: Scope 2 Emissions Breakdown by Facility or CC12.4 Question Emissions Performance). The data required for GRI G4 Sustainability Report Guidelines metric G4-EN3: Energy Consumption within the Organization, or metrics G4-EN15: Direct Greenhouse Gas Emissions and G4-EN16: Energy Indirect Greenhouse Gas Emissions can also be used to calculate the response.

## Resources

**Greenhouse Gas Protocol - Calculation Tools:** This site provides a list of sector toolsets developed by GHG Protocol, third-party databases, and other tools based on the GHG Protocol standards that can be used to calculate greenhouse gas inventories for use in emissions calculations.

<http://www.ghgprotocol.org/calculation-tools>

**CDP Climate Change Information Request:** The CDP Climate Change Information Request provides questions that assess a company's carbon use, goals, and management. This CDP report provides the overview of the results from companies responding to the request. CDP can be contacted to respond to the Climate Information Request <https://www.cdp.net/en/research/global-reports/tracking-climate-progress-2016>

**GRI G4 Sustainability Reporting Guidelines:** The GRI G4 Sustainability Reporting Guidelines provide a standard set of metrics for companies to report on material environmental, social, and economic impacts, actions, and outcomes.

<https://www.globalreporting.org/information/g4/Pages/default.aspx>

**Greenhouse Gas (GHG) Protocol Corporate Standard:** The Greenhouse Gas (GHG) Protocol provides guidance and is a useful resource published by the World Resources Institute with the World Business Council for Sustainable Development as a guide for monitoring and accounting for greenhouse gas emissions.

<http://www.ghgprotocol.org/corporate-standard>

## Definitions

**Company-owned or contract manufacturing facilities:**

Facilities responsible for manufacturing and assembly of final products, whether these facilities are internal or external to the respondent's organization.

**Greenhouse gas:** Gases that contribute to the greenhouse effect by absorbing infrared radiation in the atmosphere, e.g., carbon dioxide, methane, nitrous oxide, ozone, and chlorofluorocarbons.

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

6. Greenhouse gas - Reduction goal			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We have NOT set, tracked, or publicly disclosed a goal to reduce our greenhouse gas emissions from the company-owned and contract manufacturing facilities that produce our products.	0	OR B - C	
B.	We set, track, and publicly disclose an intensity-based goal(s) and results to reduce our greenhouse gas emissions from the company-owned and contract manufacturing facilities that produce our products.	2	Multi	
C.	We set, track, and publicly disclose an absolute goal(s) and results to reduce our greenhouse gas emissions from the company-owned and contract manufacturing facilities that produce our products.	4	Multi	
D.	We set, track, and publicly disclose an absolute science-based goal(s) and results to reduce our greenhouse gas emissions from the company-owned and contract manufacturing facilities that produce our products.	2	IF C	
E.	We publicly disclose our greenhouse gas emissions.	2	IF B - D	
<b>TOTAL POINTS AVAILABLE</b>		<b>10</b>		

## Guidance

The scope of this KPI includes company-level activities for manufacturers that sell beauty and personal care products in the United States. Company-level activities for products sold in other regions are not to be considered.

Resources that can be used to establish and track greenhouse gas reduction goals include, but are not limited to, the Greenhouse Gas (GHG) Protocol Corporate Standard and GRI Performance Indicators.

- For B, intensity based goals include, but are not limited to, reducing emissions intensity to a defined amount, interim carbon intensity goals, and increasing non-carbon generating capacity by a target time frame.
- For C, an absolute GHG reduction goal is one that is set using one of a number of methodologies, including, but not limited to, those established by the Science-Based Targets Initiative.
- For D, absolute science based goals are defined by WRI and must be in line with the two degree Celsius temperature limit as described by IPCC.
- For E, public disclosure must have occurred within 12 months of the completion date of this questionnaire.

## Resources

**The Global Reporting Initiative:** The Global Reporting Initiative is an international independent organization that provides guidance globally on sustainable reporting standards on sustainability issues such as climate change, human rights, corruption and many others.

