

IBEL Content – Work Group Packet

February 19, 2010



This document has been developed for use during the Feb 19th, IBEL workgroup call, scheduled from 2-4 PM Eastern. To participate, please use the following call-in information. Thanks.
(218) 936-1100 Access Code #105445.

-- Jack

IBEL Content- Working Menu

The following is a working list of potential IBEL content. Entries in the table indicate proposed categories and the associated IBEL metric(s) to be measured or reported. Please note: Not all metrics will necessarily apply to all products. This list will evolve through the decisions of work groups, and will be updated after each work group meeting to reflect the most recent status. When completed, this list will constitute a **MENU** of metrics against which product data can be reported. Individual metrics will be selected from this menu to assemble the product label content for each product category in future calls. **Shaded entries in the table are to be considered on the February 19, 2010 work group call. Changes since last call are displayed in Blue text.**

Human Health & Environmental

Category	Reportable IBEL Metric	Status
Asthmagen content		
Acute Chemical Concern - Oral		
Acute Chemical Concern - Inhalation		
Acute Chemical Concern - Dermal		
Corrosivity to Skin		
Skin Sensitizer		
Product Absorption via Skin		
Volatile Organic Compound Content		
Chronic Chemical Concern - Oral		
Chronic Chemical Concern - Inhalation		
Chronic Chemical Concern - Dermal		
Phosphorus Eutrophication		
Biodegradable Content – Aquatic		
Bioaccumulating content		
Toxicity to Aquatic Life		
Product Embodied Energy		
Product Embodied Water		

Product Performance

Category	Reportable IBEL Metric	Status
Product Performance (specific to product type)		
Product Duration		
Energy Efficiency		
Water Efficiency		
Product Efficiency - General		

Additional Product/Packaging

Category	Reportable IBEL Metric	Status
Prohibited Product Content		
Trace contaminants – CMRs (unintentionally added)		
Chem Prod Concentrates		Removed
Fragrance		WG Call – Feb 19
Color and dyes		WG Call – Feb 19
Combustibility		WG Call – Feb 19
Post-Consumer Material content (packaging only)	PC Packaging content (%)	Adopted (Feb 9)
Reclaimed Material content – (added by workgroup on Feb 9 In lieu of EOL Product Takeback?)		WG Call – Feb 19
Renewable /Biobased Material content (Includes product and packaging)	Renew/Biobased Product Content (%) Renew/Biobased Packaging content (%)	Revised – Posted for comment on IBEL site (WG Call - Feb 9)
Recyclable Product Content (packaging only)	% of Product Recyclable	Revised – Posted for comment on IBEL site. (WG Call - Feb 9)
EOL – Product Takeback (packaging only)		
EOL- Biodegradable/compostable Content – Land disposal		
Labeling content		
Product Certifications Obtained		Removed

Corporate Performance Categories

Category	Reportable IBEL Metric	Status
Sustainability Reporting		
Environmental Mgmt program		
Supply Chain mgmt program		
Sustainable Energy Use		

IBEL Reclaimed Material Content (Packaging)

IBEL Proposed Metric(s)–

(Note: This proposed metric is initially focused only on chemical-based products. We will take up non-chemical products in another month or so.)

1. Reclaimed Material Content- Packaging

- **Reported Value** – percent of reclaimed material content in package
- **Method for Reporting /Measurement**– total of reclaimed content in product packaging divided by the total weight of the packaging. Calculation includes all primary and secondary packaging, bags, and films. Only materials reclaimed and reused by the product manufacturer may be considered.
- **Verification** – The following documentation must be provided by manufacturer, if requested, to prove conformance with reported value(s).
 - o Manufacturer declaration of all primary and secondary packaging materials for product registered in IBEL, and the overall weight and level of reclaimed content for each material.
 - o Description of reclamation system including logistics chain, and documentation by packaging or material type of volume/mass collected over past year.
- **Rationale for inclusion in IBEL** – Reclaim and reuse of material diverts them from the landfill resulting in more efficient material use and preservation of resources
- **Reporting Context** – Not applicable

Note: This metric has been developed using the PC Material content metric as a model.

