

What the cleaning industry SHOULD BE DOING to protect your health



CLEANING PRODUCT COMPANY SCORECARD

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DEEP CLEAN: What the cleaning industry should be doing to protect your health

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Introduction

Since 2007, Women's Voices for the Earth (WVE) has compiled research on chemicals in cleaning products and their impacts to women's health. Although gender roles have changed over time, studies show that women continue to do more than 70% of the housework in the average home, meaning that their exposure to potentially dangerous chemicals in cleaning products is more frequent and exponentially higher than men.¹ Women who spend more of their time at home may also have higher exposure to these chemicals. In regards to chemicals used in fragrances, studies show that women are two to three times more likely to suffer from fragrance-induced skin allergies than men.²

In addition, women carry the health impacts of toxic chemicals in a unique way. Many chemicals accumulate in fat, and women have a higher percentage of fat tissue than men. Women are also the first environment for the next generation; the chemicals stored in a woman's body are passed onto her child during pregnancy and later through breast feeding. This last point is particularly concerning, as these chemicals are being detected in our bodies: in blood, breast milk, and even newborns. Certain hormone disrupting chemicals found in cleaning products can have significant lifelong effects on reproductive health and development, especially when exposure to these chemicals occurs during pregnancy, or other critical windows of growth and development.

In order to address this problem, WVE has been calling on cleaning product manufacturers to come clean about both the ingredients they use in their products, and their criteria for determining product safety. This report is a scorecard rating four leading cleaning product manufacturers. The goal of this report is to provide a framework that companies can use to establish strong and transparent processes for assessing ingredient safety.

¹Bird, C (1999). Gender, Household Labor, and Psychological Distress: The Impact of the Amount and Division of Housework. Journal of Health and Social Behavior, Vol 40, No. 1; March 1999

²Nardelli, A., Carbonez, A., Ottoy, W., Drieghe, J. and Goossens, A. (2008) Frequency of and trends in fragrance allergy over a 15-year period. Contact Dermatitis. Vol. 58: pp: 134-141. 2008.



Why Grade Cleaning Product Companies?

Cleaning product companies stake their integrity on the ability to sell products that consumers want. With words like *trusted*, *quality*, *healthy and responsible* used throughout their advertising, it's clear that companies care about gaining the trust and loyalty of the American consumer. Yet, companies disclose very little information on how they assess the safety of the ingredients used in their products, nor do they reveal all their product ingredients. This lack of transparency is beginning to turn off consumers who are no longer willing to simply trust that the companies' experts have determined safety based on criteria concealed from the public.

The quality of a company's chemical ingredient screening process is critical to ensuring the safety of their products and maintaining credibility with consumers. Unfortunately, there are few laws that prohibit the use of toxic chemicals in household cleaners and other consumer products. This means companies must self-regulate – deciding which ingredients they find to be both acceptable and effective to use in their products. While all companies state that the ingredients in their products are safe, they may differ considerably in the processes they use to reach that conclusion. A company must be transparent about how it makes decisions on chemicals, and reveal the specific standards a product's ingredients must meet, or risk damaging brand credibility and customer loyalty.

Additionally, many companies withhold information about the ingredients they use in their products. Unlike a favorite bottle of shampoo or a favorite food item, consumers can't pick up their favorite cleaners and check the label for ingredients. That's because cleaning product companies aren't required to disclose all the ingredients they use in their products. There is no federal law mandating the disclosure of cleaning product ingredients, which means that manufacturers are legally allowed to keep the ingredients they use –including toxic chemicals—a secret. While many companies are now disclosing some ingredients online --and some companies publish a list of prohibited chemicals in their products -- there is no way of knowing whether company claims of product safety are trustworthy without complete, easily-accessible ingredient disclosure and better information about how companies evaluate chemical safety.

In this scorecard, we graded four major cleaning product manufacturers based on the following key indicators to expose their commitment to product safety: Product Ingredient Disclosure, Responsiveness to Consumer Concerns, Toxic Chemical Screening Process and Removal of WVE's Chemicals of Concern.

The goal of this report card is to provide a framework that companies can use to establish strong and transparent processes for assessing ingredient safety. It's important to note that in order to achieve this, companies must provide a product-level disclosure of all ingredients they use in each individual product. This includes the chemicals that make up fragrances, which have typically been treated as trade secrets.

How Are Companies Graded?

WVE evaluated four leading household cleaning product manufacturers – The Clorox Company, Procter & Gamble, RB (formerly Reckitt Benckiser), and SC Johnson & Son, Inc. Assessments are based on information available from the companies' websites, product labels, and direct correspondence with the companies. (See Appendix A – Methodology for more detailed information on how each company was scored.)

Over the last several years, manufacturers have taken important strides forward in removing certain toxic chemicals from their cleaners and in disclosing ingredients to consumers.

But is it enough? Find out who's made progress – and who hasn't – in making cleaning product safety a priority when consumers demand it.

	CLOROX	SCJ	RB	P&G
OVERALL	8-	5-		<u> </u>
Product Ingredient Disclosure	A-	A-	В	D
Responsiveness to Consumer Concerns	В	A	Α	С
Toxic Chemical Screening Process	С	C+	D	D-
WVE Chemicals of Concern	В	C+	В	C+

OVERALL SCORE

Companies were awarded points based on their performance in each criteria (Product Ingredient Disclosure, Responsiveness to Consumer Concerns, Toxic Chemical Screening Process and Removal of WVE's Chemicals of Concern). Cumulative points were calculated and companies were given a final overall score and assigned a letter grade, with A being the highest grade and F the lowest grade.

I

PRODUCT INGREDIENT DISCLOSURE

In order to make informed decisions about the health and safety of products, consumers must have easy access to information about ingredients. This is particularly true for vulnerable or sensitive populations looking for specific information. Some consumers have allergies or asthma and are trying to avoid chemicals that may trigger symptoms; some are women who are pregnant or trying to get pregnant and want to take extra precautions to avoid exposures that may impact the development of their child; and some are individuals with unique chemical sensitivities or various other diseases who are concerned about controlling their exposures to certain substances. Many consumers simply want to be able to avoid certain toxic chemicals they know may be harmful to their health, such as phthalates and synthetic musks.

Before WVE launched its Safe Cleaning Products Initiative in 2007, it was nearly impossible to find ingredient information for cleaning products except what may be listed on a Safety Data Sheet. As a result of consumer demand, today most major cleaning product companies are disclosing a majority of ingredients online except for fragrances, which are still largely treated as trade secrets by the industry. Some companies, however, have announced they will begin disclosing fragrance allergens. These allergens are identified by the European Union (EU) as allergy-inducing chemicals, and constitute only a small fraction of ingredients that make up a fragrance. A fragrance may be made up of a hundred or more different chemicals, many of which have not been deemed allergens by the EU. There are currently 26 chemicals on the EU allergen list, with an additional 56 up for list consideration.

