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1st July 2016

Ref: Hazard labels on Health Product Declarations for Altro Print Range of Flooring products.

To whom it may concern,

This letter has been put together in conjunction with the Health Product Declarations for our Altro flooring products and explains the significance of the hazard labels displayed on the front of our HPDs.

Whilst we applaud the move toward greater product transparency of products within the construction industry we are concerned that ***Health Product Declarations are based on hazard rather than risk*** and hence can be misleading to our customers and can be a cause for concern. For example, something may be hazardous but the risk of being exposed to that hazard may be very low. A HPD makes no distinction between hazard and risk.

So something may be potentially hazardous if you ingest enough of it but of course the risk of doing that is very low. For example, drinking too much water can cause the brain to expand and kill you but it is unlikely that many of us would ever drink the amount necessary over a short period of time. This is the difference between hazard and risk.

Unfortunately some hazard labels including cancer appear on the HPD for our flooring products. ***In reality there is no risk of cancer to anyone being exposed to Altro flooring.***

There are many hazard labels that may be associated with substances listed on an HPD, for example Aquatic Toxicity. Again some substances may be hazardous to the marine environment but in reality the risk of aquatic life being exposed to these substances is very low. Despite this an Aquatic Toxicity label appears on the front of an HPD. For the same reasons, this is also true of substances which carry the Mammalian or Respiratory label.



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Material Safety Data Sheets (MSDS) for Altro Safety Flooring

A material safety data sheet, MSDS is available for all of our products upon request. A MSDS contains information on the potential hazards, (impacts upon health and the environment, safety and fire) and how to work with and use a product safely. There are no risks or hazards associated with the use of Altro safety flooring listed on the MSDS confirming that Altro safety flooring is safe to use and poses no threat to human health or the environment.

I hope this letter has helped to clarify the concept of hazard verses risk and explained the significance of the hazard labels that appear on the HPD for Altro safety flooring. If you require any further information about our products and their impact upon human health and the environment please let me know.

Kind regards

Tracy Perry

New Product Development Manager

tper@altro.com

Name Tracy Perry



Product ID Altro Print Range
Website www.altro.com

Classification

Manufacturer Altro Ltd
Address Works Road
Letchworth Garden City, Herts
SG61NW
UK

Contact Name Tracy Perry
Title Sustainability Manager
Phone 01462489252
Email tper@altro.com

Description This HPD includes the Altro range of printed products, Altro Wood Safety Altro Wood Smooth, Altro Zodiac Smooth and Altro Melodico Smooth.

Release Date 2016-06-02
Expiry Date 2019-06-02
HPD URL <https://builder.hpd-collaborative.org/uploads/files/hpds/200/4340-20160602121154.pdf>

Self-declared
 Second Party
 Third Party
Certifier
Certificate #

SUMMARY DISCLOSURE

The content of this product was assessed for health hazard warnings as required using Pharos

Residuals Disclosure

- Measured 100 ppm (ideal)
- Measured 1000 ppm
- Predicted by process chemistry
- As per MSDS (1,000 & 10,000 ppm)
- Not disclosed
- Other

Full Disclosure of Intentional Ingredients

Yes No

Full Disclosure of Known Hazards

Yes No

Disclosure Notes

Contents in Descending Order of Quantity

POLYVINYL CHLORIDE (PVC) , 1,2,3-PROPANETRICARBOXYLIC ACID, 2-(ACETYLOXY)-, TRIBUTYL ESTER , DOLOMITE , Tris(2-ethylhexyl) 2-(acetyloxy)propane-1,2,3-tricarboxylate , Alumina trihydrate , Distillates (petroleum), hydrotreated light paraffinic , EPOXIDIZED SOYBEAN OIL , triisotridecyl phosphite , ALCOHOLS, C11-14-ISO-, C13-RICH , zinc neodecanoate , calcium neodecanoate , Dipropylene glycol diacrylate , TETRAMETHYLENE DIACRYLATE , zinc dibenzoate , 3-ACETYL-1-PHENYL-PYRROLIDINE-2,4-DIONE , ALUMINUM OXIDE