Definition of Reclaimed Content

1. Portion of packaging or product content collected at the end-of-life and ultimately reclaimed for reuse in the production of future product. For the purposes of IBEL, all material reclaimed by a manufacturer that is used in the production of future products shall be eligible, even if the source of the reclaimed content is from other products. Refillable packages would comply with this definition.

Misc Information/Comments:

- Reclaimed content is being considered in lieu of a metric for a product take-back system which was proposed on the IBEL strawman. This is in recognition of the desire to only consider content that is actually reused, rather than including content that could be collected and simply disposed.

Established Criteria - The following products have established minimum criteria.

1) Ecologo CCD-146 – Packaging shall be recyclable, refillable, or contain a minimum of 25% post consumer material.

2) Green Seal GS-37 – A plastic primary package shall be recyclable, a refillable package, a source-reduced package, or contain at least 25% post-consumer material. The package must be clearly marked with the appropriate Society of the Plastics Industry symbol to identify the type of plastic for recycling.

(Please note: we are not establishing thresholds, only how a metric will be measured and reported. The above are listed for context purposes.)

Strawman & Comments

The following is a subsection of the original IBEL strawman and all comments submitted for each relevant metric under discussion during this call.

Not listed in IBEL Strawman
No Comments

IBEL Combustibility

IBEL Proposed Metric(s) –

2. Combustibility

- **Reported Value – 1)** flash point of the *undiluted (as sold)* chemical product and 2) method of testing
- **Method for Reporting /Measurement**– Results of testing, in degrees F, using an acceptable test method as defined here. Acceptable test methods include:
 - o ASTM D92-05a - Cleveland Open Cup Tester
 - o ASTM D3278 – Setaflash (small scale) Closed Cup method
 - o ISO 13736 - Abel Closed-Cup method
 - o ISO 2719 - Pensky-Martens Closed-Cup method
 - o ASTM D93-80 - Pensky-Martens Closed-Cup method
- **Verification** – The following documentation must be provided by manufacturer, if requested, to prove conformance with reported value(s).
 - o A report from an independent laboratory conducting flash point testing using an approved test method on the *as sold* product. At a minimum the report shall specify the results of testing and the test method applied.
- **Rationale for inclusion in IBEL** – A primary measure of safety of a chemical product, stipulated under Fed regs.
- **Reporting Context** – Suggest some indicator (e.g. Green check mark) or some other type to provide context to values.

Question – Although we are not establishing thresholds, data may not be meaningful. In this instance, should this metric be expressed as a yes/no (e.g. Product combustible – yes/no) to avoid confusing data? Verification would remain the same...

Definition of Flash Point

2. The minimum temperature of a liquid at which the vapors given off are sufficient to form a flammable mixture with air which will ignite when exposed to an open flame [Source: Ecologo CCD-146]
3. The lowest temperature at which a volatile liquid can vaporize to form an ignitable mixture in air

Misc Information:

- There are several methods for testing flash point of a liquid, but they fall into two basic categories: Open cup and closed cup testing.
- There are multiple types of tests within each of the above including tests such as Pensky-Martens and Setaflash testing.

- While closed cup testing is considered a more accurate reflection of the flash point of a liquid, both methods are routinely accepted for testing.
- Accepted test methods include:
 - o ASTM D92-05a - Cleveland Open Cup Tester
 - o ASTM D3278 – Setaflash (small scale) Closed Cup method
 - o ISO 13736 - Abel Closed-Cup method
 - o ISO 2719 - Pensky-Martens Closed-Cup method
 - o ASTM D93-80 - Pensky-Martens Closed-Cup method

Established Criteria - The following products have established minimum criteria.

1) Ecologo CCD-146 – As sold, product must have a flash point > 61 C (or 142 F)

2) Green Seal GS-37 – The *undiluted* product shall not be combustible. The product or 99% by volume of the product ingredients shall have a flashpoint above 150°F (or 65.5C), as tested using either the Cleveland Open Cup Tester (ASTM D92-05a), the Abel Closed-Cup method (ISO 13736) or the Pensky-Martens Closed-Cup method (ISO 2719). Alternatively, the product shall not sustain a flame when tested using ASTM D 4206.

