

Ingredient Disclosure for non-FDA Products

April 2017 Status



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Why Ingredient Disclosure?

- The tough counter question: "Why not?"
 - If you sell in Europe, you are probably already doing it!
 - Some key US retailers are demanding it (Target and Walmart)
 - If your product is Safer Choice recognized, you have to
 - GHS greatly increased disclosure
 - NGO's are asking for it
 - "Some" consumers are asking for it
 - It's the right thing to do

Tipping Point Reached

- ✓ NGOs
- ✓ California SB-258
- ✓ MN, NY, etc.
- ✓ Retailer policies
- ✓ Company disclosure



- ✓ Industry voluntary disclosure model
- ✓ FHSA
- ✓ GHS

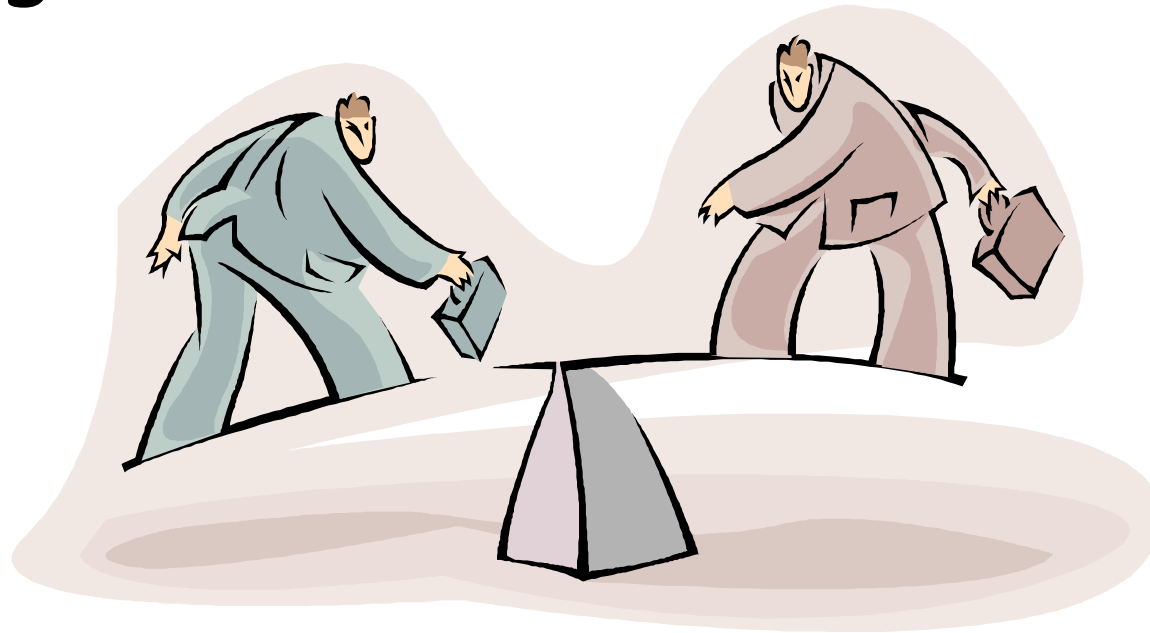
The current voluntary disclosure model is perhaps no longer sufficient for non-FDA products

The Transparency Balancing Act?

HISTORICALLY

"Right to Know"

