## **LEVI STRAUSS & CO.**

## **Development of an Intrinsic Hazard Screening Methodology**

February 2013

Levi Strauss & Co. is deeply committed to minimizing the environmental impacts of our clothing manufacturing processes. Levi Strauss & Co. supports the goal of eliminating the industrial releases of hazardous chemicals into the environment, as reflected in the <u>Joint Roadmap Toward Zero Discharge of Hazardous Chemicals</u> (ZDHC Roadmap).

We recognize the apparel industry needs to develop a screening methodology to identify and prioritize chemical substances of concern and substitute them with safer alternatives. We have been working through the ZDHC Roadmap to develop this methodology.

In collaboration with the Outdoor Industry Association (OIA) Chemicals Management Working Group (CMWG), the ZDHC Roadmap has developed a guidance document titled *Using Chemical Hazard Assessment (CHA) for Alternative Chemical Assessment and Prioritization*, which:

- Is designed to be flexible with many paths leading to the same endpoint, so companies can use different tools and customize those tools to their specific businesses;
- Enables the user to make informed decisions that will lead to safer chemical choices and be proactive in the risk management of chemicals in the supply chain; and
- Supports the activities needed to produce a list of chemicals of concern for the apparel and footwear industries.

The CHA guidance will be used to prioritize the list of textile chemicals for further review or action. The alternatives will be assessed by the screening methodology to make sure that a regrettable substitution is not chosen. A regrettable substitution is one where the substitution is as unsafe as the original chemical it was supposed to substitute. Once the chemicals have been screened for potential hazards, risk and use, it is envisioned that they will fall into the following categories:

- Avoid or phase-out, chemical of high concern (prohibited list);
- Use but search for safer chemicals and/or processes (managed list); and
- Prefer, safer chemical (positive list).

Representatives from environmental NGOs, research organizations<sup>i</sup> and the chemical industry collaborated to produce this guidance. It is currently undergoing final review and beta testing by the ZDHC group. We will continue to consult relevant stakeholders as the methodology is piloted and refined. Once the review is complete, it will be made publicly available.

In 2013, through our leadership in the ZDHC Roadmap, we will enhance this methodology by:

- Outlining the pathway to a dynamic, open-data system for use by the apparel industry that can be used to list both chemicals for which use is restricted (prohibited list) and preferred chemicals;
- Identifying credible assessment tools that can be used; and
- Pilot chemicals from the chemical inventory against a specific hazard assessment methodology.

For more information on Levi Strauss & Co.'s work on chemical sustainability, please visit <a href="http://www.levistrauss.com/sustainability/planet/chemicals">http://www.levistrauss.com/sustainability/planet/chemicals</a>.

Clean Action Network, Environmental Defense Fund, GreenBlue, and Hohenstein Institute