

HPD UNIQUE IDENTIFIER: 1041948672

CLASSIFICATION: 09 90 00 Painting and Coating

PRODUCT DESCRIPTION: For excellent performance under higher sheen paints, choose BEHR Acrylic-Alkyd Enamel Undercoater. It is specially formulated to have outstanding flow and leveling application similar to oil-based primers, but with easy soap and water clean-up. This product has a quick dry time and blocks medium to heavy tannin stains – making it an ideal primer choice for painting doors, trim, and cabinets.

Section 1: Summary

Basic Method / Product Threshold

CONTENT INVENTORY

Table with 4 columns: Inventory Reporting Format, Threshold Level, Residuals/Impurities Evaluation, and screening options (Characterized, Screened, Identified).

CONTENT IN DESCENDING ORDER OF QUANTITY

Summary of product contents and results from screening individual chemical substances against HPD Priority Hazard Lists and the GreenScreen for Safer Chemicals®.

PRODUCT | MATERIAL OR SUBSTANCE | RESIDUAL OR IMPURITY
GREENSCREEN SCORE | HAZARD TYPE

BEHR® ACRYLIC-ALKYD ENAMEL UNDERCOATER NO. 437 [WATER
BM-4 STYRENE-METHYLMETHACRYLATE COPOLYMER LT-UNK
NEPHELINE SYENITE LT-UNK LIMESTONE BM-3dg TITANIUM
DIOXIDE LT-1* CAN | END | MAM POLYURETHANE RESINS NoGS
BENTONITE LT-UNK FATTY ALCOHOL ALKOXYLATE LT-P1 MUL
2,2,4-TRIMETHYL-1,3-PENTANEDIOL DIISOBUTYRATE LT-P1 END |
AQU LUBRICATING OILS (PETROLEUM), C15-30, HYDROTREATED
NEUTRAL OIL-BASED LT-1 CAN | MUL | SKI | MAM | GEN | DEV
ZINC(2+), TETRAAMMINE-, (T-4)-, CARBONATE (1:1) LT-P1 MUL
AMMONIUM ZIRCONIUM CARBONATE LT-UNK]

Number of Greenscreen BM-4/BM3 contents ... 2
Contents highest-concern GreenScreen score(s) (BM-1, LT-1, LT-P1) ...
LT-P1, LT-1
Nanomaterial ... No

INVENTORY AND SCREENING NOTES:

None

*Form-Specific Hazard: This substance's GreenScreen Benchmark or List Translator score and the applicable hazards are related to particulate inhalation, which is expected to occur only during manufacture, installation, maintenance, or demolition, due to activities such as sawing, sanding, grinding, or intensive cleaning.

VOLATILE ORGANIC COMPOUND (VOC) CONTENT

Material (g/l): 14 Regulatory (g/l): 35
Does the product contain exempt VOCs: No
Are colorants available that do not increase the VOC content of the base paint when tinted: Yes

CERTIFICATIONS AND COMPLIANCE See Section 3 for additional listings.

VOC emissions: ASTM D6886-14e1
VOC content: SCAQMD Rule 1113 Architectural Coatings - Flats, floor coatings, non flat coatings, quick dry enamels, roof coatings only - 2007 amendments
VOC content: MPI Green Performance GPS-1-12
VOC content: MPI Green Performance GPS-2-12

CONSISTENCY WITH OTHER PROGRAMS

Pre-checked for LEED v4.1 Option 1.

Table with 3 columns: Third Party Verified?, PREPARER: Self-Prepared, SCREENING DATE: 2023-09-14; VERIFIER: VERIFICATION #: PUBLISHED DATE: 2024-04-23; EXPIRY DATE: 2026-09-14

Section 2: Content in Descending Order of Quantity

This section lists contents in a product based on specific threshold(s) and reports detailed health information including hazards. This HPD uses the inventory method indicated above, which is one of three possible methods:

- Basic Inventory method with Product-level threshold.
- Nested Material Inventory method with Product-level threshold
- Nested Material Inventory method with individual Material-level thresholds

Definitions and requirements for the three inventory methods and requirements for each data field can be found in the HPD Open Standard version 2.3, available on the HPDC website at: www.hpd-collaborative.org/hpd-2-3-standard

BEHR® ACRYLIC-ALKYD ENAMEL UNDERCOATER NO. 437

PRODUCT THRESHOLD: 1000 ppm

RESIDUALS AND IMPURITIES EVALUATION COMPLETED: No

RESIDUALS AND IMPURITIES NOTES: No residuals or impurities are expected to be present in the finished good in a concentration at or above the Content Inventory Threshold that return a GreenScreen scores of BM-1, LT-1, LT-P1 or NoGS.

