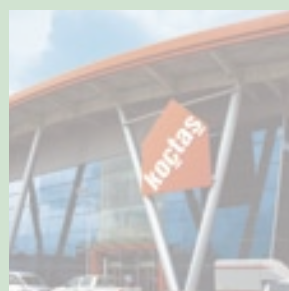
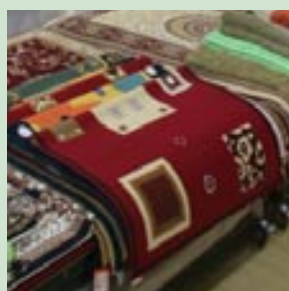
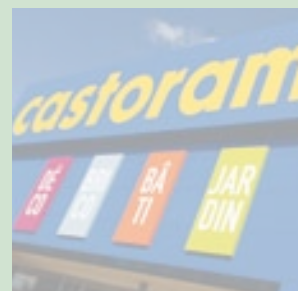
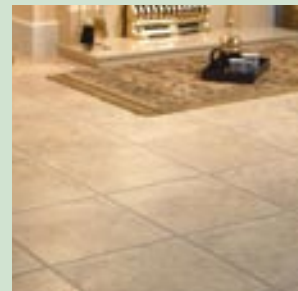
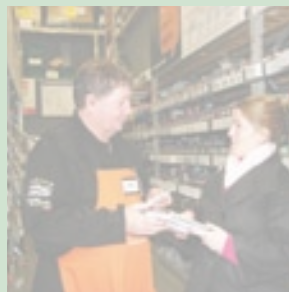


Chemicals Guidelines

OUR PRODUCTS AND SERVICES



Contact

For further information please contact:
corporateresponsibility@kingfisher.com

Kingfisher plc
3 Sheldon Square, Paddington
London W2 6PX
+44 (0)20 7372 8008
www.kingfisher.com/CR

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Appendices: available as separate documents

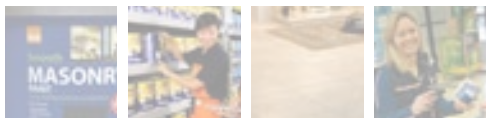
Appendix 1
Kingfisher’s Chemicals Action List

Appendix 2
Key EU legislation affecting chemicals

Appendix 3
Model letter to vendors

Appendix 4
Chemical Declaration Forms





1. Chemicals in products – our approach

Our Kingfisher Issue Policy Standard 4: (Chemicals) outlines our aim to ensure that the products we sell do not adversely affect the health of our customers, or employees, or that of their environment. Please refer to [Kingfisher CR Supporting Policy Standards](#) for our Chemicals Policy Standard.

1.1. Chemicals Action List

Kingfisher has undertaken research to identify the chemicals in products that customers and influential organisations, such as government agencies and international pressure groups are most concerned about. Around 40 chemicals of concern have been identified and placed on Kingfisher's [Chemicals Action List](#) (see [Appendix 1](#)).

Many of the chemicals included on the Action List may still be legally used – but some have already been banned and others are likely to be subject to legal restrictions in the next few years (see [Appendix 2](#) for an outline of key EU legislation affecting chemicals in products).

There is a clear business risk in using any of the substances on the Chemicals Action List, whether or not they are covered by legislation, because of the potential damage to customer confidence and the integrity of the brand.

1.2. The way forward for Operating Companies

The main challenge for Operating Companies in implementing Kingfisher's Policy Standard on Chemicals, is to identify where Action List chemicals may be used in products and then to work with vendors to eliminate or reduce their use.

This is a considerable task because chemicals on the action list have many different functions and may be used across a range of products. This Chemicals Guidelines is intended to provide Operating Companies with a model and some practical tools for engaging with vendors about chemicals in products.

The model that Operating companies are recommended to follow is based on keeping the task as simple as possible by focusing, firstly, only on product categories with the highest risk. High risk product categories are those that are:

- most likely to contain Action List chemicals
- likely to come into contact with children
- used inside the home
- have a high possibility of skin contact

The guidelines outlines a standard process for obtaining information from vendors about the presence of Action List chemicals in high risk products. Operating Companies can use this as the basis for working with vendors to eliminate or substitute chemicals of concern from products in high risk categories.