<https://www.globalreporting.org/Pages/resource-library.aspx>

**Science Based Targets:** This initiative, a collaboration between CDP, World Resources Institute (WRI), the World Wide Fund for Nature (WWF), and the United Nations Global Compact (UNGC), and one of the We Mean Business Coalition commitments, aims to showcase and promote science based targets for GHG emission reduction. Science Based Targets sets best practices for science-based target setting, offers resources for adoption, and independently assesses company targets.

<http://sciencebasedtargets.org/>

**Greenhouse Gas (GHG) Protocol Corporate Standard:** The Greenhouse Gas (GHG) Protocol provides guidance and is a useful resource published by the World Resources Institute with the World Business Council for Sustainable Development as a guide for monitoring and accounting for greenhouse gas emissions.

<http://www.ghgprotocol.org/corporate-standard>

**World Resources Institute, WRI Report - Target Intensity:** This analysis provides an overview of GHG Intensity targets along with rationales for establishing these targets and an assessment of the environmental effectiveness of establishing and achieving these goals. Complex issues surrounding public interpretation and compliance are also addressed.

<http://www.wri.org/publication/target-intensity>

## Definitions

**Absolute GHG reduction goal:** A goal for GHG reduction based on a reduction in total emissions expressed as tons of CO<sub>2</sub> equivalent per year.

**Absolute science-based goal:** Defined by Science Based Targets as “Targets adopted by companies to reduce greenhouse gas (GHG) emissions are considered “science-based” if they are in line with the level of decarbonization required to keep global temperature increase below 2 degrees Celsius compared to pre-industrial temperatures, as described in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC AR5).”

**Company-owned or contract manufacturing facilities:** Facilities responsible for manufacturing and assembly of final products, whether these facilities are internal or external to the respondent’s organization.

**Greenhouse gas:** Gases that contribute to the greenhouse effect by absorbing infrared radiation in the atmosphere, e.g., carbon dioxide, methane, nitrous oxide, ozone, and chlorofluorocarbons.

**Intensity based goals:** A goal for GHG reduction based on decreased emissions per unit of output (e.g., tons CO<sub>2</sub>e per unit produced).

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

7. Water use – Formulation raw material suppliers			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We are unable to determine the percentage of our ingredients, by total spend, that was produced by suppliers that reported their annual water use.	0	OR B	
B.	_____ % of ingredients, by total spend, was produced by suppliers that reported their annual water use in the last twelve months.	7 x (%)	OR A	
<b>TOTAL POINTS AVAILABLE</b>		<b>7</b>		

## Guidance

The scope of this KPI includes water use at facilities that produce beauty and personal care ingredients for products sold in the United States. Impacts for products sold in other regions are not to be considered.

- Calculate B as the total spend on ingredient suppliers for your beauty and personal care products sold in the United States that reported their annual water use, divided by the total spend on all ingredient suppliers for your beauty and personal care products sold in the United States, then multiply by 100.
  - Perform these calculations using data from a 12-month period that ended within 12 months of the completion date of this questionnaire.
  - Supplier water use reporting can occur through public disclosure or private disclosure from the supplier to your organization directly or through another party.
- If suppliers responded to the most recent CDP Water Information Request, you may refer to each supplier's CDP Water responses (in the 2018 information request, refer to questions W1.2: Company-Wide Water Accounting or W5.1 Facility-Level Water Accounting to determine if they report water use).

## Resources

**CDP Water Information Request:** The CDP Water Information Request provides questions that assess a company's water use, goals, and management. The report provided by CDP provides the overview of the results from companies responding to the request. CDP can be contacted to respond to the Water Information Request.

<https://www.cdp.net/en/research/global-reports/global-water-report-2015>

**GRI G4 Sustainability Reporting Guidelines:** The GRI G4 Sustainability Reporting Guidelines provide a standard set of metrics for companies to report on material environmental, social, and economic impacts, actions, and outcomes.

