

Know Your Product

The Intersection Between Regulatory Requirements and Ingredient Transparency

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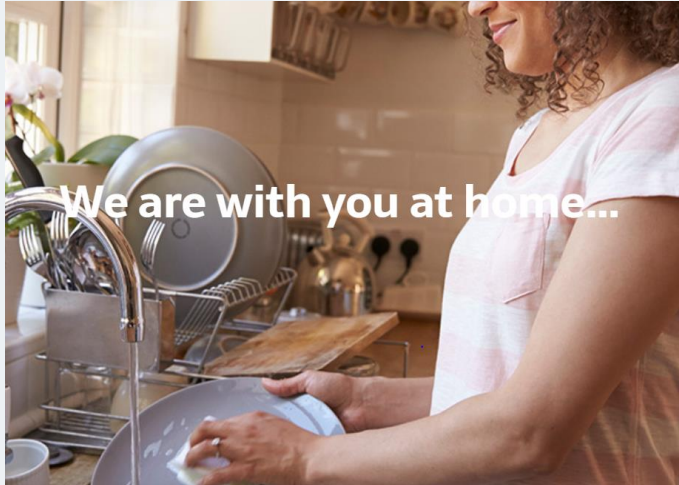
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SCHC Conference



Innovative Products For **Home. Work. Life.**

What is HCPA?



Divisions

- Air Care
- Cleaning
- Floor Care
- Industrial & Automotive
- Antimicrobial
- Pest Management
- Aerosols

Councils

- Air Quality
- Regulatory Affairs
- Scientific Affairs
- International Affairs
- Federal and State Government Affairs
- Sustainability & Product Stewardship

Importance of Transparency



Ingredient Communication Circa 2017



- FHSA – focused on hazardous substances
- Voluntary efforts
- Retailers
- Third-Party certifications
- States
 - California
 - New York
- All similar BUT key differences
- Potentially very challenging to meet all requirements at the national level

CA Compromise - Cleaning Product Right to Know Act (SB-258)



- Scope
- Label vs. Online
- Dates of Compliance
- Intentional Ingredients & Non-Functional Constituents
- List of Lists
- Disclosure methods
 - INCI/HCPA Dictionaries
 - IUPAC
 - Generic

HCPA Consumer Product Ingredients Dictionary



Consumer Product
INGREDIENTS DATABASE

HOME INGREDIENTS SUPPLIERS COMMUNICATION RESOURCES ABOUT JOIN LOGIN Q

WELCOME TO THE CONSUMER PRODUCT
INGREDIENTS DATABASE

Search Now... Search

Subscribe to the **Consumer Product Ingredients Database** and have full access to technical data on ingredients used in consumer specialty products.

[SUBSCRIBE NOW](#)

QUICK SEARCH

Quickly jump into targeted search areas to help get you started



EPA SAFER CHOICE INGREDIENT

The Safer Choice Program has evaluated and listed some product ingredients to be safer than other chemical ingredients.

[Search](#)



FIFRA 25(B) INGREDIENT

Search EPA's Federal Insecticide, Fungicide, & Rodenticide Act 25(b) minimum risk pesticide ingredients list.

[Search](#)



REACH INGREDIENT LIST

Search the Registration, Evaluation, Authorization and Restriction of Chemicals - which is a European Union regulation list.

[Search](#)



INGREDIENT SUPPLIER LISTING

Search through all active participating suppliers for the consumer product ingredients database.

[Search](#)



Consumer Product
INGREDIENTS DATABASE

HOME INGREDIENTS SUPPLIERS RESOURCES ABOUT Q

Isopropanol is the aliphatic alcohol that conforms to the formula: C₃H₈O

[Save this Ingredient](#) [Export](#)

CAS Numbers:

➤ 67-63-0

EC/ELN Numbers:

➤ 200-661-7

Trade Names:

➤ DOW Isopropanol ([Dow Chemical Company](#))

Technical Names:

- 1-Methylethanol
- 2-Hydroxypropane
- 2-Propanol
- Alcohol Isopropilico (Spanish)
- Alcool Isopropylique (French)
- Isopropanol (French)
- Isopropyl Alcohol (INCI)
- Propan-2-ol
- sec-Propyl Alcohol

Trade Name Mixtures:

- BIO-TERGE PAS-8S ([Stepan CleanGreens URL](#))

Product Categories:

- Aerosol Products
- Air Care Products
- Antimicrobial Products
- Cleaning Products

VOC Status:

VOC

Chemical Formula:

C₃H₈O

Ingredient Type:

Chemical Compound

Chemical Class:

➤ Alcohols

Ingredient Sources:

➤ Synthetic

Ingredient Functions:

- Antifoaming Agent
- Antimicrobial Agent
- Deicer
- Solvent
- Viscosity Decreasing Agent

Ingredient References:

- CPSC Federal Hazardous Substances Act Regulations Title 16 Subchapter C of the U.S. Code of Federal Regulations
- FDA Regulations on Foods, Drugs and Cosmetics Title 21 Code of Federal Regulations
- CAS Registry - Chemical Abstracts Service Registry
- EPA FIFRA Pesticide Regulations Active Ingredient Title 40 Code of Federal Regulations Subchapter E

Chemical Structure:



EPA Safer Choice Ingredient:

Yes

EPA FIFRA 25(b):

Yes

REACH Listing:

Yes

Fragrance Disclosure



- Methods of Disclosure
 - Discrete vs. differentiated
- Allergens
- Natural vs. man-made
- IFRA Palette

List of Lists



- Authoritative lists
- Static
- Dynamic

Regulatory List Name	California CPRKA	NY HCPIDP BMS	Walmart
CA Prop 65	x	x	
CA Prop 65 (repro only)			x
EU CMRs	x	x	x
EU Endocrine Disruptors	x	x	x
IRIS Neurotoxicants	x	x	
IRIS Carcinogens	x	x	
EU PBTs	x	x	x
Canada PBTs	x	x	
EU Respiratory Sensitizers	x	x	
IARC Carcinogens	x	x	x
ATSDR Neurotoxicants	x	x	
US EPA Priority Chemicals List	x	x	x
US NTP Reproductive or Developmental Toxicants	x	x	
US EPA PBTs	x	x	x
WA PBTs	x	x	x
US NTP Carcinogens (latest)	x	x	x
US NTP Carcinogens(legacy)	x	x	x
CA NLS	x	x	
CA MCLs	x	x	x
CA TACs	x	x	
CA Priority Pollutants	x	x	
CA Non-Cancer Hazards		x	
OEHHA REL	x		
CA Non-Cancer Hazards			
CA Priority Chemicals	x	x	
Marine Priority Action Chemicals	x	x	
UNEP POPs			x
ME Chemicals of High Concern			x
ME Priority Chemicals			x
MN Chemicals of High Concern			x
MN Priority Chemicals			x
WA Chemicals of High Concern			x
EU Fragrance Allergens	x	x	
AOEC Asthmagens		x	
EPA TSCA Chemicals of Concern		x	
EPA Ozone depletors		x	
NY DOH MCLs		x	
GLWQA Chemicals of Mutual Concern		x	
NY Air Toxics		x	

Federal Hazardous Substances Act



- [CPSC-regulated](#)
- Labeling required when a product
 - Common or usual or chemical name of each hazardous ingredient must be on the immediate package of a hazardous product
 - Is toxic, corrosive, flammable or combustible, an irritant, or a strong sensitizer, or it must generate pressure through decomposition, heat, or other means
 - Must have the potential to cause substantial personal injury or substantial illness during or as a result of any customary or reasonably foreseeable handling or use, including reasonably foreseeable ingestion by children

Ingredient Communication Synonymous with Low-Hazard



- Minimum Risk Pesticides (25(b))
- Key Component of 3rd Party Certification
 - Safer Choice
 - Green Seal
 - EWG Verified

Other Disclosure Systems



- Children's product laws
- Food
- EU Chemicals Strategy for Sustainability
- Beauty Personal Care
- Cosmetics
- Hygiene products

Ingredient Communication 2023



- California *de facto* national standard for cleaning products
- Learnings
 - Intentionally added
 - Impurities
 - Importance of standardized nomenclature
- SB-312
- MoCRA Implementation (still in development)
 - Product Listing (updated annually)
 - New Labeling Requirements for Each Fragrance Allergen
 - Adverse Events Reporting/Recordkeeping especially critical for flavors and fragrances

Ongoing Challenges with Transparency



- Confidential business information/trade secrets
- Data collection from suppliers
- Consumer interactions with data
- Scientific feasibility
 - Understand product chemistry
 - Testing limitations
 - Chemical class of substances referred to as UVCBs: Unknown or Variable Compositions, Complex reaction products, or Biological material
- Potential conflicting regulations

Know Your Product



- Systems in place to capture and report information
- Ask the right questions of your suppliers
- Improved communication up and down the supply chain
- Ingredient Communication is a positive product stewardship indicator
- Better Prepared for the "next" emerging chemical
 - PFAS
 - EU Fragrance Allergens

Questions?