Where can I find ingredients in cleaning products?

Unlike cosmetics, finding ingredients on a cleaning product label is still relatively rare, but most major manufacturers are disclosing ingredients online. It is not always easy to find the links to those ingredient listings on product websites – so here are the links for the four companies profiled in this report:

RB

(makers of Lysol, AirWick...) http://www.rbnainfo.com/ productpro/ProductSearch.do

Clorox

(makers of Clorox, Formula 409, Pine-Sol...)

http://www.lngredientsInside.com

Website for mobile phones and tablets: http://i.clx.com

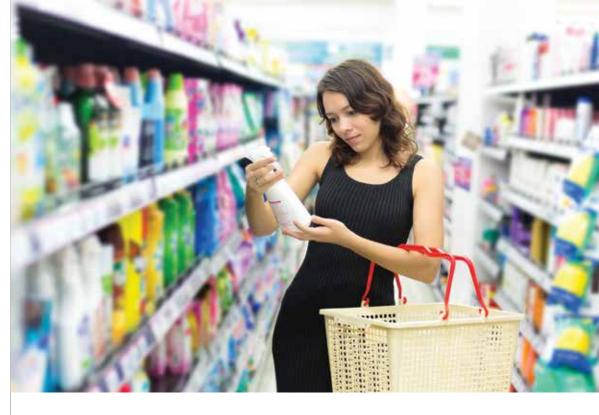
Also, a free app can be found in the iPhone App Store by typing in "Clorox ingredients"

SC Johnson & Son

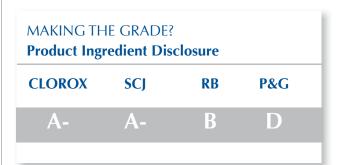
(makers of Glade, Pledge, Windex...) <u>www.</u> <u>whatsinsidescjohnson.com/</u>

Procter & Gamble

(makers of Tide, Febreze, Swiffer...) http://www.pgproductsafety.com/ productsafety/index.shtml



The optimal method of disclosure is directly on the product label so that consumers have ingredient information at the point of purchase. However, internet disclosure via a company website or through a smartphone app is becoming more useful for consumers; the majority of the U.S. population has access to the internet, and the use of smartphones has increased significantly.³



In this category, WVE graded companies on the extent to which they disclose ingredients in their products and how easy it is to find ingredient listings.

BIG STEPS FORWARD: All four companies disclose ingredients on a website, including a master list of fragrance ingredients. In addition, Clorox and RB disclose product-specific fragrance allergens present at concentrations of 0.01% or greater. SC Johnson & Son will begin disclosing all product-specific fragrance ingredients at concentrations of .09% or greater.

MAJOR PROGRESS NEEDED: To achieve a satisfactory level of product ingredient disclosure, all major cleaning product companies should disclose all fragrance ingredients on a product-specific basis present at or above 0.01% of product concentration.

³http://pewinternet.org/2013/06/05/smartphone-ownership-2013/, http://www.pewinternet.org/data-trend/internet-use/internet-use-over-time/

RESPONSIVENESS TO CONSUMER CONCERNS

Consumers not only have the right to know what ingredients are in products they use, they also deserve to have their concerns addressed. And consumer demand for safer products is on the rise, leading many to wonder: Are companies paying attention?

In this category, WVE graded companies on their responsiveness to consumer demands for ingredient information and their current ingredient disclosure policies. Companies were rated on whether they responded to WVE's requests for information on their use and disclosure of toxic chemicals in

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SCJ	RB	P&G
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fragrance, whether they acknowledge that consumers want greater access to ingredient information, and whether companies take product safety seriously by setting clear and transparent safety goals.

BIG STEPS FORWARD: All four companies acknowledge publicly that they want to meet consumers' demands to know what's in their products.

MAJOR PROGRESS NEEDED: To demonstrate better responsiveness to consumer demands, Clorox and Procter & Gamble need to develop and publicly communicate their ingredient safety goals.

TOXIC CHEMICAL SCREENING PROCESS

Little regulation exists in the U.S. to limit or control the use of toxic chemicals in consumer products. Instead, it is largely the manufacturer's responsibility to evaluate its ingredients to ensure the safety of its products, with little external oversight. Lacking any industry standards, toxic chemical screening processes that assess ingredients vary considerably from company to company.

AT A MINIMUM, WE IDENTIFY THAT A MODEL TOXIC SCREEN PROCESS SHOULD INCLUDING THE FOLLOWING:

- Screening products for contaminants and impurities;
- Establishing a list of prohibited ingredients;
- Utilizing authoritative lists of chemicals of concern established by governments or scientific organizations;
- Implementing a consistent and thorough hazard assessment procedure for all ingredients in products, with clearly specified criteria on multiple hazard endpoints;
- Committing to continual assessment of chemicals over time; and
- Publicly reporting on the progress of toxic chemical screening.

Where are ingredient safety goals?

Each company profiled in this report has issued yearly sustainability reports to highlight progress made regarding sustainability initiatives. All four companies have defined measurable goals to track progress on issues such as reducing water consumption, reducing waste to landfills and reducing energy consumption. These goals have timelines and numerical benchmarks, and the sustainability reports frequently include the data that show progress towards these goals-data that has been audited by outside sources. Comparatively, the goals mentioned (if any) regarding improving the sustainability and safety profiles of ingredients in products are sorely lacking in such detail. The goals are often vaguely worded and often do little than merely indicate a drive towards more sustainable products (which can often mean anything from ingredients to packaging.) The numerical data to back up the progress is rarely presented and even more rarely audited by outside firms. Given that all four companies state that the safety of their products is a top priority, this discrepancy between the presentation of sustainability goals (such as water conservation) and ingredient safety goals is surprising. In order to demonstrate a sincere commitment to improving safety profiles of products and their ingredients, companies should create specific measurable goals for the sustainability and safety of their ingredients. Furthermore, tracking and auditing the data is needed to show progress towards those goals in a manner on par with their other sustainability initiatives.

Most importantly, the manufacturers must be fully transparent about how their chemical ingredient screening processes work. It is not sufficient to simply state that a process is in place, conducted by company experts, which assures the safety of the company's products. Instead, in order to maintain credibility with consumers, a company must provide the information needed to understand how decisions are made about ingredients in products and how the company works to avoid and minimize the use of hazardous ingredients.

MAKING THE GRADE?
Toxic Chemical Screening Process

CLOROX SCJ RB P&G

C C+ D- D-

In this category, we graded companies on how closely their toxic screening processes meets standards in the ideal model, and measured how forthcoming the companies are about the criteria included in these processes.

