

BEST PRACTICES FOR HPD CONTENT INVENTORY REQUIREMENTS

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SCOPE

- This guidance outlines documentation requirements for HPDs.
- This aids manufacturers/preparers in completing HPDs and documenting them properly.
- Properly documented HPDs are verifiable. This is intended to both improve the quality of self-reported HPDs, and to also encourage the growth of verified HPDs—a goal of many HPD users.

Scope in context

- The core HPD Open Standard “Instructions” cover the scope and reporting requirements for a complete Health Product Declaration (HPD). [See the current version of the Standard.](#)
- The [HPDC Quality Control Protocol](#) describes HPDC procedures to ensure the quality of published HPDs in compliance with all provisions of the HPD Open Standard.

HPD DOCUMENTATION REQUIREMENTS

- An HPD content inventory must:
 - Be documented. The documentation must be verifiable. It must come from an objective party or method, and from source(s) outside of the manufacturer/preparer completing the HPD. Allowed documentation is specified below.
 - Include all substances and/or contents (including materials reported via Special Conditions guidance) falling above the selected reporting threshold(s).
 - Have documentation that supports the selected threshold(s).
 - An SDS is often used as a basis for HPD content inventory documentation. However, an SDS is seldom sufficient to fully document the content inventories for most HPDs. For example, HPDs at 100 ppm or 1,000 thresholds require more detailed and complete documentation than is required on an SDS.
- These requirements apply to all HPDs, whether self-reported by a manufacturer or third-party verified.
 - A third-party verifier always needs to independently verify the CASRN except when noted.
 - If third-party verified, the third-party verifier may, based on their professional judgment, request additional data beyond these requirements.

Documentation must meet ALL the following requirements. It must be:

- Specific to the substance, material, or component that is supplied to the manufacturer and included in the product.

Best Practice for HPD Content Inventory Requirements

- Official company documentation from the supplier, i.e., on company letterhead or from a company email address.
- Less than 5 years old.
- If SDS, either:
 - GHS-compliant, most recent version
 - Publicly available, OR communicated non-publicly by a specific person, i.e., not a generic customer service email or help desk.
- Exceptions to the above:
 - Documentation may be older than five years if a representative has attested in writing within one year of the publish date of the HPD that it remains accurate.
 - An SDS may not be GHS compliant, if:
 - A representative attests that it remains accurate within one year prior to the publish date of the HPD.
 - And the SDS is from a smaller supplier of consistent materials, e.g., mined or quarried minerals, that might not update an SDS frequently. (This requirement is stated as a general intention, to be met to the best of the HPD preparer's ability.)

Additional Requirements for Specific Documentation Types

The following additional requirements apply to specific material documentation sources.

- Direct import into HPD Builder via Supplier HPD or Toxnot
 - If a substance above the reporting threshold is proprietary/undisclosed, third-party verification requires one of the following options:
 - The CASRN must be provided to the verifier (this would typically be done outside the Supplier HPD or Toxnot tools)
 - The documentation is third-party verified, e.g., the Supplier HPD itself is third-party verified according to HPDC requirements.
- Laboratory testing
 - This method is included in this policy as a pilot. Due to the inherent complexity of this method, this policy is included in outline form only, with key points listed. Manufacturers using this method should contact HPDC to discuss the specifics of their approach, and receive approval, before publishing an HPD using this method.
 - Lab testing may be used as HPD documentation. Manufacturers using lab testing as documentation may enter the CASRN(s) or other identifier directly into the HPD. Include a short narrative in Substance Notes and/or in Material Notes to describe the source of the data and the testing method(s) and assumptions used.
 - The testing method(s) should comply with all other relevant requirements, such as being suitable to the selected threshold(s) and specific to the content being supplied.
 - Lab testing may positively identify the substance(s) and material(s) in product content.
 - Lab testing to rule out the identity of a substance and/or to demonstrate the absence of substances of concern, may also be used. Logical and sound methods must be used to

connect these negative test results with the HPD content inventory, which is by nature a positive identification.

- Documentation would include the analytes tested for and the selected detection limit for those analytes. To demonstrate that the content inventory is complete, testing to show the absence of commonly used substance(s) may be utilized, for example, testing showing the absence of plasticizers in conjunction with a product containing PVC.
- The methods and assumptions used must be appropriate to the matrix being assessed and the analytes being measured. The method must be clearly described in the Substance Notes. For example, there is a specific test approved for detection of chromium in leather, but the same method does not apply to chromium in metal alloys. To ensure validity of results, test methods must be ASTM, ANSI, or consensus-based, and labs must be ISO 17025 accredited.
- Analytical lab testing is a point-in-time method. Actual contents may vary over time. The test method and report of substance(s) must address the potential for variability in contents over time, and how this is controlled with frequency of testing.

EXCEPTIONS FOR PROPRIETARY INGREDIENT DUE DILIGENCE

If the documentation requirements above cannot be met, the following Exception for Proprietary Ingredient Due Diligence provides an allowed method for publishing an HPD.

The following constraints apply to this method:

- The policy is limited to HPDs being published with the assistance of an HPD Approved Preparer or HPD Third-Party Verifier.
- This exception is intended by HPDC as a temporary method in response to current market constraints. This particularly addresses suppliers who are unwilling to identify or provide screening data for substances. Polymers are known to be a particular issue, however, the policy is not limited to polymers.
- HPDC will track use of the policy continuously and conduct an overall review every six months to assess its impact on meeting the goals of increased rate of HPD publishing and transparency. In case of significant changes to this exception, or its withdrawal, there will be at least a six-month notice.
- Use of the exception is limited to no more than 1% by weight of the product content, or up to 5% by weight of the product content if the HPD is using a Nested inventory and the content is within one single homogeneous material.
 - This policy offers a higher threshold for Nested inventories because these inventories contain more data about product composition, and where in the product substances of concern may be located.
 - Example: A product contains a polymeric gasket from a single supplier. It is one

homogeneous material containing multiple substances that makes up 4% of the total product weight. The supplier could utilize the various methods within the exception below to report as much data as they are willing to. They may indicate ranges instead of exact amounts for proprietary substances. The intention is that the supplier would in this case be more likely to fulfill the manufacturer's information requests.