2. Guidelines

These guidelines set out a model for how Operating Companies can make a positive start in developing a chemicals programme that manages potential risks and meets Kingfisher’s policy commitments and the associated ‘Steps’ requirements.

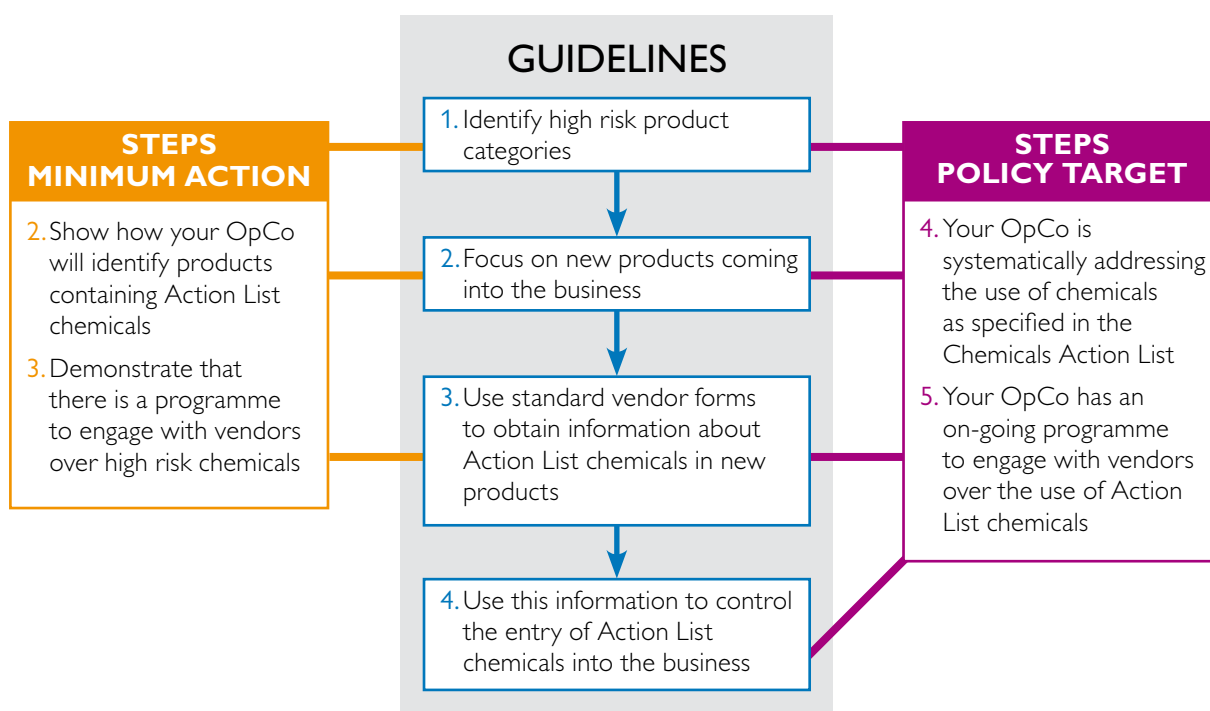
Operating Companies can either follow the recommendations of the guidelines in detail, or use elements of the guidelines to develop whatever approach best suits the needs of the business.

In overview, the guidelines approach follows these steps:

1. Identify high risk product categories
2. Focus on new products, in high risk categories, coming into the business
3. Use standard forms to obtain information from vendors about the Action List chemicals in new products they are offering to the business
4. Use this information to control the entry of Action List chemicals into the business, for example by:
 - rejecting products at the buying stage, or
 - working with vendors to use less harmful product ingredients, or
 - agreeing timetables with vendors for removing Action List Chemicals, or
 - accepting products with Action List chemicals, only in exceptional cases.

