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# **HCPA:** A History of Successful Collaborations

*Jim Jones, Executive Vice President of Strategic Alliances & Industry Relations  
Household & Commercial Products Association*

The products of the Household and Commercial Products Association (HCPA) members can be found in virtually every household and commercial establishment in the United States. That might give you an insight into our name change. Although we changed our name from the Consumer Specialty Products Association to the Household and Commercial Products Association this year, our longstanding practice of collaborating with diverse stakeholders on chemical safety issues will not change. In the past year alone, we achieved significant advances in the arena of chemical safety to the benefit of our member companies, their customers and American workers. The enactment of the Cleaning Product Right to Know Act of 2017 in California is the most recent example of HCPA and its member companies finding common ground with a unique, but very effective coalition of more than 100 organizations ranging from breast cancer prevention and clean water advocates, to janitors and some of the world's largest multinational cleaning product companies to negotiate a bipartisan landmark law. Although the California law was the most high-profile collaboration this past year, it is by no means the only one.

Prior to joining HCPA, I worked for the Environmental Protection Agency and I heard, sometimes with admiration, sometimes derision, that CSPA, now HCPA, often worked with environmental NGOs, with whom they often had a range of public policy disagreements. The reality is that HCPA will work with any credible stakeholder with whom we can find common ground to protect and advance the business objectives of our members. In 2017, that was the case in California, where the Association and several of our member companies collaborated with environmental groups such as the Breast Cancer Prevention Fund, the Natural Resources Defense Council and others on a bill that requires many of our companies to clearly communicate the ingredients used to formulate their products. Many of our members were already providing information about their products' ingredients and we would have preferred to let the market reward what the customer demanded. Left to our own devices we would have preferred not to

have such a legal requirement-- especially at the state level which leaves open the potential for multiple and conflicting state requirements.

Ultimately, however, we are realists. Given supermajorities in both houses of the California legislature and control of the Governor's office, it was clear that the NGOs could achieve their goal regardless of our position. Ultimately, our members decided that there was so much common ground on this issue that our engagement could minimize unnecessary and costly burdens by working to improve the viability of the bill. What did we have in common with the NGO community on this issue? Our customers and the commercial workers who use our products. We recognized that many consumers and workers wanted greater transparency related to ingredients in the products they buy and use. By working with NGOs on a shared goal, we were able to incorporate the internal perspective of the companies making the products which resulted in a stronger and more practical piece of legislation. In addition, it gives us a template against which to effectively advocate as other states and retailers consider transparency requirements.

Not all of the collaborative work HCPA engages in involves the environmental community. One of our most important collaborations is within the supply chain (business to business). Over the past several years, numerous retailers have required suppliers of formulated product to submit their formulas to a third party, UL-WERCs, before the retailer would accept shipment. UL-WERCs would run a "regulatory check" to ensure the product met regulatory requirements. More recently, as retailers began to implement their own chemical safety requirements, UL-WERCs was being asked by retailers to expand their review, which in turn led to greater information required by the suppliers. Not surprisingly, suppliers became frustrated about the burden of these requirements which was exacerbated by the suppliers' lack of understanding about the genesis of these information "requests".

HCPA worked with numerous other trade associations whose members are similarly affected and requested to meet with senior leaders at UL as well as retailers. What was our big ask? We sought a forum for the affected parties: retailers, suppliers, and UL to get together regularly to discuss how to most effectively meet the needs of all the parties (a forum to collaborate). The common ground here is obvious: we all have the same customer at the end of the day (or supply chain) and that is the consumer. This past fall, UL announced they would be establishing an Advisory Council of retailers and suppliers to get advice about how to better serve the needs of all the affected parties. By working together within the supply chain we can better meet the needs of a key partner, the retailers who are working hard to meet a need of our common customer, the consumer.

Similarly, HCPA worked with Walmart this past year to better align the company's ingredient transparency requirements with California's new law. Walmart was years ahead of California and others on the ingredient communication issue. In 2013 Walmart informed their suppliers that they wanted online disclosure of formulated product by 2015 and on-pack disclosure of certain ingredients by 2018. Other than the differences in the compliance schedule, there were significant differences that would make it challenging for a supplier to comply with the requirements of both the California and Walmart's chemical policy. For example, the list of chemicals requiring on pack disclosure were different between California and Walmart. Working in a collaborative manner, HCPA and Walmart were able to identify common ground and come up with a solution.

In essence, Walmart will find compliance with the substantive requirements of California's Cleaning Product Right to Know Act as meeting their requirements. Walmart will expect suppliers to meet a more ambitious schedule than California, but the substance of compliance will be the same. This may appear to be a small win but if you are a company that sells in California (almost all our members) and Walmart (almost all our members), even small differences in requirements can lead to extraordinary costs and time-consuming compliance. Perhaps more importantly is the potential

to confuse the party all sides are trying to serve, the consumer. Again, working together, HCPA was able to find common ground with an important stakeholder, in this case a major retail customer and solve what could have been a costly problem.

As other retailers are announcing chemical safety and sustainability programs HCPA is reaching out to them to offer our knowledge and experience to work with them in a collaborative manner to similarly facilitate successful implementation.

Some of the collaborations we are best known for are still works in progress. HCPA has long worked with over 600 hundred companies as well as environmental NGOs to support EPA's Safer Choice program. We are often asked why we have been so active in support of a program that by design will not recognize all the products our members make and sell. The answer is that we know that a significant number of our customers (consumers and the retailers) want such a program. As a manufacturer, having one credible program that is managed in a transparent manner and has the imprimatur of the U.S. EPA is preferable to having multiple overlapping standards from various third-party organizations with possibly conflicting criteria.

It is true, we are an organization that seeks collaboration. We do it not as an end unto itself but as a means to an end which is to help our members succeed. You might notice that in all of these examples of collaboration there two common themes. The first is identifying common ground with the other party(s). The second and perhaps more important is a focus on the end consumer (and worker) whether it is one of the hundreds of millions of HOUSEHOLDS or the tens of thousands of COMMERCIAL entities that are our customers.



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