BIG STEPS FORWARD: All four companies have established chemical screening processes and are now publishing some information about them on their websites.

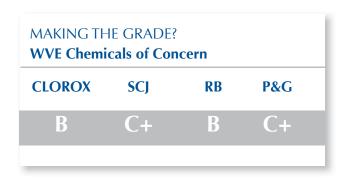
MAJOR PROGRESS NEEDED: None of the four companies are fully transparent about the criteria included in their screening processes, making it impossible to evaluate the safety of ingredients and compare the quality of any one company's process to another.

WVE CHEMICALS OF CONCERN

In 2007, Women's Voices for the Earth published the report *Household Hazards*, which highlights several chemicals commonly found in conventional cleaning products that scientific evidence indicates are harmful to women's health. The follow up report in 2009, *Disinfectant Overkill*, questioned the industry's reliance on antimicrobial cleaning



products, noting some of the same chemicals of concern to women's health. In 2010, the *What's That Smell?* report pointed out that many of the secret chemicals used to give cleaning products specific scents are the same chemicals impacting women's health. And the 2013 *Secret Scents* report examined the prevalence of fragrance allergens in consumer products. This report specifically points out that these chemicals of concern are extremely difficult to avoid since companies are not required to disclose fragrance ingredients in their products.



In this category, we rated companies on whether they have removed chemicals of concern from their household cleaning products that are identified as harmful to women's health in these scientific reports. Online ingredient research coupled with company documentation of prohibited ingredients, especially in the case of fragrance chemicals, were consulted to determine if companies still use:

- Monoethanolamine (occupational asthma)
- 2-butoxyethanol (reduced fertility and low birth weight)
- Ammonium quaternary compounds (reduced fertility, developmental harm, and occupational asthma)
- Alkyl phenol ethoxylates (reproductive harm)
- Phthalates (allergens, reproductive malformations in baby boys)
- Triclosan and triclocarban (hormone disruption, increased risk of breast cancer, persistent in environment)
- Synthetic musks (hormone disruption, bioaccumulative in humans, persistent in environment)

BIG STEPS FORWARD: Since the launch of WVE's Safe Cleaning Products Initiative in 2007, all four companies have made progress in removing certain toxic chemicals. All four have removed nonylphenol – a particularly harmful alkyl phenol ethoxylate (APE) – as well as phthalates, 2-butoxyethanol, and triclosan from their household cleaning products. Clorox and RB no longer use synthetic musks.

MAJOR PROGRESS NEEDED: All four companies need to phase out use of monoethanolamine and ammonium quaternary compounds. SC Johnson & Son and Procter & Gamble must eliminate synthetic musks from their products.

What are synthetic musks?

Synthetic musks are man-made chemicals produced to replicate the musk scents originally obtained from musk deer and musk ox.4 Two commonly used synthetic musks are polycyclic musks galaxolide and tonalide, in which increasing quantities are being used in fragranced products.5 Research indicates that synthetic musks are persistent, meaning they don't break down in the environment, and can bioaccumulate, meaning that they build up in the body. Additionally, synthetic musks are potential hormone disruptors and may break down the body's defenses against other

toxic chemical exposures. In a 2007 study of breast milk in the U.S., at least one type of musk was found in each woman tested, and 82% of participants had at least two musks in their breast milk.⁶ In 2008, another study that examined musks in the breast milk of American women, found that heavier use of fragranced laundry detergent during pregnancy led to significantly higher levels of tonalide in breast milk.⁷ This research indicates that newborns and infants can be exposed to significant levels of synthetic musks through breastfeeding, which appears to be related to

their mothers' use of fragranced products in the household. Exposure to synthetic musks also occurs during pregnancy. A 2009 study, which looked at various pollutants detected in umbilical cord blood, found galaxolide and tonalide present in seven of ten newborns tested.⁸ The potential health impacts of synthetic musk exposure so early in life are still unknown. Therefore, a precautionary approach is needed to protect the most vulnerable populations among us.

⁴World Wildlife Fund (2006). Chain of contamination: The food link – Synthetic musks. Available at: http://assets.panda.org/downloads/fact_sheet synthetic musks food.pdf 2006.

⁵Roosens, L. et.al. (2007) Concentrations of synthetic musk compounds in personal care and sanitation products and human exposure profiles through dermal application. Chemosphere 69. Pp. 1540-1547. 2007.

⁶Reiner, J. et.al. (2007) Synthetic musk fragrances in human milk from the United States. Environmental Science and Technology. Vol. 41, No. 11, pp 3815-3820. 2007.

⁷Lignell, S. et.al. (2008) Temporal trends of synthetic musk compounds in mother's milk and associations with personal use of perfumed products. Environmental Science and Technology, Vol. 42, No. 17. Pp 6743-6748, 2008.

⁸Environmental Working Group (EWG) (2009) Pollution in people: Cord blood contaminants in minority newborns. Available at: http://www.ewg.org/research/minority-cord-blood-report 2009.



SC Johnson has made important strides in improving ingredient transparency and in the safety of their products. The company committed to list ingredients on its website back in 2009, and in 2014 it became the first mainstream company to publicly commit to some degree of product-specific fragrance ingredient disclosure. SC Johnson has been responsive to consumer concerns over the years as well. It has removed many of WVE's chemicals of concern from its household cleaning products,

Brands include:









including nonylphenol, phthalates, 2-butoxyethanol, and triclosan.

Additionally, SC Johnson appears to have the most robust ingredient screening process with the internal Greenlist program. The criteria, however, used to evaluate its products are not public; therefore, consumers cannot be sure that their concerns about safety are met by the company's own standards.



Here's what SC Johnson should do to improve its processes and regain consumer trust.

Product Ingredient Disclosure

SC Johnson should:

- List all ingredients on product labels so consumers can read them at the store
- Tell consumers what's in the fragrance of every product.
- Provide product ingredient lists on every product's main webpage.

Responsiveness to Consumer Concerns

SC Johnson should:

 Develop stronger ingredient safety goals with more specificity, data and tracking to include in its annual sustainability report.

WVE Chemicals of Concern

SC Johnson should:

 Eliminate synthetic musks, monoethanolamine and ammonium quaternary compounds from all of its products and replace them with safe substitutes if substitutes are necessary.

Toxic Chemical Screening Process

SC Johnson should:

- Make public the criteria used to evaluate the safety of their products through its internal screening process.
- Ensure its internal screening process:
 - Screens out contaminants
 - Lists which ingredients the company prohibits
 - Reflects sound science about chemicals of concern established by governments or scientific organizations
 - Includes a thorough hazard assessment process consistently applied for all ingredients used in products
 - Publicly reports on the progress of toxic chemical screening

Consumer Tip

You can get information about SCJ's products by visiting www.whatsinsidescjohnson.com/

"You want products to be safe and effective. As a family company, we [SC Johnson] couldn't agree more. That's why we're committed to continuously making better ingredient choices."

