Chemicals Management Framework

Green Chemistry and Commerce Council (GC3)
Innovator’s Workshop

Bob Buck

10 May 2013
New Brunswick, NJ
The goal of the Chemicals Management Framework is to help you identify and drive improvements within your organization and supply chain toward sustainable chemistry.
How it was created

Mark Rossi, Clean Production Action

Bob Buck, DuPont

Libby Sommer, U.S. Environmental Protection Agency

James Ewell, GreenBlue

Tommy Thompson, Hanes Brands Inc.

Greg Scott, Mountain Equipment Co-op

Scott Echols, Nike
What the Chemicals Management Framework *is* …

- Comprehensive, tiered *strategy*
- Roadmap for integrating a *chemicals management system* into your business
- **Assessment** of your company and supply chain to identify opportunities (e.g., HiGG Index indicators)
- **Shared path** toward sustainable chemistry
- **Harmonized communication** language for industry
- **Guide** to external resources, tools, and services
... and what it *is not*

- Replacement for legal compliance
- Audit tool
- Certification
- Software
- Magic
What is the Framework trying to achieve?

Primary Objectives

- Process & Product Knowledge
  - Regulatory Awareness & Compliance
  - Chemical Hazard Assessment (low, med, high)
  - Chemical Safety & Risk Management
  - Safer Alternatives Assessment & Preferred Substances
  - Restricted Substances/Substances of Concern

Outputs

- Sustainable Chemistry Innovation & Continuous Improvement
- Substances of Concern List
- Preferred Substances List
- Restricted Substances List

know assess decide

- insufficient data?
- regular re-evaluation
- manage
- keep
- substitute
- innovate
- decide
How Performance is Measured

**Continuum of Performance**

**Foundational**
- Entry-level
- Begins w/ Regulatory Compliance & RSL (Restricted Substances List)

**Progressive**
- Beyond compliance and RSL
- Implement processes to identify, assess, prioritize chemicals
- Identify preferred substances

**Aspirational**
- Comprehensive knowledge of chemicals and full disclosure
- Implementation of Green Chemistry practices – driving innovation toward safer alternatives
How will we get there?
The ASK to you

1. **LEARN:** Orient yourself to the Framework

2. **ASSESS:** Know where you are

3. **PLAN:** Create an action plan

4. **SHARE:** Submit results for benchmarking & provide your feedback
LEARN

Orient yourself to the Framework

Key Framework documents:

• Introduction
• Indicators (both PDF and xls)
• Glossary of Terms
• Chemicals Management “Know-How”
1 LEARN
Orient yourself to the Framework

“ACTION LEVELS”

- FOUNDATIONAL LEVEL
- PROGRESSIVE LEVEL
- ASPIRATIONAL LEVEL

“STAKEHOLDER CATEGORIES”

- RETAILER
- BRAND
- SUPPLIER
- CHEMICAL SUPPLIER

BRAND FOUNDATIONAL LEVEL INDICATORS
Foundational Level CM 2.0 - Restricted Substances / Substances of Concern:

Create, communicate, and ensure compliance with a Restricted Substances List (RSL) used in manufacturing processes and/or residing in Final Product.

B2.F1  
**RSL Point of Contact:** Brand has an internal named point of contact to manage its RSL and communicates their name to supply chain partners.

B2.F2  
**Make RSL Publicly Available:** Brand has an RSL that is publicly Available or references an existing, publicly available RSL.

B2.F3  
**Update RSL Regularly:** Brand has a business process to ensure the RSL is updated regularly (at least once annually).

B2.F4  
**Offer RSL Education & Training:** Brand offers education and training opportunities to its suppliers and internal personnel (e.g., designers, developers, sourcing teams, etc.) about its RSL requirements.

10 May 2013
**1 LEARN**

Orient yourself to the Framework

**Chemicals Management Framework**

“KNOW-HOW” (Guidance)

<table>
<thead>
<tr>
<th>Primary Objective</th>
<th>Guidance</th>
<th>Key Terms Defined</th>
<th>Examples and Templates</th>
<th>Information Resources, Tools &amp; Services</th>
</tr>
</thead>
</table>
| CM-2.0 Restricted Substances & Substances of Concern | A business may create its own restricted substances list (RSL) or adopt one or several that already exist, which were developed by another company, a trade group, a government agency or non-governmental organization. A business may find that an RSL is adequate for their chemical management program. However there may be chemicals of concern for which more information is sought or that the business might want to phase out over time. In this | Restricted substances lists (RSLs) are a list of chemicals -- compiled by businesses, trade groups or other organizations -- which are either completely prohibited in products, in packaging, from use in manufacturing processes, or are prohibited above certain threshold levels (often stated in % or parts per million (ppm)). | Examples  
- Restricted substances list (RSL) examples  
  - American Apparel and Footwear Association (AAFA)  
  - Marks & Spencer’s (retailer) publicly available RSL  
  - **Templates** |
|                   | Substances of Concern List (SoCL) is a |

More on what this set of indicators mean

Definitions

Actionable templates, examples if you need a place to start

Other info resources & service providers
An Excel-based assessment tool

2.0: Restricted Substances / Substances of Concern

<table>
<thead>
<tr>
<th>B2.F1</th>
<th>RSL Point of Contact: Brand has an internal named point of contact to manage its RSL and communicates their name to supply chain partners.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>B2.F2</th>
<th>Make RSL Publicly Available: Brand has an RSL that is publicly available or references an existing, publicly available RSL.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>B2.F3</th>
<th>Update RSL Regularly: Brand has a business process to ensure the RSL is updated regularly (at least once annually).</th>
</tr>
</thead>
</table>

| B2.F4 | Offer RSL Education & Training: Brand offers education and training opportunities to its suppliers and internal personnel (e.g., designers, developers, sourcing teams, etc.) about its RSL requirements. |

<table>
<thead>
<tr>
<th>Your Assessment</th>
<th>Your Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Choose one</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>1</td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Unknown</td>
<td></td>
</tr>
<tr>
<td>Partial</td>
<td></td>
</tr>
</tbody>
</table>

If partial selected, estimate % complete in highlighted cell.

