RESIDUALS AND IMPURITIES (R/I) – BEST PRACTICES

www.PharosProject.net
* See "R/I Best Practices"
Statement for explanation

Question 1: Do you have evidence for the **PRESENCE** of R/I for your Product/Material/Substance based on **direct testing, supplier SDS, or other supplier documentation?**

→ **NO** →

YES

Note any R/I known to be present in the Product/ Material at or above the declared Inventory Threshold*

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Determine GreenScreen® score for each R/I noted above.

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All R/I noted above with GS score of **BM-1, LT-1, LT-P1 or NoGS** must be disclosed in Content Inventory for Product/Material (Section 2).

Question 2: Are there any additional/alternate substances used in your Product/Material at or above the declared Inventory Threshold* that are not included in the "Common Contents" (Pharos) section of the Common Product for your product type?

→ **NO** →

YES

(Follow Path B)

Review "Process Chemistry - Known or Potential Residuals" in Pharos[2] for each for each intentionally added substance present in your Product/Material at or above the declared Inventory Threshold* **(SCIL?)**

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Note any R/I with "Percentage" listed at or above disclosed Inventory Threshold* (calculated based on amount of substance used in formulation) **or** listed as "Unknown" and with a frequency of "Frequent", "Integral", or "Unknown"

If there is no Process Chemistry tab for a substance present in your Product/Material include a note that R/I were considered based on Pharos process chemistry and no R/I information was available for this chemical.

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Determine GreenScreen® score for each R/I noted above.

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All potential R/I noted above a GS score of **BM-1, LT-1, LT-P1 or NoGS** must be reported in the Content Inventory of the associated Product/Material (Section 2 of the HPD); unless there is documentation (e.g. SDS or other supplier documentation) confirming that this particular R/I falls below the declared Inventory Threshold*

NO: FINISHED WITH R/I REVIEW; See "R/I NOTES"

NO

Question 3: Could your product be considered a "Common Product", as listed in Pharos (https://pharosproject.net/common-products)?

YES (Follow Path A)

Review the Common Product profile that aligns with your product type for R/I via the "Process Chemistry - Known or Potential Residuals" section of Pharos.

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2Note any R/I that is not associated with a specific chemical in the CP and with "% Wt. Product" listed at or above the declared Inventory Threshold* OR listed as "Unknown" with a frequency of "Frequent", "Integral", or "Unknown"

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Determine GreenScreen® score for each R/I noted above.

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All potential R/I noted above that return a GS score of BM-1, LT-1, LT-P1 or NoGS must be reported in the Content Inventory of the associated Product/Material (Section 2 of the HPD): **(1)** The amount of substance with which that R/I is associated is used at a level below the declared Inventory Threshold*; **and/or (2)** There is documentation (e.g. SDS, supplier disclosure letter) to confirm that this particular R/I falls below the declared Inventory Threshold*
 FINISHED WITH R/I REVIEW; See "R/I NOTES"

R/I NOTES: Include the following (as applicable):
"Residuals and Impurities were considered based on [select any/all of the following that apply]"
- direct testing via (state methodology used)
- supplier SDS (must also include the following notification: "SDS may not identify all Residuals or Impurities present in this [Product/Material] that would require reporting on the HPD")
- supplier disclosure letter (include disclosure threshold provided – e.g., 1000 ppm for Product/Material)
- other type of documentation
- process chemistry

If R/I were investigated, but no R/I required to be reported were identified
Include the following statement: "No Residuals or Impurities are expected to be present at or above Content Inventory Threshold that return a GreenScreen score of BM-1, LT-1, LT-P1 or NoGS."