-SC Johnson & Son, Inc

The Clorox Company

Clorox has made important strides in improving ingredient transparency and in the safety of their products. It was the first mainstream company to agree to list ingredients on its website back in 2009 and in 2014 it publicly committed to disclosing fragrance allergens on a product-specific basis. Allergens are disclosed if present at, or above, 0.01% of product concentration, which is the disclosure threshold WVE recommends. Clorox has been responsive to consumer concerns over the years

as well. It has removed many of WVE's



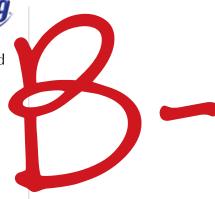






chemicals of concern from its household cleaning products, including synthetic musks, nonylphenol, phthalates, 2-butoxyethanol, and triclosan.

Additionally, Clorox has developed an internal ingredient screening process through its Preferred Ingredient Calculator program. However, the criteria used to evaluate its products are not public; therefore, consumers cannot be sure that their concerns about safety are met by the company's own standards.



"At Clorox, the safety of you, your family, pets and the environment is a top priority. Our scientists and other highly skilled personnel from our Global Stewardship and Product Safety and Regulatory Compliance departments evaluate a product's safety, efficacy and regulatory compliance before it makes it to store shelves."

-Clorox



Here's what Clorox should do to improve its processes and regain consumer trust.

Product Ingredient Disclosure Clorox should:

- List all ingredients on product labels so consumers can read them at the store.
- Tell consumers what's in the fragrance of every product.

Responsiveness to Consumer Concerns

Clorox should:

 Develop ingredient safety goals with more specificity, data and tracking to include in its annual sustainability report.

WVE Chemicals of Concern

Clorox should:

 Eliminate monoethanolamine and ammonium quaternary compounds from all of its products and replace them with safe substitutes if substitutes are necessary.

Toxic Chemical Screening Process Clorox should:

- Make public the criteria used to evaluate the safety of their products through its internal screening process.
- Ensure its internal screening process:
 - Screens out contaminants
 - Lists which ingredients the company prohibits
 - Reflects sound science about chemicals of concern established by governments or scientific organizations
 - Includes a thorough hazard assessment process consistently applied for all ingredients used in products
 - Publicly reports on the progress of toxic chemical screening

Consumer Tip

You can get information about Clorox's products by visiting http://www.lngredientsInside.com

Website for mobile phones and tablets: http://i.clx.com

Also, get the free app at the iPhone App Store by searching "Clorox ingredients"



"The vision of [RB] Reckitt
Benckiser Group plc is to
deliver better solutions
to consumers. We are
therefore committed to
supplying safe products
to our consumers and to
understanding all the issues
involving safety associated
with our products."

-RB

Consumer Tip

You can get information about RB's products by visiting http://www.rbnainfo.com/productpro/ProductSearch.do

RB

RB (formerly Reckitt Benckiser) has made important strides in improving ingredient transparency and in the safety of their products. In 2013 it became the first mainstream company to publicly commit to disclosing fragrance allergens on a product-specific basis. Allergens are disclosed if present at or above 0.01% of product concentration, which is the disclosure threshold WVE recommends. RB has been very responsive to consumer concerns over the years as well. It has removed many of WVE's chemicals of concern from its

Prisol







household cleaning products, including synthetic musks, nonylphenol, phthalates, 2-butoxyethanol, and triclosan.

Additionally, RB has developed an internal ingredient screening process with the Global Ingredient Guidelines program. However, these Global Ingredient Guidelines used to evaluate its products are not public; therefore, consumers cannot be sure that their concerns about safety are met by the company's own standards.



Product Ingredient Disclosure RB should:

- List all ingredients on product labels so consumers can read them at the store.
- Tell consumers what's in the fragrance of every product.
- Provide product ingredient lists on every product's main webpage.

Responsiveness to Consumer Concerns

RB should:

 Develop stronger ingredient safety goals with more specificity, data and tracking to include in its annual sustainability report.

WVE Chemicals of Concern RB should:

 Eliminate monoethanolamine and ammonium quaternary compounds from all of its products and replace them with safe substitutes if substitutes are necessary.

Toxic Chemical Screening Process RB should:

- Make public the criteria used to evaluate the safety of their products through its internal screening process.
- Ensure its internal screening process:
 - Screens out contaminants
 - Lists which ingredients the company prohibits
 - Reflects sound science about chemicals of concern established by governments or scientific organizations
 - Includes a thorough hazard assessment process consistently applied for all ingredients used in products
 - Publicly reports on the progress of toxic chemical screening

Procter & Gamble has made some strides in improving ingredient transparency and in the safety of their products. The company lists ingredients except for fragrance on its brand websites and has published a master list, or palette, of fragrance ingredients it allows formulators to use in its products. Procter & Gamble has been somewhat responsive to consumer concerns over the years. It has removed many of WVE's chemicals of concern from its household cleaning products, including nonylphenol, phthalates, 2-butoxyethanol, and triclosan. The company's website communicates its awareness that consumers want ingredient and product safety information. Additionally, the

However, the criteria used to evaluate its products are not public. Therefore, consumers cannot be sure that their concerns about safety are met by the company's own standards. Procter & Gamble remains the only company highlighted in this report not to offer any level of product-specific disclosure of fragrance ingredients, an alarming lack of transparency given that

company's website notes that

Procter & Gamble has adopted an

approach to ensuring product safety.

"Since Procter & Gamble was founded over 175 years ago, ensuring the safety of people who use our products, and the safety of the world we all live in, has been at the heart of what we do."

-Procter & Gamble







its fragrance palette includes carcinogens, hormone disruptors and other serious chemicals of concern to women's health. Procter & Gamble is also the only company highlighted that did not to respond to WVE's communications regarding this report.



Here's what Procter and Gamble can do to improve its processes and regain consumer trust.

Product Ingredient Disclosure

Procter & Gamble should:

- List all ingredients on product labels so consumers can read them at the store.
- Tell consumers what's in the fragrance of every product.
- Provide product ingredient lists on every product's webpage, instead of just the main ingredient website where consumers are unlikely to search.

Responsiveness to Consumer Concerns

Procter & Gamble should:

 Develop ingredient safety goals with more specificity, data and tracking to include in its annual sustainability report.

