



Center for Health, Environment & Justice

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CHEJ'S COMMENTS AND RECOMMENDATIONS ON DISNEY WORLD'S HEALTHY CLEANING POLICY

ELEMENTS OF DISNEY WORLD'S "HEALTHY CLEANING POLICY" SUPPORTED BY CHEJ:

I. Philosophy:

We feel the philosophy you have outlined is a great jumping off place and shows the commitment necessary to move forward in developing a truly comprehensive policy.

II. Approach:

We support the goal of protecting the health and safety of your guests and employees and minimizing your company's environmental impact while actively taking into account toxicity of cleaning products brought into Disney World parks and resorts. It is also encouraging to see stated that Disney World has implemented an ongoing review and improvement process while also acknowledging that this allows your company to go beyond regulatory requirements. The involvement of a fuller and broader stakeholder constituency is also important to see included.

III. Use:

We fully support the company's commitment to training employees on the best practices, and proper use of environmentally preferable cleaning products and practices. We also believe that encouraging your suppliers to develop innovative products that meet your company's standards is a great way to show that you are looking at every angle possible to improve your current cleaning program.

CHEJ'S COMMENTS AND RECOMMENDATIONS FOR IMPROVEMENT:

I. Independent Third Party Certified Products

It is critically important for Disney World to show preference for purchasing independent third party certified products. This is a key piece to showing dedication to green cleaning principles as third party certification programs must meet several standards including:

- An open and transparent process for setting standards that involves public and key stakeholders;
- Clearly avoids conflicts of interest; and
- Requests periodic revisions and updates to standards that are able to include progress in innovation.

We recommend that your team show preference for independent third-party green cleaning products such as those labeled with the Green Seal, Ecolabel and/or EcoLogo certifications.

We understand these certification programs and the products available through these programs are not perfect. As we have seen since these programs were established, environmentally preferable products and certification standards are strengthened on a regular basis. The language and standards surrounding the definition of green are evolving, as we all become more familiar with what chemical exposure means to our health and

environment. Your team has stressed the importance of the disclosure of ingredients and we appreciate this attention.

As we mentioned in our past correspondence several groups have begun discussions with cleaning product companies to increase transparency and disclosure. We feel Disney World should continue to encourage and actively work for transparency among the product manufacturers who supply Disney World parks and resorts.

II. Define the classes of products and chemicals about which Disney World is most concerned

We recommend Disney World develop criteria for chemicals to avoid in cleaning products used at parks and resorts. Listing out the types of chemicals that Disney World is most concerned about shows a deeper level of commitment towards eliminating hazardous chemical exposure of guests and employees. This will clearly communicate to employees, guests, and vendors where your company's concern particularly lies and better enables you to achieve your over-arching goals in toxic cleaning chemical reduction.

This list can be developed by first stating criteria in what types of chemicals you want to avoid. As your science team already requires the disclosure of chemicals prior to use in Disney World parks and resorts, this should not be a stretch from your normal product assessment. From this list of criteria you should be able to list classes of chemicals that are of most concern.

We recommend Disney World show strong preference for green cleaning products that do not contain or are manufactured with highly hazardous chemicals that are:

- Volatile Organic Compounds (VOCs) We recognize it can be difficult to completely avoid VOCs and recommend Disney World show strong preference for low VOC products.
- Known or suspected Carcinogens;
- Asthmagens;
- Mutagens
- Teratogens
- Reproductive or Developmental Toxicants;
- Persistent, Bioaccumulative, Toxic (PBT);
- Neurotoxicants; and
- Endocrine disruptors;

We are happy to work with you to develop a list of chemicals that meet these criteria.

Out of this list you can then state the way and with what regularity Disney World will assess the products used within parks and resorts. Products that are of particular concern include disinfectants, air fresheners, and floor finishers, to name a few.

We recommend that Disney World require suppliers to disclose chemical and material content of cleaning products and comprehensive hazard data on chemicals contained in cleaning products. We also recommend Disney World set criteria for the types of cleaning products you prefer such as those that are bio-based.

Providing details on criteria, types of chemicals of concern, and products will also allow your team to better communicate with the people within your supply chain, employees and guests. This will also help to encourage your vendors to develop innovative products that meet your standards on cleanliness, health, and safety in ways that are least harmful to the environment.

III. Regular assessments, benchmarks, and timelines of current policy and practices

In the current version of the “Healthy Cleaning Policy” it is stated, “Disney has implemented an ongoing review and improvement process to address our overall chemical use in cleaning and sanitizing”. Detailing the specific timelines in which your current policy and practices are to be assessed is important in staying up to date on best practices, green chemistry advances, consumer trends and demands as well as state and federal legislation. Regular assessments allow your team to better understand the status of practices and product use as well as the benchmarks that have yet to be achieved to meet your end goals. Stating these policy attributes in detail allows your team to be flexible, while meeting high standards, showing industry leadership and commitment to consistent improvement.

IV. Frame green cleaning practices, products and chemical exposure holistically

The frame in which you decide to address green cleaning practices, products and chemical exposure is an important part of Disney World’s green cleaning policy. Green cleaning is about eliminating unnecessary toxic cleaning chemicals not just about replacing one product for another that is more environmentally preferable. Viewing Disney World’s “Healthy Cleaning Policy” through a broader and more comprehensive lens also includes recognizing that there is no difference in protecting the health and safety of guests and employees and protecting the environment. The backbone of both environmental and health protection is in the reduction of toxic chemicals.

