

3.1 Guidance

Getting information on input materials from suppliers

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).

This guidance supports you in getting information about chemicals in your raw materials, which you use to make your products. It is useful for formulators of chemicals, such as polymer compounds, producers of (plastic) toys and toy parts from polymers and other materials as well as companies that assemble toys from different parts.

Choosing input materials

If you select new input materials, compare various options regarding their technical and chemical performance as well as other relevant parameters. Request the technical and safety documentation (indicating the content of chemicals with GHS hazard statements) with any offer or product sample. This gives you the opportunity to check if the product is suitable for the manufacture and helps to avoid non-compliance with legislation. In addition, checking chemical information in advance may help to choose the safest materials and avoid hazardous substances (such as carcinogenic chemicals) in the incoming products in order to protect human health and the environment. If your suppliers are not able to provide such information, this should be a reason not to purchase their products. It is generally advisable to purchase input materials from trusted suppliers and avoid intermediary agents that buy and sell products but frequently pay little attention to chemical safety.

Information that should be provided by suppliers

Chemical products

If you use chemical products, such as glues, lacquers or polymer compounds, you want to know as a minimum if they contain any CoCs to assess if using them in your products might cause non-compliance with legislation or contradict your company ambition or policy regarding the use of chemicals. This means that you should receive information on chemical constituents that have hazardous properties (and possibly their concentration level) in the chemical products.

In general, chemical products should be accompanied by documents that identify all potential chemicals of concern contained in the product in significant concentrations (e.g. as specified in the GHS).

This documentation should be a Safety Data Sheet (SDS) in all countries that implemented the GHS. Hence, if the country where your production is located has implemented the GHS, you are entitled to ask for an SDS and your supplier must provide it to you if the chemical product is classified according to the GHS. If the chemical product is not classified according to the GHS, there should be no relevant concentrations of chemicals of concern in the product and you can take this as a 'confirmation of the absence of CoCs'. If the chemical product is classified according to the GHS, it should not only be accompanied by an SDS but should also have a GHS conforming label including information on the content of chemicals which have hazardous properties and safety advice.

If the country you are located in has not (yet) implemented the GHS, you might receive other information from your supplier. As a minimum, the chemical product should have a label with the product name on it and possibly information on the main constituents (with their CAS numbers). In addition, you may receive a technical data sheet with information on how to use the product and, potentially also some information on the composition. You can also check if your supplier can provide an SDS if they export their chemical product to countries implementing GHS.

Non-chemical products

To obtain information on constituents of non-chemical products, such as toy parts you will likely need to request specific information from your suppliers. You may either include a respective requirement into your supply contract #Section 3-4_Guide purchasing or may make a specific request, e.g. if a new legal requirement exists on a particular substance. Suppliers will most likely provide you with a declaration of conformity or compliance in response to your request. This declaration should explicitly state what requirements the product fulfils and/or which chemicals (with which hazards) are absent. If you need a Declaration of Conformity (DoC) to place your products on the market, ensure that the DoC refers to the respective requirements. Ensure that your supplier understands these requirements.

Organising and checking information on chemical products

If you are located in a country that has implemented the GHS, a Safety Data Sheet (SDS) for chemicals and chemical products that are classified according to the GHS is required, whether it is received from the suppliers or is compiled by your company. The chemicals must also have a proper label.

Table 1: Overview of documents that could accompany different types of products and content of information on CoCs

Input material	Example	Accompanying documents	Information on CoCs that may be provided
Chemical (element or compound)	Acetone	Chemical label , packaging, technical data sheet, safety data sheet (if classified)* , bill of delivery, invoice...	Name, CAS number Indication of hazards (e.g. GHS hazard statement).
Chemical product (mixture)	Additive batch Glue	Chemical label , packaging, technical data sheet, safety data sheet (if classified)* , bill of delivery, invoice...	Product name If classified: Label: CAS number of classified constituents SDS: concentration ranges of classified substances and hazard statements
Polymer (e.g. for extrusion)	Polyester polyethylene	Chemical label , packaging, technical data sheet, safety data sheet (if classified)* , bill of	Product name If classified: Label: CAS number of classified

into toy or part thereof)		delivery, invoice...	constituents SDS: concentration ranges of classified substances and hazard statements
Part of plastic toy	Plastic handles of toy pushchair	Package, bill of delivery, invoice, declaration of conformity	Information on chemicals is not provided by default but you can ask for it.
Bold: likely that chemical information is contained.			
*: not normally provided if GHS is not implemented but may be requested and available nevertheless.			

