

CLASSIFICATION: 09 67 23

created via: HPDC Online Builder

PRODUCT DESCRIPTION: A fast-curing, two-part, polyaspartic aliphatic polyurea sealer/finish coating for both decorative and protective applications. As an industrial maintenance coating, this material is self-priming and may be applied in single or multiple coats by brush, roller, broom, squeegee, or in varying thicknesses to a variety of substrates including concrete and metal.

Section 1: Summary

Basic Method / Product Threshold

CONTENT INVENTORY

Inventory Reporting Format

- Nested Materials Method
 Basic Method

Threshold Disclosed Per

- Material
 Product

Threshold level

- 100 ppm
 1,000 ppm
 Per GHS SDS
 Per OSHA MSDS
 Other

Residuals/Impurities

- Considered
 Partially Considered
 Not Considered

Explanation(s) provided for Residuals/Impurities?
 Yes No

Are All Substances Above the Threshold Indicated:

- Characterized** Yes No
Percent Weight and Role Provided?
Screened Yes No
Using Priority Hazard Lists with Results Disclosed?
Identified Yes No
Name and Identifier Provided?

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®. The HPD does not assess whether using or handling this product will expose individuals to its chemical substances or any health risk. Refer to Section 2 for further details.

Number of Greenscreen BM-4/BM3 contents..... 0
Contents highest concern GreenScreen Benchmark or List translator Score..... BM-1
Nanomaterial..... No

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

SPARTACOTE® FLEX SB™ [TETRAETHYL N,N'-(METHYLENEDICYCLOHEXANE-4,1-DIYL)BIS-DL-ASPARTATE **LT-UNK** | SKI | AQU HEXAMETHYLENE DIISOCYANATE HOMOPOLYMER (HDI HOMOPOLYMER) **LT-P1** AROMATIC NAPHTHA, TYPE 1 **LT-1** | CAN | GEN | MAM | MUL | END COCONUT OIL **NoGS** POLY(OXY-1,2-ETHANEDIYL), .ALPHA.-[3-[3-(2H-BENZOTRIAZOL-2-YL)-5-(1,1-DIMETHYLETHYL)-4-HYDROXYPHENYL]-1-OXOPROPYL]. OMEGA.-[3-[3-(2H-BENZOTRIAZOL-2-YL)-5-(1,1-DIMETHYLETHYL)-4-HYDROXYPHENYL]-1-OXOPROPOXY)-**UNK** | SKI | AQU D-LIMONENE **LT-1** | SKI | AQU | PBT | MUL 1,6-HEXAMETHYLENE DIISOCYANATE **LT-UNK** | MAM | EYE | SKI | RES 2-BUTENEDIOIC ACID (E)-, DIETHYL ESTER **LT-UNK** POLY(OXY-1,2-ETHANEDIYL), .ALPHA.-[3-[3-(2H-BENZOTRIAZOL-2-YL)-5-(1,1-DIMETHYLETHYL)-4-HYDROXYPHENYL]-1-OXOPROPYL]. OMEGA.-HYDROXY-**UNK** | SKI | AQU DECANEDIOIC ACID, BIS(1,2,2,6,6-PENTAMETHYL-4-PIPERIDINYL) ESTER; **LT-P1** | PBT | MUL UNDISCLOSED **NoGS** UNDISCLOSED **LT-UNK** UNDISCLOSED **LT-1** | CAN | GEN | MAM | MUL UNDISCLOSED **LT-P1** | MUL UNDISCLOSED **LT-UNK** OCTAMETHYLCYCLOTETRASIOXANE (D4) **BM-1** | REP | END | PBT | MUL]

INVENTORY AND SCREENING NOTES:

This HPD was Created with Basic Inventory.

VOLATILE ORGANIC COMPOUND (VOC) CONTENT

Material (g/l): 127 Regulatory (g/l): N/A
Does the product contain exempt VOCs: No
Are ultra-low VOC tints available: N/A

CERTIFICATIONS AND COMPLIANCE See Section 3 for additional listings.

VOC content: TDS 251 "Low VOC LATICRETE® Products"

CONSISTENCY WITH OTHER PROGRAMS

Pre-checked for LEED v4 Material Ingredients, Option 1

Third Party Verified?

- Yes
 No

PREPARER: Self-Prepared
VERIFIER:
VERIFICATION #:

SCREENING DATE: 2017-11-28
PUBLISHED DATE: 2017-11-28
EXPIRY DATE: 2020-11-28

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 2.1, available on the HPDC website at: www.hpd-collaborative.org/hpd-2-1-standard

SPARTACOTE® FLEX SB™

PRODUCT THRESHOLD: 100 ppm

RESIDUALS AND IMPURITIES CONSIDERED: Yes

RESIDUALS AND IMPURITIES NOTES: Residuals and impurities are measured by quantitative methods and are only displayed when they are potentially greater than 100 ppm.

OTHER PRODUCT NOTES: See SDS at www.laticrete.com for occupational exposure information.

TETRAETHYL N,N'-(METHYLENEDICYCLOHEXANE-4,1-DIYL)BIS-DL-ASPARTATE

ID: 136210-30-5

#: 30.0000 - 38.0000 GS: LT-UNK RC: None NANO: No ROLE: Resin

HAZARDS:

AGENCY(IES) WITH WARNINGS:

SKIN SENSITIZE EU - R-phrases R43 - May cause sensitization by skin contact

ACUTE AQUATIC EU - R-phrases R52 - Harmful to Aquatic Organisms

SKIN SENSITIZE EU - GHS (H-Statements) H317 - May cause an allergic skin reaction

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

HEXAMETHYLENE DIISOCYANATE HOMOPOLYMER (HDI HOMOPOLYMER)

ID: 28182-81-2

#: 30.0000 - 38.0000 GS: LT-P1 RC: None NANO: No ROLE: Activator

HAZARDS:

AGENCY(IES) WITH WARNINGS:

None Found No warnings found on HPD Priority lists

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

AROMATIC NAPHTHA, TYPE 1

ID: 64742-95-6

#: 25.0000 - 35.0000 GS: LT-1 RC: None NANO: No ROLE: Solvent

HAZARDS:

AGENCY(IES) WITH WARNINGS:

CANCER EU - R-phrases R45 - May cause cancer

GENE MUTATION EU - R-phrases R46 - May cause heritable genetic damage

MAMMALIAN	EU - GHS (H-Statements)	H304 - May be fatal if swallowed and enters airways
GENE MUTATION	EU - GHS (H-Statements)	H340 - May cause genetic defects
CANCER	EU - GHS (H-Statements)	H350 - May cause cancer
CANCER	EU - REACH Annex XVII CMRs	Carcinogen Category 2 - Substances which should be regarded as if they are Carcinogenic to man
GENE MUTATION	EU - REACH Annex XVII CMRs	Mutagen Category 2 - Substances which should be regarded as if they are Mutagenic to man
MULTIPLE	ChemSec - SIN List	CMR - Carcinogen, Mutagen &/or Reproductive Toxicant
CANCER	EU - Annex VI CMRs	Carcinogen Category 1B - Presumed Carcinogen based on animal evidence
GENE MUTATION	EU - Annex VI CMRs	Mutagen - Category 1B
ENDOCRINE	TEDX - Potential Endocrine Disruptors	Potential Endocrine Disruptor
MULTIPLE	German FEA - Substances Hazardous to Waters	Class 3 - Severe Hazard to Waters
GENE MUTATION	Australia - GHS	H340 - May cause genetic defects
CANCER	Australia - GHS	H350 - May cause cancer

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

COCONUT OIL

ID: 8001-31-8

#: **1.0000 - 3.0000** GS: **NoGS** RC: **None** NANO: **No** ROLE: **Workability Adjuster**

HAZARDS: AGENCY(IES) WITH WARNINGS:

None Found No warnings found on HPD Priority lists

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

POLY(OXY-1,2-ETHANEDIYL), .ALPHA.-[3-[3-(2H-BENZOTRIAZOL-2-YL)-5-(1,1-DIMETHYLETHYL)-4-HYDROXYPHENYL]-1-OXOPROPYL]. OMEGA.-[3-[3-(2H-BENZOTRIAZOL-2-YL)-5-(1,1-DIMETHYLETHYL)-4-HYDROXYPHENYL]-1-OXOPROPOXY)-

ID: 104810-47-1

#: **0.6000 - 3.5000** GS: **UNK** RC: **None** NANO: **No** ROLE: **UV Stabilizer**

HAZARDS: AGENCY(IES) WITH WARNINGS:

SKIN SENSITIZE EU - GHS (H-Statements) H317 - May cause an allergic skin reaction

CHRON AQUATIC EU - GHS (H-Statements) H411 - Toxic to aquatic life with long lasting effects

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture. This product is shown as undisclosed to preserve integrity of formula and maintain competitive advantage. The component CAS# was used to identify associated hazards.

D-LIMONENE

ID: 5989-27-5

%: **0.5000 - 2.0000**

GS: **LT-1**

RC: **None**

NANO: **No**

ROLE: **Fragrance**

HAZARDS:	AGENCY(IES) WITH WARNINGS:	
SKIN IRRITATION	EU - R-phrases	R38 - Irritating to skin
SKIN SENSITIZE	EU - R-phrases	R43 - May cause sensitization by skin contact
ACUTE AQUATIC	EU - R-phrases	R50 - Very Toxic to Aquatic Organisms
PBT	OSPAR - Priority PBTs & EDs & equivalent concern	PBT - Substance of Possible Concern
ACUTE AQUATIC	EU - GHS (H-Statements)	H400 - Very toxic to aquatic life
CHRON AQUATIC	EU - GHS (H-Statements)	H410 - Very toxic to aquatic life with long lasting effects
SKIN IRRITATION	EU - GHS (H-Statements)	H315 - Causes skin irritation
SKIN SENSITIZE	EU - GHS (H-Statements)	H317 - May cause an allergic skin reaction
MULTIPLE	German FEA - Substances Hazardous to Waters	Class 3 - Severe Hazard to Waters
SKIN SENSITIZE	MAK	Sensitizing Substance Sh - Danger of skin sensitization

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

1,6-HEXAMETHYLENE DIISOCYANATE

ID: **822-06-0**

%: **0.5000 - 0.8000**

GS: **LT-UNK**

RC: **None**

NANO: **No**

ROLE: **Activator**

HAZARDS:	AGENCY(IES) WITH WARNINGS:	
MAMMALIAN	EU - R-phrases	R23 - Toxic by Inhalation (gas, vapour, dust/mist)
EYE IRRITATION	EU - R-phrases	R36 - Irritating to eyes
SKIN IRRITATION	EU - R-phrases	R38 - Irritating to skin
RESPIRATORY	EU - R-phrases	R42 - May cause sensitization by inhalation
SKIN SENSITIZE	EU - R-phrases	R43 - May cause sensitization by skin contact
RESPIRATORY	AOEC - Asthmagens	Asthmagen (G) - generally accepted
SKIN IRRITATION	EU - GHS (H-Statements)	H315 - Causes skin irritation
SKIN SENSITIZE	EU - GHS (H-Statements)	H317 - May cause an allergic skin reaction
EYE IRRITATION	EU - GHS (H-Statements)	H319 - Causes serious eye irritation
MAMMALIAN	EU - GHS (H-Statements)	H331 - Toxic if inhaled
RESPIRATORY	EU - GHS (H-Statements)	H334 - May cause allergy or asthma symptoms or breathing difficulties if inhaled
RESPIRATORY	MAK	Sensitizing Substance Sah - Danger of airway & skin sensitization

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

2-BUTENEDIOIC ACID (E)-, DIETHYL ESTER

ID: 623-91-6

%: 0.3000 - 2.0000	GS: LT-UNK	RC: None	NANO: No	ROLE: Resin
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HAZARDS:	AGENCY(IES) WITH WARNINGS:
None Found	No warnings found on HPD Priority lists

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

POLY(OXY-1 ,2-ETHANEDIYL), .ALPHA.-[3-[3-(2H-BENZOTRIAZOL-2- YL)-5- (1, 1-D IMETHYLETHYL)-4-HYDROXYPHENYL]-1-OXOPROPYL]. OMEGA. -HYDROXY-

ID: 104810-48-2

%: 0.2000 - 0.6000	GS: UNK	RC: None	NANO: No	ROLE: UV Stabilizer
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HAZARDS:	AGENCY(IES) WITH WARNINGS:
SKIN SENSITIZE	EU - GHS (H-Statements) H317 - May cause an allergic skin reaction
CHRON AQUATIC	EU - GHS (H-Statements) H411 - Toxic to aquatic life with long lasting effects

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture. This product is shown as undisclosed to preserve integrity of formula and maintain competitive advantage. The component CAS# was used to identify associated hazards.