3) DfE – Product must comply with US Fed Regs including:
 49CFR173.120(a)5 – Flammable liquid (141 F or 60.5 C)
 49CFR173.150(e) – Aqueous solutions of alcohols
 49CFR173.120(a)1 – Characteristics of Ignitability (see above)

(Please note: we are not establishing thresholds, only how a metric will be measured and reported. The above are listed for context purposes.)

Strawman & Comments

The following is a subsection of the original IBEL strawman and all comments submitted for each relevant metric under discussion during this call.

Combustibility	Chem product flash point (degree F) Test method	Applies to undiluted product. Consistently applied across standards.
COMMENT: <u>Mark Kozak</u> Addressed by DOT regs and VOC issues.		

IBEL Colors and Dyes

IBEL Proposed Metric(s)–

3. Classification of dye or colorant?

- **Reported Value** – FD&C grade/ Non- FD&C grade/ Not present
- **Method for Reporting /Measurement**– Simple disclosure
- **Verification** – The following documentation must be provided by manufacturer, if requested, to prove conformance with reported value(s).
 - o Identification of manufacturer and identity of all dyes or colorants used in product, along with MSDS's for each.
 - o Written confirmation from dye or colorant manufacturer that dye or colorant complies with FDA requirements for FD&C use.
- **Rationale for inclusion in IBEL** – Type/safety of dyes or colorants of interest to purchasing community,
- **Reporting Context** – NA

Comment/Question – I realize dyes can serve a safety purpose. We are not determining whether or not dyes are allowed, but rather informing purchasers of the characteristics of the dyes. Is this the best way, or should we treat them as the other chemicals...meaning, they will have to be included in other chemical reporting requirements and their constituents known by mfrs. Suggestions?

Definition of Food Grade Dye

1. dyes safe for use in food, as approved by the U.S. Food and Drug Administration, as defined in 21CFR70.3(f) as follows:

“(f) A color additive is any material, not exempted under section 201(t) of the act, that is a dye, pigment, or other substance made by a process of synthesis or similar artifice, or extracted, isolated, or otherwise derived, with or without intermediate or final change of identity, from a vegetable, animal, mineral, or other source and that, when added or applied to a food, drug, or cosmetic or to the human body or any part thereof, is capable (alone or through reaction with another substance) of imparting a color thereto. Substances capable of imparting a color to a container for foods, drugs, or cosmetics are not color additives unless the customary or reasonably foreseeable handling or use of the container may reasonably be expected to result in the transmittal of the color to the contents of the package or any part thereof. Food ingredients such as cherries, green or red peppers, chocolate, and orange juice which contribute their own natural color when mixed with other foods are not regarded as color additives; but where a food substance such as beet juice is deliberately used as a color, as in pink lemonade, it is a color additive. Food ingredients as authorized by a definitions and standard of identity prescribed by regulations pursuant to section 401 of the act are color additives, where the ingredients are specifically designated in the definitions and standards of identity as permitted for use for coloring purposes. An ingredient of an animal feed whose intended function is to impart, through the biological processes of the animal, a color to the meat, milk, or eggs of the animal is a color additive and is not exempt from the requirements of the statute.”

Misc Information:

- FD&C dyes have been the preference in multiple standards for cleaning chemicals and personal care products.

Established Criteria - The following products have established minimum criteria.

1) Ecologo CCD-146 – Allows dyes only if “food grade” and if present in concentrations less than 0.1 % of formulation

2) Green Seal GS-37 – Any color component shall be FDA certified and permitted for food, drug, and cosmetic (FD&C) use or be a natural color component.

(Please note: we are not establishing thresholds, only how a metric will be measured and reported. The above are listed for context purposes.)

Strawman & Comments

The following is a subsection of the original IBEL strawman and all comments submitted for each relevant metric under discussion during this call.

Color and dyes	Added color or dye (yes/no) FDA food grade dye (yes/no)	Applies only to chemical products? Does FDA have a formal program to certify these?
COMMENTS: <u>Mark Kozak</u> Dyes have real safety advantages. I don't think dyes, if below a certain level, should be as big a concern as the other components. <u>Libby Sommer</u> [FDA Food Grade Dye] We've found that this is not necessarily enough information to qualify a safer dye. In fact, some FD&C dyes have human health issues. It's possible that these data came to light after FDA's review.		