<https://www.globalreporting.org/information/g4/Pages/default.aspx>

## Definitions

**Water Use:** Water use is defined as total withdrawals from municipal and private water providers, surface water, groundwater, or wells.

**Public Disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

8. Water use – Manufacturing			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	RULES
A.	We do NOT report to CDP and we are NOT able to determine at this time the water use intensity in our company-owned or contract-manufacturing facilities.		0	OR B OR C
B.	Our CDP Water Score for company-owned or contract-manufacturing facilities is:	A: 8 points × 1.00 B: 8 points × 0.75 C: 8 points × 0.50 D: 8 points × 0.25 E: 8 points × 0.00	8	OR C
C.	We have measured our water use intensity and are able to report the following:			OR B
C1.	_____ liters of water per tonne of product.			
C2.	_____ % of our product is represented by the number reported above..		8 x (%)	IF C1
<b>TOTAL POINTS AVAILABLE</b>			<b>8</b>	

## Guidance

The scope of this KPI includes water use at facilities that manufacture beauty and personal care products for sale in the United States.

Activities for products sold in other regions are not to be considered.

- If your organization reports to CDP or is able to determine its water use intensity then answer either B OR C, not both.
- For B, enter the most recent CDP letter score for company-owned or contract manufacturing facilities. This score must have been earned within 12 months of the completion date of this questionnaire.
- You may calculate C1 using product-specific data or estimate intensity via facility data that is not product specific. If using product-specific data, calculate C1 as the average of each product's water use intensity, weighted by the mass of each product.
- If using facility data, calculate C1 as the average of each final manufacturing facility's water use intensity, weighted by the total mass of final product produced. If the manufacturing facilities produce more than one category of product, only weight using the total weight of production specific to beauty and personal care products.

- Calculate C2 as the mass of beauty and personal care products sold in the United States for which you are able to obtain data, divided by total mass of beauty and personal care products sold in the United States produced, then multiply by 100.
- Perform these calculations using data from a 12-month period that ended within 12 months of the completion date of this questionnaire.
- The data required for CDP's 2018 Water Information Request, question W1.2 Company-Wide Water Accounting or W5.1 Facility Level Water Accounting, or GRI's Water Disclosure Standard (GRI 303-1: Water 2016, Total Water Withdrawal by Source), can be used to answer this question.

## Resources

**CDP:** This program assists in the measuring and reporting of carbon emissions and water use.

<https://www.cdp.net/>

**CDP Water Information Request:** The CDP Water Information Request provides questions that assess a company's water use, goals, and management. The report provided by CDP provides the overview of the results from companies responding to the request. CDP can be contacted to respond to the Water Information Request.

<https://www.cdp.net/en/research/global-reports/global-water-report-2015>

**GRI G4 Sustainability Reporting Guidelines:** The GRI G4 Sustainability Reporting Guidelines provide a standard set of metrics for companies to report on material environmental, social, and economic impacts, actions, and outcomes.

<https://www.globalreporting.org/information/g4/Pages/default.aspx>

## Definitions

### **Company-owned or contract manufacturing facilities:**

Facilities responsible for manufacturing and assembly of final products, whether these facilities are internal or external to the respondent's organization.

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

**Water use:** The total withdrawals from municipal and private water providers, surface water, groundwater, or wells.



9. Water use – Reduction goal			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We do NOT have an intensity-based target or absolute goal to reduce our water use from company-owned and contract manufacturing facilities.	0	OR B OR C	
B.	We set, track, and publicly disclose our intensity-based goal(s) and results to reduce our water use in the company-owned and contract manufacturing facilities that produce our products.	2	OR C	
C.	We set, track, and publicly disclose our absolute goal(s) and results to reduce our water use in the company-owned and contract manufacturing facilities that produce our products.	4	OR B	
D.	We publicly disclose our water use.	3	IF B OR C	
<b>TOTAL POINTS AVAILABLE</b>		<b>7</b>		

## Guidance

The scope of this KPI includes water use for facilities that manufacture beauty and personal care products for sale in the United States.