<table>
<thead>
<tr>
<th>Your Assessment</th>
<th>Your Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Choose one</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>1</td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Unknown</td>
<td></td>
</tr>
<tr>
<td>Partial</td>
<td></td>
</tr>
</tbody>
</table>

If partial selected, estimate % complete in highlighted cell.

<table>
<thead>
<tr>
<th>Your Assessment</th>
<th>Your Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Choose one</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>1</td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Unknown</td>
<td></td>
</tr>
<tr>
<td>Partial</td>
<td></td>
</tr>
</tbody>
</table>

If partial selected, estimate % complete in highlighted cell.

<table>
<thead>
<tr>
<th>Your Assessment</th>
<th>Your Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Choose one</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>0.5</td>
</tr>
<tr>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Unknown</td>
<td></td>
</tr>
<tr>
<td>Partial</td>
<td></td>
</tr>
</tbody>
</table>

50%
## 3 PLAN

Create an action plan

### ACME Apparel’s Chemicals Management Action Plan (Updated April 25, 2013)

<table>
<thead>
<tr>
<th>Framework Objective</th>
<th>Score</th>
<th>Indicators to Improve</th>
<th>Score Goal by Jan. 2014</th>
<th>Immediate Next Step(s)</th>
<th>Resources Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>CM 1.0 – Regulatory Awareness &amp; Compliance</td>
<td>2.75</td>
<td>B1.P1; B1.P2</td>
<td>4.25</td>
<td>Determine what “most stringent” global regulations are. Establish what current language exists in supplier contracts.</td>
<td>Legal, Sourcing, Production; “Know How” document</td>
</tr>
<tr>
<td>CM 2.0 – Restricted Substances/Substances of Concern</td>
<td>4.5</td>
<td>B2.P2</td>
<td>5.25</td>
<td>Research RSL compliance business system approaches, incl. monitoring, verifying, and corrective action components.</td>
<td>Sourcing, Production, IT; “Know How” document</td>
</tr>
<tr>
<td>CM 3.0 – Process &amp; Product Chemicals Knowledge</td>
<td>4</td>
<td>B3.F2; B3.F5; B3.P2; B3.P3; B3.P4</td>
<td>7</td>
<td>Logical steps to start addressing indicators identified for improvement</td>
<td>Legal, Production, Sourcing, Third Party; Financial; “Know How” document</td>
</tr>
<tr>
<td>CM 4.0 – Chemicals Hazard Assessment</td>
<td>2.5</td>
<td>B4.A1</td>
<td>3.25</td>
<td>“</td>
<td>Production, Sourcing, Third Party; Financial; “Know How” document</td>
</tr>
<tr>
<td>CM 5.0 – Chemical Safety &amp; Risk Management</td>
<td>4.5</td>
<td>B5.P1; B5.P2; B5.P3</td>
<td>6.75</td>
<td>“</td>
<td>Production, Sourcing, Third Party; Financial; “Know How” document</td>
</tr>
<tr>
<td>CM 6.0 - Safer Alternatives Assessment &amp; Preferred Substances</td>
<td>3.5</td>
<td>B6.P1</td>
<td>3.5</td>
<td>“</td>
<td>Production, Sourcing, Third Party; Financial; “Know How” document</td>
</tr>
<tr>
<td>CM 7.0 – Sustainable Chemistry Innovation &amp; Continuous Improvement</td>
<td>2.75</td>
<td>B7.F1; B7.F2; B7.F3</td>
<td>5.75</td>
<td>“</td>
<td>Production, Sourcing, Legal; “Know How” document</td>
</tr>
</tbody>
</table>
### PLAN
Create an action plan

**Chemicals Management Framework**

"KNOW-HOW" (Guidance)

<table>
<thead>
<tr>
<th>Primary Objective</th>
<th>Guidance</th>
<th>Key Terms Defined</th>
<th>Examples and Templates</th>
<th>Information Resources, Tools &amp; Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>manner, a Substances of Concern List (SoCL) can be developed wherein chemicals may be migrated to the RSL if and when appropriate.</td>
<td>documented list which identifies specific substances which, for reasons of increasing concern for suspected toxicity, incomplete and/or insufficient toxicity information, pending regulation, other environmental factors, or market considerations.</td>
<td>Pages 64 &amp; 65 of Nike's RSL Guidance contain a test request form and an RSL Failure Resolution Form, respectively.</td>
<td>RSLs, including a Model Brand Program Protocol for Testing Clothing.</td>
<td></td>
</tr>
<tr>
<td>Indicate a need for some type of action. For some organizations a SoCL may simply be an addendum to their RSL.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**FOR EXAMPLE:**
The Know-How document includes a sample test request form and RSL Failure Resolution Form.
Recap

1. LEARN: Orient yourself to the CMF

2. ASSESS: Know where you are

3. PLAN: Create an action plan

4. SHARE: Submit results for benchmarking & provide your feedback

OUR GOAL: Benchmarking results by August 1
Now what? Immediate next steps

- Visit www.outdoorindustry.org/cmpilot
- Register and download key Framework documents
- Read the Introduction, and explore the Framework (see “Instructions” tab)
- Benchmarking & feedback: DUE June 1
  - Links and instructions to submit assessment results and feedback to follow

Questions? Email: sustainability@outdoorindustry.org