OTHER PRODUCT NOTES: None

WATER

ID: 7732-18-5

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library**

HAZARD SCREENING DATE: 2023-09-05 12:05:44

%: 40.0000 - 50.0000

GreenScreen: **BM-4**

RC: **None**

NANO: **No**

SUBSTANCE ROLE: **Solvent**

HAZARD TYPE

LIST NAME AND SOURCE

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

ADDITIONAL LISTINGS

LIST NAME AND SOURCE

NOTIFICATION

EXEMPT

European Union / European Commission (EU EC)

EU - REACH Exemptions

Exempted from REACH Annex IV listing due to intrinsic safety

SUBSTANCE NOTES:

STYRENE-METHYLMETHACRYLATE COPOLYMER

ID: 25034-86-0

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library**

HAZARD SCREENING DATE: 2023-09-05 12:05:44

%: 10.0000 - 15.0000

GreenScreen: **LT-UNK**

RC: **None**

NANO: **No**

SUBSTANCE ROLE: **Binder**

HAZARD TYPE

LIST NAME AND SOURCE

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

ADDITIONAL LISTINGS

LIST NAME AND SOURCE

NOTIFICATION

None found

No listings found on Additional Hazard Lists

SUBSTANCE NOTES: Identification of this ingredient is not being disclosed due to suppliers holding chemical composition as proprietary. The assigned CAS number best represents the chemical family and associated hazards.

NEPHELINE SYENITE

ID: 37244-96-5

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2023-09-05 12:05:45**%: **10.0000 - 15.0000**GreenScreen: **LT-UNK**RC: **None**NANO: **No**SUBSTANCE ROLE: **Filler**

HAZARD TYPE

LIST NAME AND SOURCE

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

ADDITIONAL LISTINGS

LIST NAME AND SOURCE

NOTIFICATION

None found

No listings found on Additional Hazard Lists

SUBSTANCE NOTES:

LIMESTONE

ID: 1317-65-3

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2023-09-05 12:05:45**%: **5.0000 - 15.0000**GreenScreen: **BM-3dg**RC: **None**NANO: **No**SUBSTANCE ROLE: **Filler**

HAZARD TYPE

LIST NAME AND SOURCE

WARNINGS

None found

No warnings found on HPD Priority Hazard Lists

ADDITIONAL LISTINGS

LIST NAME AND SOURCE

NOTIFICATION

None found

No listings found on Additional Hazard Lists

SUBSTANCE NOTES:

TITANIUM DIOXIDE

ID: 13463-67-7

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library**HAZARD SCREENING DATE: **2023-09-05 12:05:46**%: **10.0000 - 15.0000**GreenScreen: **LT-1**RC: **None**NANO: **No**SUBSTANCE ROLE: **Pigment**

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
CAN	US CDC - Occupational Carcinogens	Occupational Carcinogen**
CAN	CA EPA - Prop 65	Carcinogen - specific to chemical form or exposure route**
CAN	IARC	Group 2B - Possibly carcinogenic to humans - inhaled from occupational sources**
CAN	MAK	Carcinogen Group 3A - Evidence of carcinogenic effects but not sufficient to establish MAK/BAT value**
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor**
CAN	MAK	Carcinogen Group 4 - Non-genotoxic carcinogen with low risk under MAK/BAT levels**
CAN	IARC	Group 2b - Possibly carcinogenic to humans**
CAN	EU - GHS (H-Statements) Annex 6 Table 3-1	H351 - Suspected of causing cancer [Carcinogenicity - Category 2]**
CAN	GHS - Japan	H351 - Suspected of causing cancer [Carcinogenicity - Category 2]**
MAM	GHS - Japan	H372 - Causes damage to organs through prolonged or repeated exposure [Specific target organs/systemic toxicity following repeated exposure - Category 1]**
CAN	EU - Annex VI CMRs	Carcinogen Category 2 - Suspected human Carcinogen**
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CP II)	C2C Certified v4 Product Standard Restricted Substances List (RSL) - Effective July 1, 2022 Children's Products
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CP II)	C2C Certified v4 Product Standard Restricted Substances List (RSL) - Effective July 1, 2022 Formulated Consumer Products
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CP II)	C2C Certified v4 Product Standard Restricted Substances List (RSL) - Effective July 1, 2022 Cosmetics & Personal Care Products
POSITIVE LIST	US Environmental Protection Agency (US EPA)	US EPA - DfE Safer Chemicals Ingredients list (SCIL) Colorants - Green Circle (Verified Low Concern)

SUBSTANCE NOTES: **Form-Specific Hazard: This substance's GreenScreen Benchmark or List Translator score and the applicable hazards are related to particulate inhalation, which is expected to occur only during manufacture, installation, maintenance, or demolition, due to activities such as sawing, sanding, grinding, or intensive cleaning. See HPDC's Special Conditions policy for more information. Manufacturer's Safety Data Sheet (SDS), if applicable, may offer occupational health and safety information.

