4.4 Guidance
Analysing and using a chemicals inventory

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 explains how to use the data in a chemicals inventory. It can be used together with the guidance on how to set up a chemicals inventory and the template for setting up a chemicals inventory provided in this tool kit but may also be applicable for inventories with a different format.

The inventory is useful to support:

- the identification of CoCs and prioritising them for taking action
- the identification of and checking compliance with legal requirements on chemicals you use
- communication of information along the supply chain or informing your customers about the chemicals.

This guidance is addressed to producers of plastic pellets that will be used to produce toys as well as producers of toys and toy parts (from plastic pellets) who already have chemicals inventories in place in their companies. Assemblers of plastic toys may use the guide to identify how they could work with the goods they use for toy manufacture and the chemicals applied in assembling.

Once a chemicals inventory is set up and the chemicals included in input materials are identified and linked to the final products, it can be used to analyse if products are compliant with the requirements of the target markets, and if they live up to the company’s policy regarding product quality and safety.

Analysing the inventory to ensure regulatory compliance and identifying chemicals of concern (CoCs)

- Sort / filter your inventory to identify individual chemicals by CAS number or chemical name for which regulatory requirements exist in your target markets or in other countries
- Sort / filter your inventory to systematically analyse which hazard classifications the chemicals have which are contained in the input materials (and eventually the products you produce). This may give an indication of the product safety in general, potential consequences of future regulations, and chemicals which could be prioritised for action.
Documenting regulatory compliance and informing your customers about the chemicals in your product

➤ Documenting the absence of chemicals in input material can be done by listing input materials and the identified ingredients contained (which should not include any restricted/banned substances).
➤ Based on this you can make a declaration of compliance for your customers.

Communicating information on chemicals to your customers

➤ If you are a producer of polymer plastic pellets for use in toy production, you should identify any chemical hazard of your products (polymers, additives, fillers etc.). The inventory can help you to quickly find and compile this information on chemicals and their hazards and to adequately communicate it to your customers.
➤ You may also need to answer questions from your customers on chemicals in your products. Sort / filter the inventory according to the products and identify the input materials (and their composition) to check what is contained in the final product. You can use the concentration information to estimate the concentration in the final product if necessary.
➤ If you intend to get an environmental certification (e.g. ecolabel) information on the chemicals in your input materials may be needed as part of your application (this depends on ecolabel). Ecolabels can help increase your market and facilitate communication to customers.

Improving the health and environmental performance of your products

➤ If your company is dedicated to improving the health and environmental performance of its (toy) products, an overview of the use of chemicals of concern (in input materials) is an essential basis to inform action and track progress.
➤ Implementing a pro-active chemicals management policy and going beyond the legal requirements can include assessing which chemicals have the most severe hazards, in which concentrations they are used in the products and assessing (potential) exposure of children during product use. A thorough chemicals inventory is an important prerequisite for such analyses.
➤ Filter / sort the inventory by chemical hazard and identify those, which are the highest priority to remove or reduce from your products.

Creating a reference point to ensure access to up-to-date information

➤ Information on chemicals and their hazards, and the composition of input materials may change over time. The inventory should be up-to-date to ensure compliance and that all materials are addressed.
➤ Sort the inventory according to the ‘date of revision’ of the product documentation e.g. technical documents, chemical labels or safety data sheets, to identify which are outdated (more than 3 years old). Use the contact information in the inventory to request up to date information.
Ensuring workplace safety and environmental performance of your production

- You can sort the inventory according to hazard statements relevant to human health and evaluate at which steps in the production process or workplaces in the company they are used. This gives you basic information to assess potential chemical-related risks for your workers that should be addressed to protect their health.
- Hazard statements related to the environment can be analysed to assess environmental performance. If you implement an environmental management system for your company, the inventory can be a useful tool to implement and monitor a continuous improvement regarding the (non-)use of chemicals of concern, i.e. the phase-out of substances with the most severe hazards (judged by the H-Statements).