Best Practices for Consideration of Residuals and Impurities in the HPD Open Standard 2.3

Health Product Declaration Collaborative

July 2022, version 2.0

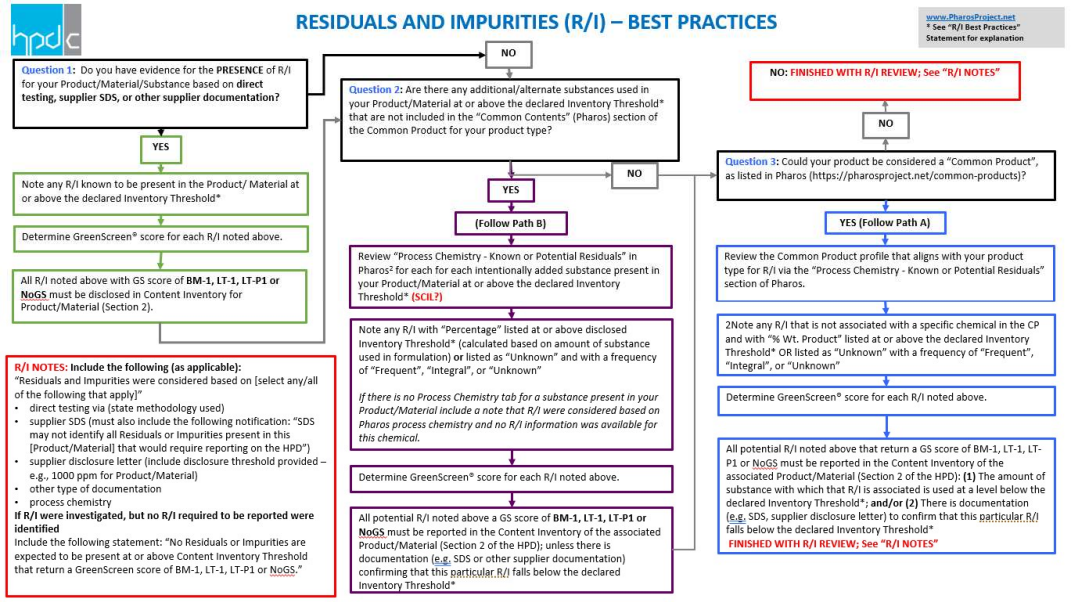
Step by Step Process

Follow this process, step by step as illustrated in this document

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

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?

QUESTION 3: Is your type of product included in the "Common Product" list in Pharos (https://pharosproject.net/common-products)?



RESIDUALS AND IMPURITIES (R/I) – BEST PRACTICES

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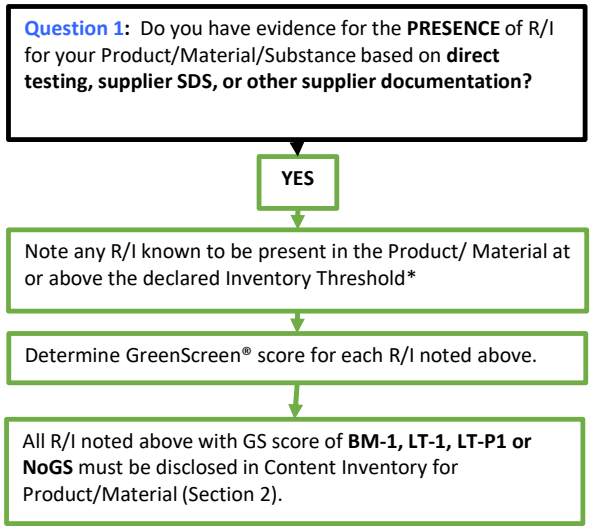