Activities for products sold in other regions are not to be considered.

Resources that can be used to establish goals for water reduction include, but are not limited to, those in the Resources section.

## Resources

**Water Footprint Network:** The Water Footprint Network is a network of over 200 partners from large companies to small-scale suppliers, financial institutions and regulatory bodies, non-profit organizations, and academia. This organization provides various tools, assessments, and information regarding water consumption accounting.

[www.waterfootprint.org](http://www.waterfootprint.org)

## Definitions

**Absolute water reduction goal:** An organization's goal for water use reduction expressed as liters of water per year.

**Company-owned or contract manufacturing facilities:** Facilities responsible for manufacturing and assembly of final products, whether these facilities are internal or external to the respondent's organization.

**Goals:** Goals should be specific, measurable, achievable, relevant, and time-bound.

**Intensity-based water goal:** A goal for water use reduction expressed as liters per unit of output (e.g., liters per unit produced).

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

**Water use:** The total withdrawals from municipal and private water providers, surface water, groundwater, or wells.

10. Water use – Scarcity mapping			Company	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	We have NO formal, documented program to reduce water use in our manufacturing or from our raw material suppliers and have conducted NO water scarcity mapping.	0	OR B - C OR E	
B.	We have conducted water scarcity mapping to identify our high risk manufacturing facilities that are in water scarce areas and have publicly disclosed our findings.	3	OR E	
C.	We have conducted water scarcity mapping to identify our raw material production facilities in our supply chain that are in water scarce areas and we have publicly disclosed our findings.	3	OR E	
D.	We have achieved our established goals from the last 48 months.	1	IF B OR C	
E.	We have conducted water scarcity mapping and have determined that our manufacturing facilities and raw material production facilities are not in water scarce areas.	7	OR B - C	
<b>TOTAL POINTS AVAILABLE</b>		<b>7</b>		

## Guidance

The scope of this KPI includes water scarcity mapping at facilities that produce beauty and personal care raw materials and final products for sale in the United States.

Tools that can be used to perform water scarcity mapping include, but are not limited to, those in the Resources section.

## Resources

### World Resources Institute - Aqueduct Measuring and Mapping Water Risk

**Risk:** WRI created the global water risk mapping tool, Aqueduct, which uses 12 indicators to map where and how water risks and opportunities occur globally.

<http://www.wri.org/our-work/project/aqueduct>

**Global Water Tool:** This tool from World Business Council for Sustainable Development creates maps of water use and assesses corresponding risks.

<https://www.wbcsd.org/Clusters/Water/Resources/Global-Water-Tool>

## Definitions

**Public disclosure:** Voluntary corporate reporting, sustainability reporting programs, or reporting as part of regulatory compliance.

**Raw material:** The basic materials from which a product is made. Raw materials are composed of synthetic or naturally derived ingredients or ingredient blends and may contain unintentionally added chemicals that are incidental or contaminants.

**Water scarce area:** A geographical area that lacks access to adequate quantities of water for use by humans and the environment.

11. Use phase – Messaging and design			Category	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	For products in this category, we have NOT conducted an on-pack, web-based, or media educational campaign in the last twelve months to inform consumers regarding the reduction of energy, water consumption, or product waste.	0	OR B - D	
B.	For products in this category, we have conducted an on-pack, web-based, or media educational campaign in the last twelve months to inform consumers regarding the reduction of energy, water consumption, or product waste.	3	OR A	
C.	For products in this category, we measure and track the reach of our communications through consumer surveys or other market research.	3	IF B	
D.	For products in this category, we develop and market products that are designed to reduce energy, water consumption, or product waste during consumer use phase.	4	OR A	
<b>TOTAL POINTS AVAILABLE</b>		<b>10</b>		

## Guidance

- For D, an example of a product that qualifies for this response option is one that is designed to replace a product that requires more water or energy to use while providing the same functionality to the consumer.

