RESIDUALS AND IMPURITIES (R/I) – BEST PRACTICES

**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?

- **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**
  - FINISHED WITH R/I REVIEW; See “R/I NOTES”

**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 A)
  - Review “Process Chemistry - Known or Potential Residuals” in Pharos® 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.
  - Determine GreenScreen® score for each R/I noted above.
  - 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, 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”

- **NO** (Follow Path B)
  - 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”
  - Determine GreenScreen® score for each R/I noted above.
  - All potential R/I noted above with 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”

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

- **YES** (Follow Path A)
  - Review “Process Chemistry - Known or Potential Residuals” in Pharos® 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.
  - Determine GreenScreen® score for each R/I noted above.
  - 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, 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”

- **NO**
  - 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.”