

## Frequently Asked Questions About Policy on Sustainable Chemistry in Consumables

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### 1. Does online public disclosure include fragrances?

With regard to online ingredient disclosure, Walmart recommends at a minimum that suppliers follow ingredient disclosure guidelines provided by the U.S. EPA Design for the Environment (DfE) Standard for Safer Products<sup>1</sup> or CSPA's Consumer Product Ingredient Communication Initiative.<sup>2</sup> These guidelines do not explicitly mandate disclosure of specific ingredients in fragrances that are trade secret. However, the DfE standard states that,

*Scent ingredients may be listed as "fragrance," on the label, but the formulator must indicate where detailed information can be found; for example, the Web site list, or subset of the list, of fragrance materials authored by the International Fragrance Association (IFRA) and available on IFRA's Web site (<http://www.ifraorg.org/>). Alternatively, if not a matter of trade secrets, the product formulator may state on its Web site the ingredients in the fragrance or the palette of fragrance materials used in its products, and may include, at the formulator's discretion, ingredients not used in the fragrance.*

The CSPA Consumer Product Ingredient Communication Initiative states that,

*All chemicals present as components of fragrances may be listed as "Fragrances," but the Manufacturer must then refer to the availability of more detail elsewhere. Such detail may include, but is not limited to:*

- a. a link to the list or a subset of the list of fragrance materials authored by the International Fragrance Association (IFRA); or*
- b. a list disclosing the ingredients that the Manufacturer uses in its fragrances.*

The Implementation Guide indicates that best-in-class online ingredient disclosure means full disclosure of all ingredients including those typically protected under trade secrets. Walmart strongly encourages and will recognize those companies that fully disclose all product ingredients.

<sup>1</sup> <http://www.epa.gov/dfe/pubs/projects/gfcp/standard-for-safer-products.pdf>

<sup>2</sup> [http://www.cspa.org/images/stories/PDF\\_Documents/Voluntary\\_IC\\_Model\\_Amended\\_2011\\_FINAL.pdf](http://www.cspa.org/images/stories/PDF_Documents/Voluntary_IC_Model_Amended_2011_FINAL.pdf)

**2. How can I tell if a chemical in my product is prioritized for reduction, restriction, or elimination by Walmart?**

For existing formulations, The Wercs has notified suppliers which products and chemicals (including CAS numbers) to prioritize as a starting point.

For new and ongoing formulations, suppliers will be notified upon entering their formulation in WERCSmart for compliance review. Suppliers are encouraged to use this free tool as early as possible in their development process.

At the Product Data Entry > Composition page, suppliers are notified if the chemical in the entered formula is “Regulated”. If the user hovers over and clicks on “yes,” a window opens. That window lists all Regulatory lists that component resides on.

If you’ve selected a Walmart High Priority Chemical or a Priority chemical, this window would include the classifications “List of WM Priority Chemicals Feb 2014” or “List of WM High Priority Chemicals Feb 2014”.

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