POLYURETHANE RESINS

ID: 89097-02-9

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library**

HAZARD SCREENING DATE: **2023-09-05 12:05:46**

%: **1.0000 - 5.0000**

GreenScreen: **NoGS**

RC: **None**

NANO: **No**

SUBSTANCE ROLE: **Plasticizer**

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
None found		No warnings found on HPD Priority Hazard Lists
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
None found		No listings found on Additional Hazard Lists

SUBSTANCE NOTES: Identification of this ingredient is not being disclosed due to suppliers holding chemical composition as proprietary. The assigned CAS number best represents the chemical family and associated hazards.

BENTONITE

ID: **1302-78-9**

HAZARD DATA SOURCE: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2023-09-05 12:05:46		
%: 0.1000 - 1.0000	GreenScreen: LT-UNK	RC: None	NANO: No	SUBSTANCE ROLE: Plasticizer
HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS		
None found		No warnings found on HPD Priority Hazard Lists		
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION		
None found		No listings found on Additional Hazard Lists		

SUBSTANCE NOTES: Identification of this ingredient is not being disclosed due to suppliers holding chemical composition as proprietary. The assigned CAS number best represents the chemical family and associated hazards.

FATTY ALCOHOL ALKOXYLATE

ID: **111905-52-3**

HAZARD DATA SOURCE: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2023-09-05 12:05:47		
%: 0.1000 - 1.0000	GreenScreen: LT-P1	RC: None	NANO: No	SUBSTANCE ROLE: Stabilizer
HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS		
MUL	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters		
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION		
None found		No listings found on Additional Hazard Lists		

SUBSTANCE NOTES: Identification of this ingredient is not being disclosed due to suppliers holding chemical composition as proprietary. The assigned CAS number best represents the chemical family and associated hazards.

2,2,4-TRIMETHYL-1,3-PENTANEDIOL DIISOBUTYRATE

ID: **6846-50-0**

HAZARD DATA SOURCE: Pharos Chemical and Materials Library		HAZARD SCREENING DATE: 2023-09-05 12:05:47		
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#: 0.1000 - 1.0000

GreenScreen: **LT-P1**

RC: **None**

NANO: **No**

SUBSTANCE ROLE: **Coalescent**

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
END	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
AQU	GHS - Japan	H401 - Toxic to aquatic life [Hazardous to the aquatic environment (acute) - Category 2]
ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
RESTRICTED LIST	Green Science Policy Institute (GSPI)	GSPI - Six Classes Precautionary List Some Solvents

SUBSTANCE NOTES:

LUBRICATING OILS (PETROLEUM), C15-30, HYDROTREATED NEUTRAL OIL-BASED

ID: 72623-86-0

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: **2023-09-05 12:05:48**

#: 0.1000 - 1.0000

GreenScreen: **LT-1**

RC: **None**

NANO: **No**

SUBSTANCE ROLE: **Defoamer**

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
CAN	EU - Annex VI CMRs	Carcinogen Category 1B - Presumed Carcinogen based on animal evidence
MUL	ChemSec - SIN List	CMR - Carcinogen, Mutagen &/or Reproductive Toxicant
MUL	German FEA - Substances Hazardous to Waters	Class 3 - Severe Hazard to Waters
CAN	GHS - Australia	H350 - May cause cancer [Carcinogenicity - Category 1A or 1B]
CAN	GHS - Japan	H350 - May cause cancer [Carcinogenicity - Category 1A]
CAN	EU - GHS (H-Statements) Annex 6 Table 3-1	H350 - May cause cancer [Carcinogenicity - Category 1A or 1B]
SKI	GHS - Australia	H315 - Causes skin irritation [Skin corrosion/irritation - Category 2]
MAM	GHS - Japan	H372 - Causes damage to organs through prolonged or repeated exposure [Specific target organs/systemic toxicity following repeated exposure - Category 1]
GEN	GHS - Japan	H341 - Suspected of causing genetic defects [Germ cell mutagenicity - Category 2]
MAM	GHS - Japan	H371 - May cause damage to organs [Specific target organs/systemic toxicity following single exposure - Category 2]
DEV	GHS - Australia	H361d - Suspected of damaging the unborn child [Reproductive toxicity - Category 2]
CAN	EU - REACH Annex XVII CMRs	Carcinogens: Category 1B

ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CPII)	C2C Certified v4 Product Standard Restricted Substances List (RSL) - Effective July 1, 2022 Children's Products
RESTRICTED LIST	Cradle to Cradle Products Innovation Institute (C2CPII)	C2C Certified v4 Product Standard Restricted Substances List (RSL) - Effective July 1, 2022 Formulated Consumer Products

SUBSTANCE NOTES:

ZINC(2+), TETRAAMMINE-, (T-4)-, CARBONATE (1:1) ID: 38714-47-5

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: 2023-09-05 12:05:46

%: **0.0500 - 0.5000** GreenScreen: **LT-P1** RC: **None** NANO: **No** SUBSTANCE ROLE: **Adhesive**

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
MUL	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters

ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
None found		No listings found on Additional Hazard Lists

SUBSTANCE NOTES:

AMMONIUM ZIRCONIUM CARBONATE ID: 68309-95-5

HAZARD DATA SOURCE: **Pharos Chemical and Materials Library** HAZARD SCREENING DATE: 2023-09-05 12:05:47

%: **0.0500 - 0.5000** GreenScreen: **LT-UNK** RC: **None** NANO: **No** SUBSTANCE ROLE: **Antistain**

HAZARD TYPE	LIST NAME AND SOURCE	WARNINGS
None found		No warnings found on HPD Priority Hazard Lists

ADDITIONAL LISTINGS	LIST NAME AND SOURCE	NOTIFICATION
None found		No listings found on Additional Hazard Lists

SUBSTANCE NOTES:

Section 3: Certifications and Compliance

This section lists applicable certification and standards compliance information for VOC emissions and VOC content. Other types of health or environmental performance testing or certifications completed for the product may be provided.

VOC EMISSIONS

ASTM D6886-14e1

CERTIFYING PARTY: Self-declared

ISSUE DATE: 2020-09-08 00:00:00

CERTIFIER OR LAB: None

APPLICABLE FACILITIES: All

EXPIRY DATE:

CERTIFICATE URL:

CERTIFICATION AND COMPLIANCE NOTES:

VOC CONTENT

SCAQMD Rule 1113 Architectural Coatings - Flats, floor coatings, non flat coatings, quick dry enamels, roof coatings only - 2007 amendments

CERTIFYING PARTY: Self-declared

ISSUE DATE: 2023-04-26 00:00:00

CERTIFIER OR LAB: None

APPLICABLE FACILITIES: All

EXPIRY DATE:

CERTIFICATE URL:

CERTIFICATION AND COMPLIANCE NOTES:

VOC CONTENT

MPI Green Performance GPS-1-12

CERTIFYING PARTY: Third Party

ISSUE DATE: 2013-01-01 00:00:00

CERTIFIER OR LAB: Master

APPLICABLE FACILITIES: All

EXPIRY DATE:

Painters Institute

CERTIFICATE URL:

http://www.specifypaint.com/APL/paintinfo_APL_new/search.asp?txtSearch=behr&btnSearch2=

CERTIFICATION AND COMPLIANCE NOTES: The MPI Green Performance® Standard (GPS-1-12) requires that the manufacturer demonstrate that VOC concentrations of the product shall not exceed those listed below as determined by U. S. Environmental Protection Agency (EPA) Reference Test Method 24 (Determination of Volatile Matter Content, Water Content, Density Volume Solids, and Weight Solids of Surface Coatings), Code of Federal Regulations Title 40, Part 60, Appendix A.

VOC CONTENT

MPI Green Performance GPS-2-12

CERTIFYING PARTY: Third Party

ISSUE DATE: 2013-01-01 00:00:00

CERTIFIER OR LAB: Master

APPLICABLE FACILITIES: All

EXPIRY DATE:

Painters Institute

CERTIFICATE URL:

http://www.specifypaint.com/APL/paintinfo_APL_new/search.asp?txtSearch=behr&btnSearch2=

CERTIFICATION AND COMPLIANCE NOTES: MPI Green Performance® Standard (GPS-2-12) provides for a maximum allowable limit of 50 g/L of VOCs. VOCs shall be listed as g/L (grams/liter). The calculation of VOC shall exclude water and tinting color added at the point of sale.

Section 4: Accessories

This section lists related products or materials that the manufacturer requires or recommends for installation (such as adhesives or fasteners), maintenance, cleaning, or operations. For information relating to the contents of these related products, refer to their applicable Health Product Declarations, if available.