This approach is summarised in the diagram below, showing the linkages with some of the core **MINIMUM ACTION** and **POLICY TARGET** requirements of Kingfisher’s [Steps Corporate Responsibility Programme](#).

Further information about [Using the guidelines to meet ‘Steps’ requirements](#) is given in [Section 3](#).



2.1. Identifying chemicals of concern

There is an increasing awareness amongst our customers about the potential health risks of some chemicals used in home improvement products. During the past ten years these concerns have been fed by frequent stories in the media and campaigns by environmental groups. The scientific debate surrounding these concerns is often controversial and inconclusive. A number of the issues raised have had a high media profile and retailers have been attacked by action groups for their alleged lack of action. Many of these issues have been closely examined by the EU and other regulators and policy makers around the world, and there is now extensive legislation covering the use of many chemicals in products (see [Appendix 2](#)).

The Kingfisher group has considerable understanding of the concerns about chemicals in consumer products, both from actively researching the issues and from the experience of Operating Companies in dealing with customer concerns and regulatory issues on a day-to-day basis.

All of this experience has been brought together to produce Kingfisher's Chemicals Action List. We believe that the Chemicals Action List covers the chemical ingredients (and residues) which pose the most significant risk to the integrity of Kingfisher products around the world. The Action List is organised under the following headings:

Biologically Active Materials

1. Insecticides
2. Fungicides
3. Herbicides
4. Timber treatments
5. Antibacterials and other biocides

Formulated Products (paints, adhesives, etc, and plastics)

6. Solvents
7. Plasticisers
8. Stabilisers (e.g. for PVC)
9. Detergents, additives and wetters
10. Fire retardants
11. Resin intermediates and curing agents
12. Fragrances

General

13. Metals – general
14. Others

The Chemicals Action List includes the high-risk chemicals that Operating Companies are most likely to encounter in their product ranges. The development of the Kingfisher Chemicals Action List has largely fulfilled, therefore, the requirement for Operating Companies to identify the chemicals of concern.

Recommended action by Operating Companies

- a. Formally adopt the Chemicals Action List as the basis for the company's chemicals programme.
- b. Record and add to the List, if necessary, any other significant chemical concerns that your business has encountered, for example as a result of contact with regulators or customers.

2.2. Identifying priority product categories

Action List chemicals have many different functions and may be used in a large number of different products. For some Operating Companies it will be difficult to address, at the same time, all potential chemicals issues in all products. It is therefore recommended that Operating Companies identify a manageable number of priority product categories to address, in the first phase of their chemicals programme, which can be built upon as the programme is developed.

The most logical approach to identifying priorities, is on the basis of risk: which products are most likely to contain Action List chemicals that actually come into contact with customers?

On this basis, it is recommended that product categories that meet one, or more, of the following criteria should be considered a high-risk 'Priority':

- most likely to contain Action List chemicals
- most likely to come into contact with children
- used inside the home
- have a high possibility of skin contact.

A review of product ranges across the Kingfisher group has identified 10 categories that meet the criteria for high risk 'Priority' status. These categories are:

Priority product categories:

- | | |
|--------------------------|--|
| 1. Children's Play Items | 6. Paint, Other Coatings and Accessories |
| 2. Garden Furniture | 7. Sealants |
| 3. Textiles | 8. Adhesives |
| 4. Flooring | 9. General Building Preparations |
| 5. Cleaning Products | 10. Garden Chemicals |

Recommended action by Operating Companies

- a. Confirm which Priority product categories will be addressed in the first phase of the company's chemicals programme.
- b. Commit to addressing remaining product categories, in subsequent phases of the company's chemicals programme.

2.3. Screening new products at the buying stage

Because the turnover of products in stores is often quite fast, some Operating Companies have found that it is inefficient to check for the presence of Action List chemicals in products that are already in the business – by the time information about the use of chemicals in an existing product is obtained, it is likely that the product has been discontinued and replaced with something else.

