



Code of Practice: Transparency Project Addendum

Version 2: November 2020



The Clean Label Project is a national non-profit with the mission to bring truth and transparency to consumer product labeling. Using actual retail sampling and testing, we establish evidence-based benchmarks to identify the America's best products using data and science as opposed to marketing.

Together, we are changing the definition of food and consumer product safety in America.

This Code of Practice: Transparency Project Addendum is subject to revision.

Go to www.cleanlabelproject.org to confirm the current version.

Questions, clarification, interpretations, and suggested revisions regarding this Code of Practice:
Transparency Project Addendum may be provided in writing to:

Clean Label Project
280 E. 1st Ave. #873
Broomfield, CO 80038-0873
E-mail: info@CleanLabelProject.org

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Clean Label Project
280 E. 1st Ave. #873
Broomfield, CO 80038-0873

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Objectives and Disclaimers

This Code of Practice provides criteria for the evaluation and marketing of manufacturers seeking compliance and certification for their products to the Clean Label Project Code of Practice- Transparency Project Addendum. The implied compliance, evaluations, and the contents contained within are limited exclusively to meeting the minimum requirements for the Clean Label Project Code of Practice - Transparency Project Addendum. It is the responsibility of the Operator to comply with all applicable state, national, and international laws such as, but not limited to, California Prop 65, FDA food labeling laws, FDA food safety laws, FDA pesticide tolerance level requirements, Country of Origin labeling, Tobacco, Tax, and Trade Bureau Laws, and USDA National Organic Program requirements, as applicable. It is also the responsibility of the Operator to comply with any applicable voluntary third-party private schemes such as, but not limited to Organic, Fair Trade, and Global Food Safety Initiative benchmarked standards.

In no way does compliance to this Clean Label Project Code of Practice- Transparency Project Addendum imply compliance to any other state or federal regulation or private standard. The Clean Label Project does not assume, displace, or undertake to discharge any obligations or responsibilities of the manufacturer or any other party, including but not limited to those responsibilities and obligations arising from the other certifications or standards referenced within this Clean Label Project Code of Practice- Transparency Project Addendum. Under no circumstances shall Clean Label Project or any of its affiliates be liable for direct, indirect, incidental, consequential, special, punitive or any other use of this Clean Label Project Code of Practice- Transparency Project Addendum. This Clean Label Project Code of Practice- Transparency Project Addendum may be revised from time to time.

Use of this Clean Label Project Code of Practice- Transparency Project Addendum is strictly voluntary.

Code of Practice- Transparency Project Addendum

I. Purpose

Studies show that consumers want brands to be completely transparent when it comes to food and personal care products, but consumers largely do not trust brands to accurately provide complete product information¹. Clean Label Project recognizes that marketing departments can do an effective job at selling comfort and security. Because of this, Clean Label Project Codes of Practice require mandatory testing using its Consumer Chain of Custody Sampling and Testing to randomly sample products unannounced at retail and test them to ensure ongoing compliance. Many brands consider their test results to be confidential and highly sensitive business information- especially in instances where a product does not test well. However, other brands embrace transparency, recognize that transparency builds consumer trust, and have confidence in their supplier and quality assurance systems to ensure that their products will consistently test well. So confident, in fact, that they voluntarily enroll in the Clean Label Project Transparency Project which takes the documents used for Clean Label Project Code of Practice compliance and posts them publicly on the Clean Label Project website for consumers to view.

The Clean Label Project Code of Practice: Transparency Project Addendum looks to create a program that provides consumers the ability to view exactly how the products they purchase tested. It provides brands an opportunity to use tracking codes to communicate to consumers how their particular lot of product tested. Given Clean Label Project's mission to reduce exposure to industrial and environmental contaminants, the Transparency Project encourages accountability and robust quality and supplier assurance programs.

The purpose of the Code of Practice is to:

1. Provide a market tool for growers, suppliers, manufacturers, brand owners, and retailers to communicate their test results.
2. Create a market opportunity for manufacturers looking to communicate this commitment to transparency to consumers
3. Satisfy the growing consumer demand for transparency through an on-package market solution that is backed by testing and data
4. Get back to the basics and provide consumers assurance and trust by looking beyond the flashy marketing because sometimes what's not on the label is the most important

II. Scope

This Code of Practice- Transparency Project Addendum is applicable to all current Clean Label Project Code of Practice certified Operators.