## Definitions

**Public disclosure:** The act of making information available and readily accessible to consumers.

**Consumer use phase:** The life cycle stage of a product during which it is being used by a consumer.

12a. Biodegradability and environmental risk			Product	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	Not applicable. This KPI is being answered at the category level.	NA	OR KPI 12b	
B.	We do NOT evaluate the biodegradability and/or environmental risk of the ingredients used in our products.	0	OR C - G	
C.	We have a program in place to evaluate the environmental safety of our ingredients using risk assessment methodologies that consider environmental fate (including biodegradability), toxicity, and exposure for the relevant environmental compartments.	1	Multi	
D.	We continuously work to develop new methods and drive the science regarding biodegradation testing in order to ensure that biodegradation is being assessed accurately in all relevant environmental compartments.	1	Multi	
E.	_____% of our organic ingredients for this product, by number, have been evaluated for biodegradability using standardized test methods, or accepted <i>in silico</i> models where appropriate.	3 × (%)	Multi	
F.	_____% of our organic ingredients for this product, by number, achieve pass level criteria for ready or inherent biodegradability using standardized test methods, or accepted <i>in silico</i> models where appropriate.	3 × (%)	Multi	
G.	_____% of all of our product's ingredients, by number, that were evaluated for environmental fate and environmental risk have been determined to be safe for the environment in our product's use scenario.	2 × (%)	Multi	
<b>TOTAL POINTS AVAILABLE</b>		<b>10</b>		

## Guidance

This KPI is to be answered only once per responder, either at the product level (KPI #12a) or at the product category level (KPI #12b).

- For C, resources for environmental risk assessment include, but are not limited to, those in the Resources section.
- Calculate E as the number of organic ingredients in this product that have been evaluated for biodegradability using standardized test methods, or accepted *in silico* models where appropriate, divided by the total number of organic ingredients in this product, then multiply by 100.
- Calculate F as the number of organic ingredients in this product that achieve pass level criteria for ready or inherent biodegradability using standardized test methods, or accepted *in silico* models where appropriate, divided by the total number of organic ingredients in this product, then multiply by 100.

in *silico* models where appropriate divided by the total number of organic ingredients in this product, then multiply by 100.

- Calculate G as the number of ingredients in this product that were evaluated for environmental fate and environmental risk that have been determined to be safe for the environment in this product's use scenario, divided by the total number of ingredients in this product, then multiply by 100.

## Resources

### European Chemicals Bureau - Technical Guidance Document on Risk

**Assessment:** This document outlines environmental chemical risk assessment methodologies for notified new substances.

[https://echa.europa.eu/documents/10162/16960216/tgdpart2\\_2ed\\_en.pdf](https://echa.europa.eu/documents/10162/16960216/tgdpart2_2ed_en.pdf)

**EPA Ecological Risk Assessment:** This EPA website describes the phases necessary for effective ecological risk assessment which include planning and scoping, problem formulation, analysis, and risk characterization.

<https://www.epa.gov/risk/ecological-risk-assessment>

### OECD Guidelines for the Testing of Chemicals, Section 3 - Test No.

**301:** Ready Biodegradability: This OECD Test Guideline outlines the steps necessary to perform tests for ready biodegradability.

[http://www.oecd-ilibrary.org/environment/test-no-301-ready-biodegradability\\_9789264070349-en](http://www.oecd-ilibrary.org/environment/test-no-301-ready-biodegradability_9789264070349-en)

### OECD Guidelines for the Testing of Chemicals, Section 3 - Test No.

**302B:** Inherent Biodegradability: Zahn-Wellens/ EVPA Test: This OECD Test Guideline outlines the steps necessary to perform tests for inherent biodegradability.

<http://www.oecd-ilibrary.org/content/book/9789264070387-en>

### Guidance on Information Requirements and Chemical Safety

**Assessment Chapter R.7b:** Endpoint specific guidance. Version 4.0

– June 2017: This guidance document provides valuable information regarding REACH regulatory requirements with emphasis on substance properties, exposure, uses, and risk management measures.