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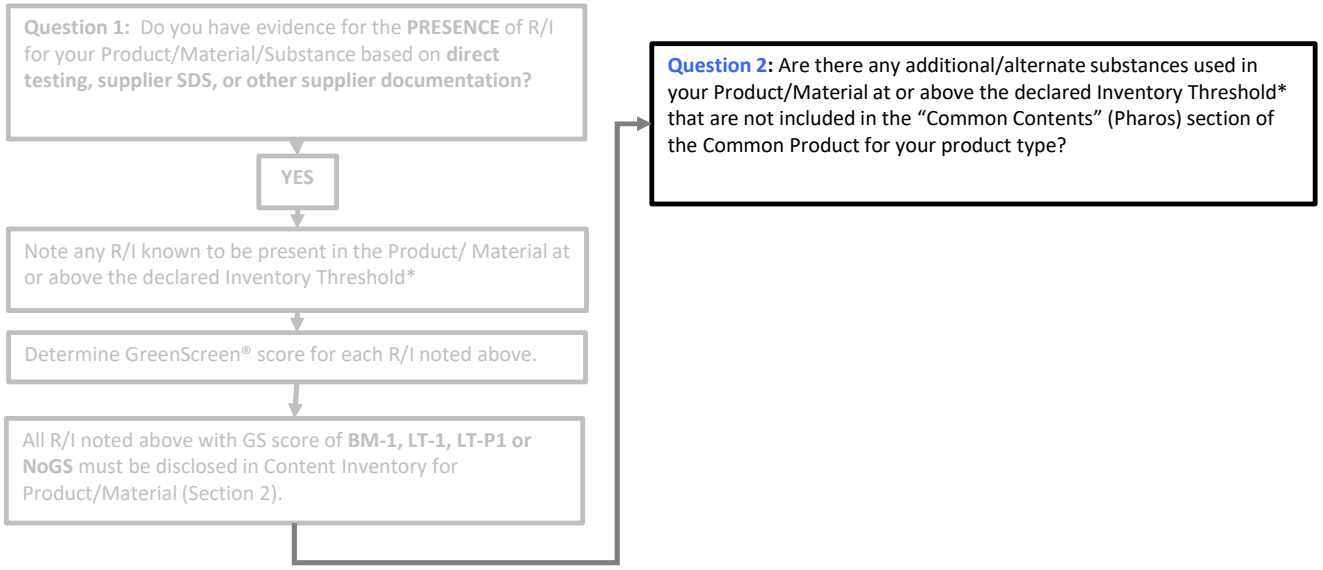
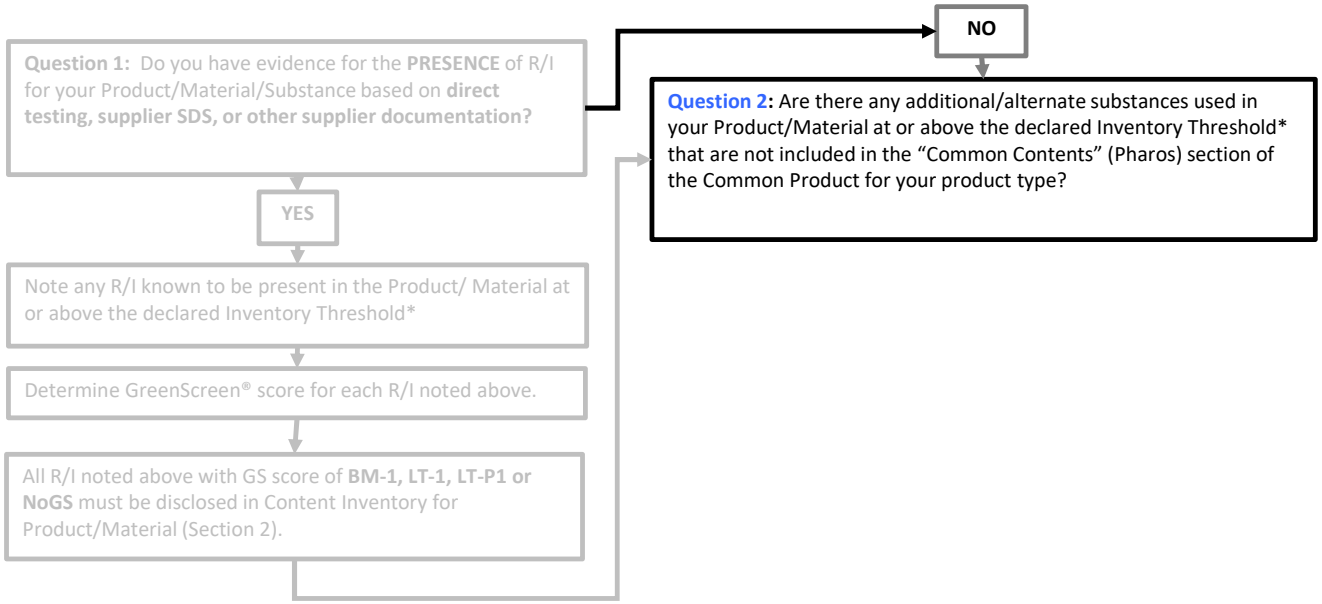