III. References

¹ <https://www.inc.com/kenny-kline/new-study-reveals-just-how-important-brand-transparency-really-is.html>

IV. Definitions

- A. Administrator: the organization(s) contractually responsible for the Clean Label Project Code of Practice- Transparency Project implementation and oversight

- B. Enlisted: An Operator that has been formally recognized by the Administrator as fulfilling the requirements as outlined in the Clean Label Project Code of Practice- Transparency Project Addendum
- C. Non-Compliant: Nonconformance to established requirements within the Clean Label Project Code of Practice- Transparency Project Addendum
- D. Operator: the organization, business, entity, or person(s) responsible for Clean Label Project- Transparency Project compliance oversight

V. Compliance Framework

A. Initial Compliance Requirements

1. Clean Label Project Code of Practice Compliance

Prior to enlisting in the Transparency Project, Operators and applicable products shall already be awarded/certified to a Clean Label Project Code of Practice. Options include:

- Clean Label Project Code of Practice: Purity Award
- Clean Label Project Code of Practice: Pesticide- Free
- Clean Label Project Code of Practice: Certification
- Clean Label Project Code of Practice: Antioxidant Superiority
- Clean Label Project Code of Practice: THC-Free

The applicable Clean Label Project Code of Practice award/certification shall be dated within the past 12 months.

2. Test Result Disclosure Approval

Operators shall elect to post all test results or certain analytes that were used to substantiate Clean Label Project Code of Practice Compliance. The Operator shall provide approval to the administrator in advance as to what analytes are to be enlisted and reported as part of the Clean Label Project Code of Practice: Transparency Project.

3. Established Testing Cadence

The Operators shall disclose to the Administrator the frequency and tracking mechanism that shall be used to disclose data for the Transparency Project.

B. Renewal/Ongoing Compliance

All requirements outlined in Section V.A apply. However, it should be noted that the Administrator of the Clean Label Project will perform testing at the Operator's

expense. It is recommended that the Operator perform routine finished product testing to ensure ongoing compliance

The Administrator of the Clean Label Project shall annually confirm proof of compliance with Section V.A.

It should be noted that the Clean Label Project Code of Practice: Transparency Project Addendum is a living document. The requirements will be revisited on a regular basis and proactively communicated to Operators. Operators shall be provided a minimum of 1-year implementation period when changes are made to the Clean Label Project Code of Practice: Transparency Project.

VI. Administrator Requirements

A. Testing Requirements

1. The Administrator of the Clean Label Project shall provide to Clean Label Project the data associated with Clean Label Project Code of Practice-Transparency Project.
2. The Administrator shall collaborate with Clean Label Project on the applicable data, images, etc. to ensure the successful and timely uploading to the Clean Label Project website.

B. Marketing Compliance Requirements

1. The Administrator shall be responsible for maintaining and publishing the list of all products bearing the Clean Label Project Code of Practice: Transparency Project on the Clean Label Project website.
2. Any product not meeting the requirements outlined in the Clean Label Project Code of Practice- Transparency Project Sections V.A, V.B, or preventing the Administrator from fulfilling its requirements shall be found to be non-compliant with the Clean Label Project Code of Practice- Transparency Project and issued a Non-Compliance.
3. In the event that a Non-Compliance goes unmitigated in excess of 90 days, Clean Label Project will remove the Operator's products from the online listing and issue a notification that the product has been dropped from listing. Additional adverse action may be executed if the Operator continues to use the Clean Label Project mark on the dropped product.
4. The Administrator shall confirm the Operator's compliance to the Mark Use Requirements outlined in the Clean Label Project Code of Practice-Transparency Project Brand Standard.

C. Other Requirements

1. In the process of ensuring compliance to the Clean Label Project Code of Practice- Transparency Project, the Clean Label Project provides necessary authority to the Administrator to require additional testing, surveillance, or documentation requests as deemed necessary.
2. The Administrator shall maintain strict confidentiality of all Operator's documentation and test reports other than those approved for disclosure under V.A.2.

VII. Request Deviation

1. Any request for deviation to requirements of the Standard shall be provided in writing to the Technical Administrator.
2. The Technical Administrator in consultation with the CLP, shall consider but is not obligated to grant the request for deviation and shall not be obligated to return any portion of fees paid if the Applicant/ Operator chooses to discontinue certification as a result of the request for deviation decision.
3. Technical Administrator shall not be responsible for any costs incurred by Applicant/ Operator related to nonconforming product which is the subject of rejected deviation request or other noncompliance.
4. To apply for a deviation, the Applicant/ Operator shall request deviation in writing and submit to the Technical Administrator.
5. Requested variances, in instances of Force Majeure, shall be considered on a case by case basis. Operators shall provide a written request to Technical Administrator documenting the situation and proposed course of action for approval.
6. The Technical Administrator, in consultation with the CLP, shall produce a written response back to the Applicant/ Operator regarding the request for deviation within 10 business days.