[https://echa.europa.eu/documents/10162/13632/information\\_requirements\\_r7b\\_en.pdf](https://echa.europa.eu/documents/10162/13632/information_requirements_r7b_en.pdf)

## Definitions

**Biodegradability:** A property of matter in which it is able to be decomposed by bacteria or other living organisms.

**Environmental fate:** The fate of a chemical in the environment after its disposal by a consumer.

**Risk assessment:** A systematic process to evaluate the potential risks associated with environmental release of individual ingredients or final formulations.

12b. Biodegradability and environmental risk			Category	
LABEL	RESPONSE OPTION/METRIC	POINTS	RULES	
A.	Not applicable. This KPI is being answered at the product level.	NA	OR KPI 12a	
B.	We do NOT evaluate the biodegradability and/or environmental risk of the ingredients used in our products.	0	OR C - G	
C.	We have a program in place to evaluate the environmental safety of our ingredients using risk assessment methodologies that consider environmental fate (including biodegradability), toxicity, and exposure for the relevant environmental compartments.	1	Multi	
D.	We continuously work to develop new methods and drive the science regarding biodegradation testing in order to ensure that biodegradation is being assessed accurately in all relevant environmental compartments.	1	Multi	
E.	_____ % of our organic ingredients in this category, by number, have been evaluated for biodegradability using standardized test methods, or accepted <i>in silico</i> models where appropriate.	1 × (%)	Multi	
F.	_____ % of our organic ingredients in this category, by number, achieve pass level criteria for ready or inherent biodegradability using standardized test methods, or accepted <i>in silico</i> models where appropriate.	1 × (%)	Multi	
G.	_____ % of all of our products' ingredients in this category, by number, that were evaluated for environmental fate and environmental risk have been determined to be safe for the environment in our products' use scenarios.	1 × (%)	Multi	
<b>TOTAL POINTS AVAILABLE</b>		<b>5</b>		

## Guidance

This KPI is to be answered only once per responder, either at the product level (KPI #12a) or at the product category level (KPI #12b).

For B - D, the scope of the response options is company level but the subsequent response options are product level.

- For C, resources for environmental risk assessment include, but are not limited to, those in the Resources section.

- Calculate E as the number of organic ingredients for products sold in the United States in this product category that have been evaluated for biodegradability using standardized test methods, or accepted *in silico* models where appropriate, divided by the total number of organic ingredients for products sold in the United States in this product category, then multiply by 100.



- Calculate F as the number of organic ingredients in this product category that achieve pass level criteria for ready or inherent biodegradability using standardized test methods, or accepted in silico models where appropriate divided by the total number of organic ingredients in this product category, then multiply by 100.
- Calculate G as the number of ingredients for products sold in the United States in this product category that were evaluated for environmental fate and environmental risk that have been determined to be safe for the environment in this product's use scenario, divided by the total number of ingredients for products sold in the United States in this product category, then multiply by 100.

## Resources

### European Chemicals Bureau - Technical Guidance Document on Risk

**Assessment:** This document outlines environmental chemical risk assessment methodologies for notified new substances.

[https://echa.europa.eu/documents/10162/16960216/tgdpart2\\_2ed\\_en.pdf](https://echa.europa.eu/documents/10162/16960216/tgdpart2_2ed_en.pdf)

**EPA Ecological Risk Assessment:** This EPA website describes the phases necessary for effective ecological risk assessment which include planning and scoping, problem formulation, analysis, and risk characterization.

<https://www.epa.gov/risk/ecological-risk-assessment>

### OECD Guidelines for the Testing of Chemicals, Section 3 - Test No.

**301:** Ready Biodegradability: This OECD Test Guideline outlines the

steps necessary to perform tests for ready biodegradability.

[http://www.oecd-ilibrary.org/environment/test-no-301-ready-biodegradability\\_9789264070349-en](http://www.oecd-ilibrary.org/environment/test-no-301-ready-biodegradability_9789264070349-en)

### OECD Guidelines for the Testing of Chemicals, Section 3 - Test No.

**302B:** Inherent Biodegradability: Zahn-Wellens/ EVPA Test: This OECD Test Guideline outlines the steps necessary to perform tests for inherent biodegradability.

