Declare Program Changes: Overview

Effective February 1, 2020

All new labels submitted to ILFI on or after February 1, 2020 will be processed under “Declare 2.0.” All labels will be transitioned to “Declare 2.0” before the “Declare 1.0” program sunsets on January 31, 2021. For a comprehensive overview of program requirements, please refer to the Declare Manufacturer’s Guide. To see all Declare products, please visit the Declare Products Database.

1) Declaration Status names have been updated, but the ingredient reporting requirements and qualifications remain the same.
   - **LBC Red List Free** (formerly “Red List Free”): 100% disclosed at 100ppm, no Red List ingredients
   - **LBC Red List Approved** (formerly “LBC Compliant”): 99-100% disclosed at 100ppm, may contain Red List ingredient(s) if covered by an existing Exception
   - **Declared**: 100% disclosed at 100ppm, Red List ingredient(s) present

Declare still requires disclosure of all ingredients and residuals present in the final product at or above 100ppm (0.01%) with a name, CASRN, and percentage by weight.

Manufacturers, however, can continue to use the Proprietary Ingredients Exception, which allows them to withhold up to 1% of ingredients, given they have confirmed that this content does not contain chemicals on the LBC Red List. These products will have a Declaration Status of Red List Approved.

A new feature in Declare is that the label clearly indicates the percent disclosed, making it easy to identify LEED-compliant labels disclosed at or above 99.9%.

2) The Declare label now displays compliance with other product-related Imperatives of the Living Building Challenge (LBC).

In addition to the Declaration Status, which indicates transparency and Red List compliance, the Declare label now clearly indicates compliance with other LBC product-related Imperatives: I-10 Healthy Interior Performance and I-14 Responsible Sourcing. Labels that read “Living Building Challenge Criteria: Compliant” indicates compliance with all three product-related LBC Imperatives.

For the Healthy Interior Performance Imperative, products that have the potential to emit VOCs and are intended for installation within the building envelope must supply a laboratory certificate of compliance. Declare labels now call out the specific emissions testing protocol (e.g. CDPH Standard Method v1.2-2017, AgBB Scheme 2009), whereas previously it simply denoted if a product was “CDPH Compliant.”

For the Responsible Sourcing Imperative, wood-containing products must now indicate which, if any, compliance pathway it meets, including FSC Chain of Custody, Salvaged Wood Content, Low Risk Wood and I-14 Exception Compliance.

3) Chemicals on the LBC Watch List designated “Priority for Red List Inclusion” are identified on the label, but do not impact Declaration Status.

Previously, Declare labels flagged EPA Chemicals of Concern (and EPA Work Plan chemicals) and REACH Substances of Very High Concern in yellow. In Declare 2.0, yellow font indicates chemicals designated “Priority for Red List Inclusion” on the new LBC Watch List. The Watch List utilizes a more holistic approach to identify priority chemicals based on regulatory hazard lists, restricted substances lists developed by various organizations, and GreenScreen List Translator priority hazard chemicals. LBC Watch List chemicals do not affect Declaration Status or LBC Compliance.

4) Embodied carbon data reporting will soon be an optional data reporting metric.

Embodied carbon reporting on a Declare label began as a pilot program in 2019 for specific product categories to support sourcing of products that meet LBC embodied carbon requirements in 4.0. Embodied carbon will not be included on labels outside of this pilot until further published notice from ILFI. If your product is within an applicable category and you are interested in participating, please reach out to Declare.Support@living-future.org.

When the feature is opened to additional manufacturers, it will remain an optional reporting field, and will not affect Declaration Status or LBC Compliance. If a manufacturer does not have or choose to include carbon data, the applicable fields will not appear on the label graphic or accompanying database entry. The Declare embodied carbon requirements remain a working draft that can be accessed here.