A more efficient approach is to establish a process for checking for the presence of Action List chemicals at the product approval stage, to ensure that new products coming into the business for the first time are free from the chemicals of concern. Over time, this will 'purge' the product ranges of Action List chemicals as older products are progressively discontinued.

One source of information to establish whether or not a new product contains any Action List chemicals is to ask the vendor. However, we know from experience that simply giving vendors the Action List and asking if their product contains any of these substances produces a very poor response. We need to ask vendors very specific questions, using our knowledge about where we expect to find Action List chemicals in the product category we are dealing with.

A standard 'Chemical Declaration Form' has been developed, for obtaining information about chemicals in each of the priority product categories listed above. Each form is based on the specific knowledge we have about which parts, or ingredients, in each category may contain an Action List chemical.

An example of a Chemical Declaration Form is given on the following page, for the 'Children's Play Items' category. It is recommended that Operating Companies incorporate these forms into their standard assurance process for new products. A model letter that Operating Companies may use when issuing the Chemical Declaration Forms to vendors is in [Appendix 3](#) document.

The key features of the Chemical Declaration Forms are:

- Each Action List chemical that may be present in each component of the product is identified (based on Kingfisher's knowledge and experience).
- The maximum permitted concentration of each Action List chemical, in each product component is specified.
- The vendor must answer YES or NO to confirm whether or not a chemical is present above the maximum permitted concentration in each component specified.
- Vendors also have the opportunity to declare the presence of any Action List chemicals not specifically included in the form.
- A representative of the vendor must sign the form to verify the information given.

The Chemical Declaration Forms have been based around the principal component parts or ingredients typically used in the products for each priority category. This approach has been taken so that the forms can effectively be applied to any individual product within a given category. The scope of products covered within each priority product category is summarised in [Table 1 \(page 10\)](#), for guidance. All of the Chemical Declaration Forms for the high-risk priority product categories can be found in [Appendix 4](#) document.

Recommended action by Operating Companies

- a. Incorporate the use of the Chemical Declaration Forms into the existing assurance/QA process, for every new product in the priority product categories.
 - b. This process should involve issuing the appropriate Chemical Declaration Form to the vendor and setting a time limit for the vendor to complete and sign the form.
 - c. An individual should be made responsible for co-ordinating responses.
 - d. An administrative record of forms issued and responses received should be established.
-

Example Chemical Declaration Form:

<h3>Children's Play Items</h3> <p>Scope: All toys, games, sports equipment and outdoor fun equipment including paddling pools, swimming pools, swings, slides, sandpits, climbing frames, trampolines and playhouses.</p>		
Vendor:	Product/range name:	
.....	Product/range code:	
<p>Declaration: The information given about the chemical substances in this product, is verified on behalf of the vendor by:</p> <p>Name:</p> <p>Position:</p> <p>Signature:.....</p> <p>Date:</p>		
Components and Action List chemicals [CAS number]	Maximum permitted concentration % w/w (see note 1)	Present at greater than maximum permitted limit? Vendor to complete (YES/NO)
Wooden parts		
Copper-chrome-arsenic (CCA) pressure treatments	Cu 0.01 Cr 0.01 As 0.01	
Pentachlorophenol (PCP) [87-86-5]	0.01	
Organotin compounds [various]	0.01	
Rigid plastic parts		
Cadmium compounds [various]	0.01	
Lead compounds [various]	0.01	
Organotin compounds [various]	0.01	
Soft or flexible plastic parts, including sheeting		
Cadmium compounds [various]	0.01	
Lead compounds [various]	0.01	
Organotin compounds [various]	0.01	
Diethyl hexyl phthalate (DEHP) [117-81-7]	0.01	
Dibutyl phthalate (DBP) [84-74-2]	0.01	
Benzyl butyl phthalate (BBP) [85-68-7]	0.01	
Di-iso-decyl phthalate (DIDP) [27554-06-9]	0.01	
Di-iso-nonyl phthalate (DINP) [28553-12-0]	0.01	
Di-n-octyl phthalate (DNOP) [117-84-0]	0.01	
Short-chain chlorinated paraffins (C10-C13) [855535-84-8]	0.01	
Textile parts		
Azo dyes [various]	No limit Reply YES if <u>any</u> Azo dye used	

