

Developing an RSL, MRSL, or Chemicals of Concern List: Questions for Consideration by Manufacturers, Brands & Retailers

What is the scope of chemicals management?
Chemicals in products, parts, or components (all or subset)
Chemicals used to process raw materials and manufacture components and/or products
Chemicals in packaging
Chemicals used in facility operations and maintenance (cleaning, grounds maintenance, etc.)

What sources do you use for your list of Chemicals of Concern?
Laws and regulations
Laws and regulations in jurisdictions of operation/sales
Laws and regulations relevant to sector worldwide
Market demand
Customer requirements
EPP requirements
Eco-label requirements
Sector generated chemicals of concern lists
NGO generated lists of chemicals of concern
Hazard information
Authoritative lists: developed by government/inter-government/scientific bodies (e.g., IARC)
Screening lists (e.g., SIN List)
Emerging scientific evidence of a chemical's hazard, likely exposure routes and potential risk

What criteria do you use to prioritize chemicals for action?
Company values and goals
Brand reputation
Relevance to product portfolio
Likely presence in products
Quantity used
Sales volume
Business opportunity vs. business risk
Inherent hazard
Opportunity for exposure through supply chain and during production
Opportunity for exposure from product use
Vulnerability of exposed population (e.g., children)
Availability of alternatives that provide performance needed
Cost of alternatives
Legal compliance
Current legal requirements
Anticipated legal requirements
Market considerations
Customer requirements
Market access (e.g., eco-labels, EPP requirements)
Sector/competitor action
NGO/consumer concern

What action(s) do you take?
Track
Collect information on current chemical use
Identify chemicals for possible future action
Inform suppliers of organizational preferences & intent to restrict
Reduce
Work with suppliers to identify safer alternatives
Work with customers to choose safer alternatives from existing product portfolio
Select suppliers that do not use specified CoCs
Avoid use in newly designed/formulated products
Redesign/Reformulate
Redesign or reformulate existing products to exclude the use of specified CoCs and utilize safer alternatives
Restrict
Restrict to de minimus level in all or specified uses
Do not allow in specified uses
Ban
State that chemical must not be present without specifying de minimus level: "do not use" or "not intentionally added"

This diagram is intended as a description of company processes; it is not intended to be prescriptive. Companies may choose multiple responses for each question posed.

