

# 1.2 Checklist

## Identify if you use Chemicals of Concern (CoCs) in toys or toy parts

This document is part of the *International Chemicals Management Toolkit for the Toy Supply Chain* developed by the United Nations Environment Programme (UNEP) in collaboration with the Baltic Environmental Forum (BEF) within the framework of the Global Environment Facility (GEF) project ID: 9771 on Global Best Practices on Emerging Chemical Policy Issues of Concern under the Strategic Approach to International Chemicals Management (SAICM).

The aim of this checklist is to support the identification of chemicals of concern in manufacturing processes and guide on the need for taking action [# Section 5 landing page](#) to address chemicals of concern in toys. The checklist consists of a set of targeted questions and help to answer them.

### Identify your role

The information you have access to depends on your role in the supply chain of toys. If you are unsure about your role, please use the following table to find out.

Please identify your role in the production process
Do you manufacture, formulate or compound plastic raw materials / pellets for manufacturing? If yes --> your role is " <b>Manufacturer of polymers</b> " If no --> proceed to the next question
Are you making plastic toys or toy parts from plastic pellets, e.g. by extrusion or injection moulding? If yes --> your role is " <b>Toy manufacturer</b> " If no --> proceed to the next question
Are you buying individual parts and assembling toys from these parts? If yes --> your role is " <b>Assembler of toys</b> " If no --> proceed to the first question

**Note:** you may have more than one role in the toys supply chain, e.g. you make plastic toy parts (toy manufacturer) and assemble them (assembler of toys). In this case, choose the first role in the table as it is most important.

### Assemblers of toys

If your main role is “**Assembler of toys**” [ask your suppliers](#) directly if there are CoCs in the toy parts they sell to you. If you apply chemicals, such as glues or lacquers in the assembly of toys, please use the below checklist for these chemicals, in addition.


There can be different reasons why you could check if chemicals are of concern, for example:

- You want to assess if you use CoCs in general and want to screen chemicals you use and which are documented in your chemicals inventory
- A customer asks you if the products you sell to them contain CoCs. In this case you would assess all input materials to that [product](#) and inform your customer of the [results](#)
- You want to use a new chemical for your production and want to ensure it is not a chemical of concern

**In any of these cases, the checklists help you to find out if a chemical is of concern.**

## Checklist

### Basic compliance or baseline management (steps 1-3)

Step 1. Chemical's identity		
As a first step, identify <b>the correct name and CAS number</b> of the chemical in question. This is the basis for any further steps. In case you have <a href="#">a chemicals inventory set up</a> , you can use the name and CAS number from there.		
Do you know the chemicals name and CAS number	• yes	• no
If you respond “no” to this question:		
<ul style="list-style-type: none"> <li>➤ you can find the chemical's name and/or CAS number in the technical documentation of your supplier, e.g. his catalogue, documents of supply, technical data sheet or safety data sheet</li> <li>➤ For further guidance on how to identify the chemicals in your products, <a href="#">consult</a></li> </ul>		
If you respond “yes” but only have the chemical's name:		
<ul style="list-style-type: none"> <li>➤ you may enter the chemical's name into different databases, for example the <a href="#">eCHEM portal by OECD</a> or the European Chemicals Agency's <a href="#">database or registered substances</a>, to retrieve the CAS number</li> </ul>		
If you only have the CAS number, you can find the name of your chemical by searching the same databases		
		
Step 2. Check if your chemical is regulated at international level, i.e. included in any international conventions		
Compare the substance name and/or CAS numbers of the chemicals you are assessing with those listed in the following Conventions and Protocols:		
<ul style="list-style-type: none"> <li>✓ Stockholm Convention, <a href="#">POPs in the Stockholm Convention</a></li> </ul>		

- ✓ Montreal Protocol, [The Montreal Protocol on Substances that Deplete the Ozone Layer](#)
- ✓ Minamata Convention, [Minamata Convention on Mercury](#)
- ✓ Rotterdam Convention, [Annex III Chemicals](#)

→ all substances listed in at least one of the Conventions are CoCs and therefore are of highest priority for [taking action](#) and ensuring legal compliance. For all other substances, proceed to step 3



### Step 3. Check if your chemical is regulated under national legislation where your product is placed on the market

Specific legislation may exist on chemicals in toys in the country where you place your products (e.g. polymers for toy manufacture, toy parts and assembled toys) on the market, such as the country where your company is located at or countries, to which the products are exported.

Use the [guidance](#) and [link list](#) in the section on legislation to identify any applicable requirements.