COLORANT

MANUFACTURER (OR GENERIC): Behr Process LLC

HPD URL: No HPD Available

ACCESSORY TYPE: Colorant System

CONDITION WHEN RECOMMENDED OR REQUIRED AND/OR OTHER NOTES: Behr uses colorants that contain low VOC content (compliant with SCAQMD Rule 1113) and formaldehyde free. Colorants added to this base paint do not significantly increase VOC levels even if used at maximum tint load in any color.

The chemical assessments contained in this Health Product Declaration form has been generated by the Health Product Declaration tool(s) and may differ from the information contained in Behr's Safety Data Sheet ("SDS") for this product. Prior to using this product, users should review Behr's SDS and follow all instructions on the SDS and product label provided by Behr.

MANUFACTURER INFORMATION

MANUFACTURER: **Behr Paint Company**
 ADDRESS: **1801 E Saint Andrew Place**
Santa Ana, California 92705
 COUNTRY: **United States**

WEBSITE: **www.behr.com**
 CONTACT NAME: **Anna Wang**
 TITLE: **Environmental Specialist**
 PHONE: **1(714) 545-7101**
 EMAIL: **anwang@behr.com**

The listed contact is responsible for the validity of this HPD and attests that it is accurate and complete to the best of his or her knowledge.

KEY

Hazard Types

AQU Aquatic toxicity	LAN Land toxicity	PHY Physical hazard (flammable or reactive)
CAN Cancer	MAM Mammalian/systemic/organ toxicity	REP Reproductive
DEV Developmental toxicity	MUL Multiple	RES Respiratory sensitization
END Endocrine activity	NEU Neurotoxicity	SKI Skin sensitization/irritation/corrosivity
EYE Eye irritation/corrosivity	NF Not found on Priority Hazard Lists	UNK Unknown
GEN Gene mutation	OZO Ozone depletion	
GLO Global warming	PBT Persistent, bioaccumulative, and toxic	

GreenScreen (GS)

BM-4 Benchmark 4 (prefer-safer chemical)	LT-P1 List Translator Possible 1 (Possible Benchmark-1)
BM-3 Benchmark 3 (use but still opportunity for improvement)	LT-1 List Translator 1 (Likely Benchmark-1)
BM-2 Benchmark 2 (use but search for safer substitutes)	LT-UNK List Translator Benchmark Unknown
BM-1 Benchmark 1 (avoid - chemical of high concern)	NoGS No GreenScreen.
BM-U Benchmark Unspecified (due to insufficient data)	

GreenScreen Benchmark scores sometimes also carry subscripts, which provide more context for how the score was determined. These are DG (data gap), TP (transformation product), and CoHC (chemical of high concern). For more information, see 2.2.2.4 GreenScreen® for Safer Chemicals, www.greenscreenchemicals.org, and Best Practices for Hazard Screening on the HPDC website (hpd-collaborative.org).

Recycled Types

PreC Pre-consumer recycled content
PostC Post-consumer recycled content
UNK Inclusion of recycled content is unknown
None Does not include recycled content

Other Terms:

GHS SDS Globally Harmonized System of Classification and Labeling of Chemicals Safety Data Sheet

Inventory Methods:

Nested Method / Material Threshold Substances listed within each material per threshold indicated per material
Nested Method / Product Threshold Substances listed within each material per threshold indicated per product
Basic Method / Product Threshold Substances listed individually per threshold indicated per product

Nano Composed of nano scale particles or nanotechnology
Third Party Verified Verification by independent certifier approved by HPDC
Preparer Third party preparer, if not self-prepared by manufacturer
Applicable facilities Manufacturing sites to which testing applies

The Health Product Declaration (HPD) Open Standard provides for the disclosure of product contents and potential associated human and environmental health hazards. Hazard associations are based on the HPD Priority Hazard Lists, the GreenScreen List Translator™, and when available, full GreenScreen® assessments. The HPD Open Standard v2.1 is not:

- a method for the assessment of exposure or risk associated with product handling or use,
- a method for assessing potential health impacts of: (i) substances used or created during the manufacturing process or (ii) substances created after the product is delivered for end use.

Information about life cycle, exposure and/or risk assessments performed on the product may be reported by the manufacturer in appropriate Notes sections, and/or, where applicable, in the Certifications section.

The HPD Open Standard was created and is supported by the Health Product Declaration Collaborative (the HPD Collaborative), a customer-led organization composed of stakeholders throughout the building industry that is committed to the continuous improvement of building products through transparency, openness, and innovation throughout the product supply chain.

The product manufacturer and any applicable independent verifier are solely responsible for the accuracy of statements and claims made in this HPD and

