In 2014 Walmart published a number of chemical sustainability requirements including expectations related to ingredient disclosure.

• They expected that by 2015 suppliers of formulated product would have on-line disclosure of all ingredients.

• They required products in “Aisle 13” to disclose “on pack” certain ingredients by January 1, 2018.
Walmart’s 2014 on pack requirements:

• Scope: Aisle 13 includes household cleaning products, including antimicrobial products as well as indoor pest control products such as rodenticides and crack and crevice products.

• Walmart indicated at the time that WERCSmart would in the future flag to suppliers if their products had “priority chemicals for suppliers”. Thus putting suppliers on notice that they had a product that triggered Walmart’s on-pack requirement.

• Walmart has identified approximately 3700 chemicals on their priority chemicals list.
The changes to WERCSmart were never made and by the summer of 2017 it was clear that suppliers were not prepared to meet the January 2018 deadline (WERCSmart identifies Walmart “high priority chemicals” but not priority chemicals).

HCPA (then CSPA) and a workgroup of member companies worked with Walmart to identify a path forward.

Last November, Walmart released an update of their on pack requirements.
Walmart’s revised on pack requirements

• Suppliers can rely on CA SB 258 list of chemicals or Walmart’s list of priority chemicals (CA has about 1300 fewer chemicals).

• Suppliers should start on pack disclosure January 2018 but can use a “rolling refresh” to meet the requirement. Suppliers should provide Walmart with their refresh schedule.

• Products that comply with CA 258 on-label format and content will meet Walmart’s expectations.
• Scope: Although HCPA proposed narrowing the scope of Walmart’s disclosure requirements to align with California’s, Walmart maintained its existing scope which includes pesticides in “Aisle 13”.

• Walmart will require on pack disclosure of “priority chemicals” for pesticide products in Aisle 13 when a company otherwise changes their label in a way that requires EPA review and approval.

• HCPA has been working with EPA to develop a path forward for pesticide products within Walmart’s scope.
Thank You

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