Hazards

- PBT (Persistent Bioaccumulative Toxic)
- Cancer
- Gene Mutation
- Development
- Reproductive
- Endocrine
- Respiratory

Highest concern GreenScreen score - List Translator Benchmark 1

- Neurotoxicity
- Mammal
- Skin or Eye
- Aquatic toxicity
- Land toxicity
- Physical hazard
- Global warming
- Ozone depletion
- Multiple
- Unknown

Total VOC Content

Material (g/L) N/A
Regulatory (g/L) N/A

Does the product contain exempt VOCs? N/A Yes No

Are there VOC-free tints available? N/A Yes No

Notes

Certifications + Compliance

VOC Emissions Eurofins Indoor Air Comfort - GOLD - certified product
VOC Content N/A

The HPD Standard is solely a declaration of product content and direct health hazards associated with exposure to its individual contents. It is not a full assessment of environmental impacts from the life cycle of this product. It is not an assessment of risks associated with actual use of the product. It does not address the potential health impacts of substances used or created during manufacture that do not appear in the final product as residuals, nor substances created during combustion or other degradation processes.

This Health Product Declaration was generated following the requirements of the noted Standard version and is valid for a total of three years after date of issue or three months after a substantive change of product contents occurs. Users should verify that this Health Product Declaration is compliant with the most current version of the HPD Standard. Accuracy of claims made in this Health Product Declaration is the sole responsibility of the listed manufacturer and certifier (if applicable). The HPD Collaborative does not warrant any claim made herein, explicit or implicit. The HPD Standard is an “open standard” developed and managed by the HPD Collaborative, a nonprofit organization. For more information, visit hpdcollaborative.org.

CONTENT IN DESCENDING ORDER OF QUANTITY

All ingredients must be assessed for health warnings against Priority Hazard Lists, regardless of disclosure level.

Priority Hazard Lists and information on the GreenScreen Benchmarks can be found at www.hpdcollaborative.org/hazardlists.

GS: GreenScreen Benchmark; **RC:** Recycled Content, **PC:** Post Consumer, **PI:** Post Industrial (Pre-consumer), **BO:** Both; **Nano:** comprised of nanoscale particles or nanotechnology

Name	CAS RN	% weight	GS	RC	Nano	Role
Hazard A	Warning A					
Hazard B	Warning B					
Hazard C	Warning C					
Hazard D	Warning D					
Hazard E	Warning E					
Notes						
POLYVINYL CHLORIDE (PVC)	9002-86-2	40 - 45 %	LT-U	N	N	Core Polymer
RESPIRATORY	AOEC: Asthmagen (ARs) - sensitizer-induced					
1,2,3-PROPANETRICARBOXYLIC ACID, 2-(ACETYLOXY)-, TRIBUTYL ESTER	77-90-7	20 - 25 %	LT-P1	N	N	Plasticiser
MULTIPLE	VwVwS: Class 2 Hazard to Waters					
DOLOMITE	16389-88-1	12 - 18 %		N	N	Filler
None found	No warnings found on HPD Priority lists					
Tris(2-ethylhexyl) 2-(acetyloxy)propane-1,2,3-tricarboxylate	144-15-0	5 %		N	N	Plasticiser
None found	No warnings found on HPD Priority lists					
Alumina trihydrate	21645-51-2	3 - 5 %	2	N	N	Active Filler
RESPIRATORY	AOEC: Asthmagen (ARs) - sensitizer-induced - inhalable forms only					