CBI

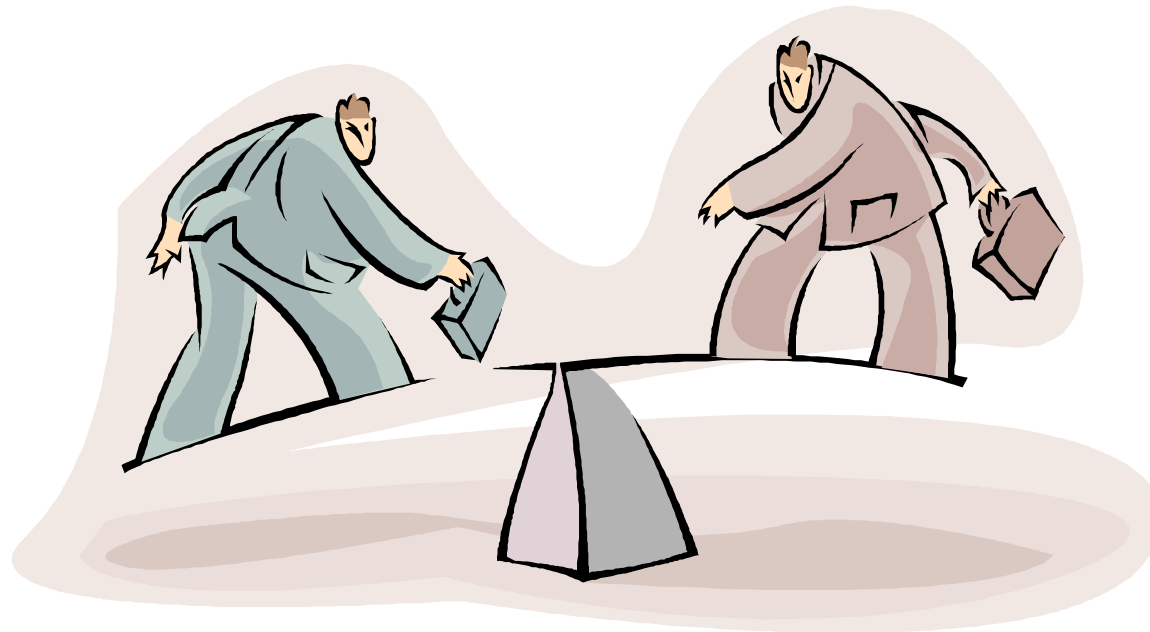


The Transparency Balancing Act?

In 2017

On-Label

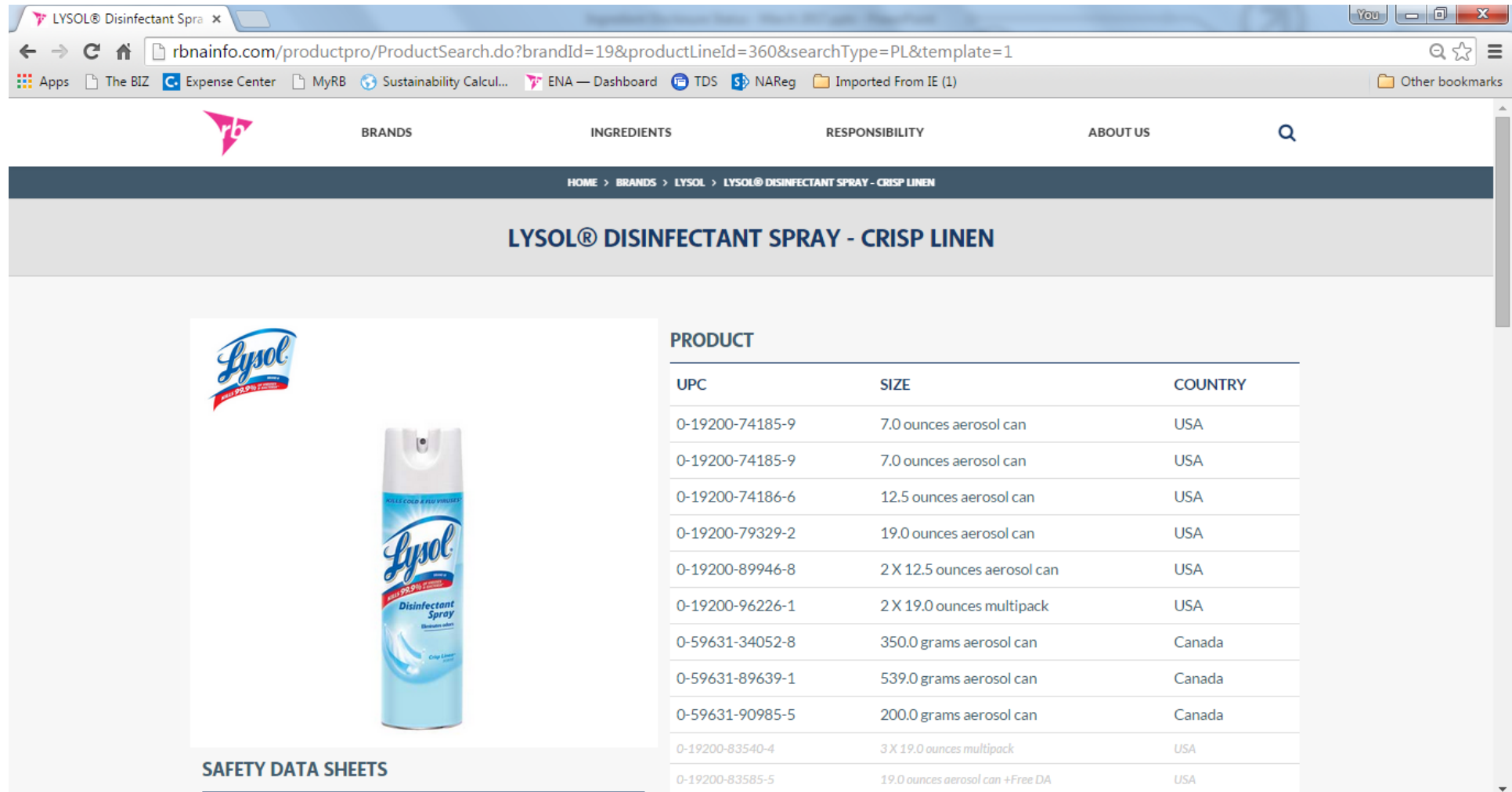
On-Line



At the core of the discussion... fragrance disclosure

- Current Voluntary Industry Model
 - On-line disclosure only
 - "fragrance" with link to IFRA Ingredient Transparency List
- Some current corporate disclosure models
 - 100% on-label
 - On-line top 10 ingredients
 - On-line individual EU fragrance allergens over 100 ppm
 - On-line individual fragrances over 100-900 ppm
 - 100% on-line disclosure for select fragrances