As we mentioned, stating Disney World’s commitment to the precautionary principle is extremely important. The precautionary principle can be found in many corporate responsibility statements throughout the industry spectrum and for a company like Disney World, that focuses on the well-being of children, the precautionary principle takes on special meaning. The impacts of exposure to certain chemicals are often tested on adults and very little is known about the short and long term impacts of chemicals on children. One interesting study recently released shows that phthalates, a group of chemicals often found in air fresheners and certain plastics, can pass from a pregnant woman to her unborn child and affect reproductive development in her daughter¹.

Discussing the precautionary approach is extremely important. We would like to see this listed in the Philosophy section in an effort to stress the precautionary approach Disney World is taking to prevent possible long term learning and developmental impacts of the children that visit Disney World parks and resorts. Companies that detail their commitment to the precautionary principle include Wal-Mart, Body Shop, and Dell

This is also a great place to mention equipment including the use of microfibers, the intention of moving to hard surfaces when appropriate, and chlorine free high content post consumer recycled paper in order to emphasize the importance of reducing the overall use of toxic chemicals.

V. Training of employees, procurement staff, and vendors

Though training employees is mentioned in the current version of the “Healthy Cleaning Policy”, the training of vendors is not. Properly training vendors in your policy is important in stressing your company’s chemical standards. It is important for the procurement staff, front of the house cast members, as well as, contractors and consultants to also be properly trained. As we mentioned in our last letter, in our research, we have found that front desk cast members of Disney World resorts are not knowledgeable about cleaning products or practices.

We understand that turnover, experience, and the amount of information a front desk cast member is expected to know makes it difficult for all information to be available at all times to all guests, but we must stress the importance of guests being able to easily be provided this type of information in a consistent manner. Also through our research, we became aware that not only were front desk cast members not knowledgeable they were unaware of how to find this information out and at times unwilling to search for this information. This is a problem that explicit training on the issue could solve. Stating this clearly in your “Healthy Cleaning Policy”

¹ <http://www.environmentalhealthnews.org/ehs/newscience/phthalates-in-moms-and-babies>

would stress the importance of being knowledgeable of the issue of cleaning products and practices. Disney World may want to consider developing a 1-2 page leaflet on green cleaning that could be handed out to guests who have questions and concerns.

The training of vendors on the Disney World “Healthy Cleaning Policy” and cleaning practices will allow for better communication and raise the bar of standards in the products and services offered by preferred vendors. It is important that vendors understand that your expectations are high which leads to a higher level of market competition of non-toxic product innovation. It is not only important that your employees and vendors are trained but they must also commit to continuous improvement.

VI. Encourage and actively work for the innovation of safer products and higher industry standards

We feel it is extremely important not only to encourage but to work actively for the innovation of safer cleaning products and chemicals and higher industry standards. As we mentioned in our letter dated February 26, 2009, given your company’s size, purchasing power, corporate mission and industry influence, we feel that Disney World is in a unique position to help change the lack of transparency among cleaning product manufacturers and stalled innovation in the field of disinfectants. The Walt Disney World Company’s current environmental policy states a dedication to inspiring action. By including that Disney World actively works for the innovation of safer products and high industry standards you will be realizing your company’s larger objectives.

Stating in more detail the steps Disney World takes reiterates for your guests and employees that your standards are high in reducing the use of toxic cleaning chemicals. For instance Dell states in their Chemical Use Policy² “If alternatives are not yet viable, Dell works with its industry partners to promote industry standards and the development of reliable, environmentally sound, and economically scalable technical solutions”.

VII. Reaching past compliance with state, federal, and international regulations

As stated in “Healthy Business Strategies for Transforming The Toxic Chemical Economy”, which we have attached, 76% of chemicals used in our economy were grandfathered into the 1976 US Toxic Substance Control Act, which means that the “chemical manufacturers were not required to disclose information on their toxicity”. Our environment and bodies are now contaminated with chemicals that we have little to no understanding about and current US laws on chemicals do not protect the health of people or the environment. In your company efforts you must reach past compliance with state, federal and international regulations on chemicals. We mentioned international laws because of Disney World’s repeated intent to bring this policy to parks and resorts across the globe.

As consumers, public officials, and business executives become more aware and concerned about the lack of knowledge of the short and long term impacts of the chemicals being used in products, it is financially beneficial for Disney World to reach past compliance with current chemical regulations. Social, economic, and legal trends of late have proven to be liabilities to companies that were unable to anticipate them in the first place. As stated in “Healthy Business Strategies for Transforming The Toxic Chemical Economy”, “Ignoring these trends not only leaves companies vulnerable to reputation, toxic tort or market risk; it also leaves them blind to the value-generating opportunities”.

As referenced in the letter dated February 17, 2009 from Mr. Montgomery, your company’s chemical disclosure policy has allowed your company to become familiar with the lack of ingredient disclosure from cleaning company manufactures. As we mentioned we expect a bill to be introduced this legislative session in California by Senator Simitian regarding product chemical ingredient disclosure, which will include cleaning products. We feel your company’s policy of needing a complete list of all components in a cleaning product prior to use in

² http://www.dell.com/content/topics/global.aspx/corp/environment/en/prod_design?c=us&l=en&s=corp&~section=016

any park or resort is an excellent statement to include in your “Healthy Cleaning Policy”. Your employees and guests will appreciate the knowledge about this type of precaution your company is taking.