WVE Chemicals of Concern

Procter & Gamble should:

 Eliminate synthetic musks, monoethanolamine and ammonium quaternary compounds from all of its products and replace

them with safe substitutes if substitutes are necessary.

Toxic Chemical Screening Process

Procter & Gamble should:

- Make public the criteria used to evaluate the safety of their products through its internal screening process.
- Ensure its internal screening process:
 - Screens out contaminants
 - Lists which ingredients the company prohibits
 - Reflects sound science about chemicals of concern established by governments or scientific organizations
 - Includes a thorough hazard assessment process consistently applied for all ingredients used in products
 - Publicly reports on the progress of toxic chemical screening

Consumer Tip

You can get information about P&G's products by visiting www.pgproductsafety.com/productsafety/index.shtml



CONCLUSION AND RECOMMENDATIONS

Consumers are increasingly demanding safer cleaning products. The numbers are undeniable. Between 2007 and 2011, retail sales of green cleaners doubled from \$303 million in annual sales to \$640 million. In 2012, 41% of respondents to a consumer survey had purchased or used eco-friendly household cleaning and/or laundry products. Product safety in general is a key concern for a majority of consumers worldwide. A 2014 survey found that 81% of respondents make purchasing choices with product safety in mind, but only 42% believe companies are doing enough to make products safe. Mothers in particular express how important safer products are to them, with 70% of mothers saying they "would buy more of a specific brand if they were aware of its positive impacts."

In the past two years, retailers like Walmart and Target announced that they are creating sustainability standards, encouraging manufacturers to provide more ingredient information and eliminate the use of certain toxic chemicals. Described as "retail regulation," retail

standards are playing an increasingly important role in helping to move the market toward greater transparency and safer chemicals in the absence of strong federal regulations.

With growing consumer demand for safer cleaning products, the economic benefits to companies committed to ingredient safety and transparency are clear. But it's not enough for cleaning product makers to claim their tile cleaner, dish soap or fabric softener is safe. The goal of this report is to provide critical information about the progress the four top cleaning product companies have made toward protecting women's health from toxic chemicals. Thanks to all the women who raised their voices, all four companies have made notable strides forward in ingredient disclosure and have voluntarily removed several chemicals of concern. Major progress is still needed, however, in disclosing to the public the standards and principles companies use to assess chemical safety and the criteria by which ingredients are determined safe for use in their products.

⁹The UN Global Compact-Accenture CEO Study on Sustainability (2014) The Consumer Study: From Marketing to Mattering. Generating Business Value by Meeting the Expectations of 21st Century People. The UN Global Compact-Accenture CEO Study on Sustainability In collaboration with HAVAS Media RE:PURPOSE. June 2014. Available online at: http://www.accenture.com/SiteCollectionDocuments/PDF/Accenture-Consumer-Study-Marketing-Mattering.pdf

RECOMMENDATIONS

Through its participation in the Workgroup for Safe Markets, Women's Voices for the Earth helped develop the Five Essential Practices for Retailers, Brand Owners and Suppliers.¹⁰ WVE recommends that companies establish and maintain a strong commitment to ingredient and product safety by adopting these practices. Specifically, WVE recommends cleaning product companies:

1. Develop a robust and transparent chemical screening process consumers can trust.

All four companies need major improvement in disclosing their toxic chemical screening processes if they want to maintain consumer trust. How a company picks and chooses which ingredients are safe and which should be avoided cannot be a matter of taking their word for it. Companies can inspire consumer confidence by being transparent about how their screening models evaluate ingredient toxicity, screen out contaminants, and prohibit ingredients linked to cancer and other serious health harms. Features of model toxic screening processes include:

- Screening products for contaminants and impurities;
- Establishing a list of prohibited ingredients;
- Utilizing authoritative lists of chemicals of concern established by governments or scientific organizations;
- Implementing a consistent and thorough hazard assessment procedure for all ingredients in products, with clearly specified criteria on multiple hazard endpoints;
- Committing to continual assessment of chemicals over time; and
- Publicly reporting on the progress of toxic chemical screening.

Examples of programs with robust screening processes and transparent criteria include Safer Choice (previously Design for the Environment), GreenSeal, EcoLogo, GreenScreen and the BizNGO Guide to Safer Chemicals. (See Appendix C for descriptions of each of these programs)

2. Make all product-specific ingredient information -- including fragrance ingredients --as accessible as possible to all consumers.

Greater product ingredient disclosure on company websites and smartphone apps is making it easier for internet-savvy shoppers to avoid toxic chemicals and allergens in cleaning products they purchase. But consumers need to know all ingredients used in the cleaning products they bring into their homes. This means companies must disclose fragrance ingredients down to 0.01% of product concentration. They also need to list ingredients on product labels and provide clear and obvious links to disclosure sites on product webpages.

3. Develop and communicate strong, measurable ingredient safety goals as part of sustainability reporting.

Companies are paying attention to consumer concerns about product safety, but some companies might be missing the point that consumers want more than lip service—they want strong ingredient safety goals they can hold them to. Ingredient safety should be just as important to companies as resource conservation and greenhouse gas reduction, and they should make these goals transparent to the public so that we can track their progress.

4. Eliminate WVE's chemicals of concern from household cleaning products.

All four companies have removed certain chemicals of concern linked to infertility, hormone disruption and serious allergies. But that is not far enough. Companies still need to phase out the use of ammonium quaternary compounds and monoethanolamine. SC Johnson & Son and Procter & Gamble also need to eliminate the use of synthetic musks.

¹⁰Workgroup for Safe Markets (2014) Five Essential Practices for Retailers, Brand Owners and Suppliers. Available online at: http://safemarkets.org/assets/media/images/Documents/FiveEssentialPractices Nov2014 formatted FINAL v3%20%284%29.pdf

METHODOLOGY FOR THE RATINGS FOUND IN THIS REPORT CARD

Product Ingredient Disclosure Criteria

Company lists INCI ingredients on product labels:

To confirm if product labels listed ingredients, WVE staff conducted informal shelf surveys in grocery stores in October 2014. Full ingredient labeling is defined as labeling which includes all ingredients regardless of concentration, by International Nomenclature of Cosmetic Ingredients (INCI) name. Full credit was awarded if all of the company's products listed all ingredients; partial credit was awarded if some products listed all ingredients. Credit was not given if ingredients were referred to by functional descriptors such as "plant-based cleaning agent," "preservative," or "fragrance."