Current RB Ingredient Website



The screenshot shows a web browser window displaying the RB Ingredient Website. The browser's address bar shows the URL: rbnainfo.com/productpro/ProductSearch.do?brandId=19&productLineId=360&searchType=PL&template=1. The website's navigation menu includes: BRANDS, INGREDIENTS, RESPONSIBILITY, ABOUT US, and a search icon. The breadcrumb trail is: HOME > BRANDS > LYSOL > LYSOL® DISINFECTANT SPRAY - CRISP LINEN. The main heading is: LYSOL® DISINFECTANT SPRAY - CRISP LINEN. On the left, there is an image of a Lysol Disinfectant Spray can. Below the image is a link for SAFETY DATA SHEETS. On the right, there is a table titled PRODUCT listing various product variants.

UPC	SIZE	COUNTRY
0-19200-74185-9	7.0 ounces aerosol can	USA
0-19200-74185-9	7.0 ounces aerosol can	USA
0-19200-74186-6	12.5 ounces aerosol can	USA
0-19200-79329-2	19.0 ounces aerosol can	USA
0-19200-89946-8	2 X 12.5 ounces aerosol can	USA
0-19200-96226-1	2 X 19.0 ounces multipack	USA
0-59631-34052-8	350.0 grams aerosol can	Canada
0-59631-89639-1	539.0 grams aerosol can	Canada
0-59631-90985-5	200.0 grams aerosol can	Canada
0-19200-83540-4	3 X 19.0 ounces multipack	USA
0-19200-83585-5	19.0 ounces aerosol can +Free DA	USA

<http://www.rbnainfo.com>

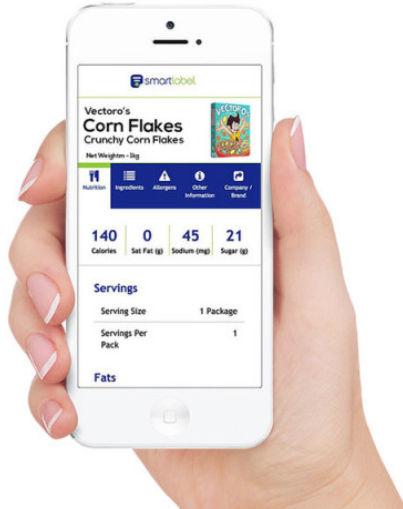
Current RB Ingredient Website

SAFETY DATA SHEETS

COUNTRY	LANGUAGE	PDF	EMAIL	FAX
Canada	Canadian English		<input type="checkbox"/>	<input type="checkbox"/>
Canada	French		<input type="checkbox"/>	<input type="checkbox"/>
United States	English		<input type="checkbox"/>	<input type="checkbox"/>

INGREDIENT INFORMATION

INGREDIENT	FUNCTION
Ethanol	Antimicrobial Active
Water	Diluent
Butane	Propellant
Propane	Propellant
Ethanolamine	pH Adjuster
Fragrance/Parfum	Fragrance
Isobutane	Propellant
Alkyl (50% C14, 40% C12, 10% C16) dimethyl benzyl ammonium saccharinate	Antimicrobial Active
MEA-Borate	Corrosion Inhibitor
MIPA-Borate	Corrosion Inhibitor
Ammonium Hydroxide	pH Adjuster



Food Products

- Nutrition
- Ingredient
- Allergies
- Other Information
- Company/Brand

Other Products

- Ingredients
- Usage Directions
- Advisories and Handling
- Other Information
- Company/Brand

Did you know?

- 84% of American adults use the internet¹
- 80% of Americans are projected to own smartphones by 2018¹
- 55% of consumers already conduct product research online or via mobile apps³
- 75% of consumers say they would use SmartLabel™ to search for product information⁴

smartlabel™

A Modern-Day Label
Delivers detailed product information right to the fingertips of consumers about food, beverage, personal care, household, and pet care products

Many easy ways to access SmartLabel™:

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- 1-800 Number
- Apps
- Customer Service Desk

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feedback@smartlabel.org
twitter.com/smartlabelinfo

SCAN HERE TO GET STARTED.

US Ingredient Communication Status

- Legislation will probably pass in California this year
- Walmart on-label disclosure of “priority chemicals” starting in Jan 2018
- Target has mandatory on-line communication of fragrance ingredients by 2020
- Goal is to proactively work with California, NGO's, retailers and allied trades to develop a single legislative solution