3.6 Going Beyond Management of raw materials

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While legal compliance is the very basis for placing any product on the market, it is recommended that companies take a proactive and precautionary approach to ensure the best possible protection from chemicals of concern, in particular where vulnerable groups (such as children) might be at risk. Adopting such an approach can have numerous advantages from a business and risk perspective and help your company to be competitive with regard to chemical product safety. The following guidance can support such a proactive approach and company's performance with regard to the management of input materials.

Controlling the quality of input materials

As an advanced practice, quality control procedures can be put in place to ensure the input materials conform with the requested product specifications and do not contain chemicals of concern #Section 1_1 Guidance understanding. A testing schedule can be developed for critical input materials, i.e. input materials which the company particularly depends on, or materials that are suspected to contain chemicals of concern. Testing could also be conducted at random and/or only focus on new input materials over a certain period of time. The quality control procedures should also foresee testing in case of changes of the incoming materials. If a suppliers' production processes or the composition of products change, potential impacts on the product quality may be monitored. Thus, a close connection and regular communication with your supplier is important and including certain conditions in your supply contracts can help to ensure quality of incoming products.

When performing quality testing #Section 3_3 in laboratory, a particular focus should be put on any recycled materials #Section 1_9 that you may use as input for your products. While the use of secondary materials is important to save resources and reduce environmental impacts of production, some secondary materials may be contaminated with chemicals of concern, such as brominated flame retardants (DiGangi, Strakova and Bell 2017). As waste streams used for recycling may change, the composition of secondary materials may vary and a regular quality control can help, ensuring that no chemicals of concern are avoided.

In addition to checking the quality of the input materials, your own product should also be assessed with regard to the content of chemicals of concern and other parameters. However, as the complexity of products increases along the supply chain, it may become increasingly difficult to generate 'homogeneous mixtures' for performing chemical analyses.

Work with your suppliers to achieve safer products

Your suppliers know a lot about their products and their manufacturing processes. They will likely be able to answer most of your questions about their products. If you aim to produce safer products and to avoid chemicals of concern, it may be worthwhile to ask your supplier if they offer alternative products without chemicals of concern. Remember, your suppliers are as interested in maintaining their client as you are and will therefore most likely be interested in cooperating with you. If they cannot help you directly in taking action on chemicals of concern, they may be able to point you to the right direction on where to look for alternative chemicals. There could also be the possibility that your supplier is willing to collaborate with you to find or develop a solution for your problem.

References

DiGangi, J., Strakova, J. and Bell, L. (2017). *POPs Recycling Contaminates Children's Toys with Toxic Flame Retardants.* IPEN, Arnika. https://ipen.org/documents/pops-recycling-contaminates-childrens-toys-toxic-flame-retardants. Accessed 22 December 2021.