Company provides a list of all ingredients for individual products on their website:

WVE staff conducted website searches for all companies in October 2014 to look for publicly available ingredient listings with special attention to fragrance ingredients. Full ingredient listing is defined as disclosure that includes all ingredients, regardless of concentration, by INCI name. Partial credit was given for disclosure of product-specific ingredients (except for fragrance); for disclosure of fragrance ingredients via a company-specific palette of ingredients; for listing Chemical Abstracts Service (CAS) numbers as part of the fragrance palette; for disclosure of product-specific fragrance allergens (partial points awarded for some fragrance allergens listed); and disclosure of product-specific fragrance ingredients. If a company had publicly committed (in writing and with a timeline provided) to disclose any of these ingredient categories and was mid-process, credit was given. Full credit was awarded if all of the company's products listed all ingredients.

Accessibility of ingredient disclosure websites:

In November 2014, WVE staff searched the websites of brand name products for each company. Full credit was awarded if ingredient listings or an obvious link to ingredient listings appeared on the product webpage (pages with product usage descriptions), as per WVE's 2010 Website Ingredient Disclosure Recommendations. Partial credit was awarded if only some brand names provided links on product webpages. No credit was awarded for links on headers or footers of websites.

In November 2014, WVE staff searched each company's website and app stores for mobile ingredient disclosure apps. Credit was given if apps were available for download.

Responsiveness to Consumer Concerns

Company responded to WVE's correspondence to request for information on screening processes:

In March 2014, WVE sent letters to the four companies reviewed in this report asking them to share with us:

- Any published guidelines on ingredient screening processes
- Method for screening out toxic chemicals (if possible, in a format similar to DfE¹¹ or Greenseal¹² criteria)
- Copy of restricted substances list (RSL), including any authoritative lists a company refers to in compiling a RSL
- Quality control standards for screening out contaminants
- Any sustainability goals for human and environmental health with regard to ingredients

Full credit was awarded if the company responded to this correspondence in writing or via phone.

http://www.epa.gov/dfe/pubs/projects/gfcp/dfe_master_criteria_safer_ingredients_v2_1

¹² http://www.greenseal.org/Portals/0/Documents/Standards/GS-8/GS-8 Ed5-1 Cleaning Products for Household Use.pdf

Company has acknowledged that consumers want to know what is in their products through a statement on their website:

WVE reviewed company websites in October 2014 for webpages or public documents such as annual reports, sustainability reports, or other materials for language which acknowledged consumer interest in ingredient disclosure. Full credit was awarded if acknowledgment was made in any of these materials indicating an awareness of this consumer issue.

Acknowledging the importance of ingredient safety by including ingredient safety goals as a part of their Sustainability Report:

WVE reviewed company sustainability reports from 2013 and 2014 for mention of ingredient safety goals or benchmarks similar to other sustainability goals such as lowering greenhouse gas emissions or waste production. Full credit was awarded if the company published these goals.

Toxic Chemicals Screening Process Criteria

The company uses an external screening/certification process (ie Greenseal, DfE, Ecologo) for all its products:

In March 2014, WVE conducted searches of each company's website looking for mentions of an external toxic chemical screening process or other "eco-label" certification; WVE also sent each company a letter in March asking them to confirm our findings. An external process or eco-label is a process or label developed by a neutral third party not associated with the company, which provides criteria for screening chemicals that can be used in products. Full credit was awarded if an external toxic chemical screening process or eco-label was identified as applicable to all of the company's products. Partial credit was awarded if an external toxic chemical screening process was applied to only some of the company's products.

The company publishes information about their chemical screening criteria and process on their website:

WVE reviewed company websites in March 2014 looking for published guidelines on ingredient screening process used for their products, including methods and criteria for screening out toxic chemicals, authoritative lists used to screen ingredients, quality control standards with regards to contaminants, and goals for ingredient safety. WVE also sent each company a letter in March asking them to confirm our findings. Full points were awarded if the ingredient screening process was explained clearly on the website. Partial points were awarded if some information was published.

Company uses one of these models or the principles of one of these models:

In March 2014, WVE reviewed published materials and any additional materials sent to us by companies for whether they used the Guide to Safer Chemicals by BizNGO, Green Screen for Safer Chemicals, DfE Safer Ingredients List, or the Clean Ingredients Database. WVE also sent each company a letter in March asking them to confirm our findings. These models share a set of core principles, including providing numerical values for toxicity (where available/relevant) and preferred testing methodology for assessing toxicity, as well as lists of prohibited chemicals and/or authoritative lists of chemicals to avoid (such as carcinogens etc.). Each of these models also provides or encourages full transparency for their screens, showing just how chemicals are assessed. Full credit was awarded if the company publicly documented the use of one of these models or principles of these models.

Commitment to continual assessment of chemicals, such as passing an internal policy to review chemical safety at least every 3-5 years:

In 2014, WVE reviewed company websites and 2013 and 2014 annual sustainability reports for mention of a continual assessment of chemicals. Full credit was awarded for a published commitment with timelines and goals.

Public reporting on progress, such as including in annual sustainability reports:

In 2014, WVE reviewed company websites and 2013 and 2014 annual sustainability reports for public reporting on progress for screening out toxic chemicals and meeting ingredient safety goals. Full credit was awarded public reporting in either of these two areas.

WVE Chemicals of Concern Criteria

Company's products DO NOT CONTAIN chemicals of concern cited in WVE's report Household Hazards,

Disinfectant Overkill, What's That Smell? or Secret Scents (monoethanolamine, glycol ethers, ammonium quaternary compounds, alkyl phenol ethoxylates, phthalates, triclosan, triclocarban, synthetic musks):

In 2014, WVE searched online ingredient listings for each company's products. Points were awarded for each chemical or class of chemicals of concern that don't appear in the company's products. In the case of unlisted fragrance ingredients such as phthalates or synthetic musks, points were awarded if the company revealed in writing the prohibition of those ingredients.

F: 0-34

Final Grade:

100 Possible Points (Sum of four category grades)

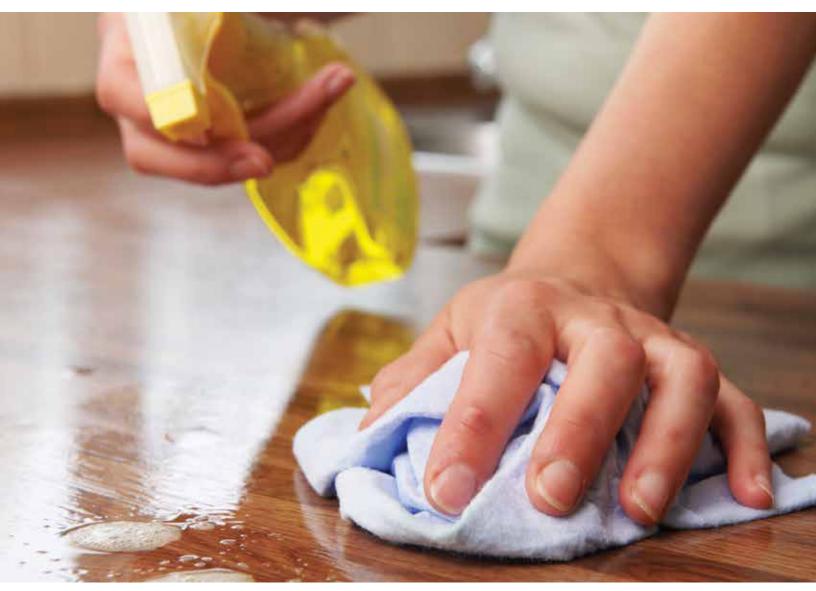
A: 65 + B: 55-64 C: 45-54 D: 35-44

Categories:

Product I Disclosur 36 Possib		Responsiveness to Consumer Concerns: 5 Possible Points	Toxic Chemical Screening Process: 31 Possible Points	Toxic Chemicals in Products: 28 Possible Points
A 21-36		A 5	A 21-31	A 25-28
B 16-20)	В 3	B 16-20	В 19-24
C 11-15	,	C 2	C 10-14	C 13-18
D 6-10		D 0	D 5-9	D 7-12
F 0-5		F	F 0-4	F 0-6

COMPANY SCORES AND ANALYSIS

TOTAL SCORES	Points Possible	Clorox	SCJ	RB	P&G
Product Ingredient Disclosure	36	23	22	18	8
Responsiveness to Consumer Concerns	5	3	5	5	2
Toxic Chemicals Screening Process	31	11	13	6	5
WVE Chemicals of Concern	28	21	17	21	17
TOTAL	100	58	57	50	32



17 | DEEP CLEAN: What the cleaning industry should be doing to protect your health

PRODUCT INGREDIENT	DISCLOSURE
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Points Po	ossible	Clorox	SCJ	RB	P&C
Company lists INCI ingredients on product label	s 5	2	2	0	0
Company provides a list of all ingredients for					
individual products on their website					
 Discloses ingredients (except for fragrance) 					
on website	c	ē			
 Discloses ingredients in fragrance 	6	6	6	6	6
Palette of ingredients	2	2			
• Palette with CAS #s	2 1	2	2	2	2
Company discloses product-specific	ı	1	0	1	0
allergens	6	6			
Company has committed to disclose all	O	6	2	6	0
fragrance ingredients on a product-specific					
basis with a public timeline for doing so	10	0			
	10	0	8	0	0
Accessibility of ingredient disclosure websites					
 Obvious links to disclosure sites on 					
product webpages	5	5	2	2	
 Mobile apps available 	1	ე 1	2	3	0
	•	I	0	0	0
UBTOTAL	36	23	22	18	8

DESPONSIVENESS T	O CONSUMER	CONCERNS
DECDONSIVENESS I	O CONSOMER	

	Points Possil	ble	Clorox	SCJ	RB	P&G
Company responded to WVE's corresp request for information on screening p	ondence to processes	1	1	1	1	0
Company has acknowledged that consumers want to know what is in the products through a statement on thei or other public document	neir r website	2	2	2	2	2
Acknowledging the importance of ing safety by including ingredient safety a part of their Sustainability Report	gredient goals as	2	0	2	2	0
SUBTOTAL		5	3	5	5	2

TOXIC CHEMICAL SCREENING PROCESS

Points	Possible	Clorox	SCJ	RB	P&G
The company uses an external screening/ certification process (ie Greenseal, DfE, Ecologo) for all its products:	3	1	0	1	0
Company publishes information about its cher screening criteria and process on its website:	nical 10	5	7	5	5
The company's chemical screening process in	cludes:	1	0	0	0
 Screening for contaminants 	2 2	2	2	0	0
 Published list of prohibited ingredients Company provides list of authoritative list to screen ingredients 	_	2	2	0	0
Company uses one of these models or the principles of one of these models: • Use Guide to Safer Chemicals by BizNGO • Use Green Screen for Safer Chemicals • Use DfE Safer Ingredients List • Use Clean Ingredients Database	10 O	0	0	0	0
Commitment to continual assessment of chemicals, such as passing an internal policy to review chemical safety every 3-5 y	ears 1	0	1	0	0
Public reporting on progress, such as includ in annual sustainability reports	ing 1	0	1	0	0
SUBTOTAL	31	11	13	6	5

TOXIC CHEMICALS IN PRODUCTS

	Points Possible	Clorox	SCJ	RB	P&G
Company's cleaning products DO NOT CONTAIN chemicals of concern cited in WVE's reports Househo Hazards, Disinfectant Overkill, and Who That Smell	old at's				
 monoethanolamine 2-butoxyethanol ammonium quaternary compounds alkyl phenol ethoxylates phthalates triclosan triclocarban synthetic musks 	3 3 4 4 4 3 3 4	0 3 0 4 4 3 3	0 3 0 4 4 3 3	0 3 0 4 4 3 3	0 3 0 4 4 3 3
UBTOTAL	28	21	17	21	17

SC Johnson & Son, Inc. OVERALL GRADE: 57/100 B-

Category	Great Progress!	Needs improvement
PRODUCT INGREDIENT DISCLOSURE 22/36 A-	 Lists ingredients on a website, including a master list of fragrance ingredients Will begin telling us what's in the fragrance of every product at concentrations of .09% or greater Provides ingredient disclosure links on some product webpages 	 Should list ingredients on product labels so consumers can read them at the store Should tell us what's in the fragrance of every product (present at or above 0.01% of product concentration)! Should provide product ingredient lists on every product's webpage
RESPONSIVENESS TO CONSUMER CONCERNS 5/5 A	 Responded to WVE's requests for information Acknowledged publicly that they want to meet consumers' demands to know what's in their products Provides some ingredient safety goals in its sustainability report Need stronger ingredient safety goals with more specificity, data and tracking. 	Need stronger ingredient safety goals with more specificity, data and tracking.
TOXIC CHEMICAL SCREENING PROCESS 13/31 C+	 Has established an internal chemical screening processes calls Greenlist with some information available on its website Publishes a list of prohibited ingredients 	 Needs to make the criteria used in its Greenlist program to evaluate the safety of its products public Needs to provide information on how its chemical screening process screens for contaminants
WVE CHEMICALS OF CONCERN 17/28 C+	 Has removed many of WVE's chemicals of concern from its household cleaning products, including nonylphenol, phthalates, 2-butoxyethanol, and triclosan 	Needs to eliminate synthetic musks, monoethanolamine and ammonium quaternary compounds