Does the legislation where you place your products on the market contain requirements on any of the chemicals in your products	• yes	• no
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→ all substances for which requirements exist in legislation where your products are placed on the market are CoCs. [Taking any action](#) required to ensure legal compliance should be of highest priority

## Checklist

### Increasing ambition and going beyond regulation (steps 4-6)

#### Step 4. Safety net – legislation in toy importing countries that are not your target markets

Regulatory requirements for chemicals in toys are different across the world. If you have identified the regulatory requirements relevant to your target markets in step 3, you can also check regulations in other countries that are not your target markets to make sure that you also cover chemicals for which other countries may have identified concern. This step may be particularly relevant if you consider expanding your markets. If you did not already do so in step 3, you can for example check the regulations (e.g. bans of certain chemicals or restriction to certain limit values) for the following countries:

- ✓ USA: [Toy Safety Business Guidance & Small Entity Compliance Guide](#)
- ✓ Canada: [Industry Guide to Health Canada's Safety Requirements for Children's Toys and Related Products](#)
- ✓ Japan: [Toy Safety Standards](#)
- ✓ EU: [Toy Safety in the EU](#)
- ✓ South America: [Brazil Toy Certification](#)

✓ Arabia: <a href="#">GSO Technical Regulation on Toys</a> ✓ Australia/NZL: <a href="#">Safety of Toys</a> Further information provided in the guidance on legislation		
Is your chemical regulated in any of the above listed (or any other) countries?	• yes	• no
<p><b>→ if the chemicals you use are regulated in these countries, they have been identified as of concern by at least one authority and you should consider prioritising them for taking action. This can also help lowering regulatory business risks of potential future markets for your products.</b></p>		



Step 5: Indication of concern via the GHS classification of chemicals		
<p>Chemicals with hazardous properties may cause harm to human health or the environment and may therefore be 'of concern' and could therefore be regulated in the future. The type of hazard may indicate potential priorities for future regulation because the more severe a chemical hazard is, the more likely it is of high priority for the regulators.</p> <p>In order to identify indications of a potential future regulation of chemicals you use in toy materials, toy parts and/toys, check the GHS classification of your chemical.</p> <p>You can find the classification of chemicals according to name or CAS number from different databases (for example from the <a href="#">eCHEM portal</a>, which includes links to the European <a href="#">classification and labelling inventory</a>), or from your supplier's information.</p> <p>In the best case, you have already included the classification of the chemicals in your input material and products in your <a href="#">chemicals inventory</a> and you can quickly sort or screen that information to answer the following questions per chemical:</p>		
Is the chemical classified as:		
Carcinogenic	• yes	• no
Mutagenic	• yes	• no
Toxic to reproduction	• yes	• no
Respiratory or skin sensitizer	• yes	• no
Specific target organ toxicity after repeated exposure	• yes	• no
Chronically toxic to the aquatic environment	• yes	• no
<p><b>→ all substances for which you identify any of the above hazards, can be considered as a priority for <a href="#">taking action</a>, as they may <a href="#">be of concern</a> and could be subject to regulation in the future.</b></p> <p><b>→ chemicals for which none of the above classifications apply are most likely not of concern. However, you may continue screening for additional properties</b></p>		



**Step 6. Persistent, bioaccumulative and toxic chemicals and endocrine disrupting chemicals (EDCs)**

In some countries and regions, additional chemicals are considered as of concern, such as those that are persistent, can accumulate in the environment and are toxic (PBT) or chemicals that are very persistent and very accumulative (vPvB). The [EU list of PBTs/vPvBs](#) is accessible online and you can search it by CAS number and substance name.

Some governments and other initiatives have also identified chemicals that are identified, or are suspected to have endocrine disrupting properties (EDCs). A compilation of such chemicals can be found in a report by the UN, cf. tables 5 and 6 on pages 25-28 (UNEP 2017).

Is your chemical identified as PBT/vPvB or (potential) EDC?

• yes

• no

**→ all substances which are identified as PBT/vPvB or (potential) EDC can be considered for taking action due being considered of concern in certain countries and potentially being regulated in the future.**



If your chemical is currently not a CoC according to the checklist, this may still change in the future, as new legislation is passed, new information is generated and new evidence for concern may emerge. Therefore, it is recommended to regularly check the chemicals inventory for chemicals of concern.

**References:**

United Nations Environment Programme (2017). *Overview Report I: Worldwide initiatives to identify endocrine disrupting chemicals (EDCs) and potential EDCs*.

[https://wedocs.unep.org/bitstream/handle/20.500.11822/25633/EDC\\_report1.pdf?sequence=1&isAllowed=y](https://wedocs.unep.org/bitstream/handle/20.500.11822/25633/EDC_report1.pdf?sequence=1&isAllowed=y). Accessed 14 December 2021.