- The manufacturer/preparer must request content inventory data from the supplier.
 - The manufacturer/preparer must obtain from the supplier a reply in writing demonstrating lack of intent to comply with the request, or willingness to comply only with this exception.
 - If this cannot be obtained, evidence should be provided showing at least three (3) attempts over at least 60 days at retrieving the information.
 - The rationale for why the identity is undisclosed/unknown must be provided in the Substance Notes and/or Material Notes.
- The specific content(s) using this method will not be considered "Identified" or "Screened" under the HPD Open Standard. However, the content will not stand in the way of an overall HPD being marked "Yes" for Screened. (This is critical for use of HPDs for LEED compliance.) Use of the exception will be noted in Inventory and Screening Notes.

The exception includes the following methods.

1) Direct entry of data without verifiability of CASRN or other identifier

This method removes the verifiability requirement for the following HPD data sources:

- Supplier HPD
- Toxnot supplier survey
- Direct entry by supplier into HPD Builder

Content falling within the constraints listed above can be considered valid for an HPD if entered in one of these ways, even if it is not verifiable by the requirements listed above under "HPD Documentation Requirements."

This is valid for both self-reported (if completed with an HPD Approved Preparer) and third-party verified HPDs. For a third-party verified HPD, the content(s) must contain a notation in the Substance Notes or the Material Notes (whichever is applicable to the content type) that:

- The identity of that content was not independently verified.
- This lack of verification was allowed under this policy.

Implementation Note: This exception is made available for HPDs as follows:

- The required Substance Notes, and disclosure of use of this exception in Inventory and Screening Notes, are entered manually in the HPD Builder by the manufacturer or the Third-Party Verifier.
- The manufacturer indicates using HPD Builder that this substance is utilizing this policy

exception. HPD Builder marks this HPD as “No” for “Identified,” even if the substance name is disclosed.

- There is no additional technical/software implementation of this exception. The manufacturer or preparer communicates to the verifier the content they are utilizing this exception for, and the rationale. The verifier determines if this is correct. Use of the exception is communicated by the verifier to HPDC.

2) Direct reporting of hazard data

The manufacturer/preparer can utilize a supplier’s direct report of hazard data, without verifiability of the CASRN or another identifier.

In this method, all of the following must be reported directly:

- GreenScreen List Translator or Benchmark score
- Results of HPD Priority Hazard List screening
- Results of HPD Additional Listings screening

This data must be obtained via an automated tool such as Pharos, the HPD Builder, or the Supplier HPD Extension to the HPD Builder. A printout of screening results with identifying information redacted is acceptable documentation.

For a third-party verified HPD, the content(s) must contain a notation in the Substance Notes or the Material Notes (whichever is applicable to the content type) that:

- The identity of that content was not independently verified.
- Hazard and list data was reported directly to the manufacturer.
- This lack of verification was allowed under this policy.

Implementation Note: This exception is made available for HPDs as follows:

- Direct report of hazard data via HPD Builder. HPD Builder notes that that this substance is utilizing this policy exception and marks this HPD as “No” for “Identified,” even if the substance name is disclosed.
- Manual addition of required Substance Notes and disclosure of use of this exception in Inventory and Screening Notes by manufacturer and checking by Third-Party Verifier.
- Dialogue between manufacturer and third-party verifier as to which content is utilizing this exception and rationale. The verifier determines if this is correct. Use of the exception is communicated by the verifier to HPDC.

3) Most informed determination of substance identity

This method provides disclosure and screening based on the manufacturer/preparer’s most informed determination of the identity of the content, and not based on supplier documentation or input.

Best Practice for HPD Content Inventory Requirements

- This method, like the other exceptions to this policy, is offered on a pilot basis. HPDC will review on a quarterly basis exceptions that are claimed under this method. Guidance and examples that may be useful in more clearly applying this method will be offered here.
- To utilize this exception, provide a narrative in the Substance Notes to describe the method for how the content was identified. The description needs to include details on methods for content identification, and how a weight of evidence supports this determination. Certain identification is not required.
- The name of the content (substance or material) and the Identifier will be accompanied by a double asterisk (**), corresponding to an entry in the Substance Notes noting:
 - The identity of that content was not independently verified and was based on an informed determination under this HPDC policy.
 - Hazard and list data is also based on this determination.
 - For a third-party verified HPD, the lack of verification of this data is allowed under this policy.

Implementation Note: This exception is made available for HPDs as follows:

- Enter CASRN manually in HPD Builder as usual.
- The manufacturer/preparer indicates in HPD Builder that this exception is being utilized. HPD Builder adds required double asterisk (**) to relevant content and marks this HPD as “No” for “Identified,” even if the substance name is disclosed.
- Manual addition of required Substance Notes and disclosure of use of this exception in Inventory and Screening Notes by manufacturer and checking by Third-Party Verifier.
- Dialogue between manufacturer and third-party verifier as to which content is utilizing this exception and rationale. The verifier determines if this is correct. Use of the exception is communicated by the verifier to HPDC.

REVISION LOG

DATE	CHANGE
7/20/23	Initial upload for HPD v2.3 update.