Ingredient Transparency

We are in this together…

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There are many cooks in the transparency kitchen
And they all want to add their own special sauce to it …
With so many contributors confusion is inevitable

• As a registrant we have to remind ourselves:
  - Which agency / retailer / outside influencer wants this?
  - How can we, as registrants:
    ✓ Not lose site of the important information on the label
    ✓ Be clear and concise
    ✓ Avoid confusion with the regulatory agency and with consumers
    ✓ Find a clear path forward for everyone
    ✓ Inform and educate our stakeholders
Walmart’s Ingredient Disclosure Policy

“For example:

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”

Walmart provides two options for disclosing ingredients on-pack:

• Chemicals on California SB 258 designated list
• Full Disclosure (i.e., all intentionally added ingredients)

FIFRA-regulated products in products categories covered by Walmart’s policy are expected to comply with on-pack disclosure requirements 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.)

Walmart also requires FIFRA-regulated products to list ingredients online

CA SB 258

Cleaning products, including FIFRA-regulated products, must list intentionally added ingredients online by January 1, 2020
Consumer advocacy groups pressure regulators

Our key stakeholders are taking charge... With imminent demands both online & on pack

Government

- Full online disclosure in 2020
- Full on pack ingredient listing in 2021 [FIFRA Exempt]

Retailers

- Walmart: Roll on pack disclosure starting in 2018
- Online ingredient transparency by 2020
- Retailers ‘Restricted substance lists’
  - Phthalates
  - Propyl-paraben
  - Butyl-paraben
  - Formaldehyde / donors
  - NPE's
### Ingredient transparency
### State and Retailer Overview

#### Scope
- **Cleaners**: Yes [California] Yes [Walmart] Yes [Target]
- **FIFRA**: Yes [California] No [Walmart] No [Target]
- **Personal Care**: No [California] No [Walmart] Yes [Target]
- **Antimicrobials**: No [California] No [Walmart] Yes [Target]
- **Anti + Pest**: Yes [California] Yes [Walmart] Yes [Target]

#### Timing

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Dept. 13
What the label will look like post SB-258

Voluntary Disclosure
1. All intentionally added ingredients online
2. Website reference
Label Requirements

- On-pack disclosure of chemicals listed on the Walmart reference list of priority chemicals.
- Product labels that comply with the on-label format and content of the new California law (SB 258) will meet Walmart’s on-pack disclosure expectations.
So … What are the key issues to be resolved?

- Registration submission pathway
  - How can this be done outside other registration actions?
- Location on the label
  - Flexibility due to real estate constraints
- Registration documentation
- Nomenclature for ingredients
  - Flexibility is needed to meet SB 258 / other retailer requirements
- Full ingredient disclosure or chemicals of concern
  - Registrants can choose partial or full disclosure
So you ask … What do we need from you?

- An immediate call to action on this issue
  - Walmart registrant action plans were due in January
- Meet with industry groups for a deeper dive into the issues
- Form a workgroup
  - Federal and State Agencies to come to a pathway resolution
  - Include industry stakeholders / groups
  - Find a resolution taking into account all of the concerns
- There are thousands of labels that can be impacted
  - How will these be processed?
In conclusion …

For those registrants that want to provide ingredient information we must have a streamlined system with Federal and State ownership.
Do not repeat the failures of the past

Engage + Effective Discussion = Success
QUESTIONS?
References:

Walmart webinars explaining policy:

Walmart Chemical Policy guidance for suppliers:

CA SB 258:
https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB258