

5.4. Guidance

Communication about substitution

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 successful substitution of CoCs in products may not only save costs, for example, because personal protective equipment may no longer be necessary, less hazardous waste must be handled or staff training can be reduced, (Chemsec 2016) but can also increase a company or brand's recognition with respect to safety and sustainability. The latter requires careful communication about the substitution case (and potentially the company's [continuous improvement process](#)) in this regard.

Reasons to communicate about substitution

No substitution case is the same, and each case is specific regarding the duration of the process, the complexity of the application, the availability of alternatives, or the supply chain involvement, for example.

There are various reasons why substitution should be communicated to the customer (markets):

- Trust is increased in that a supplier takes the responsibility for chemical safety seriously and that changes in product composition are [communicated clearly](#) and in due time (even if it is an improvement / hazard reduction).
- If customers know of changes in the product composition, they can adjust any quality control routine they may have implemented and update their [chemicals inventory](#) accordingly. This may benefit their compliance work.
- Substitution may correlate with changes in product performance, which can be a (small or considerable) improvement or deterioration. In either case, clear communication enables the customers to make an informed decision on that change, instead of the company being surprised by their own customers' feedback about it.
- Substitution may result in a need to increase the price of a product so that the substitution costs can be recuperated over time. As the toys market is rather price sensitive, a price increase should be explained by the benefits gained through the increased product safety.

Justifying price increases

There are several reasons why the price of a product may rise due to the substitution of a CoC. Among these are the resources needed to identify, assess, and test alternatives, potential investment needs and changes in the production process, or higher costs of the alternative. There may also be savings from substitution, from reduced hazardous waste amounts, the alternative being cheaper than the CoC, or the possibility to reduce the use of personal protective equipment at the workplace, for example.

The customers are most likely not interested in the reasons for price increases but want to know the benefits of the substitution for them. Therefore, communication on substitution should focus on highlighting the increased safety of the product and how it can be conveyed to the market, i.e. that toys are more attractive for parents to buy. Any improvement in the product performance, such as a longer lifetime (increased durability), a smoother surface or a more colourful appearance of a toy can be important arguments to welcome the new product.

To avoid surprises, the intention to substitution and the potential consequences of substitution should be communicated in an early stage of the process to allow any customer suggestions and concerns to be considered, as well as to give customers time to potentially adapt their process.

Target group and communication channel


A successful substitution can and should be communicated directly to the customer companies. In addition, communication can address the public if a product is supplied to retailers (i.e., consumer product / fully finished toy).





For example, it may be communicated how the substitution of a CoC improved the product safety and quality, reduced the company's environmental impact, or increased production efficiency (provided that these claims are valid). It may also be stated that certain CoCs are no longer used (and that there is an [intention to phase out further CoCs](#)).

There are several 'channels' for communicating such messages: the product itself, the company website, the company's environmental report or annual report (also investors may be interested in substitution activities). When communicating on the successful elimination and/or substitution of a chemical of concern, follow the fundamental principles outlined in the [Guidelines for Providing Product Sustainability Information](#) (UNEP 2017) to ensure [your sustainability claims are substantiated, clear, and convey a genuine benefit](#).

Effective communication of chemical substitutes

Where a chemical has been used as a substitute, the fundamental principles outlined in the [Guidelines for Providing Products Sustainability Information](#) (UNEP 2017) could be applied to ensure that claims are substantiated, clear, and convey a genuine benefit.

Principle	Discussion
Reliability 	<p>If a substitution has taken place, how proven is the alternative? Avoiding "regrettable substitutions" is key, and marketing statements should not declare an alternative is safer or performs better if testing or evidence of longer-term effects cannot substantiate this. Where a reliable source does not yet back up the substitution, it is preferable to not make any statement suggesting an improved situation, rather than declaring a benefit purely because a substitution has taken place.</p> <p>Where a manufacturer is looking to make a "drop-in" substitution, several sources exist that identify safer options – for example the ChemSec Marketplace, or the BlueSign Finder Positive Chemicals list. Communications referring to use of external, impartial resources can provide assurance to consumers.</p>
Relevance	When a chemical substitution is made, it should be communicated to the consumer only if it is relevant to the core of the product. For instance, if an industry is replacing hazardous

	<p>chemicals in ink on the packaging but not on the toy itself, and is advertising it, the relevance principle is not met.</p> <p>Avoiding burden shifting in substitutions is also important – for example a substance may not be a carcinogen compared to the one it replaces, but may have greater toxicity to aquatic organisms.</p>
<p>Transparency</p> 	<p>Communicating that a substance has been removed from a product, without details of what it has been replaced with may mask a substitution that is not an improvement. Caution should be exercised when a product is declared to be free of a particular substance, rather than the substance class (e.g. free of BPA may mean that other, similarly hazardous bisphenols are contained). Information should also be made available about the substituted chemical.</p> <p>Substitute compounds may be chemically related to the original substance, with similar properties and effects. However, users may not be familiar with the exact chemical, and it may not be subject to the same regulation – leading to reduced barriers to market entry and use.</p>
<p>Clarity</p> 	<p>If the removal of the original substance is being communicated as a benefit, then the reason for the choice of the substitute should be made clear, and detail should be provided on exactly how the product is improved.</p> <p>The use of ambiguous terminology that does not address the specific issue can mislead the consumer, suggesting a product has improved more than it actually has.</p>
<p>Accessibility</p> 	<p>Companies may communicate that a chemical has been removed from a product, but may put information on the replacement in a difficult to find place. Good practice has been seen of companies using Material Health Statements or Health Product Declarations, alongside effective provision of a safety data sheet, which communicate the chemical constituents of a product. This makes it possible for the consumer to carry out their own research on the replacement substance, and others included in the product.</p> <p>Good examples of accessible information also include where a company provides easily connected information and narrative on common chemicals used in the sector in general and replacement substances being used. Additionally, it is good practice to link to a third-party source that identifies and provides assessment of alternatives, such as the ChemSec Alternatives Marketplace.</p>

References:

- Chemsec (2016). *The Bigger Picture – Assessing economic aspects of chemicals substitution*. <https://chemsec.org/publication/authorisation-process,chemicals-business,reach/the-bigger-picture-assessing-economic-aspects-of-chemicals-substitution-2016/>. Accessed 22 December 2021.
- UNEP (2017). *Guidelines for Providing Product Sustainability Information: Global Guidance on Making Effective Environmental, Social and Economic Claims, to Empower and Enable Consumer Choice*. UN environment United Nations Environment Programme. <https://www.oneplanetnetwork.org/knowledge-centre/resources/guidelines-providing-product-sustainability-information>. Accessed 20 December 2021.