IBEL - Fragrances

IBEL Proposed Metric(s)–

4. Fragrance Classification?

- **Reported Value** – No Fragrance / IFRA Fragrance/ DFE Fragrance?/ unclassified fragrance
- **Method for Reporting /Measurement**– Mfr disclosure
- **Verification** – The following documentation must be provided by manufacturer, if requested, to prove conformance with reported value(s).
 - o TBD
- **Rationale for inclusion in IBEL** – Fragrances have been identified as having the potential for harming human health and contributing to poor indoor environmental quality
- **Reporting Context** – TBD

Comment/Question – I know there is a tremendous amount of work going on in the cleangredients TAC that we need to consider. The proposed metric above is simply a starting point and is not being put forward strongly. I simply wanted to begin the discussion. We can get an update from Don or Libby hopefully on how that work might be used to shape this metric in IBEL.

Definition of Fragrance

1) An additive, often (but not limited to) a multi-component additive, used in a product with the purpose of imparting a scent to the product. (source: Green Seal GS-37)

Misc Information

- **The International Fragrance Association** has developed the *IFRA Code of Practice*, a set of standards and requirements that address the manufacture and substance of fragrances. They maintain that they have compiled a database of 1,000+ materials with toxicity data, etc as a resource for manufacturers to ensure the safety of fragrances made in compliance with their code of practice. For more info go to:
<http://www.ifraorg.org/Home/Other+pages/What+is+the+IFRA+Code/page.aspx/92>
- **Cleangredients** has established a Technical Advisory Committee around fragrances. Several members of the committee are working on IBEL, so perhaps we can learn more about this process in the near future. To view the committee go to:
<http://www.cleangredients.org/about/process/tacs/fragrances>

Established Criteria - The following products have established minimum criteria.

1) Ecologo CCD-146 – Prohibits the use of fragrances for the sole purpose to change the scent of the product. CCD Allows fragrant ingredients that also serve a purpose such as cleaning or disinfecting if they are essential oils and not synthetic compounds. Fragrances for bathroom cleaners must comply with IFA Code of Practice

2) Green Seal GS-37 – Allows ingredients that alter the scent of a product but they must comply with IFA COP. In addition, all ingredients must be disclosed and their contributions must be considered in all other criteria.

3) DfE has adopted a more comprehensive approach to fragrances requiring that all fragrances be evaluated according to the requirements of the DfE Standard for Fragrances. Detailed criteria can be accessed at <http://www.epa.gov/dfepubs/projects/gfcp/dfescreenforfragranceshumanhealthcriteriaversion1.pdf>

(Please note: we are not establishing thresholds, only how a metric will be measured and reported. The above are listed for context purposes.)

Strawman & Comments

The following is a subsection of the original IBEL strawman and all comments submitted for each relevant metric under discussion during this call.

Frangrance	Added frangrance (yes/no) IFA Code of Practice compliant (yes/no) Full disclosure of frangrance ingredients (y/n)	If Yes, full disclosure of ingredients would be req'd to match existing stds.
<p>COMMENTS:</p> <p><u>Mark Kozak</u> I don't think we should eliminate frangrances, nor do we have to disclose all ingredients if a frangrance supplier will attest that the frangrance used meets all the other requirements of the standard.</p> <p><u>Roger McFadden</u> Yes. Why would frangrances be exempted from disclosure? Smart consumers will consider this to be industry hiding something. NGOs are very outspoken and increasingly proactive about full disclosure of all chemicals. What does "existing standards" mean. Who's standard? What about emerging standards or public policy requirements from states, local governments, federal government, EU, Canada, or businesses that are regulating chemicals in their businesses and supply chain?</p> <p><u>Libby Sommer</u> Full disclosure to whom?</p> <p><u>Don Versteeg</u> IFA Code of practice is sufficient. Can give extra points for full disclosure of frangrance ingredients.</p>		