Components and Action List chemicals [CAS number]	Maximum permitted concentration % w/w (see note 1)	Present at greater than maximum permitted limit? Vendor to complete (YES/NO)
Cadmium compounds [various]	0.01	
Tetrabromo bisphenol A (TBBPA) [79-94-7]	0.01	
Pentabromo diphenyl ether (penta-BDE) [32534-819]	0.01	
Octabromo diphenyl ether (octa-BDE) [32536-52-0]	0.01	
Short-chain chlorinated paraffins (C10-C13) [855535-84-8]	0.01	
Electrical parts		
Cadmium compounds [various]	0.01	
Lead solder	0.1	
Mercury	0.01	
Tetrabromo bisphenol A (TBBPA) [79-94-7]	0.1	
Pentabromo diphenyl ether (penta-BDE) [32534-819]	0.1	
Octabromo diphenyl ether (octa-BDE) [32536-52-0]	0.1	
Short-chain chlorinated paraffins (C10-C13) [855535-84-8]	0.1	
Decabromo biphenyl ether (Deca-BDE) [1163-19-5]	0.1	
Chemical kits (swimming pools only)		
Linuron [330-55-2]	0.01	
Isoproturon [34123-59-6]	0.01	
Trifluralin [1582-09-8]	0.01	
Bromoxynil [1689-84-5]	0.01	
Paraquat [4685-14-7]	0.01	
Other substances		
List below any other substances on Kingfisher's Chemicals Action List that are present in this product/range:		
Substance	Concentration	Use

Note 1: Permitted limits apply to concentrations measured by weight in 'homogenous materials'. Homogenous materials means any material which has uniform composition and would apply, for example to: individual types of plastic, metal, alloy, coatings, resin, etc. Something that can be mechanically disjointed into separate materials is not 'homogenous'.

Note that: 0.01% w/w = 100ppm.

Note on the EU REACH Regulation

The EU's Regulation on the registration, evaluation, authorisation and restriction of chemicals (REACH) came into force in June 2007. This will progressively introduce much tighter controls on chemical substances of very high concern. These controls will include a licensing regime under which companies will not be allowed to place substances on the market above a production or import threshold of one tonne per annum, without a satisfactory risk assessment. All retailers doing business in the EU will be affected by this requirement and several Kingfisher Operating Companies will have a legal obligation to understand what chemicals, in what amounts, are present in the products they sell. It is intended that the Chemical Declaration Forms will have the potential to be developed in the future to assist Operating Companies in meeting their obligations under REACH.

Table 1: The scope of products covered by the Chemical Declaration Form for each high-risk priority category (for guidance only)

Priority category	Scope of products
1. Children's Play Items	All toys, games, sports equipment and outdoor fun equipment including paddling pools, swimming pools, swings, slides, sandpits, climbing frames, trampolines and playhouses.
2. Garden Furniture	Tables, chairs, benches, recliners and sunbeds, cushions and covers, parasols, sunshades, awnings and gazebos.
3. Textiles	Cushions, quilts, window blinds, curtains, throws and fleeces, beanbags, lampshades, safety and protective clothing and gloves.
4. Flooring	Natural wood veneer, laminate, vinyl rolls and tiles, carpets and rugs, mats, underlay and accessories.
5. Cleaning Products	<p>Household cleaners (general, floors, furniture, ceramic tiles and grout, carpet shampoo, stain removers, mould and mildew removers, wipes).</p> <p>Appliances (washing powders, dishwasher detergents, pressure washer solutions).</p> <p>Exterior cleaners (fungicidal washes for masonry, path, patio and brickwork cleaners).</p> <p>Heavy duty cleaners (caustic soda, bleach, oil and drain cleaners, central heating system cleaners).</p> <p>Decorator's cleaners (paint brush cleaners, white spirit, turpentine substitute, methylated spirits, sugar soap).</p> <p>Motoring (screen wash, car shampoo and wax).</p> <p>Special removers (silicone, adhesive, etc removers).</p>
6. Paints, Other Coatings and Accessories	Internal and external decorative paints and varnishes, primers, undercoats and sealers, wood stains and oils, wood preservatives, aerosols, thinners, brush cleaners and paint strippers, decorators caulk.
7. Sealants	<p>Exterior: (roofs, gutters and drainpipes, anti-damp, mastics, doors and windows).</p> <p>Internal sanitary: (bathroom, kitchen, toilets).</p>
8. Adhesives	<p>General household (multipurpose, glue sticks, superglue, epoxy glue, spray glue).</p> <p>Decorating (wallpaper paste, PVA).</p> <p>Flooring (carpet, vinyl tiles).</p> <p>Building (panelling, drywall, coving, insulation, roofing felt, high-grip, woodworking).</p> <p>Plumbing (pipe cement).</p>
9. General Building Preparations	Admixtures for cement, mortar and plaster, floor screeds, general purpose fillers, expanding foam fillers.
10. Garden Chemicals	Weedkillers, fungicides, insecticides, rat and mouse bait, general disinfectants, slug and snail killers, fertilisers.

