



Boots Strategy on:

The use of Chemicals in Consumer Products -

A Precautionary Approach

March 2003

Our Aim

Our aim is to become a leading provider of products and services that promote healthy living both in the UK and overseas. In achieving this aim, we will build on the trust that our customers have in Boots. We are treating the issue of chemicals in products as a core sustainable development issue and a key component of our corporate social responsibility. We will ensure that appropriate actions are taken to safeguard both our customers' health and safety and also to protect the environment.

We have brought a number of existing internal processes together into a coherent strategy to enable a co-ordinated management approach to this issue, in a way that will include open and transparent communication to our stakeholders both internal and external to the company.

The aim of this strategy is to set out the principles that we apply to the use of chemicals in consumer products, describe the processes by which we implement them, and how we respond to the legitimate concerns of all our stakeholders.

Context

This strategy on chemicals in consumer products sits alongside a number of existing environmental policies and procedures that address environmental issues that are relevant to Boots operations. These policies are published on our website along with details of our performance and are reviewed at appropriate intervals.

There are many legislative requirements which regulate the formulation, sale and use of our products, requiring us to ensure an adequate level of product safety. However, as with other brand owners, we also need to manage increasing concerns being raised over the safety and environmental impacts of a number of chemicals. This is proving to be particularly challenging because of:

- the sheer number of chemicals under suspicion
- the wide range of issues requiring management
- the scientific complexity surrounding the issues
- the length and complexity of supply chains
- the fact that chemicals could be present as ingredients, contaminants or used as processing aids
- new information exposing gaps in our previous knowledge base
- the high level of uncertainty due to the lack of data to support cause and effect for many chemicals
- concerns over the potential long-term impact of chemicals on human health and the environment

We are aware that we are facing a huge task that will be on going as new issues are constantly added to the agenda. This strategy has been developed to help us manage the complexities affecting our product range and our supply chains.

In addressing these issues, the individual circumstances of each case need to be taken into account and balanced action taken that is both appropriate for, and in proportion to, the scale of the issue.

Scope

The task of managing this level of complexity is huge and never ending as new issues and concerns are raised. Our prime focus has to be on our own products and packaging over which we can exercise a very high degree of control.

Whilst the principles of this strategy apply equally to proprietary products sold in our retail stores as to our own brand, the reality is that the level of control we can exert over these suppliers is severely limited in the world-wide marketplace in which we operate. We are, however, committed to continuing to influence these suppliers where we are able.

General Principles

We are committed to delivering products and services that our customers can have confidence in, and our energies will be focused on this goal.

In delivering this strategy, we will set realistic but challenging targets and objectives as appropriate. We will take account of facts, on-going debates, public perception and stakeholder dialogue to ensure we are addressing the right issues at the right pace, before taking decisive action for the benefit of our customers, the environment, our business and society as a whole. We will not make sweeping commitments where there are no foreseeable answers; we will not over-promise and then ultimately under-deliver.

We will:

- consult widely:
- act quickly:
- probe deeply and widely into the supply chain:
- base our approach on sound science, but take increased account of other factors:
- take the lead in delivering quality products that promote healthy living:
- be open and transparent, and communicate our progress

While safety will be the first priority in our decision making processes, we will also recognise the importance that our customers attach to product availability and efficacy to satisfying the human need and social usefulness fulfilled by such products. We will always seek solutions that protect our customers without depriving them of the products they expect to purchase from us.

A Precautionary Approach

We take a precautionary approach to the use of potentially harmful chemicals: "Where there are reasonable grounds for concern that a chemical used in our products could be harmful to human health or the environment, we will always take appropriate precautionary measures."

The application of the precautionary approach requires judgements to be made, as to the nature and level of threat to human health and the action that should be taken, if any, to lessen or eliminate the potential harm.

For Boots, these judgements are made by the Chemicals Working Group (CWG), a multi-disciplined team of technical specialists. The CWG takes science as its starting point, referencing the latest published data, but will not use a lack of scientific certainty to justify inaction. Other factors, such as reported non-scientific opinion and public concern will also be taken into account.

The Process

The CWG is a sub-group of the company's Environmental Working Party (EWP) which is made up of senior representatives from across the business. The CWG meets regularly to review new information and emerging issues in relation to chemicals and uses relevant to the Boots product range. All chemicals under review are identified on a 'Priority Substances List' (PSL) which is regularly updated.

In assessing continuing or future use of a particular chemical, the CWG will give close consideration to a number of factors including:

- Immediate health hazard
- Longer term threats to health (bio-accumulation etc)
- Environmental (cradle to grave) impacts
- Product efficacy
- Availability and cost of alternatives
- Regulatory constraints

Following consideration and, where necessary, further investigation, the CWG may recommend one of a number of actions:

- Immediate withdrawal of the chemical or use
- Phase out of the chemical, or particular use, over an appropriate time scale
- Actively seek a replacement of the chemical

Alternatively, the CWG may recommend:

- Restrict the use of the chemical to specific purposes and continue to monitor further developments.

- Continue to use the chemical but maintain a watching brief in instances where the balance of evidence does not justify action.
- Remove the chemical or use from the Priority Substances List.

When the action to be taken has been agreed by the EWP, this will be noted on the PSL and specific guidelines will be incorporated into operating procedures for the relevant product development teams.

The Environmental Working Party (EWP) provides a senior management steer on environmental values and priorities. It is accountable for maintaining and publishing the Boots Priority Substances List containing substances identified for review, Boots position on each substance, and any precautionary actions deemed necessary along with relevant timescales. Progress against published targets will be reported as part of our annual environmental performance update on our website.

Supply Chain

Within the context of existing supply chain partnerships, we will continue to make suppliers aware of the chemicals issues affecting our business and our approach to managing them. We will involve them in our discussions, challenge them to identify which of their products are affected, and encourage them to take appropriate action.

By creating greater awareness of these issues throughout the supply chain and the industry, we will seek to extend our influence for the benefit of a much wider audience.

Consultation and Communication

We value the process of stakeholder engagement as this provides us with wider insight into the views of all those who have an interest – both inside and outside the business – and generates fresh, innovative ideas.

This strategy takes into account the views expressed at our Stakeholder Dialogue Workshop, run by the Environment Council as independent facilitators. We anticipate that there will be continuing consultation with participants in the dialogue as we further refine this process and develop specific targets and milestones.

Our Priority Substances List and agreed actions will be published on the environmental pages of our website and regularly updated.