DECANEDIOIC ACID, BIS(1,2,2,6,6-PENTAMETHYL-4-PIPERIDINYL) ESTER;

ID: 41556-26-7

%: 0.1000 - 0.3000	GS: LT-P1	RC: None	NANO: No	ROLE: UV Stabilizer
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HAZARDS:	AGENCY(IES) WITH WARNINGS:
PBT	EC - CEPA DSL Persistent, Bioaccumulative and inherently Toxic (PBiTE) to the Environment (based on aquatic organisms)
MULTIPLE	German FEA - Substances Hazardous to Waters Class 2 - Hazard to Waters

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

UNDISCLOSED

%: 0.1000 - 0.2500	GS: NoGS	RC: None	NANO: No	ROLE: Defoamer
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HAZARDS:	AGENCY(IES) WITH WARNINGS:
None Found	No warnings found on HPD Priority lists

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture. This product is shown as undisclosed to preserve integrity of formula and maintain competitive advantage. The component CAS# was used to identify associated hazards.

UNDISCLOSED

%: **0.0500 - 0.1500**

GS: **LT-UNK**

RC: **None**

NANO: **No**

ROLE: **Wetting Agent**

HAZARDS:

AGENCY(IES) WITH WARNINGS:

None Found

No warnings found on HPD Priority lists

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture. This product is shown as undisclosed to preserve integrity of formula and maintain competitive advantage. The component CAS# was used to identify associated hazards.

UNDISCLOSED

%: **0.0500 - 0.1500**

GS: **LT-1**

RC: **None**

NANO: **No**

ROLE: **Solvent**

HAZARDS:

AGENCY(IES) WITH WARNINGS:

CANCER	EU - R-phrases	R45 - May cause cancer
GENE MUTATION	EU - R-phrases	R46 - May cause heritable genetic damage
MAMMALIAN	EU - GHS (H-Statements)	H304 - May be fatal if swallowed and enters airways
GENE MUTATION	EU - GHS (H-Statements)	H340 - May cause genetic defects
CANCER	EU - GHS (H-Statements)	H350 - May cause cancer
ORGAN TOXICANT	EU - GHS (H-Statements)	H372 - Causes damage to organs through prolonged or repeated exposure
CANCER	EU - REACH Annex XVII CMRs	Carcinogen Category 2 - Substances which should be regarded as if they are Carcinogenic to man
GENE MUTATION	EU - REACH Annex XVII CMRs	Mutagen Category 2 - Substances which should be regarded as if they are Mutagenic to man
MULTIPLE	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters
CANCER	EU - Annex VI CMRs	Carcinogen Category 1B - Presumed Carcinogen based on animal evidence
GENE MUTATION	EU - Annex VI CMRs	Mutagen - Category 1B
GENE MUTATION	Malaysia - GHS	H340 - May cause genetic defects
CANCER	Malaysia - GHS	H350 - May cause cancer
GENE MUTATION	Australia - GHS	H340 - May cause genetic defects
CANCER	Australia - GHS	H350 - May cause cancer

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture. This product is shown as undisclosed to preserve integrity of formula and maintain competitive advantage. The component CAS# was used to identify associated hazards.

UNDISCLOSED

%: **0.0300 - 0.1000**

GS: **LT-P1**

RC: **None**

NANO: **No**

ROLE: **UV Stabilizer**

HAZARDS:

AGENCY(IES) WITH WARNINGS:

MULTIPLE	German FEA - Substances Hazardous to Waters	Class 2 - Hazard to Waters
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SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture. This product is shown as undisclosed to preserve integrity of formula and maintain competitive advantage. The component CAS# was used to identify associated hazards.

UNDISCLOSED

#: **0.0100 - 0.0200** GS: **LT-UNK** RC: **None** NANO: **No** ROLE: **Defoamer**

HAZARDS:	AGENCY(IES) WITH WARNINGS:
None Found	No warnings found on HPD Priority lists

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture. This product is shown as undisclosed to preserve integrity of formula and maintain competitive advantage. The component CAS# was used to identify associated hazards.