2.4. Acting on the information provided by vendors

Processing and acting on the information received back from vendors, via completed Chemical Declaration Forms, presents different challenges. There are a number of likely scenarios that Operating Companies are likely to encounter. The most typical scenarios are described below, with options for responding.

Scenario 1

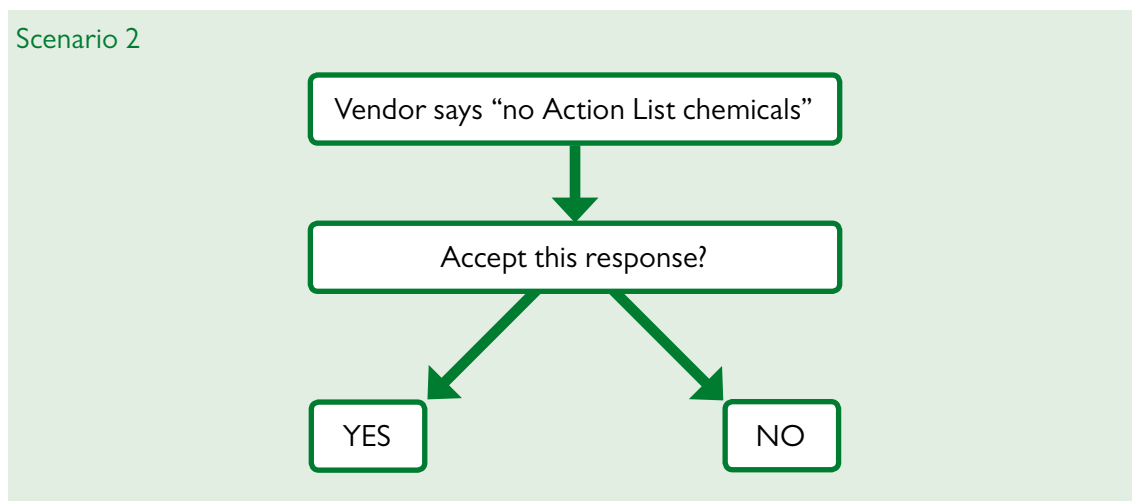
The Chemical Declaration Form has been returned but has not been completed properly, for example:

- the form is illegible
- the form has not been verified by the signature of a bona fide vendor representative
- the vendor has not recorded either YES or NO against every row of the form.

In any of these cases, the recommended response would be to return the form to the vendor and refuse to process the new product through the QA approvals process, until a properly completed form has been received.

