

## **Walmart expects suppliers of formulated consumables to Walmart U.S. and Sam's Club U.S to disclose all Walmart Priority Chemicals on pack beginning January 2018**

### **Guidance on how suppliers can comply with Walmart's On Pack Disclosure**

Product labels that comply with the on-label format and content of the new California SB 258 regulation will meet Walmart's on-pack disclosure expectations. For more information on the California requirements please visit:

[https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180SB258](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB258)

Products regulated by the U.S. Food & Drug Administration (FDA) that are within scope already meet Walmart's expectations.

We encourage Suppliers to communicate their on-pack disclosure implementation plan (by product and brand) to Walmart as soon as possible.

### **Walmart On-Pack Disclosure FAQs**

- What products are in scope for on-pack disclosure?
  - All in-scope formulated and consumable products referenced in Walmart's Implementation Guide for Commitment on Sustainable Chemistry
  - Products regulated by the FDA that are in-scope already meet Walmart's expectations.
  
- California's on-pack priority chemical list isn't the same as Walmart's Priority Chemical List, which list do we use for Walmart's Sustainable Chemistry Commitment On-Pack Disclosure?
  - Walmart recognizes there is a difference between the Walmart Priority Chemical List and the Chemicals on California SB 258 designated list. Use of the CA SB 258 designated list will meet Walmart's expectations.
  
- What ingredients does Walmart expect to be placed on pack?
  - Suppliers are asked to disclose ingredients using one of the following on-pack options beginning January 2018:
    - Chemicals on California SB 258 designated list
    - Full Disclosure (i.e., all intentionally added ingredients)
  
- When does Walmart expect ingredient information on-pack?
  - *Non-FIFRA regulated products*: Suppliers are expected to have on-pack disclosure in 2018 for new and refreshed products
  - *FIFRA regulated products*: FIFRA labels with on-pack disclosure are expected after 2018 once the U.S. EPA and appropriate state regulatory agencies have approved the new labels. Suppliers are expected to begin on-pack disclosure starting in 2018, but only as part of standard FIFRA review process. (i.e., when

products are reviewed by EPA after 2018, labels are expected to include all ingredient information.)

- We ask that suppliers communicate their on-pack disclosure implementation plan to Walmart and then provide annual updates on implementation status.
- California will require on-pack disclosure beginning in 2021, is that when Walmart expects suppliers to have information on-pack too?
  - No. Walmart expects on-pack disclosure to begin in 2018
  - Product labels can be phased-in as part of suppliers' label refresh cycle
  - Timing to implement on-pack disclosure for FIFRA-registered products will depend upon the time taken by appropriate federal and state regulatory agencies to accept a manufacturer's label changes. This will take beyond 2018 for some products.
- Does Walmart expect on-pack disclosure for products sold outside California?
  - Yes. Walmart expects all in-scope products sold in the U.S. to have on-pack disclosure. We also encourage suppliers to provide on-pack disclosure internationally.
  - Walmart recognizes there is a difference between the Walmart Priority Chemical List and the Chemicals on California SB 258 designated list. Use of the CA SB 258 designated list will meet Walmart's expectations.
- What is a "refreshed" product?
  - An existing product, already sold at Walmart US and Sam's Club stores, that is being updated/changed or replacing existing inventory.
- Do suppliers need to put stickers on packages or take back existing product to retrofit with on-pack labels?
  - No. Walmart requests all new products or refreshed products beginning in 2018 are manufactured and distributed with on-pack disclosure.