<http://www.oecd-ilibrary.org/content/book/9789264070387-en>

### Guidance on Information Requirements and Chemical Safety

**Assessment Chapter R.7b:** Endpoint specific guidance. Version 4.0

– June 2017: This guidance document provides valuable information regarding REACH regulatory requirements with emphasis on substance properties, exposure, uses, and risk management measures.

[https://echa.europa.eu/documents/10162/13632/information\\_requirements\\_r7b\\_en.pdf](https://echa.europa.eu/documents/10162/13632/information_requirements_r7b_en.pdf)

## Definitions

**Biodegradability:** A property of matter in which it is able to be decomposed by bacteria or other living organisms.

**Environmental fate:** The fate of a chemical in the environment after its disposal by a consumer.

**Risk assessment:** A systematic process to evaluate the potential risks associated with environmental release of individual ingredients or final formulations.

## Release Notes

### Version 1.1, April 19, 2019

Text describing the multi-stakeholder approach of the BPC Leadership Group was added to the introduction.

Language updates were made to Human Health KPIs #3 and #5 and point allocations were revealed. The response options were updated for KPI #3 and response option D (D1 - D8) were removed from KPI #5. Guidance language describing chemicals on the stewardship list was updated to acknowledge qualifying statements for production, exposure, or threshold for any of the referenced lists. This change was made for the following KPIs:

- Packaging #6 - Stewardship list chemical management
- Disclosure #3 - Stewardship listed chemicals – Unintentionally added
- Human Health #3 - Formulation – Stewardship list chemical management
- Human Health #4 - Formulation – Chemical selection
- Human Health #5 - Formulation – Stewardship list chemical usage
- Human Health #6 - Chemical footprint
- Human Health #8 - Ingredient disclosure to manufacturers

Minor corrections to KPI guidance were made for some KPIs.

### Version 1.0 – May 16, 2018

Public release of first version of the Beauty and Personal Care Product Sustainability Rating System

## Disclaimer

Arizona State University and University of Arkansas, administrating universities of The Sustainability Consortium, are furnishing this item “as is.” TSC does not provide any warranty of the item whatsoever, whether expressed, implied or statutory, including but not limited to, direct, indirect, special, or consequential damages arising out of, resulting from, or any way connected to the use of the item, whether or not based upon warranty, contract, tort, or otherwise; whether or not injury was sustained by persons or property or otherwise; and whether or not loss was sustained from, or arose out of, the results of the item, or any services that may be provided by The Sustainability Consortium.





The Sustainability Consortium (TSC) is a global organization transforming the consumer goods industry to deliver more sustainable consumer products. We are dedicated to improving the sustainability of consumer products. Our members and partners include manufacturers, retailers, suppliers, service providers, NGOs, civil society organizations, governmental agencies and academics. TSC convenes our diverse stakeholders to work collaboratively to build science-based decision tools and solutions that address sustainability issues that are materially important throughout a product's supply chain and lifecycle. TSC also offers a portfolio of services to help drive effective implementation. The Sustainability Consortium has more than 100 members and there are over 2,000 users of TSC tools worldwide.

[www.sustainabilityconsortium.org](http://www.sustainabilityconsortium.org)

**Report produced by The Sustainability Consortium®**

©2019 Arizona State University and University of Arkansas



Forum for the Future is one of the world's leading sustainability non-profits. For over 20 years we've been working in partnership with business, governments and civil society to accelerate the shift toward a sustainable future.

We specialize in addressing critical global challenges by catalyzing change in key systems, from food to apparel, energy to shipping. We do this by convening transformational collaborations to drive change, by partnering with businesses to help them lead by example, and by building a global community of pioneers and change makers.

Together we are reinventing the way the world works. Find out more at [www.forumforthefuture.org](http://www.forumforthefuture.org) or by following @Forum4theFuture on Twitter.

[www.forumforthefuture.org](http://www.forumforthefuture.org)