Scenario 2

A properly completed Chemical Declaration Form has been received. The vendor has replied 'NO' to the presence (above the maximum permitted limit) of any chemical included in the form. In this case, the Operating Company will need to make an informed judgement about whether or not to accept this response without asking for further evidence:



Factors that help in making such a judgement are:

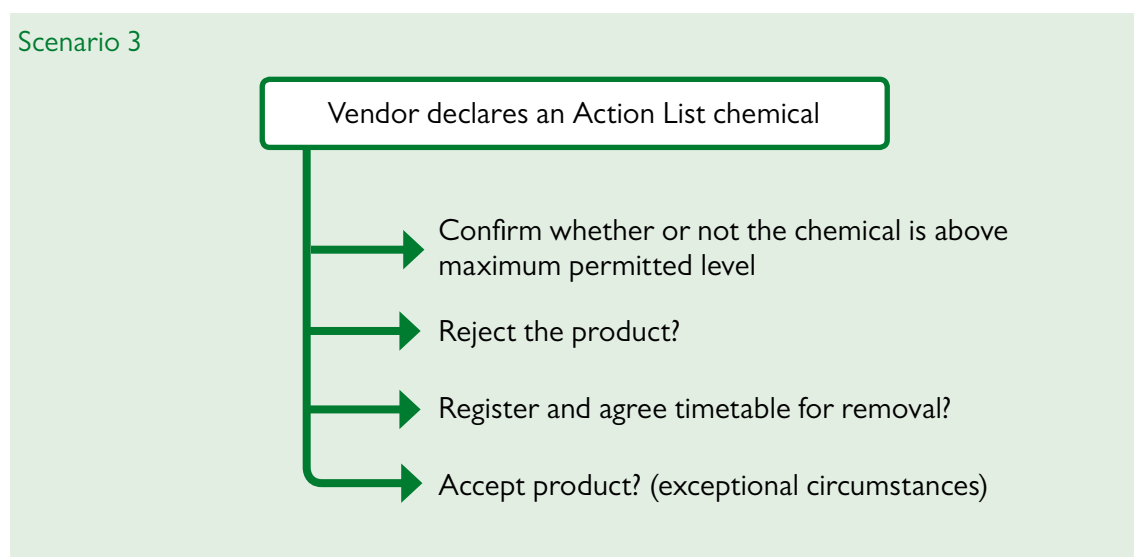
- Have other vendors, offering similar products, declared the presence of any Action List chemicals?
- Is the vendor likely to have the competence and expertise to know whether or not chemicals are present? Some vendors, for example major paint companies and other manufacturers of chemical-based products such as sealants, garden chemicals etc, are usually very expert in this area. But other vendors, especially if they are importers or agents and not the manufacturers of the product, are likely to have very little knowledge or expertise.

If the Operating Company has confidence in the vendor and can accept the 'No' response, then the product can be accepted through the QA approval process.

However, if there are doubts, for example about the quality of the information provided, then the operating Company should either (a) reject the product through the QA process, or (b) stop the product progressing through the approvals process until the vendor has provided further information – for example the Operating Company might ask the vendor why other suppliers of similar products have declared the presence of an Action List chemical but they have not.

Scenario 3

A properly completed Chemical Declaration Form has been received. The vendor has declared that the product contains one, or more, Action List chemicals at above the permitted concentration.



In this case, the first action should be to confirm with the vendor that the chemical of concern is really present at above the maximum permitted level [note the vendor should not have responded 'YES' if the chemical is present at below the maximum permitted level]. If a chemical is present, but at below the maximum permitted level, this usually indicates that it is not being used as a direct product ingredient, but rather that it is present as a residue, for example a minor contaminant of a raw material used in the product. In this case, the product can be accepted through the QA approvals process.

If it is confirmed that the chemical is present at above the maximum permitted level, the usual response would be to reject the product through the QA approvals process.

But what if the vendor claims that the use of the chemical is essential to the functioning of the product and that finding substitutes is difficult, or very expensive, or technically impossible? In this case, the options are to:

- a. Accept the product for a limited period, but record the presence of the chemical and agree a deadline with the vendor to substitute the chemical of concern, or
- b. Accept the product without qualification because there is a major technical obstacle in removing the chemical of concern. In other words the chemical has a critical function that is impossible to achieve with a substitute and the risks to customers are deemed to be acceptable. This would be an exceptional circumstance.