OCTAMETHYLCYCLOTETRAILOXANE (D4)

ID: **556-67-2**

#: **0.0100 - 0.0200** GS: **BM-1** RC: **None** NANO: **No** ROLE: **Wetting Agent**

HAZARDS:	AGENCY(IES) WITH WARNINGS:
REPRODUCTIVE	EU - R-phrases R62 - Possible risk of impaired fertility
ENDOCRINE	EU - Priority Endocrine Disrupters Category 1 - In vivo evidence of Endocrine Disruption Activity
PBT	EU - ESIS PBT Under PBT evaluation
PBT	OR DEQ - Priority Persistent Pollutants Priority Persistent Pollutant - Tier 1
PBT	EC - CEPA DSL Persistent, Bioaccumulative and inherently Toxic (PBiTE) to the Environment (based on aquatic organisms)
PBT	EC - CEPA DSL Persistent, Bioaccumulative and inherently Toxic (PBiTH) to humans
RESTRICTED LIST	US EPA - PPT Chemical Action Plans TSCA Work Plan chemical - Action Plan in development
REPRODUCTIVE	EU - GHS (H-Statements) H361f - Suspected of damaging fertility
MULTIPLE	ChemSec - SIN List CMR - Carcinogen, Mutagen &/or Reproductive Toxicant
ENDOCRINE	ChemSec - SIN List Endocrine Disruption
ENDOCRINE	TEDX - Potential Endocrine Disruptors Potential Endocrine Disruptor
MULTIPLE	German FEA - Substances Hazardous to Waters Class 3 - Severe Hazard to Waters
RESTRICTED LIST	US EPA - PPT Chemical Action Plans TSCA Work Plan chemical - ongoing chemical (risk) assessment

SUBSTANCE NOTES: The amount of this component may vary based on the plant of manufacture.

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 CONTENT

TDS 251 "Low VOC LATICRETE® Products"

CERTIFYING PARTY: Self-declared
ISSUE DATE: 2016-07-07
EXPIRY DATE:
CERTIFIER OR LAB: LATICRETE
APPLICABLE FACILITIES: Applies to all facilities.
CERTIFICATE URL:
<https://www.laticrete.com/~media/support-and-downloads/technical-datasheets/tds251.ashx?la=en>
CERTIFICATION AND COMPLIANCE NOTES: Meets LEED v4 Credit "Low Emitting Materials" Emissions and Content Requirements.

+ 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.

No accessories are required for this product.

📖 Section 5: General Notes

SPARTACOTE® FLEX SB™ does not meet Living Building Challenge requirements because it does contain a component which is found on the Red Listed Materials or Chemicals. Specifically, SPARTACOTE FLEX SB contains Octamethylcyclotetrasiloxane (D4) as stated in Section 2 of this HPD.

👁️ Section 6: References

MANUFACTURER INFORMATION

MANUFACTURER: **LATICRETE International**
ADDRESS: **1 Laticrete Park North**
Bethany CT 06524, USA
WEBSITE: **www.laticrete.com**

CONTACT NAME: **Mitch Hawkins**
TITLE: **Technical Services Manager**
PHONE: **203-393-4619**
EMAIL: **wmhawkins@laticrete.com**

KEY

OSHA MSDS Occupational Safety and Health Administration Material Safety Data Sheet
GHS SDS Globally Harmonized System of Classification and Labeling of Chemicals Safety Data Sheet

Hazard Types

AQU Aquatic toxicity

CAN Cancer

DEV Developmental toxicity

END Endocrine activity

EYE Eye irritation/corrosivity

GEN Gene mutation

GLO Global warming

MAM Mammalian/systemic/organ toxicity

MUL Multiple hazards

NEU Neurotoxicity

OZO Ozone depletion

PBT Persistent Bioaccumulative Toxic

PHY Physical Hazard (reactive)

REP Reproductive toxicity

RES Respiratory sensitization

SKI Skin sensitization/irritation/corrosivity

LAN Land Toxicity

NF Not found on Priority Hazard Lists

GreenScreen (GS)

BM-4 Benchmark 4 (prefer-safer chemical)

BM-3 Benchmark 3 (use but still opportunity for improvement)

BM-2 Benchmark 2 (use but search for safer substitutes)

BM-1 Benchmark 1 (avoid - chemical of high concern)

BM-U Benchmark Unspecified (insufficient data to benchmark)

LT-P1 List Translator Possible Benchmark 1

LT-1 List Translator Likely Benchmark 1

LT-UNK List Translator Benchmark Unknown (insufficient information from List Translator lists to benchmark)

NoGS Unknown (no data on List Translator Lists)

Recycled Types

PreC Preconsumer (Post-Industrial)

PostC Postconsumer

Both Both Preconsumer and Postconsumer

Unk Inclusion of recycled content is unknown

None Does not include recycled content

Other Terms

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 for compliance with the HPD standard noted.