RESIDUALS AND IMPURITIES (R/I) – BEST PRACTICES

1 www.QuartzProject.org
2 www.PharosProject.net
* See "R/I Best Practices" Statement for explanation



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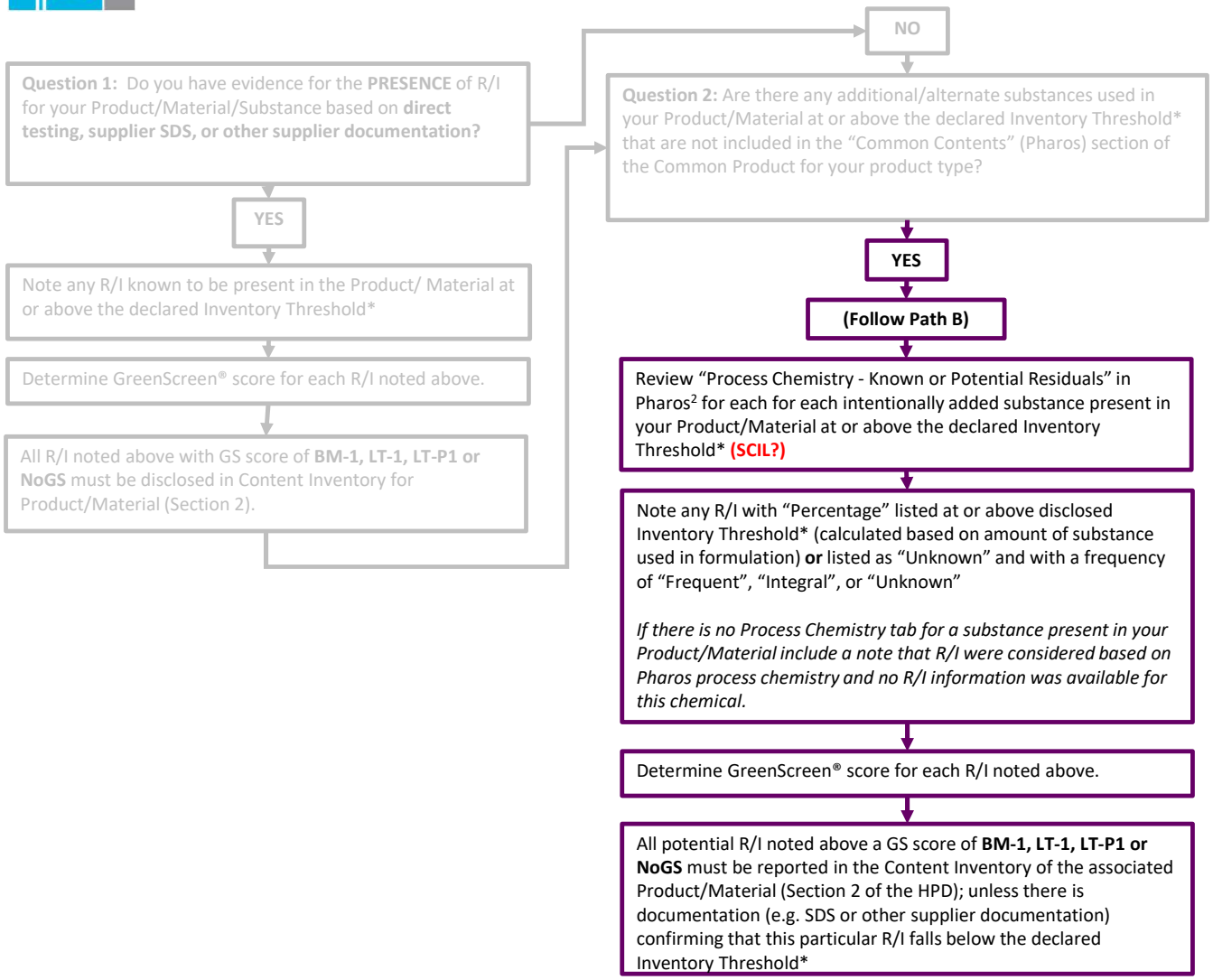

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YES

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

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

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).

NO

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?

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?)**

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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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.

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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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."

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