The Clorox Company OVERALL GRADE: 54/100 B-

Category	Great Progress!	Needs improvement
PRODUCT INGREDIENT DISCLOSURE 23/36 B+	 Lists ingredients on a website, including a master list of fragrance ingredients Green Works brand products list ingredients on product labels Tell us what allergens are in their product's fragrances Has a mobile app available that allows you to scan bar codes to see a products' ingredients Provides ingredient disclosure links on some product webpages 	 Should list ingredients on product labels so consumers can read them at the store Should tell us what's in the fragrance of every product! Needs to provide better information on how its chemical screening process screens for contaminants.
RESPONSIVENESS TO CONSUMER CONCERNS 3/5 B	 Responded to WVE's requests for information Acknowledged publicly that they want to meet consumers' demands to know what's in their products 	Needs to develop and publicly communicate its ingredient safety goals
TOXIC CHEMICAL SCREENING PROCESS 11/31 C	 Has established an internal chemical screening processes with some information available on its website Green Works brand products have received external certification from U.S. EPA's Design for the Environment Publishes a list of prohibited ingredients 	 Needs to be fully transparent about the criteria included in its screening processes used to evaluate the safety of ingredients Needs to provide information on how its chemical screening process screens for contaminants
WVE CHEMICALS OF CONCERN 21/28 B	 Has removed many of WVE's chemicals of concern from its household cleaning products, including synthetic musks, nonylphenol, phthalates, 2-butoxyethanol, and triclosan 	Needs to eliminate monoethanolamine and ammonium quaternary compounds

Category	Great Progress!	Needs improvement
PRODUCT INGREDIENT DISCLOSURE 18/36 B	 Lists ingredients on a website, including a link to IFRA's list of fragrance ingredients Lists fragrance allergens in products present at concentrations of 0.01% or greater Provides ingredient disclosure links on some product webpages 	 Should list ingredients on product labels so consumers can read them at the store Should tell us what's in the fragrance of every product! Should provide product ingredient lists on every product's webpage
responsiveness to consumer concerns 5/5 A	 Responded to WVE's requests for information Acknowledged publicly that they want to meet consumers' demands to know what's in their products Provides some ingredient safety goals in its sustainability report 	Need stronger ingredient safety goals with more specificity, data and tracking.
TOXIC CHEMICAL SCREENING PROCESS 6/31 D-	 Has established an internal chemical screening process called its Global Ingredient Guidelines with some information available on its website One Lysol brand product has received external certification from U.S. EPA's Design for the Environment 	 Needs to be fully transparent about the criteria included in its screening processes used to evaluate the safety of ingredients Needs to publish a list of prohibited ingredients Needs to provide a list of authoritative lists to screen ingredients Needs to provide information on how its chemical screening process screens for contaminants
WVE CHEMICALS OF CONCERN 21/28 B	 Has removed many of WVE's chemicals of concern from its household cleaning products, including synthetic musks, nonylphenol, phthalates, 2-butoxyethanol, and triclosan 	Needs to eliminate monoethanolamine and ammonium quaternary compounds

Procter & Gamble OVERALL GRADE: 32/100 F

Category	Great Progress!	Needs improvement
PRODUCT INGREDIENT DISCLOSURE 8/36 D	List ingredients on a website, including a master list of fragrance ingredients	 Should list ingredients on product labels so consumers can read them at the store Should tell us what's in the fragrance of every product! Should provide product ingredient lists on every product's webpage
responsiveness to consumer concerns 2/5 C	 Acknowledged publicly that they want to meet consumers' demands to know what's in their products 	 Needs to respond to WVE's request for information as an organization representing consumer concerns Needs to develop and publicly communicate its ingredient safety goals
TOXIC CHEMICAL SCREENING PROCESS 5/31 D-	 Has established an internal chemical screening process with some information available on its website 	 Needs to be fully transparent about the criteria included in its screening processes used to evaluate the safety of ingredients Needs to publish a list of prohibited ingredients Needs to provide a list of authoritative lists to screen ingredients Needs to provide information on how its chemical screening process screens for contaminants
WVE CHEMICALS OF CONCERN 17/28 C+	 Has removed many of WVE's chemicals of concern from its household cleaning products, including nonylphenol, phthalates, 2-butoxyethanol, and triclosan 	 Needs to eliminate synthetic musks, monoethanolamine and ammonium quaternary compounds

Appendix C

MODEL PROGRAMS WITH CHEMICAL INGREDIENT SCREENING PROCESSES AND TRANSPARENT CRITERIA

Safer Choice (previously Design for the Environment)

http://www.epa.gov/saferchoice

Safer Choice is a certification system administered by the U.S. Environmental Protection Agency that helps consumers, businesses, and purchasers find products that perform well and are safer for human health and the environment. Every ingredient in the product with the SaferChoice label has been reviewed by EPA scientists. Only products that meet the EPA publicly available Safer Choice Standard, which includes stringent human health and environmental criteria, are allowed to carry the label.

GreenSeal

http://www.greenseal.org/

Green Seal is a non-profit environmental standard development and certification organization. The Green Seal Certification Mark on a product label demonstrates that the product has undergone comprehensive performance testing, on-site audits and periodic monitoring to ensure compliance. Green Seal sustainability standards for products are based on life-cycle research, and are developed in an open, transparent, and stakeholder-involved process. Green Seal standards provide criteria and guidelines for manufacturers to work toward sustainability and Green Seal certification.

EcoLogo

http://industries.ul.com/environment/certificationvalidation-marks/ecologo-product-certification

EcoLogo is a third-party certification system which certifies products for reduced environmental impact. These certifications indicate that a product has undergone rigorous scientific testing, exhaustive auditing, or both, to prove its compliance with stringent, publicly available, environmental performance standards.

GreenScreen®

for Safer Chemicals

http://www.greenscreenchemicals.org/

GreenScreen® for Safer Chemicals is a publicly available and transparent chemical hazard screening method that allows users to evaluate chemicals based on their inherent hazards. The GreenScreen consolidates the available data on a chemical's inherent characteristics—including human health effects, environmental fate and toxicity, and safety—into a table of hazard endpoints each ranked as high, moderate or low. The hazard evaluations are further consolidated into a single benchmark that provides an easy means for comparing chemicals. By using GreenScreen, companies can rank chemicals and understand why some alternatives are more or less preferable.

BizNGO Guide to Safer Chemicals.

http://www.bizngo.org/safer-chemicals/guide-to-safer-chemicals

The BizNGO Guide to Safer Chemicals is a hands-on-guide that charts pathways to safer chemicals in products and supply chains for brand name companies and product manufacturers. The Guide helps companies to implement the BizNGO Principles for Safer Chemicals, which are to:

- 1. Know and disclose product chemistry.
- 2. Assess and avoid hazards.
- 3. Commit to continuous improvement.
- 4. Support public policies and industry standards that advance the above three principles.