If you receive SDSs, it is useful to conduct a brief checking of whether it is of good quality. There are several checklists and tools available that guide you on how to assess if the information in an SDS is complete and plausible. A simple checklist is provided on the website of the project [FitForREACH](#). A detailed checklist which is intended for compilers of SDSs but can also be used by those who receive it is provided by the EU chemicals association [CEFIC](#).

As this is a challenging and time-consuming task, you may decide to check only some crucial points, such as the language of the SDS and the availability (and correctness) of hazard information per substance. In any case, if information is missing, is outdated or of low quality, contact your supplier and request improved documents from them. You should be clear on what information you need (e.g. regarding compliance) and make your request as specific as possible.

Be aware that you cannot check if, for instance, the information on the composition of a chemical product is correct (unless you make a full analysis). However, the quality of the SDS gives you an indication of whether you can also trust the correctness of that information.

If the product contains substances that must be classified according to the GHS, a chemical label that conforms to the provisions of the GHS should be attached and have hazard pictogram(s) and hazard statement(s). Guidance for checking the correctness of labels is available also. In countries that have not implemented the GHS, requirements on chemical labels may be set by the country's laws, and should include provisions to provide basic hazard information.

If you only have the name and/or the CAS number of a chemical, this is sufficient to check if you may use it in your production and be compliant with legislation #Section 2_1_guidance how to, compliance but you may also want to look for chemical hazards using respective databases listed in the link list.

If you (decide to) use a chemical raw material, you should include the information from SDSs (or other information you receive) into the chemicals inventory #Section 4_1_Guidance set up. This information should always be used and updated.

Interacting with your supplier

When contacting your supplier to ask for information on chemicals in their products (e.g. more or better information on chemicals in their products, to get an updated safety data sheet or other documents, a declaration of conformity, or test results from a certified laboratory) it is important to engage with the right staff. These may be persons who are responsible for the particular product: the supplier's quality officer or environmental manager or sometimes the technical director. However, to get in touch with the right person may be challenging, thus it is best to ask for the product safety department or a person that is responsible for product safety. Usually, contact information of the person in charge can be found in Section 1 of the safety data sheet. Otherwise, it may be provided on the product label, or any technical documentation. If this information is not available, use the contact information provided on invoices.

Your suppliers may not have staff that is sufficiently trained to work on chemicals related customer requests because frequently the sales persons are tasked with customer communication. In these cases, you should be particularly precise in your communication on what you need from the supplier. You may ask to be put in contact with the technical staff or formulate a written request that the salesperson can forward inside his company. You may also indicate the materials in the background section [# Section 1 landing page](#) to him so that he can make himself more aware of the issue.

It is useful to know any relevant laws or regulations that may require your supplier to provide documentation. For example, in a country that has implemented GHS, there is a legal requirement for providers of GHS classified chemicals to supply the SDS.

Besides the exchange of documents and chemicals information, you may consider if and how you could improve your suppliers' ability to act on chemical safety, including relevant legal acts or standards. Good communication and trust are crucial to a good relationship with suppliers and you may consider making them aware of any issues or changes in your requirements as a good practice and to enable them to take action, if needed. This is essential for the fruitful long-term cooperation with your suppliers.

If you have a good relationship with your suppliers, you may also consider including conditions regarding the absence of (specific) chemicals into your supply contracts and/ or to implement testing procedures to ensure any chemical requirements are fulfilled.

References:

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