Distillates (petroleum), hydrotreated light paraffinic	64742-55-8	1 - 2 %	LT-1	N	N	Additive
CANCER	EU CMR (1): Carcinogen Category 2 - Substances which should be regarded as if they are carcinogenic to man (also in EU R-Phrases, EU H-Statements, EU CMR (2))					
MULTIPLE	SIN: Classified CMR (Carcinogen, Mutagen &/or Reproductive Toxicant)					
EPOXIDIZED SOYBEAN OIL	8013-07-8	1 %	LT-U	N	N	Co Stabiliser
None found	No warnings found on HPD Priority lists					
triisotridecyl phosphite	77745-66-5	0.5 - 0.8 %	LT-P1	N	N	Stabiliser
MULTIPLE	VwVwS: Class 2 Hazard to Waters					
ALCOHOLS, C11-14-ISO-, C13-RICH	68526-86-3	0.2 - 0.3 %	LT-P1	N	N	Stabiliser
MULTIPLE	VwVwS: Class 2 Hazard to Waters					
zinc neodecanoate	27253-29-8	0.1 - 0.2 %	LT-P1	N	N	Stabiliser
MULTIPLE	VwVwS: Class 2 Hazard to Waters					
calcium neodecanoate	27253-33-4	0.1 %	LT-P1	N	U	Stabiliser
MULTIPLE	VwVwS: Class 2 Hazard to Waters					
Dipropylene glycol diacrylate	57472-68-1	0.1 %	LT-P1	N	N	Lacquer
MULTIPLE	VwVwS: Class 2 Hazard to Waters					
TETRAMETHYLENE DIACRYLATE	1070-70-8	0.1 %	LT-U	N	N	Lacquer
MAMMALIAN	EU R-Phrases: R21: Harmful in contact with skin.					
SKIN IRRITATION	EU H-Statements: H317 May cause an allergic skin reaction (also in EU R-Phrases)					
SKIN SENSITIZE	EU R-Phrases: R43: May cause sensitization by skin contact. (also in MAK)					
zinc dibenzoate	553-72-0	0.05 %	LT-P1	N	N	Stabiliser
MULTIPLE	VwVwS: Class 2 Hazard to Waters					
3-ACETYL-1-PHENYL-PYRROLIDINE-2,4-DIONE	719-86-8	0.05 %	LT-P1	N	N	Stabiliser

MAMMALIAN	EU R-Phrases: R22: Harmful if swallowed.					
ORGAN TOXICANT	EU R-Phrases: R48: Danger of serious damage to health by prolonged exposure.					
ACUTE AQUATIC	EU R-Phrases: R51: Toxic to aquatic organisms.					
CHRON AQUATIC	EU H-Statements: H411 - Aquatic Chronic 2 - Toxic to aquatic life with long lasting effects					
ALUMINUM OXIDE	1344-28-1	0 - 2 %	LT-U	N	N	Aggregate
RESPIRATORY	AOEC: Asthmagen (ARs) - sensitizer-induced - inhalable forms only					

CERTIFICATIONS AND COMPLIANCE

Certifying Party = First: Manufacturer's self-declaration; Second: Verification by trade association or other interested party; Third: Verification by independent certifier (ideal).

Applicable facilities = Manufacturing sites to which testing applies.

Type	Standard or Certification			Certifier or Laboratory
	Certifying Party	Issue Date	Expiry Date	Certificate URL
	Applicable Facilities			
	Notes			
VOC Emissions	Eurofins Indoor Air Comfort - GOLD - certified product			Eurofins
	Government enforced claim	2014-06-01	2019-06-01	https://builder.hpd-collaborative.org/uploads/files/certifications/200/1464883854.pdf
	Altro Debolon			
VOC Content	N/A			
Recycled Content	Not tested			
Other				

ACCESSORY MATERIALS

This section is for additional products required by warranty or recommended by the manufacturer for installation (such as adhesives, fasteners, or factory

coatings) or for maintenance, cleaning, or operations. Refer to Health Product Declarations, published separately, for a complete view of these products.
Note: This declaration is not intended to address hazards of the installation process.

Required or Recommended Product	URL for Companion Health Product Declaration
Condition when required or recommended and/or other notes	

NOTES