2.5. Technical assistance

Processing the information provided by vendors inevitably requires some informed decisions to be taken, on the basis of knowledge about the use and function of the chemicals in the products in question.

There are a number of routes by which Operating Companies (OpCos) might obtain technical assistance in making informed decisions, based on the chemical information provided by vendors:

- a. Make the most use of contacts within Kingfisher Corporate Responsibility team or other OpCos, for example, by sharing information about common products and vendors.
- b. Develop in-house skills, for example by employing suitably qualified employees or by providing training for existing employees, for example in QA functions.
- c. Contract specialist help, for example from local consultants who have expertise in this area.

3. Using the guidelines to meet ‘Steps’ requirements

These guidelines are intended to provide Operating Companies with a practical model that they can use to start their chemicals programmes.

Using the guidelines will also help to meet the initial **MINIMUM ACTION** and **POLICY TARGET** requirements of Kingfisher’s [Steps Corporate Responsibility Programme](#) on Chemicals (Issue 4). The linkages between the Guidelines and the ‘Steps’ requirements are summarised in the table below.

Steps requirement	Guidelines approach
MINIMUM ACTION	
1. Maintain a record of all legislation relating to chemical use in products that affects the business. This should include a summary of the requirements and implications of legislation for your OpCo.	
2. Provide an action plan showing how your OpCo will identify products containing those chemicals listed in Kingfisher’s Chemical Action List.	<p>Formally adopt the Chemicals Action List as the basis for the company’s chemicals programme.</p> <p>Commit to undertaking the company’s chemicals programme following a phased approach.</p> <p>Confirm that all, or some, of the high-risk Priority product categories listed in the Guidelines will be addressed in Phase 1 of the company’s chemicals programme, using the Chemicals Declaration Forms. Set out a timetable for doing this.</p> <p>Commit to addressing remaining product categories, in subsequent phases of the company’s chemicals programme.</p>
3. Provide an action plan showing how your OpCo will work with its vendors to discuss the issues associated with the use of chemicals listed in Kingfisher’s Chemical Action List, and investigate opportunities for removal or substitution. (Or demonstrate that a programme to engage with vendors over the use of high risk chemicals in products exists – see point 5).	<p>Make a commitment to using the Chemical Declaration Forms to obtain information from vendors about the presence of Action List chemicals in the Priority product categories identified, as a key element of Phase 1 of the chemicals programme.</p> <p>Provide a documented plan showing how the Chemical Declaration Forms will be incorporated into the company’s assurance/QA process for new products in the Priority categories. This plan should include a process for issuing forms to vendors, setting a time limit for vendors to complete and sign the forms and keeping an administrative record of forms issued and responses received.</p> <p>The plan should also show how decisions about products, based on the chemical information provided by vendors, will be recorded.</p>

Steps requirement	Guidelines approach
POLICY TARGET	
<p>4. Demonstrate that your OpCo is systematically addressing the use of chemicals in products as specified in Kingfisher’s Chemicals Action List.</p>	<p>Provide evidence that the plan provided in point 3 (previous page) has actually been implemented during the past 12 months.</p>
<p>5. Demonstrate that your OpCo has an on-going programme to engage with vendors over the use of chemicals in Kingfisher’s Chemicals Action List.</p>	<p>Provide a record of the decisions that have been made during the past 12 months, about whether or not to accept new products into the business (based on the chemical information provided by vendors).</p>
<p>6. Provide evidence of training or communication for commercial teams on the environmental and health and safety issues surrounding chemicals in products.</p>	<p>Record the names (and positions) of individuals who have received training on the environmental and health issues surrounding chemicals in products.</p> <p>Specify the type and format of training given (e.g. training course, seminar/workshop, presentation, e-learning packages, etc).</p>

Kingfisher plc
3 Sheldon Square, Paddington
London W2 6PX
+44 (0)20 7372 8008
www.kingfisher.com/CR

For further information please contact:
corporateresponsibility@kingfisher.com

